	RELATIONSHIP POLICY WITH PUBLIC AGENTS	
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RELATIONSHIP POLICY WITH PUBLIC AGENTS

1. OBJECTIVE

This policy aims to describe the practices adopted by Fábrica Carioca de Catalisadores to ensure compliance with laws in general, its internal standards, the principles of business ethics and the organization's culture.

Thus, the aim is to prevent the occurrence of situations, conduct and illicit acts against the National and International Public Administration that may be characterized as practices of corruption, fraud, misappropriation of resources, bribery, undue advantages and other illicit acts, in particular, according to the Brazilian Anti-Corruption Law (Law No. 12,846/2013) which holds legal entities objectively responsible for illicit acts against the Public Administration and other applicable legislation, in addition to international legislation where FCC S.A. has business, partners and associates.

2. APPLICATION AND SCOPE

This Policy, duly approved by the Ethics Committee of FCC S.A, applies to all collaborators, managers and directors, employees, individuals who make up the company's workforce and anyone who represents any interest of FCC S.A or acts on its behalf, directly or indirectly, including partners, third parties, commercial representatives, service providers, suppliers and others.

3. DEFINITIONS

For the purposes of this Policy, some terms should be understood as follows:

Public Agent: Any person who holds, even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, position, employment or public function, in direct or indirect public administration, in Brazil or in a foreign country. A public agent will also be considered to be anyone who holds a position, job or function in state-owned agencies, public agencies or foundations, political parties and candidates, a government employee, department or international body or in diplomatic representations of a foreign country, of a company incorporated into public assets or entity for whose creation or funding the Treasury has contributed or competes with more than 50% of the assets or annual revenue.

Examples of Public Agents are:

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- a) Employees of city halls, secretariats, local authorities, public companies and banks, mixed capital companies, public service concessionaires and public foundations, including, but not limited to, Petrobras;
- b) Members of the Judiciary (including Justice Officers), the Legislative Branch (including politicians without a mandate) and the Executive Branch, the Public Ministry, the Federal Revenue, the forces that make up Brazil's public and social defense system, among the Military Police and the
- c) Fire Department, diplomatic offices, among others;
- d) Relatives, advisors, or people who maintain a close relationship with the Public Agents listed above.

Anyone who works for a service provider contracted or contracted to carry out typical Public Administration activities is equivalent to a public agent.

Political Agent: The person holding an elective position, elected for transitional terms, such as the Heads of the Executive Branch and members of the Legislative Branch, in addition to positions of Ministers of State and Secretaries in the Federation Units, which are not subject to the administrative disciplinary process.


Undue Advantage: Any good, tangible, or intangible, including money and valuables, offered, promised or delivered with the aim of unduly influencing or rewarding any act, decision or omission of a person, whether a Public Agent or not. This concept includes gifts, entertainment, airline tickets, accommodation, donations, sponsorships, or any other thing of value used for such purposes, which may unduly influence or reward any act or decision.

Conflict of Interest: Situation generated by the confrontation between public and private interests that may compromise the collective interest or improperly influence the performance of public functions, as described in art. 3rd, item I, of the Conflicts of Interest Law (Law nº 12,813/2013).

Corruption (or Bribery): Willingness to act dishonestly, in exchange for financial benefit, undue advantage or anything else of value, through relationships with public or private agents.

Third Parties: All individuals or legal entities who are not administrators or internal collaborators of FCC S.A, but who are hired, even temporarily, to assist in the performance of their activities, such as business partners, representatives, suppliers, consultants, service providers in general, acting on behalf of FCC S.A before public bodies, to obtain documents for the company, such as permits and certificates, which can be personified by individuals such as accountants, dispatchers, agents, or any person, natural or legal, that carries out business in name of FCC S.A.

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Politically Exposed Persons (PEPs): public agents who perform or have performed, in the previous five years, in Brazil or in other countries, foreign territories and dependencies, positions, jobs or relevant public functions, as well as their representatives, family members and close collaborators.

