

1. WHAT IT IS

The Compliance Program is one of the guiding elements of ApexBrasil's governance structure, consolidating the ethics management system, represented by a structured set of institutional guidelines and measures aimed at ensuring that the Agency fully achieves its institutional mission and strategic objectives. Respect for the legislation and internal and external regulations applicable to it, as well as a set of measures to prevent, detect, punish and remedy fraud, acts of corruption and other similar illicit acts, are fundamental for the Agency to effectively promote exports, the internationalization of Brazilian companies and the attraction of foreign investment in a sustainable manner. ApexBrasil is committed to the values of compliance, integrity, ethics and transparency, the basis for consolidating effective institutions in defense of the public interest and a fair, democratic and inclusive society.

It should be clarified that, for the purposes of this Program, the word "Compliance" is being used beyond its literal translation of "conformity", covering a wide range of topics, such as: combating fraud, corruption, conflict of interest, nepotism, influence peddling, among other similar illicit acts; ethics; risk management; internal control; information security; data protection; whistleblowing channel; discipline management; transparency; and other topics related to protecting ApexBrasil's image and reputation.

The word "integrity" reveals values related to honesty, uprightness, and impartiality. It refers to the ability to act according to ethical principles, even in the face of challenges or difficult and complex situations. People with integrity follow the rules of society and act honestly, in other words, integrity means observing ethical rules and values. In general, integrity is essential for the proper functioning of any society or organization and, in this case, ApexBrasil.

The fact is that the words "compliance" and "integrity" complement each other and must always be understood together in order to achieve the objectives set out in item 3 of this Compliance Program. Sometimes, we will speak only of compliance, when in fact we are talking about compliance and integrity.

2. LEGAL AND REGULATORY BASIS

Considering the private law nature of ApexBrasil, the public origin of its resources and its operations in Brazil and abroad, the Agency's Compliance Program has, as legal and Normative references, Private Law and National and International Public Law, being structured in a hybrid way, incorporating the best practices of the private and public sectors.

The external legal and regulatory basis, which guides and serves as a reference for best practices in the implementation of ApexBrasil's Compliance Program, is primarily as follows:

1. Constitution of the Federative Republic of Brazil of 1988;
2. Law Number 10.668, of May 14, 2003 - Authorizes the establishment of ApexBrasil;
3. Decree Number 4.584, of February 5, 2003 - Establishes ApexBrasil;
4. Consolidation of Labor Laws - CLT, approved by Decree-Law Number. 5.452, of May 1, 1943;
5. Law Number 12.846, of August 1, 2013 - Anti-Corruption Law;
6. Federal Decree Number 11.129 of July 11, 2022 - Regulates the Anti-Corruption Law;
7. Decree-Law Number 2848, of December 7, 1940 - Brazilian Penal Code;
8. Law Number 9.613, of March 3, 1998 - Crimes of "laundering" or concealment of assets, rights, and values; and prevention of the use of the financial system;
9. Decree Number 9.203, of November 22, 2017 - Governance Policy. Integrity Programs;
10. Decree Number 7.203, of June 4, 2010 - Prohibition of nepotism;
11. Law Number 8.429, of June 2, 1992 - Administrative Improbity Law;
12. Law Number 8.137, of December 27, 1990 - Crimes Against the Tax and Economic Order and Against Consumer Relations;
13. Law Number 7.492, of June 16, 1986 - Crimes against the National Financial System;
14. Law Number 12.813, of May 16, 2013 - Conflict of Interest;
15. CGU Ordinance Number 909/2015, of April 7, 2015 - Evaluation of Corporate Integrity Programs;
16. CGU/MPOG Joint Number Instruction Number 01/2016, of May 10, 2016 - Internal Controls, Risk Management and Governance within the Federal Executive Branch.
17. CGU Ordinance Number 1,089/2018, of April 25, 2018 - Guidelines for bodies and entities of the Federal Public Administration to adopt procedures for structuring, executing, and monitoring their integrity programs.
18. CGU Ordinance Number 1.163/2019, of March 20, 2019 - Institutes the governance structure related to Risk Management and the Integrity Program of the Office of the Comptroller General of the Union - CGU.
19. Joint Normative Ordinance Number. 6/2022 CGU/Secretariat for Transparency and Corruption Prevention, which updates the Practical Manual for Evaluating Integrity Programs in Administrative Accountability Processes (CGU), of September 3, 2018.
20. Law Number. 12.527, of November 18, 2011 - Access to Information Law - LAI.
21. Decree Number. 7.724, of May 16, 2012, and subsequent amendments - Regulation of the LAI.
22. Joint Ordinance CGU / Ministry of Economy Number. 2, of February 24, 2021 - Regulates the active transparency obligations to be met by entities with legal personality under private law constituted in the form of autonomous social service, recipients of social contributions.
23. Law Number. 13.709, of August 14, 2018 - General Personal Data Protection Law - LGPD; and
24. Decree Number. 10.795, of September 13, 2021 - Integrity Program of the Presidency of the Republic.

