	ANTICORRUPTION AND ANTI-BRIBERY POLICY		
	Type: Institutional Policy		Version: 1
Area: Compliance Office	Author: Compliance Office	Approver and/or Reviewer: Alex Ingles	Version Date: 19/02/2021

1. Introduction

The institutional policy of Anticorruption and Anti-Bribery establishes guidelines for prevention and fighting, as well as reinforcing Company's position of repudiation and intolerance, of any act of corruption and bribery, in public or private field, considering any jurisdiction where it has established business.

This Policy does not cover all ethical or legal issues that may occur, nor does it replace the obligation of each employee or speaker of the Company to exercise good sense in their activities and seek guidance from their immediate superior or from the Legal and Compliance areas when needed.


2. Objectives

- 2.1. Reinforce Sencinet's commitment to meeting legal requirements in all jurisdictions in which it operates.
- 2.2. Define guidelines for preventing and fighting the occurrence of acts of corruption and bribery, providing guidance to our employees to recognize and handle possible unlawful occurrences.
- 2.3. Identifying, monitoring and managing Sencinet's corruption and bribery risks.
- 2.4. Monitoring changes in the regulatory field, considering national and international legal context and self-regulation codes applicable to all Sencinet's Entities, in order to implement measures for readjustment and adherence to mandatory requirements.
- 2.5. Disseminate Company's and employees' obligations, as well as the due responsibilities in case of non-compliance with the guidelines set out in this policy.

3. Guidelines


- 3.1. All employees and third parties who act on behalf of Sencinet are prohibited:
 - a. Promising, offer, authorize, grant, receive, directly or indirectly, improper advantage, payment of facilitation or transfer in cash, kind or property to any person, whether public agent or not, as well as to the third person related to it, aiming influencing or rewarding any action or decision for its own or to Company's benefit.
 - b. Granting a gift, hospitality or entertainment invitations to anyone, whether a public agent or not, as well as to the third person related to them, as a way of exercising influence or compensation to obtain an advantage or benefit, either to himself or in Sencinet's behalf. The guidelines on this topic are detailed in the Receiving and Offering Hospitality, Gifts and Presents Policy.
 - c. Accepting an invitation to entertainment provided by suppliers, customers, partner companies and subcontractors not legitimately related to an intellectual or business purpose, creates the impression of commercial advantage, generates an implicit obligation.
- 3.2. All interactions with the Public Administration must follow the guidelines and orientations established in the Public Agent Relationship Policy.

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- 3.3. Defrauding, through any action, the competitive character of bidding processes, preventing or interfering in the performance of this, removing or seeking to remove the bidder, as well as creating a legal person in an irregular manner exclusively to participate in bids will not be tolerated.
- 3.4. It is strictly forbidden to manipulate or adulterate any documents used to participate in public bidding and contractual agreements, either with public or private administrations.
- 3.5. Defrauding contracts, in the public or private fields, as well as obtaining an undue advantage or benefit from modifications or extensions of contracts in an irregular, fraudulent or unauthorized manner, will not be tolerated.
- 3.6. Hiring former public agents or their families must be properly evaluated, as well as based on the competence and applicability to the available position, in a way that does not represent reputational and image risk to Sencinet.
- 3.7. For suppliers contracting, partner companies, as well as establishing a commercial agreement with new clients or donation and sponsorship action, prior diligence must be carried out, in order to ascertain the existence of involvement with the Public Administration, as well as assess the inherent risks that this relationship may cause to Sencinet.
- 3.8. All contracts signed between Sencinet and its suppliers, customers and partner entities must include anti-corruption clause and awareness and responsibility for compliance with the guidelines established in this policy, in addition to reserving the Company the right to perform extraordinary audits to evidence the existence of anti-corruption controls.
- 3.9. Sencinet may perform a due diligence process to verify personal information when hiring new employees. The rules regarding background investigation must be included in the human resources procedures of the local entity, always observing the current labor legislation for each country.
- 3.10. For any incorporation, merger or acquisition process with any organization, a due diligence process must be carried out, as well as anti-corruption and authorization clauses for periodic audits, in order to avoid the succession of any liability before the operation is closed, as well as to safeguard future illicit acts.
- 3.11. Donations or sponsorships on behalf of the Company, solicited or intermediated by agents or agencies of the Public Administration, national or foreign, are prohibited.
- 3.12. Donations or sponsorships must be approved by the competent authorities, following the internal guidelines of the Donation Policy and its procedures, as well as having their due recorded clearly and completely in the Company's accounting books.
- 3.13. Donations and sponsorships must be monitored and audited, including requesting declarations from the beneficiary, proving that the allocated resources were applied in an appropriate manner and for the correct purposes.
- 3.14. All employees and third parties are expressly prohibited from making any kind of contribution to political parties, organizations or public individuals involved in political activities, on behalf of Sencinet, whether in the form of donations, transfer of securities or assets, money or kind, or any other way.