4. GENERAL DISPOSITIONS


FCC S.A prohibits and does not tolerate any acts of corruption and bribery in its relationship with public authorities, including through third parties through the practice of acts of corruption and bribery or contrary to public administration, as set out in the Brazilian Anti-Corruption Law and in International Laws:

- i) Promising, offering or giving, directly or indirectly, an undue advantage to a Public Agent or a third party related to them;
- ii) Finance, fund, sponsor or in any way subsidize the practice of illegal acts harmful to public administration;
- iii) Using an interposed natural or legal person to hide or disguise their real interests or the identity of the beneficiaries of the acts carried out;
- iv) Frustrate, defraud, manipulate, prevent, disrupt or obtain undue advantage in relation to tenders and contracts with the public administration, or fraudulently or irregularly create a legal entity to participate in such tenders and contracts; and
- v) Hinder investigation or inspection activities of public bodies, entities, or agents, or intervene in their activities.

Some activities in the relationship with public authorities pose greater compliance risks, given the prohibitions set out in Brazilian and foreign legislation. Such activities include:

- i) Offering of gifts;
- ii) Offers of entertainment, hospitality, image and accommodation;
- iii) Participation in tenders and administrative contracts;
- iv) Political donations;
- v) Sponsorships and philanthropic donations; and
- vi) Transactions with intermediaries.

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5. Relationship with Public Authorities

All relationships with Public Authorities must be ethical, honest and transparent, always in accordance with applicable legislation, especially the Anti-Corruption Law, FCC S.A. policies such as the Anti-Corruption Policy, Conflict of Interest, the Related Party Transactions, the Code of Conduct and others, in addition to the policies to which the Public Agent is subject.

The relationship with the Public Authorities may occur in different ways, such as in meetings, tenders, public calls, inspections or in routine activities, such as obtaining certificates, guides, branch contacts, among others.

In all cases, the company's employees must observe the respective protocols, or public scheduling of meetings for the purposes of the relationship.

Whenever possible, meetings with Public Agents must be attended by at least two representatives from FCC S.A and will take place at the official premises of the Public Administration body or at the premises of the Fábrica Carioca de Catalisadores.


If it is not possible for the meeting to take place within the premises of the company or public entity, it is possible for it to take place in other formal locations or via video conference, preferably recorded. Meetings in informal places, which have an entertainment nature (such as, for example, bars and restaurants) and outside business hours are discouraged.

Every meeting with any public agent will be preceded by an official schedule and formalized in writing, and, internally, there must be a proper record of the date, time and agenda of the meeting, indicating the name of the public agent with whom the meeting was held and the list of participants (collaborators appointed by the regional manager, the public agent and other people, depending on each situation), archiving such information to control the activities carried out, aiming to promote transparency and ethical principles.

When possible, these meetings should have minutes of meeting and/or recording. If this does not occur, it is up to the Employee to formalize the meeting, by email, containing:

- i- Location and date of the meeting.
- ii- Full name and position of participants.
- iii- Brief description of the subject covered.
- iv- Brief description of the deliberations taken.

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All requests, notifications, notices and demands arising from Public Agents must, when applicable, be responded to or defended officially and formally, with the assistance of legal counsel.

When exchanging electronic messages, it is essential that the content is succinct and formal, avoiding any possibility of dubious interpretation.

After finishing a telephone conversation with a Public Agent, it is important and recommended to write an email with the content of what was discussed and send it to interest parties, which includes the Public Agent, seeking to formalize what was understood and avoid different interpretations.

Contracts must be formalized in writing and with a well-defined scope, and any payment made to third parties will preferably be made through a bank deposit in a bank established in the country where the service was provided, with presentation of the respective invoice or corresponding official document.

In contracts made with the Public Power, autarchy, public foundations, public companies, mixed capital companies and other entities controlled directly or indirectly by the Union, States, Federal District and Municipalities, especially through the bidding procedure, any representative from the company or who acts on the company's behalf is prohibited to maintain informal contacts with public officials involved directly or indirectly in any tender in which the company is a participant.


5.1- Acquisition of licenses, authorizations, and permissions

All acts carried out by the Employee(s) must be duly formalized by means of minutes or email to the hierarchical superior and filed in a specific physical or virtual folder, for control. In the case of a continuous process of renewing licenses, authorizations, permissions and certificates, the Regional Director will be responsible for promoting rotation among Employees.

