

POLICY ON COMBATING CORRUPTION PRACTICES



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APPROVED BY THE GENERAL MEETING OF SHAREHOLDERS OF REAM PARTICIPAÇÕES S.A. ON AUGUST 22, 2022

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Legal Department
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Communication Department
Integrated Management System Department



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1. INTRODUCTORY PROVISIONS

1.1. INTRODUCTION

The Company's Policy on Combating Corruption Practices ("Policy") is an Internal Normative Document that establishes a series of principles, procedures and actions aimed at combating the involvement in Corrupt Practices and compliance with Brazilian anti-corruption legislation.

The Company is a corporation incorporated in Brazil. Any activity of the Company or action of its Employees must comply with Applicable Laws.

It is the duty of all Employees to pay attention to the Internal Normative Documents, their rules, procedures, permissions and work instructions - observing the best corporate governance practices and meeting the objectives of creating value for the Company and its shareholders based on an adequate level of transparency and communication with stakeholders.

The Policy herein was prepared in accordance with Law No. 12.846/2013 ("Anti-Corruption Law"), Decree No. 8.420/15 ("Regulatory Decree"), Law No. 8.429/1992, as amended by Law No. 14.230/2021 ("Administrative Improbity Law"), Law No. 9.613/1998 (the "Anti-Money Laundering Law"), Law No. 8.666/1993 (the "Public Procurement Law"), Law No. 14.133/2021 (the "New Public Procurement Law") and the Brazilian Criminal Code, in addition to other similar laws.

1.2. OBJETIVOS

This Policy reflects the Company's position in relation to ethics and integrity and formalizes the common principles and conduct expected by the Company to combat Corruption Practices.

This Policy was prepared with aiming to:

- Ensure that the Employees (regardless of the hierarchical position) of the Company and its controlled companies, as well as its shareholders, investors, and any other persons, have a common understanding of the Company's zero tolerance for Corrupt Practices, in any form, and at any level of corporate governance;
- Formalize and describe objectives and methods to minimize the risk of the Company's involvement in Corrupt Practices.

1.3. APPLICATION

This Policy is mandatory for the following:

All Employees, including employees, officers, managers, interns, apprentices, outsourced workers and service providers, who work in the interest or benefit of the Company or its subsidiaries, regardless of hierarchical level.

All Employees are responsible for complying with the principles and requirements of this Policy, as well as for actions (or omissions) of their subordinates in violation of the aforementioned principles and requirements.



When hiring companies to perform works or provide services, the Company must include, in the contractual instrument, a specific provision for full compliance with the principles and strict compliance with the requirements contained in the applicable anti-corruption law.

Any violations of this Policy will be subject to the applicable measures and sanctions, in accordance with disciplinary, administrative, civil or criminal rules, at the discretion of the Company.

1.4. EFFECTIVE TERM AND AMENDMENTS

The Policy herein is a permanent Internal Normative Document and must be approved or edited by the Company upon approval by the General Shareholders' Meeting of REAM.

Compliance with the requirements of this Policy shall be monitored by the Company's Compliance Department.

2. TERMS AND DEFINITIONS

COMPANY AREA(S)	an organizational area or structural subdivision of the Company, or of a company of its economic group — with independent functions, tasks and responsibilities within the framework of its competences.
GOVERNMENT AUTHORITY or GOVERNMENT OFFICIAL	 any agent who, on a continuous or temporary basis or under a special authorization: Holds a public position, job or function in any Public Entity, from any location – or performs organizational, directive, administrative or commercial functions within a Public Entity; Acts in the service or on behalf of Public Entities, persons linked to them or any Government Authorities; Is a candidate to fill an elective government office in any sphere.
EMPLOYEE	every Employee – including employees, officers, managers, interns, apprentices, outsourced workers and service providers, who work in the interest or benefit of the Company or its subsidiaries, regardless of hierarchical level.
COMPANY	REAM Participações S.A. (but it covers the group of legal entities of different legal natures, in which REAM Participações S.A. acts as the controller).
CONFLICT OF INTEREST	any situations or circumstances in which the Private Interests of the Employee or those close to him/her may be inconsistent with the interests of the Company and, thus, may affect the proper development of his/her professional duties and attributions – including the taking of decisions that may result in harm to the Company and/or to the companies that make up its economic group (including, but not limited to, possible damage to its legitimate rights and interests, its property and its business reputation).



