

	ATTACHMENT	Reference	AN01-DO002-GIT99
	ANTI-BRIBERY AND ANTI-CORRUPTION POLICY - SUMMARY VERSION	Revision	01

Aegea, through its Anti-Bribery and Anti-Corruption Policy, seeks to:

- Ensure that management members, employees and business partners comply with the requirements of the Anti-Bribery and Anti-Corruption Laws as well as with its anti-bribery and anti-corruption policies and procedures, so as to guarantee that the highest standards of integrity, legality, ethics and transparency are adopted in the conduction of business;
- Require compliance with the anti-bribery and anti-corruption laws, as well as with any legal, regulatory or contractual requirements related to its activities;
- Have a zero-tolerance approach to bribery and other corrupt practices, strongly prohibiting the payment and receipt of payoffs by its management members, employees and business partners;
- Guarantee the assignment of the Compliance Function to someone with competence, position, authority and independence, and with direct access to the Board of Directors and the Senior Management;
- Ensure that management members, employees or business partners will not be subject to retaliation or penalties as a result of business delay or loss due to their refusal to negotiate, offer, promise, receive, facilitate, pay, authorize or provide any payoff, bribe and unfair advantage;
- Encourage everyone to report to the applicable communication channels, in good faith or based on a reasonable conviction of trust, any matters regarding signs of improper conduct, be it by a management member, employee, civil servant or business partner, without fear of retaliation;
- Record, analyze and investigate any reports related to bribery or corruption, adopting preventive controls to avoid their occurrence and corrective controls to prevent their repetition;
- Inform everyone of the consequences, defined in their disciplinary process, in the event they violate the laws and regulations, in breach of ISO 37001 and Aegea's own requirements set forth in its anti-bribery and anti-corruption policies and procedures;
- Guarantee a continuous and updated process for awareness and training of its anti-bribery and anti-corruption policies and procedures, highlighting everyone's obligation and commitment to ethics, integrity, transparency, honesty and exemplarity.
- Improve the Anti-Bribery Management System continuously.

This Policy is applicable to all Management Members, Employees and Business Partners with whom/which Aegea has or might have a relationship, including the organizational units.

Fábio Galindo Silvestre
Chairman of the Board of Directors