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- 3.15. The Compliance Office is responsible for carrying out activities to prepare and maintain internal controls, operating procedures and organizational instruments related to preventing and fighting illegal acts, corruption and bribery, associated with local and international legal guidelines.
- 3.16. Sencinet must maintain books and accounting records reflecting in a detailed, precise and integral manner all operations and transactions carried out. In addition, all operations and transactions must be properly documented and evidenced, described clearly and in line with the event in a degree of detail and contextualization that ensures the transparency and reliability of its economic-financial transactions and approved in accordance with the internal guidelines. The Company will ensure the availability of its books to audits and to inspection and regulatory agencies when necessary.
- 3.17. The Company must delivery auditing activity periodically, either by an internal team or an independent company, in order to evaluate the implemented controls and processes for risk management and governance, which will respond to possible risks of fraud, corruption and bribery.
- 3.18. Sencinet will be responsible for applying periodic training to all employees, addressing updates regarding the regulatory field, internal guidelines and disseminating the organizational culture for preventing and fighting corruption and bribery. All training must be properly documented and all participants must be tested in order to determine the content assimilation and to identify the need for new sessions and further study on specific topics.
- 3.19. All employees of Sencinet are responsible for identifying and preventing situations that may suggest or cause a conflict of interest in any type of relationship, whether between employees, with the public administration, suppliers, customers, collaborate companies or competitors. Any observation of suspicious or proved act of illegality must be reported to Sencinet's Report Channel, Your Voice, though the email address yourvoice@sencinet.com.
- 3.20. All employees, third parties and business partners are responsible for bringing to the attention of Sencinet any facts or suspicions that may cause risk to the people or the reputation and image of the Company, or even that they represent a breach of the guidelines established in this policy.
- 3.21. All employees are committed to using the benefits provided by Sencinet correctly and transparently, including, but not limited to, routine equipment, corporate cards and reimbursement of expenses, further corroborating the application of penalties and forwarding to the competent authorities, if applicable, in case of identification of fraudulent actions.
- 3.22. Violations of the guidelines of this policy will result in disciplinary action, which can range from warnings to termination of contract, depending on the severity of the violation. This penalty will act in conjunction with the civil and criminal penalties established by the local legislation.
- 3.23. In circumstances in which the employee suspects that his health or physical integrity, or that of persons related to him, is being threatened, accepting a bribe is permissible. However, this action must be immediately reported to the competent bodies for prior authorization, acknowledgment and due treatment. Even if it is an attempted bribe, not culminating in a concrete action, it must be properly reported.

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- 3.24. All reports will be investigated and treated considering the confidentiality of the rapporteur's data, if he wishes. In addition, no form of retaliation will be allowed to any employee, third party or partner who, in good faith, reports an occurrence that violates the guidelines established in this policy. Such acts will also be subject to the application of disciplinary measures by Sencinet.
- 3.25. Reports must be reported to the competent authorities, if the internal investigation unit consider it is applicable.
- 3.26. Sencinet's Ethics Committee or, when necessary, an external company or professional specialized in carrying out investigations, properly assigned, will investigate the reports receives by the Report Channel. The applicable sanctions will be defined by a Senior Management with the support of the legal unit, in accordance with Sencinet's internal norms, in addition to local or international legal guidelines on the subject.
- 3.27. It is strictly forbidden to act towards hiding or preventing investigations procedures or inspections of public entities or agents, including within the scope of regulatory agencies and supervisory agencies of the national financial system.
- 3.28. Sencinet must assess the risks of corruption and bribery periodically, with minimal consideration for processes involving interactions between employees and third parties with public agents, as well as commercial processes for contracting suppliers, reviewing the efficiency of associated controls, considering changes in local and regional legal environments that safeguard anti-corruption and anti-bribery guidelines.

4. Appendix

- 4.1. Concepts
- 4.2. Responsibilities

5. Revision history

Version	Date	Author(s)	Content reviewed
1	19/02/2021	Compliance Team	Document creation