The Agency's main internal rules related to the Compliance Program are:

- ✓ Management Contract.
- ✓ Strategic Planning.
- ✓ Programming Budget.
- ✓ ApexBrasil's Bylaws.
- ✓ ApexBrasil's Internal Regulations.
- ✓ Code of Ethics.
- ✓ ApexBrasil's Four-Year Strategic Plan.
- ✓ Internal Regulatory System Management Policy.
- ✓ Information and Communication Security Policy.
- ✓ Risk Management Policy.
- ✓ Legal Action Policy.
- ✓ Internal Audit Policy.
- ✓ ApexBrasil Normative Instruction (INA) Number. 046, which deals with the Ombudsman's Office.
- ✓ INA Number. 048, which deals with the Internal Investigation Process.
- ✓ INA Number. 049, which deals with the Disciplinary Code.
- ✓ INA Number. 063 - Integrity *Due Diligence*.

The above lists should not be considered exhaustive. Other internal and external, national, and international laws and regulations may influence the implementation, execution, and monitoring of ApexBrasil's Compliance Program.

Awareness of and compliance with these documents contributes to everyone's commitment to strengthening the Agency's Compliance and Integrity environment, in particular to preventing and combating fraud and corruption, with zero tolerance for any kind of misconduct.

3. OBJECTIVES

ApexBrasil has a legal duty to implement its Compliance Program, pursuant to Article 12 of its Bylaws. This Program is based on the pillars listed in that article, which should guide its construction, execution, and ongoing monitoring.

Article 12 of ApexBrasil's Bylaws reveals that the Agency's Compliance Program is intended, among other things, to implement policies and a culture of Compliance and Integrity aimed at compliance with the Agency's Regulatory System, external standards and other applicable regulations, as well as the prevention, detection, punishment and remediation of illicit activities.

To this end, ApexBrasil's Compliance Program has the following objectives:

1. Ensure legal and regulatory compliance.
2. Protect the Agency's reputation and image.
3. Contribute to strengthening ApexBrasil's institutional identity, values, and Code of Ethics.

4. Incorporating compliance, integrity, risk, and transparency management into the Agency's routine, disseminating the Compliance and Integrity culture; and
5. Clarifying the roles and responsibilities of the different Compliance and Integrity activities.

4. TO WHOM IT APPLIES

The Compliance Program applies to all hierarchical levels of ApexBrasil and must, in accordance with the Agency's Bylaws, guide the behavior of the members Decision-Making Body (CDA), the Audit Committee (CFA) and the Executive Board (DIREX), as well as that of its employees, interns, collaborators, partners, clients and suppliers, in Brazil and abroad.

ApexBrasil Offices located abroad must also be guided by this Compliance Program, and may incorporate complementary rules and procedures for integrity, compliance, ethics, and transparency, in accordance with applicable local legislation and with the guidance and supervision of the area responsible for managing ApexBrasil's Compliance Program.

It is important to emphasize that everyone on the ApexBrasil team plays an active role in creating the Agency's environment of compliance and integrity and must foster the expected behavior through their actions.

5. GOVERNANCE STRUCTURE OF THE COMPLIANCE PROGRAM

APEXBRASIL'S EXECUTIVE BOARD

The main pillar of the Compliance Program, the President and Directors are committed to supporting the implementation, execution, and monitoring of the Program, as well as conducting the Agency's management and business with integrity, observing the highest ethical, compliance and transparency standards.

In accordance with ApexBrasil's Bylaws, the Executive Board (DIREX) is responsible for submitting the Code of Ethics to CDA for approval. It is also responsible for approving the Disciplinary Code and the Compliance Program, as well as other rules related to the Program's themes. DIREX is also responsible for ensuring that the material, human, financial and technological resources needed to implement and maintain the Compliance Program in the Agency's routine are made available in a timely manner.

