

1. ABOUT

The Compliance Program is one of the guiding elements of ApexBrasil's governance structure and represents the structured set of institutional guidelines and measures aimed at ensuring that the Agency, in fulfilling its institutional mission and achieving its strategic objectives, complies with the law, the external regulations applicable to it, and its internal rules, operational and ethical, as well as prevents, detects, punishes, and remedies fraud, acts of corruption, and other similar offenses.

It is essential for the Agency to effectively promote exports, the internationalization of Brazilian companies, and the attraction of foreign investment in a sustainable manner. ApexBrasil believes that actions, initiatives, and conduct guided by compliance, integrity, ethics, and transparency are the basis for developing effective institutions, a fairer society, and a peaceful world.

We should explain that, for the purposes of this Program, the word "compliance" covers a wide range of topics, such as: combating fraud, corruption, conflict of interests, nepotism, influence peddling, among other similar offenses; ethics; risk management; internal control; information security; data protection; ombudsman's office; discipline management; transparency; and other topics related to the protection of ApexBrasil's image and reputation.

In turn, the word "integrity" (being straight, upright, or incorruptible) is used to refer to actions and initiatives for prevention, detection, punishment, and remediation or for behaviors related to fraud, acts of corruption, conflicts of interest, nepotism, influence peddling, and other similar conduct criminalized under applicable Brazilian and international law.

2. LEGAL AND NORMATIVE BASIS

Considering ApexBrasil's legal status under private law, the origin of its resources in public funds, 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 manner by incorporating the best practices of both private and public sectors.

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

- ❖ Constitution of the Federative Republic of Brazil of 1988.
- ❖ Law No. 10,668 of May 14, 2003 – Authorizes the establishment of ApexBrasil.
- ❖ Decree No. 4,584 of February 5, 2003 – Establishes ApexBrasil.
- ❖ Consolidation of Labor Laws (CLT), approved by Decree-Law No. 5,452 of May 1, 1943.

- ❖ Law No. 12,846 of August 1, 2013 – Anti-Corruption Law.
- ❖ Decree No. 11,129 of July 11, 2022– Regulates the Anti-Corruption Law.
- ❖ Decree-Law No. 2,848 of December 7, 1940 –Penal Code of Brazil.
- ❖ Law No. 9,613 of March 3, 1998 – Money laundering or concealment of assets, rights, and values; and prevention of the misuse of the financial system.
- ❖ Decree No. 9,203 of November 22, 2017 – Governance Policy. Integrity Programs.
- ❖ Decree No. 7,203 of June 4, 2010 – Prohibition of nepotism.
- ❖ Law No. 8,429 of June 02, 1992 – Law of Administrative Impropriety.
- ❖ Law No. 8,137 of December 27, 1990 – Crimes against the tax and economic orders and against consumer relations.
- ❖ Law No. 7,492 of June 16, 1986 – Crimes against the National Financial System.
- ❖ Law No. 12,813 of May 16, 2013 – Conflict of interests.
- ❖ CGU Ordinance No. 909/2015 of April 7, 2015 – Evaluation of corporate integrity programs.
- ❖ Joint CGU/MPOG Normative Instruction No. 01/2016 of May 10, 2016 – Internal controls, risk management, and governance within the scope of the federal executive branch.
- ❖ CGU Ordinance No. 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.
- ❖ CGU Ordinance No. 1,163/2019 of March 20, 2019 – Establishes the governance structure related to Risk Management and the Integrity Program of the Office of the Comptroller General of the Union (CGU).
- ❖ CGU/Office for Transparency and Prevention of Corruption Joint Ordinance No. 6 of September 9, 2022 – Updates the Practical Manual for the Evaluation of Integrity Programs in Administrative Accountability Proceedings of September 3, 2018.
- ❖ CGU/Ministry of Economy Joint Ordinance No. 2 of February 24, 2021 – Regulates the obligations of active transparency to be met by entities with legal personality under private law established as autonomous social service organizations, recipients of social contributions.
- ❖ Law No. 12,527 of November 18, 2011 – Access to Information Law (LAI).
- ❖ Decree No. 7,724 of May 16, 2012, and subsequent amendments – Regulates LAI.
- ❖ Law No. 13,709 of August 14, 2018 – General Data Protection Law (LGPD).
- ❖ Decree No. 10,795 of September 13, 2021 – Integrity Program of the Presidency of the Republic.

