



Relationship Policy with Public Authorities: Anti-Corruption and Anti-Bribery

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PURPOSE

This policy, aligned with Insi's Code of Ethics and Conduct, serves as a guide and establishes rules to be followed by Insi's employees and representatives in their interactions with the public sector—at any level and with entities of the direct or indirect public administration—to prevent any act of national or transnational corruption resulting from the company's operations.

In addition to the rules outlined here, all laws applicable to Insi's business must be respected and followed by employees in their actions and relationships, especially the Brazilian Anti-Corruption Law (No. 12.846/2013).

Please note that this document does not list all possible unlawful acts. For this reason, applicable legislation and Insi's internal rules should always be consulted to avoid any violations in dealings with the government.

SCOPE

This policy applies to all managers, employees, suppliers, service providers, intermediary agents, and anyone who provides services for or on behalf of Insi, regardless of position or hierarchical level. Everyone must formally adhere to this policy, promote it, and strictly follow it in all activities—especially those involving interactions with government agents.

DEFINITIONS

Public Agent: a political agent, public servant, or any person performing a public function—even temporarily and without compensation—through election, examination, appointment, designation, contract, or any other form of investiture or assignment. This includes mandate, position, job, or function. For the purposes of this policy, any agency, authority, company, entity, concessionaire, or

government body, as well as their representatives, are considered Public Agents. (Definition from Law No. 8.429/1992).

Corruption (Bribery): any act that harms the public administration—national or foreign—or undermines its assets, principles, or international commitments. Active corruption is defined as: "Offering or promising an undue advantage to a public official in order to get him to perform, omit, or delay an official act" (Article 333 of the Brazilian Penal Code).

Passive: "Soliciting or receiving, for oneself or for others, directly or indirectly, even when out of office or before assuming it, but because of it, an undue advantage, or accepting a promise of such an advantage" (Article 317 of the Brazilian Penal Code).

Bribe: the means by which corruption is carried out, involving the act of promising, offering, or paying an authority, government official, or Public Agent any sum of money or other benefits.

Conflict of interest: any situation in which an individual or legal entity doing business with Insi is involved in a decision-making process where they have the power to influence or direct the outcome, potentially benefiting themselves, a family member, or a third party with whom they have a relationship or interest that may impair their judgment.

Facilitation payment: a payment made to Public Agents to expedite processes such as certificates, licenses, permits, or other requests to which the company is legally entitled, meeting all formal requirements. Commonly referred to as an "urgency fee."

Undue advantage: any illicit payment or offer made to obtain a benefit for or on behalf of Insi, whether in the form of money (regardless of currency), gifts, presents, gratuities, etc.

Gifts (institutional): items of no commercial value, usually branded with the company logo, such as office supplies, calendars, clothing, and similar items.

Gifts (personal): items that provide personal pleasure, have market value, and are usually not branded with the company logo. These are given with the intent to thank or favor the recipient. Examples include chocolates, beverages, gift baskets, event invitations, luxury items, and other personal-use goods.

Entertainment: events of a cultural, sporting, or social nature primarily intended for participant leisure.

Politically Exposed Persons: Public Officials who currently hold or have held, within the last five years, in Brazil or abroad, a significant public position, function, or job, along with their representatives, family members, or others closely connected to them (Resolution No. 29, dated 12/07/2017 - COAF).

Anti-Corruption Law: also known as the Clean Company Law, refers to Law No. 12.846/2013, which addresses the administrative and civil liability of legal entities for engaging in corrupt acts against domestic or foreign public administrations.

PRINCIPLES AND DUTIES

Insi does not tolerate any acts of corruption, bribery, or other undue advantages—national or transnational—whether practiced directly or indirectly, in relations with Public Officials.

All employees and third parties to whom this document applies must follow this policy, uphold the highest standards of integrity, legality, ethics, and transparency in dealings with public authorities, and report any violations or suspected violations of this policy, national or foreign anti-corruption laws, or the general provisions of Insi's Code of Ethics and Conduct.

CONTRACTS

Insi strives to combat corruption not only in its internal processes but also in its relations with third parties. It requires a contractual

commitment to comply with national and foreign anti-corruption laws, as well as respect for its own internal rules, principles, and values.

Failure to comply with contractual clauses on preventing and combating corruption may result in contract termination and other penalties.

Contract managers, along with the Legal and Compliance department, are responsible for monitoring legal compliance, internal policies, and contractual obligations. They must remain vigilant to any risks or vulnerabilities that could compromise Insi's integrity.

SPECIFIC GUIDELINES

Relations and interactions with Public Agents

Interactions with Public Agents must be objective and transparent, strictly for purposes related to Insi's activities, and must not involve any personal matters between the parties. These interactions must always comply with applicable legislation, particularly the Anti-Corruption Law, as well as Insi's internal policies and those governing Public Agents.