The President and Directors ensure the independent performance of employees who are appointed to analyze, apply and/or maintain integrity, compliance, ethics and transparency within the scope of ApexBrasil, and do not allow retaliation, punishment and/or arbitrary dismissal arising from the regular exercise of their duties.

DIREX is the body that initiates and makes decisions on Internal Investigation Processes and investigations conducted by external agents, in Brazil and abroad, related to the

Agency's employees. In accordance with ApexBrasil's Bylaws, in the case of an investigation involving members of DIREX, the CDA and/or the CFA, the CDA will take on this role, except in the case of the involvement of the Chairman of the CDA himself, in which case his conduct will be investigated and judged by the Public Ethics Commission of the Presidency of the Republic.

INTEGRITY AND COMPLIANCE MANAGEMENT

The Integrity and Compliance Management (GIC) is the technical area responsible for drawing up, updating and generally coordinating the Compliance Program; providing internal and external guidance on compliance and clarifying doubts related to compliance and integrity; managing integrity risks and internal controls; carrying out Integrity *Due Diligence* on directors, employees, partners, clients and suppliers; the Ombudsman's Office and customer service; managing the transparency environment; the Internal Audit; and the Agency's Risk Management area. In order to carry out these activities, GIC's organizational structure includes the Prevention, Ombudsman and Transparency Coordination (CPOT), the Internal Audit Coordination (CAI) and the Risk Management Coordination (CGR).

Non-compliance, illicit behavior, and misconduct

Non-compliant legal, regulatory, disciplinary, or ethical behavior, identified by the Integrity and Compliance Management, in the continuous monitoring of the environment or reported to it by the ApexBrasil Ombudsman channel, will be forwarded for internal or external investigation, in accordance with specific regulations.

Whistleblower channel

The ApexBrasil Ombudsman's Office is the official channel for receiving internal and external whistleblower complaints about corruption, fraud, illegal acts and violations of the law, applicable external regulations and internal, operational and ethical standards, or about other inappropriate conduct that is observed in the light of the Agency's Compliance Program.

Whistleblower complaints and other manifestations to the Ombudsman's Office must be registered through the Integrated Platform for Ombudsman and Access to Information - Fala.BR (<https://falabr.cgu.gov.br/>).

If you have any questions about how to use the Platform or any other questions related to the manifestations, an Ombudsman is available at e-mail address: ouvidoria@apexbrasil.com.br, by telephone: (61) 2027-0202 - Option 9, or, in person, at ApexBrasil's headquarters, during its opening hours: Monday to Friday, from 9:00 a.m. to 12:30 p.m. and from 2:00 p.m. to 6:30 p.m., with the exception of holidays and recess days observed by the Agency.

Before contacting the Ombudsman's Office, employees should first raise their concerns with their managers, who are responsible for ensuring compliance with all

requirements and legal and regulatory obligations related to the management and business of their respective areas, associated with activities at ApexBrasil.

However, in circumstances where privacy is required or there is no feedback from managers, the ApexBrasil Ombudsman should be contacted.

Whistleblower complaints received by the ApexBrasil Ombudsman will be treated confidentially.

In the case of whistleblower complaints, anonymity is guaranteed, in accordance with specific internal rules. This channel must therefore be used responsibly and seriously.

Furthermore, any form of retaliation against anyone who reports a concern in good faith to the ApexBrasil's Ombudsman is strictly prohibited.

Transparency

It is the responsibility of the Integrity and Compliance Management, through the CPOT, to ensure the transparency of ApexBrasil's management, ensuring that information and documents related to the Agency's governance, administration and business and others stipulated by law and internal or external rules are duly published on the Agency's official website and/or intranet, so as to enable social control and external and internal auditing and monitoring bodies to act.

Integrity and transparency of information are fundamental to strengthening the compliance environment. In this context, ApexBrasil is committed to maintaining a transparent, respectful, and initiative-taking dialog with all stakeholders, paying close attention to the rules and legislation in force.

In this regard, DIREX is committed to approving ApexBrasil's Open Data Policy, under the responsibility of the Data, Information and Knowledge Management Committee - CGDATA, with the aim of organizing and standardizing the Agency's open data publication processes, in order to guarantee greater availability, access, quality and wide reuse of open data by control bodies, society and ApexBrasil's own employees.

Internal Audit

The Integrity and Compliance Management is also responsible for assessing, through regular internal audits (in compliance with the Annual Internal Audit Activities Plan - PAINT), among other things, compliance with the Compliance Program by all those involved. This task is carried out through the CAI.