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

- ❖ Management Agreement.

- ❖ Strategic Planning.
- ❖ Program Budget.
- ❖ Articles of Incorporation.
- ❖ Bylaws.
- ❖ Code of Ethics and Conduct.
- ❖ Four-Year Strategic Plan.
- ❖ Disciplinary Code.
- ❖ Normative System Management Policy.
- ❖ Information and Communication Security Policy.
- ❖ Risk Management Policy.
- ❖ Legal Action Policy.
- ❖ Internal Audit Policy.
- ❖ Normative Instruction of ApexBrasil (INA) No. 046, which addresses the Ombudsman's Office.
- ❖ INA No. 048, which addresses the Internal Investigation Process.
- ❖ INA No. 050, which addresses the Ethics and Discipline Committee.

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

Understanding and adherence to these documents contribute to everyone's commitment to strengthening the Agency's compliance environment, especially in preventing and addressing fraud and corruption with zero tolerance for any kind of misconduct.

3. GOALS

ApexBrasil has a legal duty to implement its Compliance Program, by virtue of Article 12 of its Articles of Incorporation. This Program is based on the pillars listed in the aforementioned article, which should guide its development, implementation, and ongoing monitoring.

Article 12 of the Articles of Incorporation of ApexBrasil shows that the Agency's Compliance Program is intended to, among other purposes, the implementation of policies and of a culture of compliance aimed at the adherence to the Agency's Normative System, external rules, and other applicable regulations, as well as the prevention, detection, punishment, and remediation of misconduct.

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

- ❖ To ensure legal and normative compliance.

- ❖ To protect the Agency's reputation and image.
- ❖ To contribute to strengthening the institutional identity of ApexBrasil, its values, and the Code of Ethics and Conduct.
- ❖ To integrate compliance, integrity, risk, and transparency management into the Agency's routine, disseminating a culture of compliance.
- ❖ To define roles and responsibilities regarding the different compliance activities.

4. TO WHOM IT APPLIES

The Compliance Program applies to all hierarchical levels within ApexBrasil and must, in accordance with the guidelines of the Agency's Articles of Incorporation, guide the behavior of the members of the Board of Directors (CDA), the Fiscal Council (CFA), and the Executive Board (DIREX), as well as that of its employees, interns, collaborators, partners, clients, and suppliers, both in Brazil and abroad.

ApexBrasil's Offices located abroad must also align with this Compliance Program, and they may incorporate additional integrity, compliance, ethics, and transparency regulations and procedures in accordance with the applicable local legislation and under the guidance and supervision of the department responsible for managing ApexBrasil's Compliance Program.

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

5. COMPLIANCE PROGRAM GOVERNANCE STRUCTURE

❖ APEXBRASIL'S EXECUTIVE BOARD

As the main pillar of the Compliance Program, the President and the Directors commit to support the implementation, execution, and monitoring of the Program, as well as to conduct the Agency's management and business with integrity by observing the highest ethical, compliance, and transparency standards.

As provided in the Articles of Incorporation of ApexBrasil, the Executive Board (DIREX) is responsible for submitting the Code of Ethics and Conduct for approval by the Board of Directors (CDA). Additionally, it is their responsibility to approve the Disciplinary Code and the Compliance Program, in addition to other rules related to the topics of the Program, as well as to ensure the timely provision of the material, human, financial, and technological resources necessary for the implementation and maintenance of the Compliance Program in the Agency's routine.

The President and the Directors ensure the independent performance of the employees appointed to act in the reviews, application, and/or maintenance of integrity, compliance, ethics, and

transparency within the scope of ApexBrasil, and do not admit arbitrary retaliation, punishments, and/or dismissals arising from the regular exercise of their duties.

