

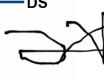
ANTI-CORRUPTION POLICY

1. INTRODUCTION

- 1.1. The Anti-Corruption Policy of the São José dos Campos Technology Park Association – APTSJC (“Policy”) commits the APTSJC, in all its operations, to conduct business in an ethical manner and with the utmost integrity. This Policy requires compliance with the APTSJC Code of Ethics and Conduct (“Code”) and all applicable laws and regulations regarding bribery and corruption, including, but not limited to, Law no. 12.846/13 and Decree no. 8.420/15 (“Anti-Corruption Standards”).
- 1.2. Any violation/infraction of this Anti-Corruption Policy and the Anti-Corruption Standards may result in severe civil and administrative penalties for the APTSJC, its administrators and employees, as well as reputational impacts, not to mention any criminal liability of the individuals involved.
- 1.3. All associates, administrators, employees, suppliers, and partners are expected to become familiar with this Policy and to observe, recognize and report issues possibly related to anti-corruption situations in sufficient time for them to be properly addressed by the Legal and Compliance Department of the APTSJC.

2. DEFINITIONS

- 2.1. The following definitions shall be considered for the purposes of this Policy:
- a) Administrators: members of the APTSJC’s Executive Board and Board of Directors;
 - b) Public Agent: (i) agent, authority, staff member, worker, employee or representative of any government entity, department, agency or public office, including any entities of the Executive, Legislative, and Judiciary branches, direct or indirect public administration entities, including public companies, joint capital companies, and public foundations, national or foreign; (ii) any person exercising, even temporarily and without remuneration, a position, function or employment in any entity of a State and its instrumentalities; (iii) director, board member, employee or representative of a public international organization; and (iv)

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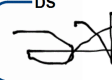

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director, board member, or employee of any political party, as well as candidates running for public office or political appointment, in Brazil or abroad;

- c) APTSJC: São José dos Campos Technology Park Association;
- d) Associates: members of the APTSJC, as set forth by its articles of incorporation;
- e) Collaborators: all employees and other collaborators of the APTSJC, including members of the fiscal council and any committees with technical functions and/or intended to advise Administrators, as well as interns and trainees;
- f) Suppliers: Suppliers of products and/or services to the APTSJC; and
- g) Partners: Signatories and participants in terms of agreement or partnership agreements, protocols of intention, memoranda of understanding, or related instruments, as well as individuals and legal entities that become associated with the programs managed by the APTSJC.

3. PURPOSE AND SCOPE OF THE ANTI-CORRUPTION POLICY

- 3.1. This Policy establishes minimum standards of behavior for its associates, administrators, employees, suppliers, and partners in situations that could involve or characterize corruption, bribes, or money laundering, making the APTSJC's stance clear in rejecting any and all situations or circumstances related to these practices.
- 3.2. It is also the purpose of this Policy that everyone shall comply with the requirements of the applicable legislation with regard to combatting corruption, especially the provisions of the Anti-Corruption Standards, in order to ensure that the conduct of business dealings follows the highest standards of integrity, legality, and transparency.
- 3.3. This Policy reflects the APTSJC's standing commitment to monitor its processes for identifying and penalizing all fraudulent and illicit acts and behavior, or those that could be identified as corruption in any of its manifestations, by maintaining effective communication mechanisms and raising awareness of all employees, as well as developing a business culture based on ethics and honesty.

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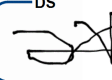

4. COVERAGE OF THE ANTI-CORRUPTION STANDARDS

4.1. The Anti-Corruption Standards declare that legal entities shall be objectively liable, in the administrative and civil spheres, for any harmful acts committed by their administrators and employees against public administrations, national or foreign, not to mention the individual responsibility of the author, co-author or participant in the unlawful act, to the extent of their culpability.