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principle – based on the notion of reasonableness and good faith, according to the legislation in force - for which the Company and its Employees are responsible when carrying out commercial operations or making managerial decisions, specifically to obtain, before the establishment of any relationship, contractual, sufficient information to develop an adequate opinion as to whether there are indications of the unsuitability of a contractor or job applicant.

an official internal document issued as a set of objective rules and continuous actions that regulate certain aspects of the Company's business, mandatory for the Employees covered by it. .

EMPLOYEE'S PARTICULAR INTERESTS

any private, personal, social, proprietary, financial, political, and other interests of an Employee or their Related Persons.

APPLICABLE LAWS

all laws and regulations of the legal system in force in the Federative Republic of Brazil, in particular the Anti-Corruption Law, its Regulatory Decree, the Administrative Improbity Law, the Anti-Money Laundering Law, the Public Procurement Law, the New Public Procurement Law and the Brazilian Criminal Code, in addition to other similar laws.

PUBLIC ENTITY

any form of entity, body or authority of:

- State or Government structures at federal, state, municipal and Federal District levels, covering direct and indirect Public Administration (including executive, legislative and judicial branches and state activities, state-owned companies, public foundations, regulatory agencies and other autarchies);
- Intranational or international public associations or public organizations (including those of an interstate and supranational nature), social movements and political parties, as well as non-profit organizations (association/union, autonomous non-profit institution, foundation, NGOs and any other forms of organization non-profit) that carry out activities of public interest and are partially or fully funded by government sources.

RELATED PERSONS

Spouses and siblings (including half-siblings), children and parents (including adoptive).

CORRUPTION PRACTICES or CORRUPTING ACTIONS

any act of offering, giving, promising, soliciting, receiving or accepting bribes, brokering bribes or payments – in any way, including money, valuables, services or the provision/receipt of any unwarranted advantages – from/to any Government Officials, with any intention to influence the conduct or obtain or facilitate undue advantages – whether administrative, bureaucratic, formal, commercial or economic



CORPORATE COMPLIANCE SYSTEM

set of actions aimed at avoiding any violation of the Laws, regulations and rules applicable to the Company, to comply with high professional and ethical standards, minimize the risks of non-compliance with Applicable Laws and avoid significant financial loss or damage to the Company's reputation.

3. FUNDAMENTAL PRINCIPLES IN COMBATING CORRUPTION PRACTICES

3.1 ZERO TOLERANCE WITH CORRUPTION

The Company and all its Employees adopt a zero-tolerance approach to Corruption Practices, in any form, in the context of their operations, investments, interests and activities. The Company emphasizes that any corrupt action is considered unacceptable.

The principle of zero tolerance for corruption means that the Company's Employees, or any other persons acting in the name, interest or benefit of the Company, are strictly prohibited from taking part, directly or indirectly, personally or through an intermediary, in any Corruption, despite any customary business customs or practices.

In case an Employee has doubts as to whether their actions are lawful and whether they are in compliance with this Policy, they should consult their immediate superior or the Compliance Department on the matter. Illustrative examples of practices that violate this Policy are available in Annex 1.

The Company reserves the right to report to law enforcement agencies any information relating to persons who may have violated the requirements of the Applicable Laws or this Policy.

3.2 NECESSARY SANCTION

The Company will: (i) investigate any communication that reports a possible violation of appropriate procedures to combat Corrupt Practices; and (ii) hold Employees involved in Corrupt Practices accountable, regardless of their position, length of service or any other condition.

Any violation of this Policy is subject to the application of disciplinary measures – including warning (oral or written), suspension and/or definitive termination of the relevant contract or agreement, under the terms of the Human Resources Policy –without prejudice to the application of other applicable legal measures.

Investigations of suspected violations, as well as decisions on the application of sanctions, are the responsibility of the Company's Ethics Committee and will be carried out in accordance with the provisions of the Code of Conduct and Corporate Ethics. The Company shall use its best efforts to stop and remedy any violation of this Policy as soon as possible and in an unequivocal and exemplary manner..

3.3 TONE AT THE TOP

All senior leaders and executives (officers and managers), in addition to the Company's shareholders, must declare zero tolerance for any form of Corrupt Practice at all levels of the Company; they will have to demonstrate it, implement it and comply with it concretely in their daily activities.

The Company's management openly supports the principles established in this Policy.