Whenever possible, interactions with Public Agents should be attended by at least two Insi employees and conducted by professionals trained in this policy and Insi's Code of Ethics and Conduct. They should always occur in professional settings and during business hours.

Government relations activities must be carried out in an impartial and independent manner, without any attachment to political or partisan ideologies, and must be aimed exclusively at defending Insi's legitimate interests.

Insi employees are expressly forbidden from maintaining any relationship with a Public Agent who:

- Attempts to interfere with or obstruct supervision or investigation by any public, supervisory, or regulatory body;
- Offers, promises, delivers, or accepts—directly or through third parties—economic benefits or undue advantages of any kind to or from Public Agents to facilitate business, omit acts, or obtain benefits for Insi, even if indirect, such as authorizations, licenses, permits, or certificates;
- Contributes to acts that could be considered harmful to the public administration or intended to obtain any undue advantage for Insi.

Records of meetings and interactions

All meetings, encounters, and interactions with Public Officials must have a pre-defined agenda and be formalized in writing, with a list of participants, to improve transparency. All interactions must include the participation of more than one Insi employee.

When possible, meetings should be recorded. If this is not feasible, the collaborator must formalize the meeting by email, including:

- Location and date of the meeting
- Full names and positions of participants
- Subjects discussed
- Decisions made

The Compliance Department will be responsible for receiving and managing the records, reporting relevant data and situations to the Compliance Committee as needed, adopting appropriate measures, and ensuring the confidentiality of the information provided.

The following are exempt from registration:

- Meetings, encounters, and interactions related to Insi's regular business routine, i.e., in situations where business is conducted (e.g., tenders, inspections);

- Interactions related to Insi's routine and operational activities, such as those of an administrative nature (e.g., registrations, obtaining permits, licenses, etc.);
- Interactions with Public Agents who are members of the judiciary, in defense of Insi's legitimate interests.
- It is not recommended to hold meetings in informal and/or entertainment venues such as bars or restaurants. Meetings should also be avoided outside of business hours.

Payments

All payments to the government—at any level, whether direct or indirect—must follow official procedures and be made in accordance with legal or regulatory requirements. Whenever a payment must be made to the government on behalf of Insi, the proper procedures must be followed, and the payment must go through official channels.

If payment details are provided by Public Agents, verify that the information is official and not linked to personal bank accounts. In case of doubt, do not proceed with the payment and consult the Compliance Department.

Payments in kind must not be made to Public Officials in exchange for any undue advantage or benefit.

Requesting and sending information

Requests for information from public authorities must always be made through legal and written channels, in compliance with current laws and preserving the confidentiality of Insi's information.

Routine operational information related to business activities may be provided through standard communication channels, provided ethical standards and this policy's guidelines are strictly followed.

Tenders

When participating in public tenders and calls for tenders, Insi must comply with the applicable legal provisions, especially the Anti-Corruption Law, the Bidding Law (Law 14.133/21), and the guidelines of Insi's Code of Ethics and Conduct.

Employees must be aware that both the law and Insi prohibit any act intended to:

- Frustrate or defraud the competitive nature of a public bidding procedure through arrangements, combinations, or any other means;
- Remove or attempt to remove a bidder through fraud or by offering any kind of advantage;
- Submit fraudulent bids for public tenders or contracts arising from them;
- Obtain undue advantages or benefits—fraudulently or without legal authorization—by altering or extending instruments related to public administration, including public bid invitations, public calls, or related legal and contractual documents;
- Fraudulently or irregularly create a legal entity to participate in public tenders or enter into administrative contracts;
- Manipulate or defraud the economic and financial balance of legal instruments established with the public administration.

Any direct contracting by the government, whether due to waiver or unenforceability of the bidding process, must be monitored by the Legal and Compliance Department to ensure the legality of the company's actions.

Licenses, permits, permissions, and authorizations

Insi values ethics, integrity, and the legality of its business. Therefore, any activity related to obtaining or renewing licenses, permits, or operating authorizations must be conducted exclusively through official channels—without personal involvement, promises, or the exchange of undue advantages between parties.

The payment of facilitation fees or any other form of advantage to expedite the issuance of licenses, authorizations, permits, or any official documents is strictly prohibited.

Gifts, presents and hospitality

Employees, managers, third parties, and representatives must not accept or offer gifts or favors, or promise or provide anything of value—or even of no value—directly or indirectly, to Public Officials or their family members, if it could influence a decision or secure an improper advantage.

As established in the Gifts and Presents Policy, any benefit offered, granted, accepted, or received from a public-sector counterpart must be registered and approved by the Compliance Department.

The following are expressly prohibited:

- Offering to or receiving from Public Agents, directly or indirectly, any form of courtesy intended to influence decisions, facilitate actions that would not normally occur, or obtain undue advantages (financial or otherwise) for themselves, third parties, or Insi;
- Providing entertainment or hospitality to Public Agents for tourism purposes.

