



Anti-Corruption Policy.

Establishing guidelines for conducting its work on behalf of the 7COMm Group.



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Presentation

The publication of Law 12,846 on August 1, 2013 is part of the Brazilian government's anti-corruption program and reinforces the international commitment assumed in Decree 5,687/06 that publishes the United Nations (UN) Convention against corruption, adopted by the United Nations General Assembly on 10/31/2003 and signed by Brazil on 12/09/2003.

Law 12,846/13 (Anti-Corruption Law or Clean Company Law) provides for the objective, administrative and civil liability of legal entities for the practice of harmful acts that are committed in their interest or benefit.

This Anti-Corruption Policy was developed to help the directors, administrators, employees, interns, apprentices and collaborators of the 7COMM Group, as well as other publics with which the 7COMm Group relates, to understand the internal policies and anti-corruption practices adopted by the 7COMm Group.

7COMm Group understands the importance of Compliance as a set of measures that can be applied in all areas of activity. At 7COMm Group, integrity and honesty are reflected in all of our business practices.

2

Goals

The purpose of this Anti-Corruption Policy is to strengthen prevention, investigation and punishment mechanisms, crystallizing an organizational culture intolerant of corruption, fraud and misconduct. As well as, describe and explain the expected conduct in borderline situations related to bribery and corruption, and highlight the specific Compliance requirements related to it, reinforcing the commitment to conduct all business with the highest standards of honesty and integrity.

It is not expected that this document covers all possible situations of corruption that may arise, therefore, it defines basic procedures that should guide the conduct of all directors, administrators, employees, interns, apprentices, collaborators and third parties who should be guided by principles established in this document, as well as by the other policies, rules and procedures available in the 7COMm Group.

It should also serve as a parameter for any business and administrative activities, also cov-

ering any and all activities conducted on behalf of the 7COMm Group through third parties.

The eventual violation of anti-corruption laws exposes the 7COMm Group, directors, administrators, employees, interns, apprentices and collaborators of the 7COMM Group and third parties involved, regardless of nationality or place of residence, to criminal, civil and/or administrative liabilities, and to fines and penalties established in specific legislation.

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Integrity Program

The 7COMm Group Integrity Program is focused on curbing inappropriate conduct by our directors, administrators, employees, interns, apprentices, collaborators and third parties involved, who act on behalf of the 7COMm Group, both in Brazil and abroad and is composed of a set of policies, rules and procedures aimed at preventing, monitoring, detecting and responding to harmful acts provided for in Law 12,846/2013 (Anti-Corruption Law or Clean Company Law).

The other documents of the 7COMm Group that relate to the Integrity Program are:

- Corporate Code of Conduct and Ethics;
- Anti-Corruption Policy;
- 7COMm Group Good Practices Manual.

Each of these documents has specific objectives, but in all of them the 7COMm Group's commitment to lawful practices is reinforced.

The 7COMm Group's Integrity Program also includes the following actions, all under the guidance and coordination of Senior Management together with Legal:

- a. Distribution and/or availability of this Policy to all recipients;
- b. Train recipients, about its content, in particular, what are acts of corruption and similar illicit acts, how they develop and can be prevented or controlled;
- c. Include specific liability clauses in contracts entered into with customers, suppliers or business partners for acts of corruption or similar illicit acts that may be committed by them and about which the 7COMm Group has no prior knowledge;
- d. Disseminate the 7COMm Group documents related to this Policy among the company's

managers, reinforcing their commitment to the adherence of their actions to the 7COMm Group Integrity Program.

e. Deal with complaints and facts presented directly to managers or even anonymously.

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Behavioral Guidelines

Every recipient involved in any and all activities carried out by the 7COMm Group, or on its behalf, must strictly observe the following guidelines:

5.1. Relationship with the Public Sector

The 7COMm Group does not allow anyone on its behalf to seek undue or pecuniary advantages, whether offering or receiving, in contracting with the public administration.

The 7COMm Group does not authorize anyone to, on its behalf, offer any type of undue advantage to public agents with the aim of hastening or facilitating the obtaining of licenses, authorizations and permissions.

As an example, harmful acts against the public administration are also considered when a person(s) or company(ies) who, with regard to bids and contracts:

- a. Prevent, frustrate, disturb or defraud, through adjustment or not, combination or any other expedient, the competitive nature of a public bidding procedure;
- b. Remove or seek to remove bidders, through fraud or offering of advantage of any kind;
- c. Create, fraudulently or irregularly, a legal entity to participate in a public bidding process or enter into an administrative contract;
- d. Manipulate or defraud the economic-financial balance of contracts entered into with the public administration.