The hiring of Third Parties to assist in obtaining licenses, authorizations, permissions and certificates from the Public Authorities must occur exceptionally.

If essential, the responsible Employee must request authorization from the Legal and Compliance Department, which will supervise the Third Party's prior verification procedures, in accordance with the Third Party Hiring Policy, Anti-Corruption Policy, Related Party Transactions Policy, Policy on Conflicts of Interests, FCC S.A. Code of Conduct and other related documents.

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It is prohibited to offer facilitation payments or any other type of undue advantage or facilitation payments to speed up the obtaining of licenses, authorizations, certificates, permissions by employees, suppliers or intermediary agents or to induce a Public Agent to perform, omit or delay an official act, as these are considered as bribes by the Brazilian Anti-Corruption Law and, therefore, are repudiated, prohibited and not tolerated by FCC S.A.

“Facilitation payments” are known as those made to employees in both the public and private sectors, as a personal benefit, to guarantee or accelerate the execution of routine acts to which the company is entitled.

No employee, third party or partner will suffer any type of retaliation or penalty due to delay or loss of business resulting from their refusal to pay or receive a bribe. It is essential to act responsibly when reporting the situation, which must be consistent and truthful.

It is important to highlight that payment made to the Public Administration as a result of legal or contractual provision (fees, taxes, provision of services, etc.) are not undue.

5.2- Interaction of Third Parties with Public Agents

Third parties (accountants, partners, dispatchers, agents, representatives or any person, natural or legal, who carries out business on behalf of FCC S.A) are those who act on behalf of FCC S.A and, sometimes, act on behalf of the company before public bodies to obtain documents for the company, such as permits and certificates or work directly with Public Agents.

Whenever possible, FCC S.A should avoid the use of dispatchers and agents when interacting with Public Agents.

All Collaborators and Third Parties are expressly prohibited from giving, offering or promising, directly or through third parties, any undue advantage to any Public Agent or person related to them, especially for the purpose of:

- I- Influence any act or decision of a Public Agent or induce him to carry out, omit, delay or speed up any act in violation of his legitimate or official duty.
- II- Obtain information regarding a fact or circumstance that the Public Agent is aware of due to their duties and that must remain confidential.
- III- Frustrating the legality of the bidding process with or without the purpose of benefiting a Public Agent.

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- IV- Obtain the granting of an administrative or tax benefit without observing the applicable legal or regulatory formalities.
- V- Carrying out an illegal act of any nature or an improper act against the Public Administration in Collusion with a Public Agent.
- VI- Obtain or retain business for FCC S.A.

For the purposes of this policy, offering an undue advantage to relatives of the Public Agent, such as parents, children, spouse, partner, stepchildren, brothers, and nephews, is equivalent to offering an undue advantage to the Public Agent himself. The illicit act is configured even if the undue advantage was not accepted by the public agent, or the offeror did not intend to corrupt him.


For the purposes of this Policy, undue advantages are anything of value offered, delivered, or even just promised to a Public Agent, with the expectation of obtaining, in return, some benefit for FCC S.A, such as:

- a) Amounts (in cash);
- b) Gifts that may influence a decision by the Public Agent, or even accelerate or delay their actions;
- c) Funding for travel and accommodation that do not have a legitimate business purpose;
- d) Hiring friends, family members or companies that are linked to the Public Agent, with the aim of influencing them to benefit FCC S.A;

FCC S.A's guidelines for conduct in the relationship of employees and third parties with Public Agents are based on the following:

- Non-tolerance of any attitudes or intentions that may be perceived as possibly inappropriate;
- Care for the image and good reputation of FCC S.A and the company's clear stance of integrity;
- Inform the immediate superior of any and all interactions with Public Agents, preferably in advance;
- Request for guidance from the immediate superior or the FCC S.A. Ethics Committee in case of doubts regarding a suspicious situation and information to this immediate superior regarding any and all interactions with Public Agents, preferably in advance, and
- Report to the Ombudsman if they are subjected to any inappropriate approach, even if indirectly or subtly with Public Agents.

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Employees who are second-degree relatives of Public Agents from bodies with which they have a relationship must immediately inform their manager so that the necessary measures can be taken to avoid potential conflicts of interest.

