

ANTI-CORRUPTION POLICY

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1. Objective

BOLD conducts its business in accordance with the ethical and moral standards set forth in its Code of Ethics and Conduct Guide, and does not tolerate any form of corruption and bribery. This policy ratifies our commitment to good practices of conduct and the fight against corruption.

This anti-corruption policy is part of BOLD's Compliance Program, and deals specifically with corruption or harmful acts involving public agencies, but the concept applies to corruption involving any entity, whether public or private, the distinction is made on account of the provisions of the enacted law, which makes specific reference to organs and public officials.

2. Application and scope

This anti-corruption policy is intended for everyone who, directly or indirectly, has relationships with BOLD, administrators and employees, and supplements, but does not replace our Code of Ethics and Conduct Guide.

3. References

Law No. 12,846/2013;
Decree No. 8,420/2015;
Code of Conduct and Good Practice;
Donations and Sponsorship Policy.

4. Settings

For best application and for the purposes of this Policy, it is defined as:

Public Administration: composed of the direct and indirect administration of the union, states, federal district and municipalities, including entities with legal personality of private law under the control of the public authorities and foundations established or maintained by it.

Foreign Public Administration: state bodies and entities or diplomatic representations of foreign country, of any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public power of a foreign country.

Public Agent: every person who exercises – even if on a transitional basis or without remuneration, whether by election, appointment, appointment, hiring, competition or any other form of bond – mandate, office, employment or function in the municipality, state,

union, public bodies or any public or government-controlled company (foundations, municipalities, etc.).

Compliance: means complying with the rules imposed by the laws and regulations applicable to the business, bold's Code of Ethics, as well as corporate policies and other guidelines.

Corruption: act or effect of bribing one or more persons in their own or other causes, usually by offering money, but they can also be gifts, entertainment or any benefit that leads someone to step away, act or stop acting according to the law, morals and what is considered right in the social environment. Corruption can be active: (i) when the act is performed by a private individual against the Public Administration and consists in offering or promising undue advantage to the Public Agent, to determine him to practice, omit or delay the act of office; and, (ii) passive: when practiced by public agent against the public administration and consists in requesting or receiving, for themselves or for others, directly or indirectly, even if outside the function, or before assuming it, but because of it, undue

advantage, or accepting promise of such advantage.

Value Thing: means money, gifts, gift vouchers, travel, entertainment, job offers, meals and work, event sponsorship, scholarships, support for research and charitable contributions, for the benefit of Public Agent, his family members or interposed person, physical or legal.

Money laundering: these are economic and financial practices that are intended to conceal or conceal the illicit origin of certain financial resources or property, so that such assets appear to be a lawful source or that, at least, the illicit origin is difficult to demonstrate or prove.

Covered Persons: all employees and associates (employees, interns and apprentices), administrators (directors and directors) and tax advisers (tax advisors) of BOLD, and third parties, whether natural or legal, with or without profit, such as, but not limited to, suppliers, distributors, consultants, business partners, subcontractors, brokers, service providers, who interact with the government or other Public

Agents, act on bold's behalf or interest/benefit.

Bribery: it is the means by which corruption is practiced, since it is the practice of promising, offering or paying a Public Agent or private sector professional, any amount of money or other favors, so that that person ceases to behave ethically with his professional duties.

5. Guidelines

Undue advantage

It is declared offering undue advantages to public agent, national or foreign, under the penalty of the Company to be seriously harmed, subjecting it, as well as the administrator and collaborator involved in such practice, to judicial proceedings, serious civil and criminal penalties and administrative sanctions. We stress that persons covered in this policy are prohibited from offering, promising, making, authorizing or providing (directly or indirectly through third parties) any undue advantage, payments, transfer of anything of value to public agent. It is declared the granting of differentiated benefits or favoritism to public agents, even as bold

customers, which may be considered an undue advantage for the purposes of the anti-corruption law. In the holding of meetings with national or foreign public agents, regardless of the subject, the act must be recorded in the agenda of meetings with public agents and / or in minutes of meeting demonstrating transparency of the facts.

Gifts and Small Gifts

It is denied to give, promise or offer gifts or gifts in exchange for inappropriate favorable treatment of the public agent, national or foreign, for any benefit to BOLD. Gifts identified as free distribution (characterized as institutional) can be granted observing the following guidelines: a) Gifts should be given in small quantities; b) Avoid giving multiple gifts to a single person.

Meals, Travel and Entertainment

It is veered to pay, promise or offer to the public agent, national or foreign, expenses with entertainment, such as games and shows. The payment and offer of meals must comply with the limit amount set forth in BOLD's internal

policies and avoid offering frequent meals to a public agent as an indication of improper activity. It is veeban to pay, promise or offer travel and lodging to public agent, national or foreign, as well as cost aid. The persons concerned shall not provide cash to the public servant for the public to organise a journey.

