



ANTI-CORRUPTION AND ANTI-BRIBERY POLICY

ESTRE AMBIENTAL S.A.



GLOSSARY

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1. DESCRIPTION

1.1. OBJECTIVE

The Estre Ambiental, acting in the field of Collection and Treatment of Industrial and Commercial Waste in General, Urban Waste, Hospital Waste and Urban Cleaning, Transshipment, Preparation and Execution of Projects and Environmental Licensing, have established the following commitments:

- The prohibition of bribery; (pay or receive), Corruption and Fraud;
- Strict commitment to Estre Ambiental Code of Ethics and Conduct.
- Strict commitment to Estre Ambiental Anti-Corruption and Anti-Bribery Policy;
- Strict commitment to all the policies, procedures and other applicable documents;
- Strict commitment to the Anti-Corruption Law – Law number 12.846/2013; and
- The continuous improvement of its activities and Anti-Corruption and Anti-Bribery Management System.

1.2. GENERAL ASPECTS

The Anti-Corruption and Anti-Bribery Policy aims to present the main directives and legal guidelines related to Estre Ambiental in line with the other initiatives from the Company, such as: The program to disseminate Code of Ethics and Conduct and the Estre Conduct Line (Alô, Integre!) also the active participation of the Ethics Committee. These initiatives provide the employees with the knowledge to identify risk situations related to the Brazilian Corporate Anti-Corruption Law.

The Anti-Corruption and Anti-Bribery Policy will be permanently disclosed to the Employees, who must formally assume the commitment to comply with this Policy.

All the Employees must observe the standards of integrity that were set forth in this Policy and stay away from interests and relations that are potentially harmful or contrary to the Company's Ethical principles.

The Employees or Third Party who become aware of any violation of the Anti-Corruption Law and the guidelines of this Policy, or also report any request for payment or Undue Advantage by a Public or Private Agent, must immediately report it through the following means of communication or in the “Alô, Integre!” available below:

- **Website:** <https://www.alointegre.com.br>
- **Phone:** [0800 721 5964](tel:08007215964)

We establish that good-faith communications of deviations or potential deviations will not cause, in any way, any type of retaliation for the employee that realizes the communication or for refusing to participate in bribery/corruption. Even if this means a loss for the company (except when the person participated in the violation).

In case of questions about this Policy can also be clarified by the email: integre@estre.com.br, before any actions have been taken.

1.3. AUTHORITY

The Legal Director and Compliance team have sufficient responsibility, independence and authority to perform their duties.

1.4. ANTI-CORRUPTION GUIDELINES IN THE PUBLIC SECTOR

1.4.1. The prohibition of corruption, Fraud and bribery;

I - Promise, offer directly and indirectly, undue advantage payment or non-official payment to a Public Agent or Third Parties related to him;

II - Finance, fund or sponsor the practice of Fraud, Bribery and Corruption;

III - Using as intermediary individual or legal entity to hide or disguise their real interests or the identify of the beneficiaries of the acts;

IV - Regard to bids and contracts:

a) Frustrating or defrauding the competitive nature of bidding procedures with the Public Administration;

b) Impede, disturb or defraud the realization of any act of bidding procedures with the Public Administration;

c) Depart or seek to depart the Public Agent by fraud or offering Undue Advantage;

d) Defraud bidding procedures or contracts related to the Public bidding;

e) Create in a fraudulently or irregularly way a legal entity to participate in public bidding or celebrate a administrative contract;

f) Obtain improper benefit from modifications or extensions of contracts entered into with the Public Administration without authorization in Law in the act in the bidding; or

g) Manipulate or defraud the economic and financial balance of contracts entered into with the Public Administration.

V - Hide the investigation or inspection activity of Public Agencies, Entities or Public Agents or intervene in their performance including in the scope of regulatory agencies and the supervisory of the national financial system.

1.4.2. Estre and Third Parties acting on his behalf shall cooperate in case of investigations or inspections realized by Public Agencies/Agents or Entities.

1.4.3. In case of mergers, acquisitions or other corporate transactions, Estre will audit the counterparty before the conclusion of the transaction to verify the history of the practice of harmful acts provided in the Law number 12.846/2013 or other illicit related to Bribery, Corruption and Fraud.

2. PENALTIES

All the Estre employees are responsible for fully complying with this Policy and the non-observance of the precepts described will be considered a violation, may lead to application of disciplinary measures, such as: verbal or written or even get fired which will be applied according to the nature and seriousness of the offense committed.

3. CONTROL INFORMATION

Nome da Política: Anti-Corruption and Anti-Bribery Policy

Responsáveis pela Política:

Atribuições	Nome	Área
Approver	Gesner Oliveira	President of the Administration Board
Approver	Elaine Vallerini	Human Resources Manager
Approver	Antônio Carvalho	Operations Director
Approver	Hamilton Agle	CEO
Reviewer	Diego Ressurreição	Compliance Director
Reviewer	Beatriz Costa	Compliance Manager

Review/Approval Dates:


Review History:

Review 1.0 - 03/16/2017

Review 2.0 - 08/27/2018

Review 3.0 - 08/26/2019

Review 4.0 - 11/26/202



Review 5.0 - 03/14/2022

Review 6.0 - 03/20/2023

ATTACHMENT I - GLOSSARY AND DEFINITIONS

CORRUPTION – Act to promote, offer or give undue advantage to third-party with the purpose of obtaining benefits in relation to others in an illegal and illicit manner.

BRIBERY – The offer, promise, donation, acceptance or solicitation of an unduly advantage of any amount (financial or otherwise), directly or indirectly, and regardless of location, as an incentive or reward for a person who is acting or not acting in relation to the performance of its obligations.

ANTI-CORRUPTION LAW - Law number 12.846/2013, endorsed in August 2013 which provides for the objective administrative and civil liability of legal entities for the practice of corruption against the public administration and its regulatory decree.

HELLO, INTEGRITY – Tool to the internal and external public to receive the complaints.

ANTI-CORRUPTION AND ANTI-BRIBERY MANAGEMENT SYSTEM – Set of interrelated or interactive elements of an organization to establish policies, controls and processes to achieve the objects of preventing bribery practices.

THIRD PARTIES - Suppliers, Business partners or anyone acting on behalf of Estre.