These assessment processes aim to identify whether the various pillars of the Program (support from senior management, risk assessment, compliance with the Codes of Ethics and Discipline, effectiveness of internal controls and the whistleblowing channel, among others) are working as planned, whether the expected effects of raising employee awareness are materializing and whether the risks previously identified are

being mitigated as planned and/or whether new risks have arisen in the course of operations.

Risk Management

The Integrity and Compliance Department is responsible for improving the decision-making process by managing the processes and risks involved in ApexBrasil's business. It is also responsible for establishing the governance of the Agency's internal regulatory system, with a focus on excellence in strategic management.

Risk management is essential for the Compliance Program to become efficient and effective. Therefore, any occurrences that threaten integrity, compliance, ethical principles, and transparency must be detected and treatment measures established, all in line with the Risk Management Policy approved by DIREX, which is responsible for defining ApexBrasil's risk appetite.

Integrated Action

Therefore, in view of the duties set out above, the scope and extent of the work of the Integrity and Compliance Management will be aligned and integrated with the duties of the other areas of the Agency, with the aim of complementing the roles and responsibilities of the main lines of action in risk management and internal controls, in accordance with their purpose and regulatory powers.

This proposal for integrated action aims to preserve the governance structure that permeates the other areas of ApexBrasil, as well as sustain efforts that have similar or complementary functions or attributes in a common purpose. The definition of roles and responsibilities between the areas allied to Compliance also aims to avoid conflicts of interest, duplication of work, overlapping activities and efforts in the quest to fulfill the mission and vision of ApexBrasil's areas.

Among the various synergies between the Integrity and Compliance Management and the other areas of the Agency, the following stand out:

LEGAL MANAGEMENT

This is the area responsible for verifying the legal and regulatory compliance of ApexBrasil's internal procedures and for providing legal advice to other areas on compliance and integrity decisions, such as doubts about acts and procedures in internal investigation processes; compliance with international legislation in cases of non-compliant, unlawful and/or unethical behavior by employees of ApexBrasil Offices abroad; the adequacy of Integrity *Due Diligence* in relation to the Consolidation of Labor Laws (CLT), among others.

ETHICS COMMITTEE

The Ethics Committee is the guardian of ApexBrasil's Code of Ethics, and its primary duty is to ensure that it is observed, in order to educate, sensitize and make employees and trainees, in Brazil and abroad, aware of the importance of respecting it.

The members of the Ethics Committee also have the task of participating, when called upon, in Internal Investigation Processes involving employees of the Agency, arising from allegations of non-compliant, unlawful, unethical behavior or behavior that damages the image, reputation and/or assets of ApexBrasil. The purpose of these processes is to ensure that the facts are verified, responsibilities identified and, if necessary, appropriate sanctions and/or improvement actions are suggested.

The Committee is also responsible for establishing criteria for dealing with situations not provided for in the Code of Ethics, settling controversial situations and resolving ethical dilemmas, with the exception of cases involving "Conflicts of Interest", which fall under the advisory competence of Integrity and Compliance Management.

The Committee is responsible for drawing up and amending its Internal Regulations.

INFORMATION AND COMMUNICATION SECURITY MANAGEMENT COMMITTEE

This is the group responsible for ensuring the confidentiality, integrity, and availability of ApexBrasil information. The Committee is also responsible for drawing up, updating, and disseminating the Information and Communication Security Policy and other related internal rules, in order to sensitize, raise awareness and train employees, trainees and collaborators in Brazil and abroad.

The Committee is also responsible for drawing up and amending its Internal Regulations.

The Integrity and Compliance Management, the Legal Management, the Ethics Committee and the Information and Communication Security Management Committee are endowed with authority, independence, and impartiality, with a view to the optimum performance of their respective duties. It is essential that these areas have sufficient material, human, financial and technological resources for the Compliance Program to function fully.

In ApexBrasil's organizational structure, hierarchically, the Integrity and Compliance and Legal Managements report functionally to ApexBrasil's Executive Board, with the possibility of direct access to the Agency's Decision-Making Body and Audit Committee when necessary to ensure the Agency's reputation and integrity, in the use of their attributions. Administratively, they are linked to the Presidency.