With regard to partners, as set out in the company's Code of Conduct and Anti-Corruption Policy, FCC S.A will only interact with third parties and Partners who: (i) adopt satisfactory integrity and ethical conduct practices; (ii) comply with applicable legislation, when carrying out their activities and fulfilling their contractual commitments; (iii) maintain adequate secrecy regarding confidential information that they may acquire as a result of activities carried out for or in conjunction with FCC S.A. Contractual commitments will not be signed with partners declared demonstrably unsuitable by the public authorities.

To effectively select, monitor and inspect Partners covered by this Policy, internal integrity processes and procedures must be developed, adopted and periodically reviewed.

5.3- Tenders and Public Contracts


When participating in public tenders, FCC S.A must observe the legal provisions, especially the Anti-Corruption Law, Law 13,303/2016 (the Law of State-Owned Companies, including mixed-capital companies, where appropriate, on behalf of one of the partners of the FCC S.A. to be Petróleo Brasileiro S.A), the Bidding Laws (Law 8.666/93 and Law 14.133/2021, in order to fully comply with the bidding rules and the contractual clauses signed with the bidding public body), the Defense Law of Competition (Law 12,529/2011) and others.

Any type of collusion, fraud, price adjustment, manipulation or any other form of undue intervention in public tenders and contracts will not be tolerated. Even informal conversations with competitors about prices and tender notices and public contracts should be avoided.

In the event of public tenders and contracts, including concessions and public-private partnerships, any conduct aimed at:

- I- Frustrate or defraud, through adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- II- Obtaining an undue advantage or benefit, fraudulently, from modifications or extensions of contracts signed with the public administration, without authorization by law, in the act calling for public bidding or in the respective contractual instruments;

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

Examples of improper practices are:

- I- Develop the technical specificity of the bid,
- II- Assist with the preparation of the public notice,
- III- Adjust price or offer items not described in the public notice.

The analysis of documents that will be presented in the event of a public tender must always be carried out by at least two duly trained FCC employees.

5.4- Hiring Public Agents

It is prohibited to hire former Public Agents who are within the six-month period, as established in art. 6th, item II, of the Law on Conflict of Interest for Public Agents (Law No. 12,813/2013), except for legal exceptions.

After this period, the hiring of a former Public Agent will be permitted, if this is communicated to the Compliance Department for analysis and subsequent opinion to avoid potential conflicts of interest or legal impediment. If so, this contract should not take place.

5.5- Supervision and Investigations

The Public Administration has the power to supervise the actions of individuals, in the cases and conditions provided for in the legislation.

Whenever exercised with prudence and within legal limits, supervision is an effective instrument for preventing abuse or illicit activities. In this sense, dealing with public authorities during inspections must be based on transparency and ethics, always respecting the rules of this and other company policies.

In inspections of any nature carried out by a Public Agent in FCC S.A. operations, the Employee(s) responsible for the interaction must act with cordiality and integrity, preferably with the help of the Legal Department, providing the requested information objectively, following the guidelines below:

- At least two Employees responsible for monitoring public inspections, and it is recommended that there be rotation between such Employees.

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- It is essential to collect the formal inspection document carried out by the supervising Public Agent, such as the inspection report. If not provided, the Employee(s) must prepare a report, formalized by email, containing the complete description of the inspection.

This report must include, at a minimum: (i) date; (ii) identification of the responsible Public Agent; and (iii) summary of what was inspected. In both cases, the Employee(s) must subsequently forward the document to their superior and the Legal Department.

- All requests made by Public Agents and all documents made available for inspection by the Employee(s) must be duly registered and controlled in the respective FCC S.A. unit, being strictly prohibited the practice of acts by an Employee or Third Party with the intention of hindering, defrauding or obstructing investigation or inspection activities of public authorities, as well as any act that may constitute contempt or disobedience.

Any questions from Employees or Third Parties regarding interaction with Public Agents in inspection procedures must be immediately submitted to the Compliance Department.

5.7- Sponsorships and Philanthropic Donations


Collaborators responsible for sponsorships and philanthropic donations are prohibited from approving them to individuals and must make all transfers of resources through bank transfers, duly registered, accounting and financially.

