

DONATIONS AND SPONSORSHIP POLICY

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OBJECTIVE, APPLICATION AND DEFINITIONS

1 Objective

Establish guidelines for the realization of Bold Participações donations and sponsorships to ensure that these contributions occur with the highest standard of transparency and ethics, in accordance with the legislation.

2 Application

This Policy must be known and complied with by those who have the purview to solicit, deliberate and manage donations and sponsorships.

3 Definitions

For the purposes of this Policy, some terms should be understood as follows:

3.1 Public agent

Person who holds public service, temporarily or permanently, with or without remuneration, by election, appointment, appointment, hiring or any form of endowment or bond, mandate, position, employment or civil service. It is equivalent to a public agent who works for a company providing a contracted

service for the execution of typical activity of the Public Administration.

3.2 Due Diligence

Methodical process of analysis of information and documents with the predetermined objective of knowing the organization with which the company intends to relate and interact.

3.3 Sponsorships

It is the payment of financial amounts or exchange of goods and services to an institution or event organized by a third party, in order to disclose its brand and strengthen the company's communication with its customers, suppliers and with society.

3.4 Politically Exposed Persons

It is the public agents who perform or have held, in the last five years, relevant positions, jobs or public functions, as well as their representatives, family members and close collaborators, as defined by the Financial Activities Control Board, COAF Resolution No. 16.

3.5 Non-Profit Organizations

They are organizations of private law, endorsed with legal personality and aimed

at achieving a common objective for their members, an objective which cannot be profit.

GENERAL GUIDELINES

4 General Guidelines

Contributions from donations and sponsorships will be made in accordance with the principles of Bold's Code of Conduct and Good Practice and in accordance with the laws of the country.

4.1 Donations for Social Responsibility purposes

In order to ensure that donations for social responsibility purposes occur with the highest standard of transparency, integrity and legality, this Policy establishes the following guidelines.

The Social Relations Committee is responsible for selecting, validating and managing donations for social responsibility purposes to be made to non-profit organizations.

These donations for social responsibility purposes can occur in different modalities, whether through financial contributions, donations of materials and products, coordination of solidarity programs, volunteering, professional projects, sport, among others.

4.1.1 Prohibited donations

Donations are prohibited from being offered, promised or granted for the purpose of obtaining an improper advantage or influencing

the action of any person, whether public agent, supplier, third party, among others, regardless of the suitability of the organization to be favored.

Donations to non-profit organizations that have a history of involvement in corruption or fraud are being fenced.

Donations to organizations that have any history of involvement with corruption or fraud.

Donations to organizations are prohibited that are administered, directly or indirectly, by people politically exposed or by public agents in order to avoid a situation that generates potential conflict of interest, in compliance with the rules set out in the Code of Conduct and Bold Best Practices.

4.1.2 Prior and periodic verification

Bold Participações will submit the possible organization benefited to a prior and periodic verification to be carried out by the Social Relations Committee.

This verification will take place through an integrity due diligence of both the organization and its administrators in order

to ensure compliance with the requirements of this Policy.

Based on the analysis, the Social Relations Committee will issue an opinion to the company. In critical situations, you may send this opinion for deliberation of the Ethics Committee on the approval or rejection of the donation for the purposes of social responsibility.

4.1.3 Donation monitoring

Bold Participações is committed to continuous monitoring of the effectiveness of donations and social actions carried out to non-profit organizations.

Donations when made in cash will be made directly to legal entities by depositing into a bank account held by the said beneficiary organizations, except in public call projects that expressly allow in notice the possibility of participation of individuals.

4.1.4 Anti-Corruption and Integrity Clause

Contracts signed with the beneficiary institutions shall contain the anti-corruption clause that safeguards Bold Participações

if the other party engages in violations of the anti-corruption law (Law No. 12,846) that may impact its reputation.

The contracts signed must also contain the integrity clause in which they recommend that the beneficiary organizations submit to the provisions of bold participações' Code of Conduct and Good Practices and commit to ethics in the performance of their organizations in return for the donation.

4.2 Donations for Institutional purposes

Bold Participações makes donations in order to establish an institutional relationship, either through cooperation, partnership or support to cultural, scientific, educational and public entities, provided that they are in accordance with the strategic objectives and values of the company.

Donations for institutional purposes can occur in various modalities, such as:

- (i) unusable materials, without use or obsolete, of the company's assets;
- (ii) consumables or insum purchased specifically for donation purposes;

(iii) contracting services for donation purposes;

(iv) implementation of own services in general (e.g. construction, renovations, among others) and

(v) financial values.

Requests for institutional donations must be documented and directed to the Executive Board responsible for validating whether the purpose and purpose of the donation are in accordance with Bold Participações' business strategy and values.

Upon receipt of the donation request, the Executive Board will submit the potential entity benefited to integrity due diligence to be made by the Social Relations Committee in order to verify the risks and impacts related to compliance and anti-corruption rules, conflict of interest and adherence to this Policy.

