



**ANTICORRUPTION POLICY**  
**IG4 CAPITAL INVESTIMENTOS LTDA.**


(“Manager”)

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1	6 (June 2022)	11/30/2016, and, when applicable, as from obtainment of CVM consent to operate as fund manager

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## CHAPTER I

### PURPOSE AND SCOPE

1.1. Under the terms of the Law 12,846/2013 (“Anticorruption Law”), this Anticorruption Policy (“Policy”) is permanent and has the purpose of setting the guidelines and measures necessary to prevent, detect and remedy illegal and corruption acts against Public Administration, as well as any other act that violates the Code of Ethics and Conduct of IG4 Capital, and/or are in non-conformity with applicable domestic and foreign laws.

1.2. This Policy is also intended to prevent and manage situations of potential offering or receiving undue advantages, aiming at mitigating reputational, operational and financial risks the Manager is exposed to, as well as safeguarding all its workers, third parties, Board members and officers.

1.3. The guidelines of this Policy are aligned with the Code of Ethics and Conduct, in conformity with Brazilian and international laws and rules regarding fight against corruption, including, but not being limited to:

- Law no. 12,846/2013 (“Anticorruption Law”);
- Decree no 8,420/2015, which regulates the Anticorruption Law;
- Decree-Law 2,848/1940 (“Penal Code”);
- Foreign Corrupt Practices Act (“FCPA”);
- UK Bribery Act (“UKBA”).

1.4. The Policy applies to all workers, Board members, committee members and officers of the Manager.

1.5. Legal entities will be objectively liable, in administrative and civil spheres, for acts practiced by their workers detrimental to the Public Administration, domestic or foreign, notwithstanding the individual liability of the perpetrator, co-perpetrator or participant in an illegal act, to the extent of their guilt.

Public officials, which are subject to Anticorruption Rules, are considered to be, without limitation:

- (i) any individual who, even if temporarily and with no reward, is on duty, employed or keeping a public function in a governmental entity, an entity controlled by the government or an entity owned by the government;
- (ii) any individual who is running for or occupying a public position;
- (iii) any political party or representative of a political party;
- (iv) relatives of public officials up to second degree (spouses, children and stepchildren, parents, grandparents, siblings, uncles, aunts, nephews and nieces); and
- (v) civil registry officers, public officials' assistants and representatives of public pension funds.

1.5. Foreign public administration comprises State bodies and entities or diplomatic representations from foreign countries, of any level or government sphere, as well as legal entities directly or indirectly controlled by the public authority of foreign countries and international public organizations.

## **CHAPTER II**

### **ANTICORRUPTION PRINCIPLES**

2.1. Practice of acts of corruption is expressly forbidden by the Manager.

2.2. The Manager repudiates and does not authorize any practice of act of corruption and other illegal acts against Public Administration, domestic or foreign, under the terms of the aforementioned legislations or any other that may become applicable, considering their respective updates, such as: (i) United Nations Convention against Corruption (UN Convention); World Economic Forum's Partnering against Corruption Initiative (PACI); (iii) Convention against Corruption of the Organization of American States (OAS Convention); (iv) Organization for Economic Cooperation and Development Convention on Bribery of Foreign Public Officials in International Trading Transactions (OECD Convention); (v) Bidding Law (Law no. 8,666/93 and Law no. 14,133/2021) and (vii) Administrative Improbity Law (Law no. 8,429/92);

2.3. For IG4 Capital, any act of corruption, regardless of the circumstance, is unacceptable. In order to prevent and fight corruption, the Manager shall adopt, in addition to the review and supervision of compliance with this Policy, the following guidelines:

- Anticorruption Training;
- Regularly reviewed internal procedures and controls;
- Internal system for irregularity reporting (Reporting Channel);
- Daily implementation of a Compliance culture, in conformity with the Code of Ethics and Conduct of IG4 Capital;

2.4. All workers, as well as the Manager, cannot allow and accept any act of corruption and/or undue advantage (private corruption), working actively against such conducts. Any corrupt practice, including bribery, undue advantage and private corruption (a criminally unusual conduct, but morally illicit), is forbidden and must be immediately reported.

2.5. Fighting corruption is an essential element of the ethical conduct of IG4 Capital and all of its Workers, who must prevent and detect any act of corruption, as well as not practicing corrupt conducts and employ every effort to prevent corruption,

bribery and/or any type of undue advantage.

2.6. In case of doubt, please contact the Department of Compliance.

### **CHAPTER III**

#### **DETRIMENTAL ACTS**

3.1. Acts detrimental to public administration, domestic or foreign, are considered to be those which damage domestic or foreign public property, against principles of public administration or against international commitments undertaken by Brazil, so defined ("Acts of Corruption"):

- (i) promising, offering or giving, directly or indirectly, undue advantage to a public official, or to a third party related to them;
- (ii) provenly financing, funding, sponsoring or by any means endowing the practice or illegal acts provided for in Anticorruption Standards;
- (iii) provenly using a third party, either an individual or a corporation, to conceal or dissimulate their actual interests or the identity of the beneficiary of the acts practiced.
- (iv) regarding biddings and contracts:
  - frustrating or defrauding, upon adjustment, arrangement or any other means, the competitive nature of public bidding procedure;
  - impeding, disturbing or defrauding any act of a public bidding procedure;
  - removing or trying to remove a bidder, by defrauding or offering advantage of any nature;
  - defrauding a public bidding or the contract arising from it;
  - creating, fraudulently or irregularly, a legal entity to participate in a public bidding or to execute an administrative contract;
  - obtaining undue advantage or benefit, fraudulently, from changes or extensions of contracts signed with public administration, without authorization by law, in the bid invitation or in the respective contractual instruments; or

- manipulating or defrauding the economic-financial balance of the contracts signed with public administration.