DIREX is the initiating and decision-making body for Internal Investigation Processes and investigations conducted by external agents, in Brazil and abroad, related to the Agency's employees. Pursuant to the Articles of Incorporation of ApexBrasil, when it comes to an investigation involving member(s) of the DIREX, the CDA, and/or the Fiscal Council (CFA), the CDA will assume this role, except in the case of involvement of the Chairman of the CDA, in which case their conduct will be investigated and judged by the Public Ethics Committee of the Presidency of the Republic.

❖ INTEGRITY MANAGEMENT

The Integrity Department (GINT) is the department responsible for the development, updating, and overall coordination of the Compliance Program; for the internal and external guidance regarding the observance and clarification of compliance-related matters; for the management of integrity risks and internal controls; for conducting integrity due diligence on directors, employees, partners, clients, and suppliers; for the Ombudsman's Office and its citizen services; for managing the transparency environment; and for the Agency's Internal Audit. To conduct these activities, GINT has, within the Agency's organizational structure, the Prevention, Ombudsman, and Transparency Division (CPOT) and the Internal Audit Division (CAI).

Nonconformities, illicit acts, and misconduct

Behaviors in legal, normative, disciplinary, or ethical non-compliance, which have been identified by the Integrity Department, in the continuous monitoring of the environment, or which are reported by ApexBrasil's Ombudsman's Office, will be forwarded for internal or external verification according to specific regulations.

Whistleblower channel

ApexBrasil's Ombudsman's Office is the official channel for receiving internal and external complaints about practices of corruption, fraud, illegal acts, and violations of laws, external regulations applicable to it, and internal, operational, and ethical rules, or other inappropriate conducts that are observed in relation to the Agency's Compliance Program.

Access to the Ombudsman's Office will be preferably through the Integrated Platform for the Ombudsman's Office and Access to Information – Fala.BR (<https://falabr.cgu.gov.br/>), or by the email address: ouvidoria@apexbrasil.com.br, both available 24 hours a day, seven days a week. For in-person assistance, the Ombudsman's Office will be available at the ApexBrasil headquarters during its opening hours: Monday to Friday, from 9:00 AM to 12:30 PM and from 2:00 PM to 6:30 PM, excluding holidays and days off observed by the Agency.

Before contacting the Ombudsman's Office, employees must first expose their concerns to their managers, who are responsible for ensuring compliance with all requirements and legal and normative obligations related to the management and business of their respective areas associated with activities at ApexBrasil.

However, in circumstances where privacy is required or where there is no response from managers, ApexBrasil's Ombudsman's Office must be contacted.

Complaints and reports received by the ApexBrasil's Ombudsman's Office will be treated confidentially.

In the case of reporting, anonymity is guaranteed as per specific internal regulations. Therefore, this channel must be used responsibly and seriously.

Furthermore, retaliation will not be allowed against anyone who reports a concern in good faith to the ApexBrasil's Ombudsman's Office.

In the case of complaints and reports related to the work of employees who perform activities in the Ombudsman's Office, according to the organizational structure, duties, and powers defined in ApexBrasil's Bylaws, these must be forwarded for evaluation and processing by the President of ApexBrasil via email: presidente@apexbrasil.com.br.

Transparency

It is up to the Integrity Department, through the Prevention, Ombudsman, and Transparency Division, to ensure the transparency of ApexBrasil's management, ensuring that the information and documents related to the Agency's governance, administration, and business and others stipulated by law and internal or external regulations are duly published on the official website of the Agency and/or on the intranet in order to enable social control and external and internal audit and monitoring bodies.

The integrity and transparency of information are fundamental for strengthening the compliance environment. In this context, ApexBrasil undertakes to maintain a transparent, respectful, and initiative-taking dialog with all stakeholders paying close attention to current regulations and legislation.