6. COMPLIANCE ACTIVITIES

a. APEXBRASIL TEAM

ApexBrasil's Compliance Program applies to the "Three Lines" model of the Institute of Internal Auditors (IIA), so that everyone has their roles defined in managing the Agency's risks and internal controls. These lines of action serve as a basis for the Agency to act efficiently and effectively in fulfilling its institutional mission and strategic objectives, while preserving its image and reputation.

Each of these lines of action plays a distinct role within the Agency's governance structure, acting interdependently and simultaneously.

The members of the Agency's Decision-Making Body and Audit Committee and Executive Board are the main parties served by the "Three Lines" of governance and are best placed to ensure that the model is applied to ApexBrasil's risk management and internal control processes.

ApexBrasil's Three Lines are:

1st Line: Management and Business Activities

They manage and have ownership over the risks and internal controls that apply to them.

The first line includes all the organizational units, both in the core and support activities, which are responsible for the internal controls of their respective areas, with a view to maintaining the compliance of the activities under their attribution.

Employees are primarily responsible for identifying, assessing, controlling and reporting the risks in their areas to the area responsible for Risk Management at ApexBrasil, in line with the applicable laws and internal or external standards, as well as implementing preventive and corrective actions to resolve deficiencies in processes, mitigate risks that are above DIREX's appetite, implementing the respective internal controls in their areas.

In addition to ensuring that its processes and services adhere to the Compliance and Integrity standards, the 1st Line must comply with the recommendations of the 2nd and 3rd line(s) in a timely and complete manner, so that risk mitigation is effective.

2nd Line: Compliance and Risk Management Activities

They continuously supervise and monitor risk management processes, seeking prevention and remediation.

The second line is made up of activities complementary to those of the first line and

focused on risk-related issues, with the aim of providing expertise, tools, and methodologies, supporting, monitoring, and monitoring risk management and the effective implementation of internal controls.

The 2nd Line areas are independent of the 1st Line management and business areas and act as facilitators in the implementation of effective risk management practices (e.g. compliance with laws, standards, regulations and acceptable ethical behavior; internal control; information and technology security; sustainability; and quality assessment), as well as supporting the management and business areas in an advisory capacity.

They are also responsible for testing, monitoring and evaluating adherence to the law and internal or external standards, maintaining ethical, compliance, integrity and transparency standards in line with the principles, guidelines and risk appetite adopted by ApexBrasil, through the Bylaws, the Code of Ethics, the Compliance Program, the Risk Management Policy and the Information and Communication Security Policy, and for systematically and timely reporting the results of their analyses in relation to these issues to the Executive Board and the Agency's Decision-Making Body and Audit Committee.

At ApexBrasil, the 2nd Line is made up of the Integrity and Compliance and Legal Managements, as well as the Ethics Committee and the Information and Communication Security Management Committee, each of which monitors the risks and internal controls related to their purposes and regulatory powers.

3rd Line: Internal Audit

Provides independent assessments through random and temporal monitoring.

The perfect functioning of the entire cycle of risk management and internal controls at ApexBrasil is verified by the Internal Audit, making up the 3rd Line.

Internal Audit carries out periodic and independent checks, focusing on the risks to which the Agency is exposed, assessing risk management actions and the adequacy of internal controls by verifying their quality, sufficiency, compliance, and effectiveness. The Internal Audit's conclusions, as well as the recommendations issued to mitigate the weaknesses identified, are reported to the managers who owe the processes assessed at the end of the work.

Internal Audit also has the role of providing the Agency's Executive Board and Advisory and Fiscal Boards with comprehensive, independent, and objective assessments of the Agency's risks and internal controls.

The independence of this line allows Internal Audit to systematically review the effectiveness of the first two lines, contributing to their improvement.

ApexBrasil's Integrated Internal Control System

As can be seen above, the Agency's Internal Control System is made up of a set of actors and actions that, in a coordinated manner and in accordance with their purposes and regulatory powers, contribute to the same end, which is to ensure that ApexBrasil's assets and resources are properly used, that it is operationally efficient and that everyone, in Brazil and abroad, complies with applicable national and international legislation and internal rules.

This system is constantly being improved and must be detailed in a specific internal rule, to be approved by ApexBrasil's Executive Board and its implementation monitored by Integrity and Compliance Management.

b. PARTNERS, CLIENTS, AND SUPPLIERS

The compliance activities of partners, clients and suppliers must be related to their compliance with the ApexBrasil Compliance Program, acting in accordance with the laws and external or internal rules of ApexBrasil, in order to ensure, throughout their relationship with the Agency, the expected legal, fiscal and integrity regularities (Integrity *Due Diligence* - DDI).