(v) hindering activities of investigation or inspection by public bodies, entities or officials, or intervene in their actions, including in the scope of regulating agencies and supervisory bodies of the national financial system.

3.2. The practice of any Act of Corruption is forbidden and no Worker shall be punished internally in the event of non-conclusion or delay in carrying out an operation for refusing to practice an Act of Corruption.

3.3. The Workers must act with good faith and question the legitimacy of any payments requested by public officials, which are not founded by legal or regulatory provisions.

3.4. In case of doubt about the characterization of an action as an Act of Corruption, about the legitimacy of a payment requested by a public official or about a suspected Act of Corruption in the scope of an operation, the Worker must report such doubt or suspicion to the Department of Compliance, refraining from taking any action until they receive further instructions from the Compliance Officer.

3.5. It is noted that any amount offered to public officials, as low as it may be and regardless of being accepted or not by the public official, may characterize violation to Anticorruption Standards and cause the enforcement of the penalties provided for by this Policy, by the Code of Ethics and Conduct or by law.

#### **CHAPTER IV AVOIDABLE AND FORBIDDEN BEHAVIORS**

4.1. All workers at IG4 Capital must be alert for their conduct, so that it does not characterize, yet unintentionally, any type of undue advantage (monetary or not) with domestic and foreign public officials.

4.2. It is forbidden, directly or indirectly, giving, promising, offering, requesting or accepting to or from any individual or third party any advantage in exchange for favor and/or influence.

4.3. Workers must also be alert not to put the Manager into any transaction/business where there is a risk of corruption and/or money laundry, considering that this Policy, jointly with the Code of Ethics and Conduct, presents the

forbidden behaviors that may be considered and construed as corruption, bribery or undue advantage.

4.4. Any act involving bribery or undue advantage is strictly forbidden, namely in connection with: i) any public official or private person; ii) clients or partners; iii) political parties; iv) organizations such as unions, foundations, charity institutions, and more; v) friends and relatives.

4.5. According to the Code of Ethics, offering and receiving treats, gifts and hospitalities, despite seeming to be common in the corporate environment, may lead to corrupt practices and conflict of interests.

4.6. Therefore, it is expressly prohibited to offer or receive any treats, gifts or hospitalities from or to Public Officials, Politically Exposed People ("PEP"), Private Agents or to any third party, with the purpose of obtaining or keeping business or benefits for the Manager, for oneself or for someone else.

4.7. All workers are subject to the internal policy of the Manager on receiving gifts and invitations, according to the Code of Ethics and Conduct, and receiving any treats or gifts that are not in compliance with the rules of IG4 is prohibited. Furthermore, accepting cash values or any other payment method as a gift is expressly prohibited.

4.8. The Workers are prohibited from giving any amount of money to public officials or private workers with the purpose of speeding up the development of administrative procedures or to obtain authorizations. Moreover, the Workers must not accept payments nor make payments in cash which are not documented.

4.9. In the exceptional event of an offering or receiving surpasses the limit set in the Code of Ethics and Conduct, it must be previously approved by the Department of Compliance, upon filling the Form attached to this Policy.

4.8. It is a duty of all IG4 Workers reporting, as soon as possible, to the Department of Compliance, any transaction that does not comply with the guidelines of this Anticorruption Policy or with any other policy of the Manager, through the Reporting Channel or the e-mail [compliance@ig4capital.com](mailto:compliance@ig4capital.com).

## **CHAPTER V GENERAL PROVISIONS**

5.1. This Policy must be reviewed at least every 2 (two) years, except when the aforementioned events demand adjustments in shorter periods, considering (i)

regulatory changes; (ii) changes in the best practices adopted by the market; (iii) occasional deficiencies found, and more, in order to ensure adequate and permanent monitoring, as well as improving internal controls and processes.

5.2. All relevant documents and information for the risk management process are archived, in physical or digital media, at the headquarters of the Manager, for a minimum period of 5 (five) years.

5.3. Failing to enforce any of the guidelines set in this Policy shall subject the offenders to disciplinary sanctions, in addition to those of applicable laws.

5.4. The Reporting Channel is a communication tool and it is available at the website of the Manager for internal and external public, preserving the identity of the people involved and the confidentiality of the information provided.

5.5. It is everyone's duty to report suspicious activities, as well as it is everyone's right to forward questions and/or clarifications. In order to contact the Department of Compliance, the worker may send an e-mail to [compliance@ig4capital.com](mailto:compliance@ig4capital.com) or use the Reporting Channel available at the website [www.ig4capital.com](http://www.ig4capital.com).



**APPENDIX I**

**FORM FOR OFFERING OR RECEIVING TREATS, GIFTS AND HOSPITALITIES**

<b>Name of the Worker:</b>
<b>Position:</b>
<b>Area:</b>
<b>Company or individual who intends to receive or offer the treat, gift or hospitality:</b>
<b>Details of the treat, gift or hospitality:</b>
<b>Value of the item (if it is not possible to assess the accurate value, indicate an estimate value):</b>
<b>Comments of the Department of Compliance:</b>

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\_\_\_\_\_  
Applicant

\_\_\_\_\_  
Compliance Department