In addition to the technical requirements of the projects, the qualification process (due diligence) must, at a minimum, require candidates for sponsorship or donations to present, declare or prove in writing to FCC S.A:

- (i) Relevant experience in project types requesting sponsorship or donation;
- (ii) Identification and summary CVs of executive directors or people responsible for applying resources; and
- (iii) Declaration to the effect that the institution is not controlled, directly or indirectly, by any Public Agent, that the project will not employ and will not transfer resources, directly or indirectly, to Public Agents, their families or other third parties to him/her related.

In case of doubt regarding any of the qualification requirements set out in this Policy or in procedures approved based on it, sponsorships and philanthropic donations may only be carried

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out with prior written approval from the Ethics Committee and in accordance with the Sponsorship and Donations from FCC S.A.

5.8- Interaction with Public Banks and Promotion Agencies

It is expressly prohibited to give, offer or promise, directly or through Third Parties, an Undue Advantage to any Public Agent who works, holds a position or function in these institutions or to a person related to him/her.

Negotiations on financing contracts and the contracts themselves must be monitored and registered by the Legal Departments and, when necessary, also by Compliance, however, these are adhesion contracts.

Loans, subsidies and grants must strictly adhere to the objectives of FCC S.A., and will not under any circumstances be directed to the benefit of any individual involved in the negotiation.

6- GIFTS, HOSPITALITY, TRAVEL AND ENTERTAINMENT

Employees, partners, and suppliers are prohibited from accepting, offering or giving, directly or indirectly, favors, money, gifts and hospitality to a Public Agent or third party related to them, in order to obtain advantages, influence or compensate their decisions for the benefit yourself or the company.


Therefore, to avoid any situation of discomfort or distrust, all gifts and hospitality must be declared and only it will be permitted, solely and exclusively, to receive and give promotional gifts without commercial value or within the value established in the respective policies of the company FCC S.A.

It is important to highlight that the gifts to be distributed to Public Officials must be provided as a courtesy, advertising, regular publicity, on special events or commemorative dates, offered in a diffuse manner, without a focus on specific bodies or authorities.

Gifts that have commercial value, even with the company logo, tickets to sporting events and shows, are prohibited from being offered or received from Public Agents, to avoid situations that could interfere with decisions or cause discredit to the employee as well as the company.

If the employee has any doubts about the possibility of offering or accepting any type of gift in the relationship with the Government, he or she may contact his or her immediate superior, manager or the Compliance Department.

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Entertainment and hospitality for Public Officials for tourism purposes will not be permitted. Entertainment and hospitality invitations can be used as an occasion to discuss matters of interest to FCC S.A. and the Public Agent. Regarding business meals with a Public Agent, they must be in accordance with the policies regarding meals of both parties, unnecessary expenses must be avoided, be reasonable in value and in line with local customs.

Every travel, hospitality and entertainment offering must:

- Have a business purpose;
- Be done in a transparent manner;
- Be in accordance with the law, regulations and good customs of the place;
- Be within what can be considered reasonable and proportionate.

7. IDENTIFICATION OF ALERT SITUATIONS (RED FLAGS)


Below are some topics that will help in identifying alert situations (Red Flags) to determine risks or warning signs in relation to Public Agents:

- I- The Public Agent does not have expertise on the subject;
- II- The Public Agent requests some advantage and in return offers some type of benefit, such as a license, easier access to the public body or privileged information;
- III- The value requested by the Public Agent is inconsistent with the market value;
- IV- The Public Agent requests that the contract be carried out in the name of a relative;
- V- The bank details provided to receive the amounts are not the property of the Public Agent;
- VI- The Public Agent recommends to FCC S.A the use of the consultancy services of a specific Third Party;
- VII- The Public Agent requests travel or any other hospitality for relatives; and
- VIII- The relationship takes place with Politically Exposed Persons (PEPs).

8. CONFLICT OF INTEREST

Employees who are related to Public Agents with decision-making power within the scope of FCC S.A.'s business must declare any possible conflict of interest through a separate term. This statement will be received and analyzed by the Compliance Department, which will suggest the necessary measures to avoid situations of conflict of interest.