DIREX is committed to approving ApexBrasil's Open Data Policy, which is 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 ensure greater availability, access, quality, and wide reuse of open data by control bodies, society, and ApexBrasil's employees.

Internal Audit

The Integrity Department is also responsible for evaluating, through regular internal audits (in compliance with the Annual Plan of Internal Audit Activities – PAINT), among other points, compliance with the Compliance Program by all parties involved. Such assignment is conducted through the Internal Audit Division.

These evaluation processes aim to identify whether the various pillars of the Program (support from top management, risk assessment, compliance with the Code of Ethics and Conduct and Disciplinary Code, effectiveness of internal controls and the reporting channel, among others) are working as planned, whether the expected employee awareness effects are materializing, and whether previously identified risks are being mitigated as anticipated and/or whether new risks have emerged in the course of operations.

Integrated Action

In view of the duties set out above, the scope and extent of the work of the Integrity Department will be aligned and integrated with the duties of the other areas of the Agency with the objective of complementing the roles and responsibilities of the main lines of action in the management of risks and internal controls, in accordance with its regulatory purposes and powers.

This proposal for integrated action aims to preserve the governance structure that permeates the other areas of ApexBrasil, as well as support efforts that have similar or complementary functions or duties in a common purpose. The definition of roles and responsibilities between the areas allied with compliance aims to avoid conflicts of interest, redundancy of work, and overlapping of activities and efforts in the pursuit of meeting the mission and vision of the areas of ApexBrasil.

Among the various existing synergies between the Integrity Department and the other areas of the Agency, those related to the Managements below stand out.

❖ STRATEGIC MANAGEMENT DEPARTMENT

It is the area responsible for planning and implementing ApexBrasil's Risk Management and Internal Normative System, in addition to the Corporate Strategy and its monitoring.

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

Similarly, best governance practices require an internal framework of regulations capable of clearly and objectively guiding the rules, processes, procedures, behaviors, and conduct to be observed and the consequences for non-compliance. In this way, ApexBrasil's Internal Normative System must be widely disseminated and known by all.

❖ LEGAL DEPARTMENT

It is the area responsible for verifying the legal and normative compliance of ApexBrasil's internal procedures and for providing legal advice to other areas regarding compliance decisions, such as, for example, doubts about acts and procedures in internal investigation processes; compliance with international legislation in cases of non-compliant, illegal, and/or unethical behavior by employees of ApexBrasil's Offices abroad; the suitability of the Integrity Due Diligence in relation to the Consolidation of Labor Laws (CLT); etc.

❖ ETHICS AND DISCIPLINE COMMITTEE

It is the guardian of the Code of Ethics and Conduct and the Disciplinary Code of ApexBrasil, ensuring, as its primary obligation, compliance with such codes to raise awareness and train employees and interns in Brazil and abroad about the importance of respecting them.

The members of the Ethics and Discipline Committee are also responsible for participating, when called, in the Internal Investigation Processes involving the Agency's employees, arising from complaints of non-compliant, illicit, unethical behavior or that generate damage to the image, reputation, and/or assets of ApexBrasil. Such processes aim to ensure that facts are verified, responsibilities identified, and, if necessary, appropriate sanctions and/or improvement actions suggested to be applied.

It is also up to the Committee to establish criteria for addressing situations not provided for in the Code of Ethics and Conduct and in the Disciplinary Code, to resolve controversial situations, to resolve ethical and/or disciplinary dilemmas, and to ensure uniformity of processing in the resolution of similar cases, with the exception of cases involving the topic "Conflict of Interests", which are in the advisory jurisdiction of the Integrity Department.

It is the responsibility of the Committee to propose amendments to its Bylaws to be voted by DIREX.

❖ INFORMATION AND COMMUNICATION SECURITY MANAGEMENT COMMITTEE

It is the group responsible for ensuring the preservation of confidentiality, integrity, and availability of ApexBrasil's information. The Committee is also responsible for preparing, updating, and disseminating the Information and Communication Security Policy and other related internal rules to raise awareness and train employees, interns, and collaborators in Brazil and abroad.

