

Integrity Compliance Policy

Established in 2023, approved by the
Board of Directors on 02/23/2024,
revised on 03/07/2025

INTEGRITY COMPLIANCE POLICY		Code NR-FNB022
		Version: 2
Approved: 03/07/2025	Last updated: 01/28/2025	Approved by: Funarbe's Board of Directors

1. GOAL

The goal of this policy is to outline the integrity compliance guidelines, aiming to establish the principles that guide and raise awareness among all those involved, in the performance of their duties, ensuring that the activities are conducted ethically.

2. SCOPE

This policy covers all actions conducted by board members, directors, leaders, employees and other partners who work directly or indirectly in the units of the Arthur Bernardes Foundation (Shared Services Center, Dairy School, Projects and School Supermarket).

3. PRINCIPLES

This policy is based on the following principles:

- Not tolerate and not allow any kind of act related to corruption, bribery, fraud, money laundering and cartel, and other unethical acts;
- Comply with integrity compliance obligations;
- Comply with the requirements of the ABNT NBR ISO 37301 and ABNT NBR ISO 37001 standard in its updated version, as well as engage in continuous improvement on these requirements;
- Not accept and not engage in any business opportunity that conflicts with ethical values and is inconsistent with the Foundation's integrity compliance obligations;
- Always act ethically in relationships with customers, suppliers, society, public agents and other stakeholders, and in all relationships, we are guided on principles of ethics and transparency, reflected and reinforced by our conduct, valuing and respecting all diversities;
- Be fully aware that ethical action will be one of the fundamental factors for the foundation's longevity, protecting it from negative media;
- Establish and maintain a culture of integrity compliance permeating all levels of our Foundation.

4. COMPLIANCE OFFICER

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The compliance officer, in the figure of the Superintendent, has independence to deal with matters related to the Anti-Bribery and Integrity Compliance Management System, and reports to the Executive Board and the Board of Directors.

5. PENALTIES

Board members, directors, leaders, employees and other partners who work directly or indirectly in the Foundation's business units shall not practice any act that is not in accordance with the provisions of this Policy.

Any act contrary to the provisions of this Policy must be reported through the Ombudsman Channel, for the adoption of the appropriate measures.

Anyone who fails to comply with any of the provisions set forth in this Policy will be subject to the sanctions provided for in the Code of Ethics and Conduct and in the Internal Regulations.

6. OMBUDSMAN CHANNEL

In case of knowledge or suspicion of non-integral practices, those involved are committed to reporting such situation through the Ombudsman Channel, and no retaliation or sanctions will be tolerated against whistleblowers who make records in good faith or with a reasonable conviction in trust, without fear of reprisal. It is essential that if any employee becomes aware of acts of non-compliance with the guidelines of this Policy, they report them to the Ombudsman Channel.

The reporting channel is operated by a specialized company, ensuring even more confidentiality and security. It is not necessary to identify yourself when using the channel, but it is essential to act responsibly when reporting, which must be consistent and truthful.

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