5.2. Relationship with Business Partners, Suppliers, Service Providers, Resellers or Customers

The eventuality of the 7COMm Group being held responsible for acts resulting from relation-

ships with third parties to act as its commercial partner, service providers, resellers and/or supplier implies the need to obtain minimum and sufficient information about these characters that make it possible to assess their integrity and conduct.

It is especially sought to assess possible corporate, administrative and family ties between the customer, supplier, service providers, resellers and/or the commercial partner with a public agent. In any situation, the possibility of an undue or pecuniary advantage, or conflict of interests must be avoided.

All contracts signed with customers, suppliers, service providers, resellers or commercial partners seek to have clauses that attest to the existence of practices that curb acts of corruption and money laundering and attest to the third party's commitment to compliance with anti-corruption and anti-bribery laws.

5.3. Contributions, Donations or Sponsorships

The 7COMm Group does not make contributions or donations to politicians, political parties and unions, nor does it oppose the exercise, by directors, administrators, employees, interns, apprentices and collaborators, provided that it is strictly personal and without interference in their responsibilities with the 7COMm Group.

Any contributions, donations or sponsorship in exchange for favors with any natural or legal person, public agent or not, is prohibited, even if the beneficiary is a genuine charitable institution. It being certain that the contribution, donation or sponsorship must be made to the charity and not the individual and, under no circumstances, payment can be made in cash or through deposit / pix in a personal account.

All sponsorships must be based on contracts formalized between the 7COMm Group and institutions that will receive sponsorship and must follow the guidelines of this Policy and other applicable ones.

5.4. Gifts, Gifts, Entertainment and Hospitality.

The acceptance of gifts, favors and services depends on the usual practices of the market, and everything that could or seems to compromise the 7COMm Group or any people in-

volved should be avoided.

To preserve the exemption in the business of the 7COMm Group:

a. You must not accept or offer, directly or indirectly, favors, money or gifts that may affect decisions, facilitate business or benefit third parties. In order to resolve any doubts about the application of this precept, it is recommended to observe the limit value of BRL 100.00 (one hundred) reais. Any item accepted that exceeds this amount must be duly communicated and delivered to the direct superior and/or the Board of Directors so that the donation can be arranged.

b. Promotional gifts with no commercial value are not understood as an improper relationship, nor do they conflict with the precepts of this Policy;

c. Expenses may be incurred that aim to strengthen 7COMm Group relationship with customers, such as meals, meetings, entertainment, accommodation and travel, respecting reasonable limits that do not imply any embarrassment for the guests or possible retribution on their part.

5.5. Money Laundering and Terrorism Financing (PLD FT)

Money laundering is understood to be economic and financial practices whose purpose is to conceal the illicit origin of certain assets, so that they appear to have a licit origin.

The 7COMm Group does not condone such practices and if they are identified, they will be appropriately reported to the competent authorities. In this way, it is expected that constant zeal will be adopted:

a. For compliance with the laws and regulations applicable to the activities carried out by the 7COMm Group, as well as the self-regulations to which we formally adhere;

b. Compliance with our policies, rules and controls to prevent and combat money laundering, terrorist financing, corruption, bribery and illegal acts of any nature.

Terrorist financing, on the other hand, is the process of disguising the distribution of resources to be used in terrorist activities, whose source is usually from the activities of other criminal organizations related to drug trafficking, arms and ammunition smuggling, or even originating from illicit activities. , such as donations to “front” institutions.

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It is very similar to the practice of money laundering, however, normally, terrorists use resources obtained in a lawful way with the focus of reducing the threats of being discovered before the terrorist act.