It is also the responsibility of the Committee to propose amendments to its Internal Regulations to be voted by DIREX.

The Integrity Department, the Strategic Management Department (in its role as responsible for managing risks and the internal normative system of ApexBrasil), the Legal Department, the Ethics and Discipline Committee, and the Information and Communication Security Management Committee of ApexBrasil have autonomy, independence, and impartiality aiming at the optimal performance of their respective responsibilities. These areas must have sufficient material, human,

financial, and technological resources for the full operation of the Compliance Program.

In ApexBrasil's organizational framework, hierarchically, the Integrity Department and the Legal Department report functionally to ApexBrasil's Executive Board with the possibility of direct access, when necessary, to the Agency's Board of Directors and Fiscal Council. Administratively, they are linked to the Presidency.

6. COMPLIANCE ACTIVITIES

6.1. APEXBRASIL TEAM

ApexBrasil's Compliance Program applies the "Three Lines" model of the Institute of Internal Auditors (IIA), so that every person has their roles defined in the management of 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, in this way preserving its image and reputation.

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

Members of the Agency's Board of Directors, Fiscal Council, and Executive Board are the main parties served by the "Three Lines" and are in the best position to ensure that the model is applied to ApexBrasil's risk management processes and internal controls.

ApexBrasil's Three Lines are:

First Line: Management and Business Activities

They manage and are responsible for the risks and internal controls applicable to them.

The first line includes all organizational units, both in the core business and in support functions, which are responsible for the internal controls within their respective areas, aiming to ensure compliance of the activities under their purview.

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

In addition to ensuring adherence of processes and services to compliance standards, the First Line must comply with the recommendations of the Second and Third Lines in a timely and complete manner so that risk mitigation is effective.

Second Line: Compliance and Risk Management Activities

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

The second line is formed by complementary activities to those of the first line and they are focused on issues related to risks, aiming to provide expertise, tools, and methodologies and to support, monitor, and question risk management and the effective implementation of internal controls.

Here, the Second Line areas are independent from the First Line management and business areas and act as facilitators in the implementation of effective risk management practices (for example: compliance with laws, rules, regulations, and acceptable ethical behavior; internal control; information and technology security; sustainability; and quality assessment), as well as providing support to the management and business areas in an advisory manner.

These areas are also responsible for testing, monitoring, and evaluating compliance with the law and internal or external rules; for maintaining ethical, compliance, integrity, and transparency standards in line with the principles, guidelines, and risk appetite adopted by ApexBrasil through the Articles of Incorporation, the Code of Ethics and Conduct, the Compliance Program, the Risk Management Policy, and the Information and Communication Security Policy; and for systematically and timely reporting to the Agency's Executive Board, the Board of Directors and the Fiscal Council the results of their reviews in relation to these topics.

At ApexBrasil, the Second Line is composed by the Integrity Department, Strategic Management Department, and Legal Department areas, as well as the Ethics and Discipline Committee and the Information and Communication Security Management Committee, each one working to monitor risks and internal controls related to their purposes and regulatory competences.

Third Line: Internal Audit

It provides independent assessments through random and temporal monitoring.

The perfect operation of the entire risk management and internal controls cycle at ApexBrasil is verified by the Internal Audit, which comprises the Third Line.

The Internal Audit performs periodic and independent verifications focusing on the risks to which the Agency is exposed and evaluating risk management actions and the adequacy of internal controls based on the verification of their quality, sufficiency, compliance, and effectiveness.

The findings of the Internal Audit, as well as the recommendations issued to mitigate the weaknesses identified, are reported to the process owners at the conclusion of the evaluations.

The Internal Audit also has the role of providing the Agency's Executive Board, Board of Directors, and Fiscal Council with comprehensive, independent, and objective assessments related to the Agency's risks and internal controls.