3.4 CONTINUOUS MONITORING

The Company shall identify, analyze and regularly reassess the risks related to corruption inherent to its business – in order to control, mitigate and monitor all potentially vulnerable points. When identifying, evaluating and monitoring risks, the Company shall take into account all available information on exposure.

When reassessing the risks related to corruption in its activities, the Company must keep its procedures, mechanisms and policies of the Corporate Compliance System adequate and updated.

The Company shall develop and implement a system of adequate procedures to combat and prevent Corruption Practices – and shall seek to make the procedures transparent, clear, concrete and consistent with the identified risks..

3.5 DUE DILIGENCE

The Company's Compliance Department must conduct Due Diligence procedures before the beginning or continuation of any contractual relationship by the Company, verifying the profile and reputational history, in good faith, integrity, ethics, good repute, intolerance with Corruption Practices and Conflict Interests, as necessary, of any potential counterparty and potential Employees.

Due Diligence must be carried out before any decision to initiate or continue a contractual relationship or business partnership, including the hiring of potential Employees, and the terms of the Company's Third Party Due Diligence Policy must be observed.

The Company does not interact with service or product providers that have a dubious reputation or that are not committed to complying with anti-corruption legislation.

3.6. INTERACTION AND COORDINATION

The Company shall ensure the coordination of the actions of all the Company's Areas, as well as its ethical and integral interaction with Government Authorities and law enforcement agencies, within due compliance with this Policy.

3.7. INFORMATION AND TRAINING

The Company shall publish this Policy on its electronic portal so that it is easily accessible.

The Company shall make its best efforts to inform and make its Employees aware of the principles and rules of this Policy and any other Internal Normative Documents related to the combat against Corrupt Actions. Thus, the Company's Compliance Department will carry out regular and periodic training to all Employees, including members of the Company's management, on the fundamentals of combating Corruption Practices.

3.8. SUPERVISION AND COMPLIANCE

The Company's Compliance Department must monitor any procedures that are implemented in order to combat and prevent Corrupt Practices, and supervise their application and compliance.

Moreover, it is responsible for continually evaluating the adequacy of the Company's Corporate Compliance System policies and procedures – as well as managing the Whistleblower Channel and submitting reports of complaints or suspected violations to the Company's Ethics Committee.



3.9. REPORTS OF POTENTIAL INFRINGEMENTS AND VIOLATIONS

It is the duty of all Employees to monitor and inspect compliance with this Policy in their daily lives.

Thus, the Company encourages all Employees (as well as any interested third parties) to report, as soon as possible, suspicions of potential violations or violations of any provisions found in Applicable Laws, in this Policy or in other Internal Normative Documents of the Company.

- Such communications may be sent through the following means:
- to the Whistleblower Channel, through the address: https://www.canaldeintegridade.com.br/atem;
- to the Company's Compliance Department;
- to the direct superior.

Employees must refuse, and immediately report by the means above, within the shortest possible time, any request, coming from any person, trying to induce them to practice Corrupt Actions.

The Company guarantees confidentiality and the possibility of anonymity to anyone who reports, in good faith, any concerns about potential violations.

In case an Employee suspects illegalities or irregularities in any conduct of other Company Employees or business partners, he/she must report it through the Whistleblower Channel. This channel is made available so that anyone can report actions, omissions, non-compliances or any situations that may violate current legislation and regulations, as well as the rules described in this Policy, in the Code of Conduct and Corporate Ethics or in other internal regulations of the Company. In case it is desired, the Company guarantees the confidentiality of the identity of any person who uses the Whistleblower Channel.

The Company's Compliance Department is the department responsible for managing the Whistleblower Channel, receiving reports and submitting them for investigation and deliberation by the Company's Ethics Committee. The Ethics Committee, in turn, is responsible for investigating and judging the reports and complaints received – including deciding on any applicable remedial and disciplinary measures, as provided for in the Code of Conduct and Corporate Ethics.

3.9.1. PROHIBITION OF RETALIATION OR REPRISALS TO GOOD FAITH WHISTLEBLOWER

Retaliation or reprisals against Company's Employees who:

- refuse to give or receive a bribe, engage in Corrupt Practices, or act as a bribery intermediary
 even if, as a result of such refusal, the Company incurs apparent loss or fails to obtain any advantage, or
- report, in good faith, suspected violations of Internal Regulation Documents or potential illegal or unethical Corruption Practices, or inadequate effectiveness of existing procedures.

