	CONFLICT OF INTEREST POLICY		
	Type: Institutional Policy		Version: 1
Area: Compliance Office	Author: Compliance Office	Approver and/or Reviewer: Hermann Maranhó	Version Date: 11/02/2021

1. Introduction

The Conflict of Interest institutional policy provides guidelines for identifying and dealing with the occurrence of conflicting relationships, whether internally, between Sencinet employees, or externally, between employees and suppliers, partners or customers, ensuring compliance with laws and ethical values of the Company, protecting its image and integrity, as well as its Senior Managers and employees.

Conflict of Interest is an occasion when Senior Managers, employees or a third party on behalf of Sencinet, by a provision or contract, make a decision, execute or omit an action acting in their own interest or in the interest of third parties to obtain a financial or non-financial benefit, which is not their right, to the detriment of the legal interest of the Company, customers or suppliers, going against their legal, statutory, contractual and ethical duties.


2. Objectives

- 2.1. Establish guidelines, principles, and competencies to guide practices and actions to prevent and identify possible situations of conflict of interest that could harm the company in conducting business with integrity, in line with its values.
- 2.2. Establish guidelines, principles and competences to guide practices and actions to prevent and identify possible situations of conflict of interest in hierarchical relationships between Sencinet employees, causing losses to professionals, in their career or in the development of their activities.
- 2.3. Verify Sencinet's compliance with Conflict of Interest rules issued by regulatory agencies.
- 2.4. Ensure the means for the Seniors Managers, employees, third parties and partners to be able to declare real or potential Conflicts of Interest.

3. Guidelines

- 3.1. All employees, third parties and partners must be committed to the Sencinet's ethical values and principles, as set out in the Code of Ethics and Conduct, following the principles and rules defined in this policy, in order to avoid any situation that may generate conflict of interest for yourself and/or the Company.
- 3.2. Sencinet acts in accordance with the principles of integrity and transparency, its values and ethical principles, which are disseminated to all interested parties, including business partners, through contractual clauses and the Company's means of communication.
- 3.3. Compliance Office, through the Compliance Channel - Ask Compliance, will be responsible for receiving and dealing with questions, situations and complaints related to possible conflicts of interest, assessing the reported interactions situations, generating action plans to mitigate any identified risks. Ask Compliance is available in the email address askcompliance@sencinet.com.
- 3.4. All employees and third parties who act on behalf of Sencinet must receive guidance about practices to be avoided, instructions for identifying situations of conflict of interest, guidelines for conducting their interaction with public bodies

PUBLIC		
Next Review: 02/2023		1
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and for handling Company's information and/or retained by it, according to the degree of vulnerability of their activities, considering the nature of the operation and the level of decision of each group in order to avoid conflicts of interest.


3.5. Conflict of interest situations are configured, but not limited to:

- Employees and third parties acting on its behalf in contracting suppliers, customers or any commercial association with companies of which they are partners or representatives as an individual or legal entity.
- Employees and third parties acting on its behalf in contracting suppliers, customers or any commercial association with companies which partners or representatives, are their natural or civil relatives, up to the third degree, as an individual or legal entity.
- Employee in a vertical line of leadership of a natural or civil relative, up to the third degree, who may interfere in the subordinate's progression, promotion or dismissal processes.
- Significant shareholding of Sencinet's employees in competing businesses.
- Sencinet's employees working for or in benefit of a competitor or supplier while under a labor contract by Sencinet.
- Sencinet's employees involved in conflicting activities or which generate incompatible schedules, impairing their work shift or deliverables agreement of their labor contract.
- Use of position or any privileged information for personal gain or in actions/activities that may harm Sencinet's business.
- Use of a privileged position by Sencinet's employees or third parties acting on its behalf, either by position or relationship in the Company, to influence the selection and recruitment process of new employees.
- Use of a privileged position by Sencinet's employees or third parties acting on its behalf to take advantage of opportunities, commissions, rebates, loans, discounts, favors, gratuities or advantages for personal benefit, members of their family or third parties.
- Use of Sencinet's equipment and resources by Sencinet's, employees or third parties acting on its behalf for private purposes or for purposes other than the development of their activities at the Company.
- Interaction of Sencinet's, employees or third parties acting on its behalf in negotiations with Public Agents of whom they are natural or civil relatives, up to the third degree.


3.6. All employees or third parties acting on behalf of Sencinet who have natural or civil relatives, up to the third degree, working in government agencies must report the compliance management unit to assess possible conflict of interest.

3.7. All Sencinet employees who have a company or business related to the Company's activities, or who provide services to it, must declare information about the enterprise in order to Sencinet to assess possible situations of conflict of interest.

PUBLIC		
Next Review: 02/2023		2
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- 3.8. Employees and third parties acting on behalf of Sencinet, when involved in any contracting, sponsorship, partnership or contract management activity, as well as non-commercial relationships such as obtaining licenses, court agreements, inspections or audits by public regulatory entities, among others, who are in a situation of conflict of interest, must declare themselves prevented from exercising their activities for that occasion. The conflict must be reported, with details of the occurrence, to your direct superior and, formally, to the Compliance Office.
- 3.9. All new or rehired employees must declare in the hiring process the possible conflicts of interest arising from their relations with other Sencinet employees, clarifying the existence of natural or civil relatives, up to the third degree.
- 3.10. Employees or third parties acting on behalf of Sencinet who wish to run for elections, aiming at any political and/or public position or function, must request the termination of their contract with the Company.
- 3.11. Sencinet will provide all its Administrators and employees training on the guidelines of this policy, in order to capacitate all its employees to identify real or potential situations of conflict of interest.
- 3.12. All employees or third parties acting on behalf of Sencinet must report any actual or potential conflict of interest situation to the Compliance Office.
- 3.13. The Compliance Office should report directly to its board the result of the conflict of interest analysis. The reported situation must be analyzed in an independent, transparent manner, following the principles of impersonality and legality, involving, if necessary, support areas such as HR and Legal, or an external consultant can be called upon, in order to assist in the analysis for taking decision-making.
- 3.14. The final analysis report of the possible conflict of interest must be stored electronically, in a safe environment, according to the period defined in the local procedures, based on the legal requirements for handling information, maintaining the traceability and confidentiality of the process.
- 3.15. Potential or real violations by employees, representatives of the company or third parties must be reported, through their immediate supervisor, to the Compliance Office or to the Sencinet's Complaints Channel - Your Voice (yourvoice@sencinet.com).
- 3.16. Violations of the guidelines set out in 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 current local legislation.

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4. Appendix

- 4.1. Concepts
- 4.2. Responsibilities

5. Revision History

Version	Date	Author(s)	Revision ref
1	11/02/2021	Compliance Team	Document creation