5. APPLICATION OF ANTI-CORRUPTION STANDARDS

5.1. Under the terms of the Anti-Corruption Standards, all who violate national or foreign public property, public administration principles, or international commitments assumed by Brazil, constitute harmful acts against public administrations, national or foreign, defined as follows:

- i) Promise, offer, or give, directly or indirectly, an undue advantage to a public official, or to a third person related to him/her;
- ii) Objective evidence of financing, funding, sponsoring or otherwise subsidizing the practice of unlawful acts as set forth in the Anti-Corruption Standards;
- iii) Objective evidence of using a natural person or legal entity to hide or disguise the true interests or the identity of the beneficiaries of the acts performed;
- iv) Interfere with investigation or inspection activities of public bodies, entities, or agents, or intervene in their performance, including within the scope of regulatory agencies; and
- v) With regard to bids and contracts:
 - a) Thwarting or defrauding, by agreement, arrangement, or any other opportunistic measure, the competitive nature of a public bidding process;
 - b) Impeding, disturbing or defrauding the holding of any action of a public bidding process;
 - c) Removing or seeking to remove a bidder by fraudulent means or by offering any type of advantage;
 - d) Defrauding a public bidding process or a contract arising from a public bid;

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- e) Fraudulently or irregularly creating a legal entity to take part in a public bidding process or signing an administrative contract;
- f) Fraudulently obtaining undue advantage or benefit through modifications or extensions of contracts signed with public administrations, without legal backing, for the invitation to the public bid, or in the respective contractual instruments; or
- g) Manipulating or defrauding the economic and financial balance of the contracts signed with public administrations.

6. GENERAL STANDARDS OF CONDUCT

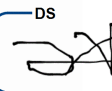
6.1. Offering or giving any amount of money or a gift to a public agent without the prior and express authorization of the Legal and Compliance Department is expressly prohibited.

6.2. Administrators, employees, and all those acting on behalf of the APTSJC must be attentive to the fact that: (i) any money offered to public agents, however small the amount, could be taken as a violation of the Anti-Corruption Standards and give rise to the application of the established penalties; and (ii) the violation of the Anti-Corruption Standards will stand, even if the offer of a bribe is refused by the public agent.

6.3. Administrators, employees, and all those are acting on behalf of the APTSJC must question the legitimacy of any payments requested by public agents that do not have legal or regulatory support.

6.4. No administrator, employee, or supplier shall be penalized due to delay or loss of business resulting from their refusal to pay or receive a bribe or kickback or to perform any act that is identified as corrupt.

6.5. With regard to relations maintained with public agents, everyone shall act with honesty, transparency, and cordiality in the business environment, adhering to the APTSJC Code of Ethics and Conduct and the Professional Codes of Ethics that guide the conduct of public agents. It is everyone's duty to ensure the existence of

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appropriate means for opening, building, and maintaining these relationships, as established by this Policy and the legislation in effect.

6.6. Administrators and/or employees who deal with APTSJC suppliers occupy a special position of trust and, as such, must exercise the utmost caution to preserve their autonomy. Therefore, no administrator and/or employee shall receive payment or anything of value in exchange for a decision involving the business dealings of the APTSJC. Likewise, no administrator and/or collaborator shall offer payment or anything of value to third parties, in order to obtain a given result in favor of the APTSJC. The exception to this rule is provided for in the APTSJC Code of Ethics and Conduct, which allows gifts, giveaways, and hospitality that do not exceed an amount corresponding to 9% (nine percent) of the current Federal minimum wage.

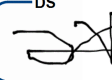
6.7. Bribes, kickbacks, or other improper payments, even between private sector entities, have no place in the APTSJC's business dealings and will not be tolerated.

6.8. All contracts signed with suppliers must contain anti-corruption clauses to ensure compliance with this Policy. Although the APTSJC has its own standard anti-corruption clauses, upon prior assessment by the Legal and Compliance Department, it is possible for the APTSJC to adhere to the anti-corruption clauses of its suppliers, provided that the basic principles of combatting corruption are included therein.

7. RELATIONS WITH PUBLIC AGENTS

7.1. It is expressly prohibited to promise, offer, or deliver, directly or indirectly, any undue advantage (in cash or anything of value) to a public agent or a third party related to a public agent.