If a Company's Employee or any other person provides information or a report that is known to be false, submitting a communication in bad faith or motivated by a Private Interest contrary to the Company's interests, their action will be subject to the application of disciplinary and legal measures as provided in the Code of Conduct and Corporate Ethics.



4. FUNDAMENTAL RULES IN COMBATING CORRUPTION PRACTICES

4.1. GIFTS AND ENTERTAINMENT

Receiving or offering gifts, freebies, travel, hospitality, entertainment or gratuities, even in the form of courtesy treatment, from or to any person or entity related to the Company's business is not allowed: (i) for the purpose of obtaining any consideration or the granting of advantages of any nature; (ii) to the detriment of the Company's interests; (iii) that have high commercial value; or (iv) that, if disclosed, could give rise to risks, including reputational risks, to the Company, the Employees or other people involved.

Freebies: items of no commercial value distributed or received as a courtesy, advertising or usual disclosure, which are of a general nature and, therefore, are not intended to exclusively award a specific person, and which contain the logo of the grantee company, such as agendas, calendars, keychains, flash drives, t-shirts and pens.

Gifts: objects or services for personal use, which have commercial value and which do not fall within the definition of gifts.

Entertainment: activities or events whose main purpose is to provide leisure to their participants, such as parties, concerts, sporting events or commemorative meals.

Travel and hospitality: displacement (trip, journey or voyage), accommodation, food and hospitality, whether or not related to business activitiesens sem valor comercial distribuídos ou recebidos a título de cortesia, propaganda ou divulgação habitual, que sejam de caráter geral e, portanto, não se destinem a agraciar exclusivamente determinada pessoa, e que contenham o logotipo da empresa donatária, tais como agendas, calendários, chaveiros, pen drives, camisetas e canetas.

The Company acknowledges that the exchange of gifts, freebies and institutional invitations involving travel, hospitality or entertainment may constitute accepted cordiality practices within a legitimate and customary business relationship – but must not reduce or compromise our responsibilities, diligence and professional standards of conduct. This is a vulnerable field in terms of involvement with Corrupt Practices. Therefore, the following criteria must be strictly complied with:

- full compliance with the rules found in the Applicable Laws, in the Code of Conduct and Corporate Ethics and in other Internal Normative Documents of the Company;
- total absence of any intention or objective, direct or indirect, to influence or determine the conduct or decisions of third parties, especially Governmental Authorities, Public Entities or any other persons that may have an impact on the Company's business or activities;
 - that the action will not imply any binding obligation for either party; and
- that the action does not involve cash, current account funds, securities, precious metals, or other forms or equivalents of cash and/or luxury items.

All expenses for the purpose of business courtesies and hospitality must be approved by the Company's Officers. Additionally, the offer or receipt of any gifts, gifts, entertainment or courtesies from or to the same Third Party, whose total and global market value exceeds **BRL 300.00 (three hundred reais**) must be previously communicated and authorized by the Department of the Company's Compliance.

Offering any gifts or entertainment to Government Officials is prohibited. The offering of any other types of courtesies to Government Officials must be previously authorized by the Company's Compliance Department.



In any case, we never give, promise, deliver, authorize or offer payments, advantages, gifts, entertainment or anything of value to Brazilian or foreign Government Officials, and Government Authorities in order to influence their activities or obtain undue advantages for their own benefit or for the Company.

The rules also apply to our friends and relatives, including Related Persons. In case any question arises as to whether a business courtesy or an event complies with this Policy, the Employee shall discuss the issue with his or her immediate superior on the matter or send a message to the Whistleblower Channel

4.2. DONATIONS AND SPONSORSHIPS

We understand that corporate social responsibility is an integral part of the Company, and we seek to promote healthy institutional relationships with all stakeholders.

Any donations or sponsorships, including those of an academic nature, may be made by the Company as long as they are previously approved by the Compliance Department. Donations or sponsorships for candidates or political parties, as well as for covering undue payments or obtaining undue benefits or favors, will not be accepted.

The Company shall not offer donations, sponsorships or any financial assistance with the aim of unduly influencing decisions to be made by Government Authorities, Public Entities or other persons that may have an impact on the retention or expansion of the Company's business.