5.5.1. Responsibilities and Enforcement Mechanisms

The 7COMm Group is strongly committed to ethics, business transparency and integrity, actively working to disseminate the Compliance culture.

a. Senior Management: (i) provides resources so that the entire team involved in the process can achieve its objectives, always following the guidelines described in the Integrity Program; (ii) ensures the prevention of crimes of money laundering and financing of terrorism and (iii) decides on the guidelines applicable to issues of prevention of crimes of money laundering and financing of terrorism (“PLD FT”) covered by this Anti-Corruption Policy.

b. WeAre7: (i) guarantees the annual training of all employees with regard to the prevention of money laundering and terrorist financing (PLD/FT); (ii) annually trains all employees in co

c. Legal Department:(i) provides the content that will be made available for training all recipients; (ii) guarantees regulatory requirements related to PLD FT;

d. Know Your Partner Process – KYP (Know Your Partner):KYP is a set of rules, procedures and controls that must be adopted for verification and acceptance of suppliers, service providers, resellers and commercial partners, preventing the relationship of disreputable companies or suspected involvement in illegal activities. For those who present a higher risk, the Due Diligence process will be studied.

e. Know Your Client Process – KYC (Know Your Client): 7COMm Group spares no efforts to improve its KYC process with actions aimed at getting to know its clients and their activities.

5.6 Training

An effective and mandatory anti-money laundering and terrorist financing training program to ensure that:

a. All recipients of the 7COMm Group, including senior management, receive adequate training;

b. Training is ongoing, incorporating current events and changes in laws and regulations on

preventing and combating money laundering and terrorist financing;

c. A record is maintained of everyone who has received training to ensure that they meet mandatory requirements.

5.7. Accounting Records

All accounting records of the 7COMm Group fairly and accurately reflect the transactions involving the business and/or disposition of the assets of the 7COMm Group, taking into account the regulations and accounting practices applied.

All expenses are accurately accounted for, including proper supporting documentation, and are entered into due records and classifications when paid or reimbursed.

5.8. Conflicts of Interest

The 7COMm Group requires all recipients of this Policy to be attentive and avoid any interaction with public agents that may be identified as a conflict of interest, situations that are characterized by the impossibility of certifying the

impartiality in judgments and decisions or any type of undue or pecuniary advantage.

7 Warning Signs

To ensure compliance with anti-corruption laws, all recipients must be aware of risk factors that may indicate that improper benefits or payments may be taking place.

Warning signs are not necessarily evidence of corruption, nor do they automatically disqualify those representing the 7COMm Group. However, they raise suspicions that must be investigated until we are sure that these signs do not indicate a real infraction.

It is important that everyone pay special attention to the following warning signs regarding any operation in which payment or benefit may be received by anyone, whether a public official, including their family members, or not:

a. The counterparty has a reputation in the market for involvement, albeit indirect, in matters related to corruption, unethical or potentially illegal acts;

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- b. Any type of payment or receipt made in kind (cash);
- c. The counterparty is controlled by a public official or has a close relationship with the Government;
- d. The counterparty is recommended by a public official;
- e. The counterparty provides or requests an invoice or other documents with non-specific and subjective descriptions of income and expenses that generate difficulties related to the identification of the origin and destination of the amounts involved;
- f. The counterparty refuses or tries to hinder the inclusion of anti-corruption clauses in the written contract and/or adherence to this Anti-Corruption Policy;
- g. The counterparty proposes a financial operation that differs from the commercial practices usually adopted for the type of operation/business to be carried out;
- h. Perception that donating to a charity at the request of a public official is an exchange for government action.

The above list is not exhaustive and the indications may vary depending on the nature of the operation, the request for payment and/or expense, as well as the geographic location.

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Conduct Punishable by the Anti-Corruption Law or the Clean Company Law

The 7COMm Group's Anti-Corruption Policy allows it or its companies, its directors, administrators, employees, interns, apprentices and collaborators, to be investigated through the regulatory bodies of different jurisdictions, and, depending on the circumstances, prosecuted administratively, civilly and/or criminally. Any recipient caught in violation of the Anti-Corruption Policy will be subject to disciplinary measures, applied in accordance with the laws and other policies of each company.

Third parties who maintain a relationship with the 7COMm Group regardless of contract, caught in violation of the Anti-Corruption Policy, will be subject to the termination of their

commercial relationship with the 7COMm Group, without prejudice to the reparative, administrative and legal measures necessary to repair the committed violation.

No recipient will be retaliated against or penalized for delay or loss of business resulting from your refusal to pay or receive a bribe.

The 7COMm Group will not allow or tolerate any type of retaliation against anyone who files a good faith report or claim of violation of this Policy or anti-corruption laws. Any directors, administrators, employees, interns, apprentices and collaborators who engage in retaliation will be subject to disciplinary acts by the 7COMm Group, up to and including termination of employment.