The DDI corresponds to the assessment of the Degree of Integrity Risk (GRI) to which ApexBrasil may be exposed in its relationship with its partners, clients, and suppliers, based on information related to reputation, suitability, and practices for combating fraud and corruption.

The structuring, coordination, and execution of ApexBrasil's Integrity *Due Diligence* (DDI) is the responsibility of the Agency's Integrity and Compliance Management.

In fulfilling its institutional mission, ApexBrasil believes that Brazilian exporting companies or those seeking to internationalize, aligned with the principles of integrity and ethics, have a competitive edge, which favors them in their ventures in the international market, since maturity in governance, compliance and integrity is a relevant point when an investor or business partner makes their choices.

Likewise, the foreign investors and international buyers served by the Agency, its partners, and suppliers, public and private, national, and international, must be imbued with these same principles, making every effort to incorporate responsible business conduct into their businesses.

The fight against fraud, corruption in all its forms and other illicit activities must be an incessant and joint effort by ApexBrasil and its partners, clients and suppliers, so that we have a safe and competitive country in an internationally attractive market, as well as a fairer society and a sustainable future.

7. TRAINING, COMMUNICATION AND KNOWLEDGE MANAGEMENT

The culture of compliance and integrity must be disseminated to the parties involved through institutional actions, including face-to-face and/or online courses, lectures, videoconferences, campaigns, communications, publications, among other modalities and forms, which contain subjects common to the members of the Decision-Making Body, Audit Committee and the Board of Executive Officers, and to all employees at all hierarchical levels, as well as subjects specific to those who carry out activities with greater exposure to the risks of non-compliance and illegality.

The aim is to deepen the knowledge of those involved regarding legal and regulatory requirements and responsibilities, as well as institutional guidelines, risk situations or situations with signs of fraud or corruption in ApexBrasil's management and business. It is essential to develop employees' analytical capacity to diagnose a problem and adopt the best options to resolve it, always guided by upright, legal, and ethical conduct.

The President, Directors and managers (leaders) are considered facilitators of knowledge management and are responsible for using example as the main tool for raising awareness of the Agency's culture of compliance and integrity. Consistency between speech and action is fundamental.

It is through effective communication, information, and training tools, as well as the commitment of ApexBrasil's leaders to multiply the culture of compliance and integrity among their teams, that individual and collective conduct will be cultivated, based on the guidelines stipulated by the Agency.

In order to reaffirm senior management's commitment to integrity, compliance, ethics and transparency, ApexBrasil's Executive Board will support training actions for its members, with the aim of creating a specific path for awareness and development of compliance and integrity issues to be observed in the execution of the Agency's strategy.

In the same vein, every effort will be made to ensure that the topic is disseminated and known by the members of ApexBrasil's Boards, so that the definition of the strategy and monitoring are guided by integrity, compliance, ethics, and transparency.

Likewise, training and communications must reach the Agency's partners, clients, and suppliers, considering the risks identified and the specificities of each relationship.

The Integrity and Compliance Management is responsible for the general coordination of the Communication and Training Plans for the topics covered in the Compliance Program, which should be drawn up and implemented with the support of the areas that make up ApexBrasil's Compliance and Integrity System, mentioned in item 5, as well as the areas responsible for the Agency's communication, marketing and human resources.

a. APEXBRASIL EMPLOYEES**i. Integrity Assessment**

The assessment of the Degree of Integrity Risk (GRI) will also be applied to ApexBrasil staff, in compliance with the governing legislation.

Integrity Due Diligence (DDI) in the hiring processes of future employees and employees already hired by ApexBrasil aims to ratify the reputation and suitability of these professionals and to support DIREX's decision-making, in accordance with specific internal rules.

Likewise, the DDI will cover the integrity assessment related to ApexBrasil's Directors, in accordance with the Agency's Bylaws. The integrity assessment related to the President of ApexBrasil will be the responsibility of the Presidency of the Republic.

ii. Performance Evaluation

In view of the efforts to disseminate and maintain a culture of compliance and integrity at ApexBrasil, the performance evaluation process for its employees in Brazil and abroad should consider competencies that assess commitment to integrity, compliance, ethics, and transparency. The aim is to assess the ability of the Agency's employees to carry out activities in compliance with internal or external laws and regulations, with a focus on preventing non-compliance and unethical conduct, thereby strengthening the internal control environment, as well as the Agency's image and reputation.

iii. Diversity and Inclusion

ApexBrasil believes that diverse attributes such as origin, age, gender, race, sexual orientation, religious beliefs, among other socio-cultural aspects, must be respected and are part of ApexBrasil's identity. In addition, having empathy in complex situations, understanding, and defending human and individual rights fosters positive change in our society, making it fair and supportive.

