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|  | ORGANIZATIONAL GUIDANCE | Reference | D0016-GIT99 |
| | ETHICS CHANNEL POLICY | Revision | 02 |

ETHICS CHANNEL POLICY

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1 PURPOSE

This procedure has the purpose of establishing guidelines for Aegea’s Ethics Channel and the treatment of reports.

The Management Members, Employees and Business Partners are responsible for reporting to their immediate superior, or through the Ethics Channel, any violation they come to know of the laws in force, the Code of Conduct and the Policies and Procedures of Aegea.

Any report of violation of the laws in force, the Code of Conduct and the Policies and Procedures of Aegea shall be treated with confidentiality, except for those which need to be informed to the authorities due to a legal obligation.

2 APPLICATION


All of Aegea’s Management Members, Employees, including the Organizational Units, and Business Partners.

3 REFERENCES

- AEGEA’S CODE OF CONDUCT;
- BUSINESS PARTNER’S CODE OF CONDUCT;
- POLICY ON CONSEQUENCES AND DISCIPLINARY MEASURES.

4 DEFINITIONS

- Not applicable.

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5 DESCRIPTION

5.1 GENERALITIES

The Ethics Channel is the most important tool to identify any misconduct, and the procedures must be effective to be in compliance with the laws in force, the Code of Conduct and the Policies and Procedures of Aegea.

All Management Members, Employees and Business Partners must use the Ethics Channel whenever they suspect or learn of something that violates the laws in force, the Code of Conduct and the Policies and Procedures of Aegea.

Aegea must make communications and provide trainings to ensure that everybody is aware of the importance of the Ethics Channel and how to access it.


The Ethics Channel has to be used in accordance with the good-faith principle, that is, it must not be used for gossip, defamation, reporting lies on purpose or retaliation of any nature.

It is guaranteed to anyone reporting misconduct that they will not suffer any type of internal retaliation.

At Aegea, allegations are received and consolidated by an independent company, and forwarded for analysis to the Ethics Committee, and later, to the Investigation Committee.

All allegations received are investigated based on facts. It is important that they include sufficient information and evidence. Accordingly, it is essential that the reporting person describe the situation very thoroughly, because the more details are given, the bigger the chance of clarifying the case and having a speedy process.

After the investigation, if necessary, disciplinary measures shall be applied in accordance with the Policy on Consequences and Disciplinary Measures.

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5.2 PRINCIPLES

INDEPENDENCE

At Aegea, denunciations are received by an external company, so as to preserve independence, confidentiality and anonymity.

The Ethics Channel provider must fully observe the guidelines of this procedure and provide good service when it is acquired by the contracting company.

The Integrity Department, in turn, must monitor all the aspects in this procedure, which have to be fulfilled by the person in charge of the Ethics Channel, and must request clarification whenever there is suspicion of violation of any topic.

ANONYMITY


Aegea must ensure the right of anonymity to the reporting person. Therefore, the verification process shall be conducted so as to preserve the identity of the reporting person.

During the verification process, the reporting person may be requested to provide additional elements related to the allegation. Such request seeks to obtain all the information needed to obtain factual results.

CONFIDENTIALITY

The content of the allegations and the identity of the reporting person are confidential. Aegea adopts the principle of content importance and not of source importance. Therefore, the information shall only be given to those who really need it.

All denunciations received are forwarded to the Ethics and Investigation Committees, except if the denunciation is related to one of their members, which in this case has to be sent to Aegea's CEO and Board of Directors. The name of the persons involved must be preserved, because, if at the end of the

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verification the reported person is proved to be honest, it is Aegea's responsibility not to allow any risk to his/her reputation.

It is decided on a case basis who shall receive the information, but, as a general rule, the following persons and functions must receive information related to their role:

- a) Independent company that receives the denunciations; and
- b) Ethics Committee and Investigation Committee, which will deal with the topic.

The platform responsible for the Ethics Channel must ensure the due reliability of the system regarding hacking, information security, impossibility of access by unauthorized persons, impossibility of excluding any denunciation log and/or record, data encryption, among others.

In addition, all the records must be kept in reliable and inviolable archives, be they physical or electronic.

5.3 ACCESS TO THE CHANNEL

The Ethics Channel must be accessible to all Management Members, Employees working directly or indirectly at Aegea, Business Partners and Clients.

The Ethics Channel must also be available for 24 hours, seven days a week, to all Management Members, Employees working directly or indirectly at Aegea, Business Partners and Clients, in their own language.


Reporting of violations can be made through Aegea's Ethics Channel:

Call Center: 0800-648-6301

Website: www.contatoseguro.com.br/aegea

6 ATTACHMENTS

Not applicable.

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7 RECORDS

| IDENTIFICATION | STORAGE | | PROTECTION | RECOVERY | RETENTION | DISPOSAL |
|--|--|---------|---|----------|-----------|----------|
| | PLACE | FORM | | | | |
| R1 - Record of each denunciation content. | Independent Company and Integrity Department | Digital | Independent Company and Investigation Committee | Backup | 5 years | Archive |
| R2 - List of all denunciations, identified according to the numbering criterion established. | Integrity Department | Digital | Investigation Committee | Backup | 5 years | Archive |
| R3 - Management records (statistics, reports, indicators, etc.). | Integrity Department | Digital | Integrity Analyst | Backup | 5 years | Archive |