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

ApexBrasil's Integrated Internal Control System

As can be seen above, the Agency's Internal Control System is comprised of a set of players and actions that, in a coordinated manner and in accordance with their purposes and regulatory powers, contribute to the same purpose: that of ensuring the safeguard of the proper use of ApexBrasil's assets and resources, ApexBrasil's operational efficiency, and compliance by all, in Brazil and abroad, with applicable national and international laws and internal rules.

This System is in constant improvement and must be detailed in a specific internal rule to be approved by ApexBrasil's Executive Board, and its execution is monitored by the Integrity Department.

6.2. PARTNERS, CLIENTS, AND SUPPLIERS

The compliance activity of partners, clients, and suppliers must be related to their alignment to ApexBrasil's Compliance Program, acting in accordance with the laws and external or internal rules of ApexBrasil to ensure, throughout their relationship with the Agency, the expected legal, fiscal, and integrity regularities (Integrity Due Diligence – IDD).

The IDD corresponds to the evaluation of the Integrity Risk Level (IRL) to which ApexBrasil may be exposed in the relationship with its partners, clients, and suppliers based on information related to reputation, suitability, and practices to combat fraud and corruption.

The structuring, coordination, and execution of ApexBrasil's Integrity Due Diligence (IDD) are the responsibility of the Agency's Integrity Department.

In fulfilling its institutional mission, ApexBrasil understands that Brazilian companies that export or seek internationalization, in line with the principles of integrity and ethics, have a competitive advantage, which favors them in their endeavors in the international market, as maturity in governance and compliance is a relevant point when an investor or a business partner makes their choices.

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

The fight against fraud, corruption in all its forms, and other wrongdoings must be an ongoing and collaborative effort by ApexBrasil and its partners, clients, and suppliers, to ensure a secure and competitive country in an internationally attractive market, as well as promoting a fairer society and a sustainable future.

7. TRAINING, COMMUNICATION, AND KNOWLEDGE MANAGEMENT

The compliance culture must be disseminated to the parties involved through institutional actions, which include in-person and/or online courses, lectures, videoconferences, campaigns, communications, publications, among other modalities and forms, which cover subjects common for the members of the Board of Directors, the Fiscal Council, the Executive Board, and to all employees of all hierarchical levels, as well as specific topics to those who engage in activities with higher exposure to risks of non-compliance and illegality.

The objective is to deepen the understanding of those involved regarding legal and normative requirements and responsibilities, as well as institutional guidelines, risky situations, or situations with indications of fraud or corruption in the management and business of ApexBrasil. It is essential to develop in employees the analytical ability to diagnose a problem and to adopt the best options to resolve it, being always guided by upright, legal, and ethical conduct.

The President, the Directors, and the managers (leaderships) are considered agents that facilitate knowledge management, and they have the responsibility of using their example as the main tool for raising awareness of the compliance culture at the Agency. Consistency between words and actions is essential.

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

To reaffirm the commitment of the Executive Board to integrity, compliance, ethics, and transparency, it will support training actions for its members to create a specific path of awareness and development of compliance topics to be observed in the execution of the Agency's strategy.

In this same sense, every effort will be made to ensure that the topic is promoted and known by the members of ApexBrasil's Board of Directors and Fiscal Council, so that the definition of the strategy and its monitoring are guided by integrity, compliance, ethics, and transparency.

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

The Integrity Department is responsible for the general coordination of the Communication and Training Plans for the topics addressed in the Compliance Program, which must be prepared and implemented with the support of the areas that comprise ApexBrasil's Compliance System, mentioned in item no. 5, as well as the areas responsible for the Agency's communication, marketing, and human resources.

7.1. APEXBRASIL'S EMPLOYEES

7.1.1. Integrity Assessment

The Integrity Risk Level (IRL) assessment will be applied to ApexBrasil's staff in accordance with the governing legislation.

The integrity review (Integrity Due Diligence - IDD) in the hiring processes of future employees and employees already hired by ApexBrasil aims to ratify the reputation and suitability of these professionals and support DIREX's decision-making according to specific internal rules.