Therefore, this Compliance Program will act to ensure that diversity and inclusion are respected and observed in all of the Agency's relationships. Any kind of discrimination is repudiated and will be subject to appropriate disciplinary, civil, and criminal sanctions.

b. DISCIPLINE MANAGEMENT

The dissemination of ethical standards and the management of compliance and integrity knowledge is supported by the application of sanctions in the event of misconduct. In this sense, the Compliance Program is structured to legitimize and support decisions involving disciplinary measures and improvement actions.

If a violation of the law and/or of ApexBrasil's external or internal rules is proven, disciplinary measures and improvement actions must be applied fairly, consistently and in proportion to the seriousness of the conduct, ensuring equal treatment for all

employees.

Non-compliance, unlawfulness or misconduct, including the omission of the manager and/or President/Director with regard to discipline management, will result in sanctions under the Consolidation of Labor Laws (CLT), the Bylaws, the ApexBrasil Codes of Ethics and Discipline, as well as other applicable rules and laws.

The disciplinary procedures, in addition to resulting in the application of an appropriate solution to those involved, promoting their awareness and the opportunity to reposition themselves, when appropriate, produce inputs for the various managers to identify, evaluate and correct any weaknesses in the object of the irregularity or regulatory gaps and inconsistencies, promoting their improvement. In addition, information from disciplinary action can serve as an input for improving the Compliance Program.

8. MATURITY OF THE COMPLIANCE PROGRAM

The implementation of ApexBrasil's Compliance Program takes place through a gradual process in which stages of maturity are reached and overcome. The stages are reached as the Agency dedicates the necessary and sufficient material, human, financial and technological resources to the development of the Program, counting on the permanent support of the Decision-Making Body, Audit Committee, the Executive Board, and its employees, in Brazil and abroad.

The progress of the Compliance Program must be guided by a systematic development plan, aimed at its continuous strengthening, as well as the achievement of a common compliance and integrity objective.

Working in an environment of integrity and ethics should not only be an objective of Integrity and Compliance Management, but of all the areas that make up ApexBrasil's organizational structure. In this way, the evolution of the Compliance Program depends on everyone's commitment and good conduct.

Therefore, in order to assist in the implementation of the Compliance Program at ApexBrasil, the following maturity model is presented, containing the following stages of development:

Fragmented;

Managed;

Integrated; and

Structured.

Each stage aims to describe the main characteristics found in the Compliance Program, as ApexBrasil develops towards full implementation and maturity of the Program:

COMPLIANCE PROGRAM IMPLEMENTATION MATURITY

FRAGMENTED

- i. The governance structure is established, publicized, and known, with clear definitions of hierarchy, attributions, and responsibilities.
- ii. Resources for carrying out routine compliance activities are made available as required.
- iii. Macro-processes and management, end and support processes are structured in accordance with the Value Chain.
- iv. The standards of conduct and internal rules are formalized and disseminated.
- v. The Lines interact punctually to coordinate efforts.
- vi. There is an internal financial control system.
- vii. The financial statements are in accordance with international accounting standards.
- viii. There is an internal accounting control system to prevent accounts from being tampered with.
- ix. Compliance issues are considered in the performance evaluation.
- x. Consequence management/discipline is formalized.

MANAGED

- i. The organizational structure is stable and is changed, exceptionally, on the basis of the achievement of strategic objectives, compliance with the principle of segregation of duties, non-overlapping of attributions and the availability of material, human, and financial resources.
- ii. The material, human, financial and technological resources for carrying out routine and non-routine compliance activities are accessible.
- iii. The prioritized, managerial, finalistic and support processes are evaluated and/or transformed and, if necessary, their risks are assessed, with treatment defined and communicated, and internal controls implemented.
- iv. The Compliance area is formally established.
- v. Roles and responsibilities of the areas with regard to compliance activities are clearly defined and disclosed.
- vi. Internal rules and procedures are formalized and disseminated.
- vii. The members of the Executive Board sponsor the continuous development of the Compliance Program.
- viii. The Lines communicate periodically to make use of resources and information.
- ix. Risk assessment (*Integrity Due Diligence*) in the process of hiring members of the Executive Board (Directors) is regular.
- x. The performance of the Compliance Program is supported by appropriate technology solutions.
- xi. Consequence management/discipline is formalized, disseminated, and applied.
- xii. The accounting statements are prepared, where applicable, on the basis of accounting applied to the public sector, in accordance with the requirements of NBC TSP EC (or another CFC standard that may succeed it), whether or not concomitant with business accounting.
- xiii. The accounting activities are independently audited.