4.3. PARTICIPATION IN POLITICAL ACTIVITIES

The Company does not participate in financing or contributions to any movement, campaign, candidacy or collection of political parties or candidates for elected government positions. The use of Company resources for such purposes is not permitted, nor is the linking of the Company's image to any candidate or political party.

The Company's Employees shall always notify their direct superior of the intention to run for an elective governmental position, in order to rule out any Conflict of Interest.

4.4. INTERACTIONS WITH COUNTERPARTIES; PAYMENTS THROUGH INTERMEDIARIES AND PAYMENTS TO THIRD PARTIES

The Company shall refrain from hiring any intermediaries, agents, partners, or other persons, to act in the name or interest of the Company, with the purpose of committing actions that violate the principles and requirements of this Policy or the Corporate Code of Ethics - or even if, if disclosed, they could create a risk to the reputation of the Company, its Employees, or any person involved. Interactions with Government Officials and Public Entities must be impartial and complete.

Before deciding to enter into or renew a contract with an intermediary, agent, or any other third party, or to enter into or renew its participation in a business partnership, the Company shall:

- carry out preliminary verifications of potential counterparties or business partners, prior to the
 execution of the contractual documentation, regarding payment data, bank and jurisdiction
 for transferring values in order to combat money laundering possibilities;
- gather, analyze and verify information related to the third party or business partner, performing Due Diligence of their profile and reputational history, in good faith, integrity, ethics, good repute, intolerance with Corrupt Practices and Conflict of Interest, as necessary;
- inform such third parties about the principles and requirements of this Policy.



The Company shall encourage its business partners to adopt internal anti-corruption regulations.

All agreements with third parties must be in writing. When entering into contracts, specific provisions for compliance with applicable anti-corruption legislation must be included.

The Company reserves the right to terminate any contracts with a counterparty or with a business partner if it is identified that they have committed any Corrupt Practices.

4.5. MERGERS AND ACQUISITIONS TRANSACTIONS

In cases of acquisitions, mergers, consortia, partnerships or joint ventures, it will be necessary to carry out Due Diligence work by qualified professionals – to assess compliance and detect any vulnerabilities, or history of violations of anti-corruption legislation.

In the course of mergers and acquisitions, the Company shall:

- Carry out Due Diligence and anti-corruption profile research, before and during the execution of the agreement;
- Introduce anti-corruption controls in companies formed or acquired.

4.6. INTERACTION WITH GOVERNMENT AUTHORITIES OR PUBLIC ENTITIES

Interactions with Government Authorities or Public Entities must be governed by transparency and ethics. The Company interacts with Government Officials lawfully and with integrity.

Any interactions of the Company with government officials, including in hearings or meetings, must take place in professional environments and during business hours, and, whenever the interaction is a matter sensitive to the Company's activities, they must be attended by at least , two employees, whenever possible – and be formalized in writing, being registered by e-mail or with the corresponding entity. Records must be forwarded to the Compliance Department.

It is a sensitive matter for the Company's activities, by way of example, the following acts: (i) negotiation and execution of agreements or commitments of any kind, (ii) negotiations to obtain permits, licenses, authorizations, registrations, registrations, approvals or homologations, among other acts of granting, (iii) participation in auctions or competitive processes organized by government authorities, mixed capital companies or public companies, (iv) participation in meetings and public hearings, (v) consultations and negotiations with government authorities on matters that may represent a material negative or positive impact for the Company.

The offer, promise, delivery and authorization of payments, advantages, gifts, entertainment or anything else of value to Brazilians or foreigner Government Officials and Government Authorities in order to influence their activities or obtain undue advantages for the benefit of own or the Company.

We repudiate any and all Corruption Practices, bribery, undue favoritism, extortion, kickbacks, administrative improbity, fraud in public tenders or any crimes against the public administration and/or the economic and tax order that cause damage to public assets.

Examples of practices prohibited by the Company are:

- Financing, funding, sponsoring or in any way subsidizing the practice of illegal acts provided for in the Anti-Corruption Law and other Applicable Laws;
- Fraud, manipulate, prevent or frustrate administrative bids and contracts;



- Using third parties to hide or disguise their real interests or the identity of the beneficiaries of the acts performed;
- To hinder investigation or inspection activities, or to intervene in the performance of Public Entities or Government Officials, including regulatory agencies; and
- Defray any gratuities or expenses from Government Authorities or Public Entities or even their representatives, friends and/or family members –, with the direct or indirect purpose of obtaining any commercial, financial, tax and/or competitive advantage.