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It is important to highlight that, for a conflict of interests to occur, it is not necessary for there to be damage to public property nor for the public agent to have any financial gain, it is enough that the situation generated by the conflict between public and private interests can compromise, influence, or appear to be improperly interfere with the performance of public functions.

Therefore, it is essential that any potential conflict of interest with a Public Agent is declared to be dealt with the support of the Compliance area.

9. QUESTIONS AND TRAINING

All Employees are encouraged to ask questions related to this Policy on Relationships with Public Agents, as well as other FCC S.A. policies.

FCC S.A will maintain a periodic and constant communication and training plan for its Employees with the aim of publicizing and raising awareness of the importance of complying with the rules of this Policy on Relationship with Public Authorities. It is the responsibility of all FCC S.A Leaders to disclose the content of this Policy to their subordinates and make them aware of the importance of its compliance and encourage them to raise doubts or concerns regarding its application.

Any situations, doubts, exceptions and/or clarifications related to the application of this Policy may be sent via the communication channel with the Compliance Department via email xxxxxxxx, telephone XXXXX.

10. REPORTING CHANNEL

It is essential that everyone covered by this Policy immediately report any acts or suspicions of acts of bribery, corruption and/or payment/receipt of bribes or other situations and conduct that violate this Policy on Relationship with Public Authorities, the Policy on Transactions with Parties Related, the company's Anti-Corruption Policy and others and/or its Code of Conduct. In this sense, we provide the following means of contact:

E-mail: canaldedenuncias@fccsa.com.br

Site: www.fccsa.com.br, Reporting Channel link

Call 0800-9400158. Free call from anywhere in Brazil, Monday to Friday, from 8am to 6pm.

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It is not necessary to identify yourself when using the channel, but it is essential to act responsibly when making reports, which must be consistent and truthful.

No form of retaliation will be permitted or tolerated against people who may report in good faith or complain about violations of this policy or anti-corruption law.

11. INVESTIGATIONS AND SANCTIONS

All reported incidents of suspected violations of this Policy will be investigated promptly and appropriately. If, after the investigation, it is found that conduct has occurred that violates the rules of this and/or other FCC S.A Policies that deal with the topic, immediate and exemplary corrective measures will be taken, always in accordance with the circumstances, severity and the applicable law.

Any employee, third party or partner who violates any provision of this Policy will be subject to disciplinary sanctions provided for in the Code of Conduct and the Policy on Consequences and Disciplinary Measures of FCC S.A, listed below:

- i- Written warning;
- ii- Suspension;
- iii- Dismissal without just cause;
- iv- Dismissal for just cause;
- v- Exclusion of the supplier, partner or intermediar agente of FCC S.A.;
- vi- Appropriate legal action.

It should be remembered that crimes related to fraud in competitions, committed against the administration, including influence peddling and corruption, committed against the national or foreign administration, carry a sentence of detention or imprisonment of at least 6 months and a fine, in accordance with Law 12846 /2013, Administrative Improbity Law and other national and international laws on the subject.

12. RELATED DOCUMENTS

- i- Anti-Corruption Policy;
- ii- Third Party Hiring Policy;
- iii- Conflict of Interest Policy;

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- iv- Related Party Transactions Policy;
- v- Consequences and Disciplinary Measures Policy;
- vi- Sponsorship and Donations Policy;
- vii- Code of Conduct;
- viii- Anti-Corruption Legislation (Law 12846/2013, Decree 11,129/2022, FCPA and other international laws);
- ix- Conflict of Interest Law (Law 12813/2013);
- x- State Law (Law 13,303/2016); and
- xi- Tender Legislation (Law 8666/1993 and Law 14,133/2021)

Prepared by:
Catia Pereira**Consensus by:**
Luiz Santos; Paulo Saturnino**Approved by:**
Cid Carvalho; Luiz Eduardo
Valente

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ANNEX I –DECLARATION MODEL OF KNOWLEDGE OF THE POLICY

Declaration of Knowledge of the Relationship Policy with Public Authorities

I confirm receipt of my personal copy of the Relationship Policy with Public Authorities.

I further declare that I am aware of my personal responsibility for knowing, understanding and following the standards of conduct indicated in this Policy.

Full Name: _____

RG: _____ CPF: _____

Unit: _____

Department: _____

Signature: _____

Local and date: _____

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