MATURITY OF IMPLEMENTATION OF THE COMPLIANCE PROGRAM

INTEGRATED	<ul style="list-style-type: none"> i. Material, human, financial and technological resources are sized according to the established governance structure. ii. Representatives from the Compliance area routinely participate in Agency committees/commissions. iii. The Compliance area manager has the authority and legitimacy to escalate critical issues to the Decision-Making Body and Audit Committee, when necessary. iv. Integrated action between the Lines is being taken advantage of, generating gains in effectiveness and efficiency. v. The Agency's commitment to participating in actions and/or public projects and/or collective efforts related to compliance is supported by the Executive Board. vi. Prioritized managerial, finalistic and support processes are managed, their risks and controls are monitored and continuously improved. vii. Technology solutions that support the Compliance Program are, as necessary, integrated with the Agency's other applications and systems. viii. The risk assessment (<i>Integrity Due Diligence</i>) of suppliers and partners is regular. ix. Risk assessment (<i>Integrity Due Diligence</i>) in the process of hiring employees is regular. x. The identification of Politically Exposed Persons among its clients is regular. xi. Indicators that measure the efficiency and effectiveness of the Compliance Program are defined and applied.
STRUCTURED	<ul style="list-style-type: none"> i. Material, human, financial and technological resources are defined and institutionalized for the full execution of the Compliance Program's mission. ii. The Compliance Program is implemented in all the Agency's offices abroad. iii. The Compliance area operates with legitimacy, independence, objectivity, and impartiality within the scope of its competencies, with technical reporting to senior management or a committee appointed by it and functional reporting to the Presidency. iv. Senior management plays an active strategic role in supervising the Compliance Program. v. The Internal Audit area operates with legitimacy, independence, objectivity, and impartiality within the scope of its competencies, with technical reporting to senior management or a committee appointed by it and functional reporting to the Presidency. vi. Indicators that measure the efficiency and effectiveness of the Compliance Program are part of the Agency's performance analysis. vii. Compliance activities and initiatives are part of the Agency's routine and are present at all levels of governance and hierarchy. viii. The training activities on integrity, compliance, ethics, and transparency are part of a specific trail to raise awareness and develop compliance issues. ix. The integrity of information is respected at all levels of activity, observing the criteria of individual and institutional responsibility, risks, and governance in the use of artificial intelligence or any other technological resources.

The maturity level will be assessed annually so that ApexBrasil can obtain a practical and quantitative perception, measured by technical criteria, as to whether it has reached compliance maturity. Based on this, the Program can be updated to reflect regulatory and legal adjustments, and improvements can be made to its implementation, considering the Agency's experiences and best market practices.

Reaching the maximum maturity of the Program (Structured level) will not dispense with monitoring and the implementation of continuous improvements.

To this end, the Integrity and Compliance Management may: carry out benchmarking with public and/or private institutions, national or international, which are recognized in the market for adopting the best compliance practices; provide opportunities for the technical improvement of employees directly or indirectly involved in the Program; participate in debate forums on the subject; encourage the exchange of information and experiences, presenting proposals for signing Technical Cooperation Agreements; among other actions.

9. FINAL CONSIDERATIONS

In the implementation of the ApexBrasil Compliance Program, in addition to the concepts and definitions stipulated in the rules that make up the Agency's Internal Regulatory System, those used in the national and international legislation guiding this Program will be considered by analogy, in the absence of internal provisions, according to item 2, previously presented, observing the need for the pertinent adjustments.

APEXBRASIL EXECUTIVE BOARD

Normative Act	Approval Instrument	Approval Date	Duration	Responsible technical area
Compliance Program	RD Number. 05-03/2019	05/22/2019	05/22/2019	Governance and Compliance Management
Compliance Program	RD Number 12-04/2022	12/16/2022	12/16/2022	Integrity Management
Compliance Program	RD Number. 07-01/2025	July 2025	07/08/2025	Integrity and Compliance Management