COMPLAINT CHANNEL POLICY

1. OBJECTIVE

1.1. This Complaint Channel Policy ("Policy") establishes the guidelines of the São José dos Campos Technology Park Association ("APTSJC") regarding reports of irregularities and the non-retaliation principle, complementing the provisions of the Code of Ethics and Conduct, the Anti-Corruption Policy, and other internal policies and procedures of the APTSJC.

2. SCOPE

2.1. This Policy applies to all APTSJC associates, administrators, employees, suppliers, and partners.

3. DEFINITIONS

- 3.1. 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) APTSJC: São José dos Campos Technology Park Association.
 - c) Associates: members of the APTSJC, as set forth by its articles of incorporation.
 - d) <u>Collaborators</u>: 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;
 - e) <u>Suppliers</u>: 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; and
 - f) <u>Partners</u>: 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.



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4. ROLES AND RESPONSIBILITIES

- 4.1. It is incumbent upon the Legal and Compliance Department of the APTSJC to clarify any doubts related to this Policy, establish the necessary procedures for its implementation, and verify and communicate the rules established in this Policy.
- 4.2. All APTSJC associates, administrators, employees, suppliers, and partners shall comply with the guidelines established herein.

5. GUIDELINES

- 5.1. The APTSJC encourages everyone to report any wrongdoing. If a person becomes aware of any actual or potential violation of the provisions of: (i) the Code of Ethics and Conduct; (ii) the Anti-Corruption Policy; (iii) any other internal APTSJC policy or procedure; or (iv) of the legislation in effect, that person shall immediately report such violations and/or wrongdoing: (i) to the APTSJC Complaint Channel; or (ii) their immediate superior; or (iii) directly to the Legal and Compliance Department.
 - i) Complaints regarding the following matters shall be reported, preferably, through the APTSJC Complaint Channel: fraud; corruption; money laundering; conflict of interest; harassment; discrimination; safety, environment, and health.
 - However, the use of the Complaint Channel is not mandatory, and any other means available for communicating concerns or registering complaints may be used. The APTSJC, however, encourages everyone to use the Complaint Channel to report any concerns they have. No person will be affected, punished, evaluated, or retaliated against if they choose not to use the Complaint Channel.
 - iii) The APTSJC is committed to protecting from retaliation any person who, acting in good faith, has filed a complaint, or is helping with an investigation.
 - iv) The Complaint Channel is available 24 hours a day, 7 days a week, every day of the year. Complaints can be made through the web portal www.helloethics.com/pqtec.

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NO BORDERS FOR INNOVATION INOVAÇÃO SEM LIMITES

- v) The Complaint Channel is operated by an independent company that collects all data provided by complainants and stores them. This independent third party, upon receiving a report, forwards it to the Legal and Compliance Department to properly address and investigate, and shall maintain the utmost confidentiality in order to protect complainants' data against unauthorized use and/or access. These obligations include measures to restrict access to data by unauthorized persons and implementation of technological measures to protect data against access by unauthorized persons and/or systems, and others.
- vi) All complaints are made confidentially and shall be handled by a limited group of people, according to their need for information, mainly by the Legal and Compliance Department of the APTSJC.
- vii) When filing a complaint, the complainant will be asked to provide the following information: who, what, when, and where someone may have or will commit an act of wrongdoing. The complainant may update this information at any time by accessing the Complaint Channel.
- viii) Anyone who has made complaint follow а can at www.helloethics.com/pqtec, by using the protocol number provided at the time of filing the complaint. If an anonymous report has been made, it is even more important that the complainant monitor the progress of the report at www.helloethics.com/pqtec, because this will be the only means of contacting the complainant. Furthermore, the complainant could be contacted to clarify any doubts that may arise during the investigation.
 - ix) Complaints submitted to the APTSJC shall be carefully analyzed and, if the circumstances warrant, they shall be investigated. In the event that a violation is proven, the APTSJC may take the disciplinary and/or legal action it deems most appropriate. The complainant motivated by good faith shall not suffer any form of retaliation, even if the complaint cannot be substantiated.
 - x) The APTSJC repudiates any form of retaliation against complainants. Persons who believe they have been victims of any form of retaliation or have questions



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about it, shall report the fact to their immediate superior, the Legal and Compliance Department, or even file a complaint through the Complaint Channel. Complaints of retaliation shall be analyzed and investigated.

6. QUESTIONS REGARDING THIS POLICY

6.1. Questions regarding the content and application of this Policy must be forwarded to the Legal and Compliance Department of the APTSJC.

7. REVIEW AND APPROVAL

7.1. 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

(A)

Eduardo Bonini Santos Pinto

President

Daniel Wioczydlower

President Vice

EXECUTIVE BOARD

-- DocuSigned by:

Marcelo Munes

Marcelo Nunes da Silva

General Director

Sergio W V Buani Filh

Director of Operation