

	SERVICE INSTRUCTION	No.: 01.000EFACEC-08030375-038-000-EN-00
		Issue Date: 2019-12-09
	Scope: Efacec	Review date: -
		Entry into Force: 2019-12-09
Subject:	Anti-Corruption Policy	

1. Introduction

Efacec is committed to a transparency and zero-tolerance approach to Bribery and Corruption, regardless of geography and nature (public or private) of the business, and expects its contractors, third party representatives and suppliers to fully comply with this approach. Thereby, Efacec warrants its actions and decisions are taken in the best interest of its clients, stakeholders and the community.

'Corruption' is the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of gifts, loans, fees, rewards or other advantages (taxes, services, donations, favours etc.)

2. Objective

Efacec's Anti-Corruption Policy ('Policy') sets forth mandatory key rules and procedures, ensuring the company's commitment to the fight against Corruption.

3. Scope and exclusions

This Policy applies to all Efacec's employees and contractors and must be divulged and implemented by anyone doing business with Efacec or acting on its behalf.

This Policy applies in all countries in which Efacec (and its subsidiaries) operates and may be adjusted to local Law's requirements.

4. Description

In line with the UN Global Compact's 10th Principle and the OECD Anti Bribery Convention, Efacec sets forth the following rules and procedures:

- We carry out fair, honest and open business;
- We do not give or offer any money, gifts, hospitality or other advantage, directly or through a third party, to any person carrying out a business or public role, in order to compensate or influence her to take an improper action or decision;
- We do not give or offer any money, gifts, hospitality or other advantage, directly or through a third party, to any foreign public official or an international organization employee, with intent to influence them or obtain an improper business advantage;
- We do not use third party representatives or contractors for the purpose of making illicit payments or obtaining improper business advantages, dealing only with third party representatives or contractors with relevant market knowledge and a clear business rationale, in strict compliance with Efacec's internal rules, namely Efacec's Partnership Management Programme;

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- We do not allow facilitation payments (payments offered to a public official to secure or speed up a routine and necessary governmental or official action);
- Our employees will not accept or solicit money, gifts, hospitality or other advantage, offered with the intent of influencing a business decision or a transaction, in violation of their duties;
- Our employees may offer or accept gifts of nominal value that do not violate applicable laws and regulations. Promotional gifts or gratuities are not considered bribery and may be accepted if offered openly and without an expectation of reciprocity;
- We avoid doing business with persons who do not commit to fair, honest and open business;
- Every payment is made in accordance with Efacec's internal rules on approvals and payment's records are transparent and accurate;
- We do not make any donation for political purposes, in strict accordance with Efacec's internal rules and applicable Law;
- Sponsorship and donations to social, humanitarian and educational organizations must be pre-approved in accordance with Efacec's internal rules on approvals. Money donations or money transfers to private bank accounts are strictly forbidden.

5. Responsibility

Any breach of this Policy may entail disciplinary, contractual and/or criminal liability against the employee, as well as serious damage to the reputation and sustainability of Efacec.

6. Training

Specialized training on Anti-corruption is conducted on risk functional groups, with the adequate and feasible frequency.

7. Monitoring and Auditing

The application of this Policy is monitored by the Legal & Compliance team and audited through the internal applicable procedures.

For more information on this Policy or if you are unsure what to do, please contact your supervisor or the Legal & Compliance team.

You can raise concerns or report potential misconduct to your supervisor, the Legal & Compliance team or through *Linha Ética*.