Donations and Sponsorships

Any donations are prohibited in exchange for favororor improper advantage, or to influence the decision of a public agent or governmental authority, directly or indirectly, even if the favored entity is a charitable institution. BOLD does not make contributions or donations to political activities, political parties or individuals and legal entities linked to them. Sponsorships for certain public administration events, national or foreign, should be treated with caution, as they may be a channel for illegal payments or generators of corruption.

Facilitation Payment

They are known as "facilitation payments" payments made to employees in both the public and private sectors, as personal benefit, to

ensure or accelerate the execution of routine acts to which the company is entitled. BOLD prohibits and does not tolerate the offering or payment of facilitation to speed up or favor the analysis and authorizations to be carried out by its employees, suppliers or intermediary agents.

Bids

In the event that BOLD participates in public tenders and contracts, including concessions and public-private partnerships, any conduct aimed at:

- (a) to frustrate, defraud, by adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- (b) prevent, disturb or defraud the performance of any act of public bidding procedure;
- (c) remove or seek to fend off bidders by fraud or offering advantage of any kind;
- (d) Defraud ing public tender or contract arising therefrom;
- (e) create, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
- (f) obtain an undue advantage or benefit,

fraudulently, from modifications or extensions of contracts concluded with the Public Administration or in their contractual instruments; or
(g) manipulate or defraud the economic and financial balance of contracts concluded with the public administration.

Money Laundering

BOLD does not tolerate any money laundering initiative.

Acquisitions and Mergers

For acquisition, merger and other forms of business associations, BOLD must carry out the due diligence process, with the objective of identifying a history of involvement with corruption or other types of illegal or unethical conduct, identifying risks of the operation and verifying the existence of internal controls and integrity measures in the target company.

Accounting

BOLD must have and maintain books, records and accounting accounts reflecting in detail, accurate and correct, all its operations and

financial transactions, as well as its asset sand situation. The use of false documents, improper or fraudulent accounting entries, and any other accounting procedure or gimmick that may conceal or cover up illegal payments is prohibited.

Supervision of Government Agencies

BOLD maintains an ethical and transparent relationship with government agencies, regulators and supervisors. It is denecessary to hinder the activity of investigation or supervision of organs, entities or public agents, or to intervene in their activities, including within the regulatory agencies and the supervisory bodies of the national financial system.

Accounting-Financial Transactions Records

BOLD requires and ensures that all accounting/ financial transactions/transactions are fully documented, correctly approved and classified to the correct expense description that accurately reflect their nature, with respect to shareholders, investors and the company in general. Under no circumstances should false, inaccurate or

misleading documents appear in books and records.

All records and their original supporting documents of BOLD's accounting and financial operations will be submitted to public supervisory bodies and external audits whenever necessary.

6. Conflict of interest

All BOLD employees must act to prevent and remedy situations that may cause or suggest conflict of interest in the relationships between employees, suppliers, competitors and public agencies and that, if not disclosed, may shake the trust and credibility of the employee and BOLD.

Thus, employees should not use their position in the company to appropriate opportunities, favors or advantages for their own benefit, should not use confidential information improperly for their own benefit, should not have any direct involvement in business that is conflicting with bold's interests, i.e., they should avoid any situation of real or potential conflict of interest that in any way, compromise their independence or impartiality.

Therefore, any possible conflict of interest situation must be avoided and declared to the Immediate Manager so that it can be treated appropriately by the Ethics Committee, in accordance with the rules set out in Bold's Code of Conduct and Good Practice.

7. Communication and training

BOLD will maintain a periodic and constant communication and training plan for its Employees in order to disseminate and raise awareness of the importance of compliance with the rules of this Policy and the Anti-Corruption Law.

It is the responsibility of all BOLD Leaders to disclose to their leaders the content of this Policy and to make them aware of the need and importance of their compliance and encourage them to present questions or concerns regarding its application.

Any situations, exceptions and/or clarifications about the application of this Policy may be sent to the Ethics Committee via comitedeetica@bold.net.

8. Penalties

Agents, representatives, suppliers, consultants and other Business Partners or Third Parties

who work for BOLD and who are caught in violation of this Policy will be subject to termination of their business relationship, as well as any other restorative and legal measures available to the Company under applicable law.

9. Consultations and complaints

Elf in doubt, please consult bold's Ethics Committee. If you suspect or witness any practice that violates the guidelines of this policy, please report it through our Reporting Channel. This communication channel ensures the confidentiality of your contact.

The Reporting Channel can be accessed through the www.bold.net/canaldedenuncias. Questions can be addressed to the email [**comitedeetica@bold.net**](mailto:comitedeetica@bold.net).