In any event, if the Employee faces any kind of invitation, coercion or threat so that a third party or Government Officials receive an undue advantage, he/she must refuse it and immediately report what happened to the Compliance Department or the Company's Whistleblower Channel.

4.7. ACCOUNTING

All unrecorded business transactions, as well as any misrepresentation or fraudulent manipulation of accounting records, financial information or ancillary records or documents, must and shall be investigated, prosecuted and remedied.

The Company seeks to ensure that its accounting and financial information, as well as related documents, are accurate and reliable.

The Company complies with all Applicable Laws, ensuring that:

- Business operations are fully and accurately recorded in the accounting records, in accordance with the principle of transparency of the Company's activities;
- Internal control procedures ensure the reliability of financial and accounting records; and
- Accounting documents are maintained, preserved and used in accordance with the requirements of Applicable Laws.

4.8. SUPERVISION AND AUDIT

The Company shall ensure that its internal controls, such as the accounting system and administrative accounts, are regularly examined through an internal and/or independent audit; and that compliance with Applicable Laws and with the Company's Internal Normative Documents, including the principles and requirements established by this Policy, and the requirements of anti-money laundering laws, are duly monitored.

As the Company may be held liable for any corrupt actions involving its Employees, or any persons acting on its behalf or benefit, any justified suspicion that a Corrupt Practice has been committed must be thoroughly investigated by the Company's Ethics Committee.



ANNEX 1. ILLUSTRATIVE EXAMPLES OF PRACTICES VIOLATING THE POLICY TO COMBAT CORRUPTION PRACTICES

- Failure to report suspected potential violations or violations of any provisions found in Applicable Laws, in this Policy or in other Company Internal Normative Documents through appropriate channels;
- Participate in meetings with Government Officials, in the interests of the Company, without the presence of at least one other Employee of the Company;
- Interact with Government Officials without formalization in writing, or without sending the record to the Compliance Department;
- Enter into contracts with service providers or suppliers without performing Due Diligence by the Compliance Department;
- Enter into agreements with third parties without formalization in writing;
- Omit business transactions from the Company's records, as well as distorting or manipulating accounting records, in order to, directly or indirectly, hide, Corrupt Practices;
- Apply retaliatory measures or reprisals against a Company Employee who refuses to give or receive a bribe, engage in Corrupt Practices, or act as a bribery intermediary;
- Receive or offer gifts, freebies, trips, hospitality, entertainment or gratuities (even if in the form of courtesy treatment), from or to any person or entity related to the Company's business, with the objective of obtaining any consideration or the granting of advantages of any nature;
- Receive or offer gifts, freebies, trips, hospitality, entertainment or gratuities from or to any person or entity related to the Company's business, involving cash, current account funds, securities, precious metals, or other forms or equivalents cash and/or luxury items;
- Offer or receive any gifts or courtesies from or to the same business partner, whose total and global market value exceeds BRL 300.00 (three hundred reais), without the prior authorization of the Compliance Department;
- Offer any gifts or entertainment to Government Officials;
- Offer payments, advantages or anything of value to Government Officials and Government Authorities, Brazilian or foreign, in order to influence their activities or obtain undue advantages for their own benefit or for the Company;
- Make donations or sponsorships without the prior authorization of the Compliance Department;
- Use Company funds to finance or contribute to the movement, campaign, candidacy or collection of political parties or candidates for elected government positions;
- Falsify documents for participation in bids and administrative contracts;
- Collusion with competitors for the manipulation of public bids and competitions;
- To hinder investigation or inspection activities by Public Entities or Government Officials, including regulatory agencies;
- Defray any gratuities or expenses of representatives, friends and/or family members of Government Officials, with the direct or indirect purpose of obtaining any advantage for themselves or for the Company.



DECLARATION OF SCIENCE AND COMMITMENT

I declare that I am fully aware of the guidelines contained in this Policy of the Company to Combat Corruption Practices of Ream Participações S.A., and I assume the full commitment to comply with and enforce all its provisions.

I do understand that my conduct must be guided, at all times, by the ethical standards emanating from this Company's Policy on Combating Corruption Practices. I undertake to fully comply with the terms and conditions set forth in this Company's Policy on Combating Corruption Practices and I am aware that non-compliance may lead to the application of disciplinary and legal measures.

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