Similarly, the IDD will cover the integrity assessment related to the Directors of ApexBrasil as provided in the Agency's Articles of Incorporation. The integrity assessment related to the President of ApexBrasil will be the responsibility of the Presidency of the Republic.

7.1.2. Performance Evaluation

In view of the efforts to disseminate and maintain the compliance culture at ApexBrasil, the performance evaluation process of ApexBrasil's employees in Brazil and abroad must consider the skills that evaluate the commitment to integrity, compliance, ethics, and transparency. The objective is to evaluate the ability of the Agency's technicians and managers to conduct activities with respect to laws and internal or external rules with a focus on preventing non-compliance and unethical conduct, thus strengthening the internal control environment, as well as the Agency's image and reputation.

7.1.3. 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 and understanding and defending human and individual rights fosters a 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 the Agency's relationships. Any type of discrimination is condemned and will be subject to appropriate disciplinary, civil, and criminal sanctions.

7.2. DISCIPLINE MANAGEMENT

The dissemination of ethical standards and compliance knowledge management is supported by the application of sanctions in case 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 the external or internal rules of ApexBrasil is proven, disciplinary measures and improvement actions must be applied in a fair, consistent, and proportional manner to the seriousness of the conduct, in this way ensuring equal treatment for all employees.

Non-compliance, illegality, or misconduct, including the omission of a manager and/or President/Director regarding the discipline management, will result in sanctions pursuant to the Consolidation of Labor Laws (CLT), the Articles of Incorporation, Code of Ethics and Conduct, and Disciplinary Code of ApexBrasil, as well as other applicable norms and laws.

Disciplinary procedures, in addition to resulting in the application of an appropriate solution to those involved and promoting awareness and opportunity for repositioning, when appropriate, produce inputs for the various managers to identify, assess, and correct any weaknesses in the object of the irregularity or normative gaps and inconsistencies, thus promoting their improvement. In addition, information from disciplinary action can be used as input to improve the Compliance Program.

8. COMPLIANCE PROGRAM MATURITY

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 achieved as the Agency dedicates the necessary and sufficient material, human, financial, and technological resources to the development of the Program with the permanent support of the Board of Directors, the Fiscal Council, the Executive Board, and the Agency's employees in Brazil and abroad.

The advancement 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 objective.

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

Thus, to assist in the implementation of the Compliance Program at ApexBrasil, the maturity model is presented below with the following stages of development:

- ❖ Fragmented.
- ❖ Managed.
- ❖ Integrated.
- ❖ Structured.

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

COMPLIANCE PROGRAM IMPLEMENTATION MATURITY	
FRAGMENTED	<ul style="list-style-type: none"> The governance structure is established, disclosed, and known with clear definitions of hierarchy, duties, and responsibilities. Resources for conducting routine compliance activities are made available as needed. The macro processes and the managerial, core, and support processes are structured according to the Value Chain. The standards of conduct and internal rules are formalized and disclosed. Lines interact from time to time to coordinate efforts. There is an internal financial control system. Financial statements comply with international accounting standards. There is an internal accounting control system to prevent improper changes in accounts. Compliance issues are considered in the performance evaluation. Consequence/Discipline Management is formalized.
MANAGED	<ul style="list-style-type: none"> The organizational structure is stable, being changed, exceptionally, based on the achievement of strategic objectives, adherence to the principle of segregation of duties, avoidance of overlapping responsibilities, and the availability of material, human, and financial resources. The material, human, financial, and technological resources to conduct routine and non-routine compliance activities are accessible. The prioritized managerial, core, and support processes are assessed and/or transformed and, if necessary, their risks are assessed with defined processing and communicated, and internal controls are implemented. The compliance area is formally established. Roles and responsibilities of the areas regarding compliance activities are clearly defined and disclosed. Internal rules and procedures are formalized and disclosed. Members of the Executive Board sponsor the continued development of the Compliance Program. Lines communicate periodically to leverage resources and information. Risk assessment (Integrity Due Diligence) in the process of hiring members of the Executive Board (Directors) is regular. The performance of the Compliance Program is supported by appropriate technology solutions. Consequence/Discipline Management is formalized, disclosed, and applied.