Based on the analysis, the Social Relations Committee will issue an opinion to the Executive Board. In critical situations, you may submit this opinion for deliberation of the Ethics Committee on the approval or rejection of the donation for institutional

purposes.

The beneficiary entities, whether public, private or mixed, must prove the application and effectiveness of the donation received through an accountability procedure.

Donations to public entities will only be made if they comply with the guidelines of the Code of Conduct and Good Practice and the Anti-Corruption Policy.

4.3 Political Donations

Bold Participações does not make donations to political parties, candidates for elective positions, campaign committees, coalitions or related individuals or legal entities.

Bold Participações respects the participation of Employees in political activities as long as they are always on a personal basis, outside the working hours and in compliance with the guidelines of the Code of Conduct and Good Practices.

4.4 Sponsorships

In order to ensure that sponsorships occur with the highest standard of transparency, integrity and legality Bold Participações

establishes the following guidelines.

Bold Participações sponsors several entities and projects with the objective of promoting and intensifying the knowledge of its brand and strengthening communication with its customers, suppliers and society.

Several areas may indicate suggestions of entities and projects to be sponsored by Bold Participações and the Marketing Area will be responsible for deliberating, formalizing and managing sponsorships.

4.4.1 Prohibited Sponsorship

Sponsorship contributions are prohibited to be offered, promised or granted for the purpose of obtaining an inappropriate advantage or influencing the action of any person, whether public agent, supplier, third party, among others, regardless of the suitability of the entity to be favored.

Sponsorship contributions to entities that have a history of involvement in corruption or fraud are noded.

Sponsorship contributions to entities that are administered, directly and indirectly, by

politically exposed persons or public agents, who have their activities related to bold participações' business, in compliance with the conflict of interest rules provided for in the Code of Conduct and Good Practices, are declosed.

4.4.2 Prior and periodic verification

The Marketing Area will submit the possible entity benefited to a prior and periodic verification to be carried out by the Social Relations Committee that will perform a due diligence of the entity and its administrators in order to verify compliance with the requirements of this Policy.

Based on the analysis obtained, the Social Relations Committee will issue an opinion to the Marketing Area. Based on the analysis carried out, the Marketing Area will issue an opinion to the Executive Board. In critical situations, you may submit this opinion for deliberation of the Ethics Committee on the approval or rejection of sponsorship.

4.4.3 Sponsorship monitoring

Continuous monitoring will be carried out by the Marketing Area in order to verify that

the applied value of sponsorship is meeting the objectives of its realization.

Sponsorship contributions will be made directly to legal entities by depositing into a bank account held by the said beneficiary entities, unless the sponsorship is for an athlete and may be in the bank account of the individual.

4.4.4 Anti-Corruption and Integrity Clause

Contracts signed with the beneficiary entities shall contain the anti-corruption clause that safeguards Bold Participações if the other party engages in violations of the anti-corruption law (Law No. 12,846) that may impact its reputation.

The contracts signed must also contain the integrity clause in which they recommend that the beneficiary entities submit to the provisions of bold participações' Code of Conduct and Good Practices and commit to ethics in the performance of their organizations in return for the donation.

COMMUNICATION, TRAINING AND DOUBTS

5 Communication, Training and Doubts

Bold Participações 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 the Donations and SponsorshipS Policy. Requests for donations and sponsorships will be met, if approved, upon budget availability and appropriate accounting release, considering the tax deductibility when applicable.

It is the responsibility of all Bold Participações Leaders to disclose to their leaders the content of this Policy and to make them aware of the need and importance of compliance with them.

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

It is up to Bold Participações employees to comply with all provisions of this Donations and SponsorshipS Policy and ensure that all third parties and partners in their relationship are informed of their content.

6 Whistleblowing channel

It is essential that anyone immediately reports

any acts or suspected non-compliance with Bold Participações' Code of Conduct and Good Practice and this Policy, preventing acts of corruption and preserving the company's image in the market and in front of its stakeholders.

In this sense, we provide the Reporting Channel:

- E-mail: comitedeetica@bold.net
- Website: www.bold.net/canaldedenuncias;

It is not necessary to identify yourself when using the channel, but it is essential to act responsibly when making reports, which must be consistent and truthful.

Any situations, exceptions and/or clarifications about the application of this Policy should be reported to the Social Relations Committee.

7 Investigations and sanctions

All incidents reported of suspected violations of this Policy will be investigated immediately and appropriately. If, after the investigation, it is found that conduct has occurred that violates the rules of this Policy, immediate and exemplary corrective measures will be

taken, always in accordance with the circumstances, severity and applicable law.

Any employee, third party or partner who violates any provision of this Policy will be subject to disciplinary sanctions under bold entries' Code of Conduct and Good Practice, listed below:

- Written warning;
- Suspension;
- Dismissal without just cause;
- Dismissal for just cause;
- Exclusion of donation or sponsorship made by Bold;
- Legal action.

