	RECEIVING AND OFFERING GIFTS, PRESENTS AND HOSPITALITY		
	Type: Institutional Policy		Version: 1
Area: Compliance Office	Author: Compliance Office	Approver and/or Reviewer: Arlette Guibert and Jayme Ribeiro	Version Date: 09/02/2021

1. Introduction

The institutional Policy of Receiving and Offering Gifts, Presents and Hospitality aims to establish guidelines and rules to be followed by all the employees and third parties acting on behalf of Sencinet for the acceptance and concession of gifts, presents, invitations to events, hospitality, meals and other items of value, both in the public and private fields, considering any jurisdiction where the Company may establish business.


2. Objectives

- 2.1. Reinforce Sencinet's commitment to meeting legal requirements in all jurisdictions in which it operates.
- 2.2. Define guidelines for the acceptance and concession of gifts, presents and hospitality, aiming to provide guidance on appropriate treatment in the event of possible occurrences.
- 2.3. Identify, monitor and manage risks arising from situations that may generate a conflict of interest or be misinterpreted.
- 2.4. Disseminate the importance of knowing the obligations, as well as the due responsibilities in case of non-compliance with the guidelines set out in this policy.
- 2.5. Safeguard Sencinet from situations that may cause negative interpretations and undue sanctions to the Company, its employees, third parties or partners.

3. Guidelines

- 2.6. It is allowed to all employees and third parties acting on behalf of Sencinet granting to anyone, national or foreign, except public agents, gifts without commercial value, such as campaign material or promotional items from Sencinet, as well gifts and hospitality up to the amount of U\$ 30.00.
- 3.1. It is granted to all employees and third parties acting on behalf of Sencinet accepting gifts or presents up to a maximum amount of US \$ 30.00 from any person, national or foreign, except public agents. Any item received with a value higher than that must be reported to the Compliance Office for approval and registration. Approval must be asked through the Compliance Channel - Ask Compliance (askcompliance@sencinet.com). Large volumes of campaign material or promotional items received at once must be retained by the recipient and communicated to the Compliance Office, which, together with the Ethics Committee, will be in charge of giving the correct treatment and destination to the received items.
- 3.2. Offering large volumes of gifts or promotional materials on behalf of Sencinet must be previously planned and reported to the Compliance Office and the Ethics Committee through the Compliance Channel - Ask Compliance (askcompliance@sencinet.com). The Compliance Office will proceed the analyses of the chosen entity and the regularity of the offer. Private initiatives by employees or third parties acting on behalf of Sencinet will not be permitted.
- 3.3. Invitations to events held or received by employees or third parties acting on behalf of Sencinet to private entities or the Public Administration, with a value greater than


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U\$ 30.00, must be reported to the Compliance Channel - Ask Compliance (askcompliance@sencinet.com). The Compliance Office will assess the risks to the image and reputation of the Company and approval of the offer.

- 3.4. It is strictly forbidden during a contracting process, to accept gifts, presents, hospitality or invitation for events, even of intellectual or technological means, any value or type, from any individual, whether a public agent or not, national or foreign participating on the process.
- 3.5. It is allowed to offer meals, regardless of the parties involved (members of suppliers, partner companies, customers, national or foreign public agents, among others), as long as these do not exceed the amount stipulated for Sencinet employees (30USD), within the commercial context and not have the intention to influence or reward a decision or action. If it exceeds the amount stipulated in this policy, a approval and registration with the Compliance Office is required. If any party involved is a member of the Public Administration, national or foreign, the event must be reported to the Compliance team accompanied by the due account of the amounts spent.
- 3.6. Hospitality expenses, such as transportation and accommodation, related to businesses already established, can be paid by Sencinet to suppliers, partner companies and customers, in compliance with the limits established for employees and third parties of the Company. This permission does not apply if the objective is to establish a new business relationship, nor is it extended to family members and other individuals other than those directly linked to the business in question.
- 3.7. Costs of hospitality expenses to members of the Public Administration must be previously evaluated by the Compliance Office, which must validate the reason, the values involved and the risks that this action may cause to the Company. If the costing is authorized, it must not exceed the limits established for Directors, employees and third parties of the Company and cannot be extended to family members and other individuals other than those directly linked to the business in question.
- 3.8. Granting of gifts, presents, entertainment and hospitality to any individual, whether in the public or private sector, in the form of cash or equivalent, such as gift cards, discount coupons, vouchers, among others, is strictly prohibited.
- 3.9. Every expense arising from the action of granting gifts, presents, entertainment and hospitality, whether to a public agent or not, national or foreign, must be recorded in the Sencinet's accounting systems in a detailed, complete manner, containing the correct supporting documentation and due authorizations.
- 3.10. Sencinet will be responsible for applying periodic training to all employees and third parties acting on behalf of the Company, updating and emphasizing the internal guidelines for receiving and offering gifts, presents and hospitality.
- 3.11. Audits must be carried out periodically, either by an internal team or an independent company, in order to evaluate the controls implemented and adherence to internal policies, with regard to the receipt and offer of gifts, presents and hospitality.
- 3.12. It is expressly forbidden for employees, on behalf of the Company, to make any type of contribution to political parties, organizations or public individuals involved in political activities, whether in the form of donations, transfer of securities or assets, money , or other.

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- 3.13. All employees are responsible for bringing to the attention of Sencinet facts or suspicions that may cause risk to the people or the reputation and image of the Company, or even that represent a breach of the guidelines established in this policy. Any observation of suspicious situations must be reported to Sencinet's Report Channel, Your Voice – yourvoice@sencinet.com. All cases reported, as well the identity of the reporter will be kept confidential, being handled by Sencinet's Ethics Committee.
- 3.14. 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.

4. Appendix

- 4.1. Concepts
- 4.2. Responsibilities

5. Revision History

Version	Date	Author(s)	Content reviewed
1	11/02/2021	Compliance Team	Document creation