7.2. The APTSJC does not tolerate acts of corruption by its administrators and employees, or even by its suppliers. Any violation of this Code, or APTSJC policies or procedures that has originated in an act of corruption will subject violators, in all cases, to the termination of their employment contract or contractual relationship with the Association.

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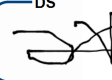

- 7.3. The APTSJC will not tolerate any form of active or passive corruption, such as extortion or bribery, in an attempt to influence business dealings, or to obtain any undue advantage.
- 7.4. Relations between the APTSJC and public agents shall always be based on transparency and integrity, as well as on the other principles established in Laws no. 9637/98 and no. 12846/13.
- 7.5. It is possible that situations constituting a conflict of interest with public bodies could occur, and that fact must be immediately reported to the APTSJC Ethics and Conduct Committee.
- 7.6. Meetings between APTSJC representatives and public agents must be held on the premises of the appropriate public offices and/or buildings. The APTSJC shall keep clear and accurate records of those meetings.
- 7.7. The hiring of public agents is prohibited.

8. FACILITATING PAYMENTS

- 8.1. Any type of facilitating payment is prohibited, that is, payment made directly, or via third parties, through which a government decision, service, or act may be unduly expedited or ensures the execution of an action or service outside of its normal performance conditions, especially if the act or omission could characterize a situation involving favoritism.

9. PENALTIES

- 9.1. The APTSJC and/or its administrators and/or employees may be investigated by State regulatory agencies and, depending on the circumstances, prosecuted administratively, civilly, or criminally. This can result in severe fines and penalties, exclusions and/or imprisonment, if the APTSJC and/or its administrators and/or employees are found to be in violation of the Anti-Corruption Standards.
- 9.2. Administrators and/or employees caught in violation of the provisions of this Policy shall be subject to disciplinary measures up to and including dismissal for just cause.

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9.3. Associates caught violating this Policy may be excluded from the APTSJC, and its suppliers and other third parties who work for the APTSJC that are caught in the same violation will be subject to the termination of their business relationship, as well as to any other remedial and legal measures available to the APTSJC, according to applicable legislation.

10. REPORTS

10.1. All employees shall be vigilant regarding the practice of illegal acts, in particular with regard to combatting corruption and money laundering. It is everyone's duty to report any situations that may involve suspicions or risks of corruption, bribery, extortion, illicit payments, and money laundering, as well as suspected violations of the Anti-Corruption Standards, the Code of Ethics and Conduct or the internal policies and procedures of the APTSJC. The APTSJC Ethics Channel is available for that purpose: <https://www.helloethics.com/aptsjc/>

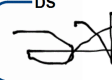
10.2. The APTSJC shall not tolerate retaliation, veiled or outright, against any person who reports, through the channels provided by the APTSJC, a concern expressed in good faith. Furthermore, all reported matters, concerns, complaints, or violations shall be treated with the utmost confidentiality and anonymity.

11. TRAINING PROGRAMS

11.1. Administrators and employees take part in online and/or in-person training programs at sufficiently regular intervals to ensure that their knowledge is kept up to date.

12. QUESTIONS REGARDING THIS POLICY

12.1. Questions regarding the content and application of this Policy or any situations that may involve suspicions of corruption, bribery, extortion, or money laundering shall be forwarded to the Legal and Compliance Department of the APTSJC.

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13. REVIEW AND APPROVAL

13.1. The Legal and Compliance Department shall periodically review the content of this Policy, ensuring that it contains the recommendations and best national and international practices in effect, at all times, and shall propose to the Board of Directors any amendments and updates that contribute to its continuous development and improvement, taking into account, when appropriate, any suggestions and proposals made by APTSJC employees or external entities.

BOARD OF DIRECTORS

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Eduardo Bonini Santos Pinto
President

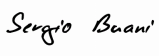
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President Vice

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Marcelo Nunes da Silva
General Director

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Sergio W. V. Buani Filho
Director of Operations