COMPLIANCE PROGRAM IMPLEMENTATION MATURITY	
INTEGRATED	<ul style="list-style-type: none"> • The financial statements are prepared, as applicable, based public sector accounting, following the guidelines required by Brazilian Accounting Standard for the Public Sector (NBC TSP EC) or other standards issued by the Brazilian Federal Accounting Council (CFC) that succeed it) whether concurrently or separate from business accounting. • Accounting activities are independently audited.
INTEGRATED	<ul style="list-style-type: none"> • Material, human, financial, and technological resources are dimensioned according to the established governance structure. • Representatives of the compliance area routinely participate in the Agency's committees/commissions. • The compliance area manager has the authority and legitimacy to escalate critical issues to the Board of Directors and the Fiscal Council when necessary. • The integrated action between the Lines is being used, thus generating gains in effectiveness and efficiency. • The Agency's engagement in participating in collective effort and/or public projects and/or actions related to compliance is supported by the Executive Board. • Prioritized managerial, core, and support processes are managed, and their risks and controls are monitored and continuously improved. • Technology solutions that support the Compliance Program are, as needed, integrated with the Agency's other applications and systems. • Risk assessment (Integrity Due Diligence) of suppliers and partners is regular. • Risk assessment (Integrity Due Diligence) in the process of hiring employees is regular. • The identification of Politically Exposed Persons among the Agency's clients is regular. • Indicators that measure the efficiency and effectiveness of the Compliance Program are defined and applied.
STRUCTURED	<ul style="list-style-type: none"> • Material, human, financial, and technological resources are defined and institutionalized for the full execution of the Compliance Program's mission. • The Compliance Program is implemented in all the Agency's offices abroad. • The Compliance area operates autonomously within the scope of its responsibilities with functional reporting to the Board of Directors or the committee designated by it and with administrative reporting to the Presidency. • The Board of Directors plays an active role in supervising the Compliance Program. • The Internal Audit area operates autonomously within the scope of its responsibilities with functional reporting to the Board of Directors or the committee designated by it and with administrative reporting to the Presidency. • Indicators that measure the efficiency and effectiveness of the Compliance Program are part of the Agency's performance analysis. • Compliance activities and initiatives are integrated into the Agency's routine, being present at all levels of its governance and hierarchy.

The assessment of the maturity level be conducted annually, providing ApexBrasil with a practical and quantitative understanding, measured by technical criteria, regarding its achievement in compliance maturity. Based on this, the Program can be updated to reflect regulatory and legal adjustments and incorporate improvements in its implementation considering the Agency's experiences and the best market practices.

Reaching the maximum program maturity (Structured level) will not exempt the need for ongoing monitoring or implementation of continuous improvements.

For this purpose, the Integrity Department may: perform benchmarking with public and/or private institutions, both national and international, recognized in the market for the adoption of best practices in compliance; facilitate the technical improvement of its collaborators directly or indirectly involved in the Program; participate in forums for discussions on the subject; promote the exchange of information and experiences, presenting proposals for the signing of Technical Cooperation Agreements; among other actions.

9. FINAL REMARKS

In the implementation of ApexBrasil's Compliance Program, in addition to the concepts and definitions established in the norms that comprise the Agency's Internal Normative System, those used in the national and international legislation guiding this Program will be considered by analogy in the absence of internal provisions, as outlined in item no. 2, subject to the need for relevant adjustments.

10. HISTORY OF DEVELOPMENT AND CHANGES

Nomative Act	Instrument of Approval	Date of Approval	Effective Dates	Technical Area Responsible
Compliance Program	DIREX Resolution No. 05-03/2019	May 22, 2019	From May 22, 2019, to Dec 16, 2022	Governance and Compliance Department
Compliance Program	DIREX Resoution No. 12-04/2022	Dec 16, 2022	Since Dec 16, 2022	Integrity Department