Hiring Public Officials, Former Public Officials or Politically Exposed Persons

The hiring of Public Officials, former Public Officials or Politically Exposed Persons (PEPs) must follow the same selection and hiring criteria applied to all candidates and third parties at Insi. No privileges or benefits may be granted, and all actions must comply with the legal provisions of the Conflict of Interest Law (Law No. 12.813/2013).

Hiring Public Agents, former Public Agents, or other Politically Exposed Persons who have held a mandate, position, job, or function in public office requires prior assessment of any potential conflicts of

interest, to be conducted jointly by the People Department and the Compliance Department.

If a Public Agent, former Public Agent, Politically Exposed Person, or their family member is being hired for a position involving interaction with the public body from which they originate, the Compliance Committee must be informed.

Employees who are related—up to the second degree—to Public Officials of entities with which they have a relationship must inform their manager, who will implement appropriate measures to avoid conflicts of interest.

When hiring Public Officials, former Public Officials, Politically Exposed Persons, and/or their family members, a Politically Exposed Person Declaration must be completed. This document is provided by the Human Resources department following review and discussion with the Compliance team.

Additionally, the hiring of Public Officials or former Public Officials must comply with any applicable legal or regulatory quarantine period.

Visits, audits or inspections

Public agents may visit Insi's premises to conduct inspections, audits, or other oversight activities. In such cases, the following procedures must be followed:

- Request the official documentation from the Public Agent for record-keeping;
- Immediately inform the Compliance Department of the agent's arrival or scheduled visit, providing as much detail as possible;
- The Compliance Department must designate an employee to accompany the visit, along with a representative from the relevant area being visited or inspected;
- The Compliance Department must record the visit, including the date, time, location, and topics covered;

- Any documentation left by the Public Agent must be immediately forwarded to the Compliance Department.

ANTI-CORRUPTION AND ANTI-BRIBERY PROVISIONS

Insi maintains a zero-tolerance policy toward all forms of corruption—whether public or private, national or international—including but not limited to:

- Bribery, embezzlement, extortion, illegal agreements, and facilitation payments;
- Offering, giving, promising, or agreeing to give—directly or indirectly—any financial or non-financial advantage or benefit to any person, or accepting or agreeing to accept the same, whether directly or through intermediaries, that constitutes a corrupt act under applicable laws in any jurisdiction.
- Financing, funding, sponsoring, approving, or in any way subsidizing the commission of illegal acts against the Public Administration is strictly prohibited.

No administrator, employee, supplier, service provider, intermediary agent, or any person performing services for or on behalf of Insi shall suffer retaliation or penalties due to delays or loss of business resulting from their refusal to negotiate, offer, promise, receive, facilitate, pay, authorize, or provide bribes.

COMPLAINTS CHANNEL

Insi's official channel for submitting complaints is:
compliance.meta.com.br/en.

If a complaint originates from a personal conversation, email (compliance@meta.com.br), telephone call, anonymous letter, or any other form, it must also be properly documented and investigated.

SANCTIONS

Non-compliance with the legal and regulatory provisions outlined in this document may result in disciplinary measures, including but not limited to:

- Verbal or written warnings
- Suspension
- Reassignment to another position or area
- Dismissal with or without cause
- Immediate termination of contracts and relationships with suppliers, partners, or clients
- Legal measures in civil, labor, and/or criminal spheres, as applicable

These may also include the formal submission of complaints to relevant authorities and/or the filing of lawsuits in the judicial system.

ANNEX I

DECLARATION OF CONFLICT OF INTEREST

This form is intended for employees who may be in any situation that could indicate a potential conflict of interest with Insi's business, whether involving Public Agents or not. It also applies to situations requiring validation by the Compliance Department and/or the Board of Directors, in accordance with the company's internal regulations.

Indicate if you have an emotional or family relationship with someone at Insi

Full name	Level of relationship	Department

Indicate individuals with whom you have a close relationship (e.g., affective or emotional) who are partners, directors, executives, negotiators, sales representatives, or individuals with decision-making authority at a third-party company, partner, supplier, or competitor of Insi:

Full name	Level of relationship	Company / department

Indicate the third-party companies (suppliers and service providers) or Partners of Insi, in which you hold a role as partner, director, executive, representative, or any decision-making position:

Company / department	Connection to Insi	Position

Indicate any Public Agents from mixed-capital companies or public institutions with whom you have a close relationship or who hold positions of decision-making authority:

Full name	Relationship level	Public body / position

Other situation(s) requiring validation:

Description of the situation

I declare that the information provided above has been completed solely by me and is true and accurate.

Full name:

Date: ____/____/____ Signature: _____



Questions?

Contact: [insi.com](https://www.insicom.com)