

OGMA ANTICORRUPTION POLICY**1. Introduction to OGMA Anticorruption Policy**

OGMA – Indústria Aeronáutica de Portugal, S.A. ("OGMA" or "Company") governs its activity based on a set of rules, principles and values that define the conduct of all of its employees and the behavior to be adopted in the relationship between the Company and any other entity or individual with which it relates.

This Anticorruption Policy ("Policy") constitutes the formalization of this set of rules, which require OGMA, across all its activities, to conduct business with ethics, integrity and transparency. The Policy requires compliance with the OGMA Code of Ethics and Conduct ("Code of Ethics and Conduct") and all applicable laws and regulations against bribery, corruption or related offences, including, but not limited to, the Portuguese laws, the United States Foreign Corrupt Practices Act or "FCPA", the United Kingdom Bribery Act of 2010 or "UKBA" or other applicable anti-bribery laws, and rules and regulations on the matters that are implemented.

The Policy also reflects OGMA's commitment to acknowledge and apply the relevant standards foreseen in the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions or "OECD Convention", in the United Nations Convention Against Corruption or "UNCAC", in the United Nations Global Compact and in the Communication from the Commission to the Council, the European Parliament and the European Economic and Social Committee of June 6, 2011 - Fighting Corruption in the European Union.

OGMA understands that its commitment shall be extend to all "Third Party Intermediaries" (as defined in § 4.4) and other business partners, which shall comply with such laws, regulations, standards and ethical practices, as established in "OGMA Due Diligence Procedure".

The Policy specifically prohibits OGMA members of the Board, directors and employees (collectively referred to as "Employees"), as well as all Third Party Intermediaries hired by OGMA, from getting involved in any corrupt act and, directly or indirectly, offer, promise, give or authorize any person to provide money or "Anything of Value" (as defined in § 4.2) to any "Public Authority" (as defined in § 4.1) or any natural or legal person with the purpose of obtaining or accumulate any "Improper Advantage" (as defined in § 4.3).

In this regard, as a company committed to adopting strict Compliance standards and the highest ethical standards, OGMA shall ensure that all Employees and Third Party Intermediaries comply with this Policy, related procedures, the Code of Ethics and Conduct, as well as with all standards mentioned hereinabove, where applicable.

OGMA shall not allow or tolerate any business practice that fails to comply with this Policy. Additionally, all Employees shall review their business practices on a regular basis and, should such practices fail to comply with this Policy, in any manner whatsoever, they shall carry out the necessary adjustments, together with OGMA

Compliance Department ("Compliance Department") to ensure that they are complied with as appropriate.

This Policy is not intended to respond to all the questions and considerations regarding corruption and related issues that may arise in the course of OGMA's business activity. The examples herein are intended to provide support in understanding the object and relevance of Compliance rules and requirements, and therefore, do not reflect the complete list of circumstances covered by the Policy. Therefore, any doubts regarding the application of this Policy, or any doubts or difficulties regarding improper conduct, shall require guidance from the Compliance Department.

All OGMA Employees and business partners shall be familiar with this Policy and comply with the requirements herein, and shall recognize and report any potential corruption issues, so that they can be appropriately handled by the Compliance Department.

2. Anticorruption Policy Purpose

The purpose of this Policy is to describe and explain some of the prohibitions established against bribery, corruption or related offences in all OGMA operations, highlight the specific Compliance requirements related to such prohibitions and reinforce the Company's commitment to conducting its business worldwide with the highest ethical standards, integrity and transparency.

OGMA, as a company with worldwide operation, must comply with the laws and regulations against bribery and corruption applicable in all the countries where it operates. Moreover, as a Company that is part of the Embraer group, OGMA must also comply with Embraer standards, since Embraer is listed on the New York Stock Exchange and is therefore subject to the application of FCPA. This act prohibits, inter alia, the payment of bribes and other illicit payments to Public Authorities anywhere around the world. The violation of such standards or of any other anticorruption applicable standards shall expose OGMA and its Employees or Third Party Intermediaries (regardless of their nationality or address) to criminal, civil or administrative liability, as well as to fines or related penalties.

Interpretation of this Policy should go along with the Code of Ethics and Conduct and related policies and procedures. In case of conflict between this Policy and other OGMA policies, or of any situation in which the provisions in this Policy are more specific than the Code of Ethics and Conduct or other relevant policies, the more restrictive policy or procedure shall apply. In such circumstances, the Compliance Department shall be notified to handle the conflict, recommend the appropriate actions to be taken and, if necessary, review the respective policy or procedure.

3. Anticorruption Policy Application

This Policy fully applies to OGMA, including to the Company's international operations, as well as to any business activities managed or conducted on behalf of OGMA by Third Party Intermediaries. All Employees shall be familiar with this Policy and comply with it. The Policy also applies to the Company's affiliates, direct or indirect subsidiaries to which the Code of Ethics and Conduct applies, representatives, consultants, service providers and other Third Party Intermediaries hired by OGMA.

OGMA's subsidiaries to which the Code of Ethics and Conduct does not apply shall also comply with the principles provided for in this Policy. The Compliance Department shall provide support to such subsidiaries, in order to ensure that they adopt the policies and procedures that promote the same standards, principles and purposes as established in this Policy.

4. Definitions

4.1. The term "Public Authority" means:

- a) Any official or employee, designated or elected, from any department, agency or ministry of any country's government, or from bodies of a municipal, state, regional, federal or multinational government;
- b) Any natural person who, although temporarily or without receiving payment, holds a public office, job or function;
- c) Any official or employee of a public international organization such as, for example, the United Nations or the World Bank;
- d) Any natural person acting in the capacity of authority by, or on behalf of, a public regulatory agency, department, public prosecutor or international organization;
- e) A political party, an official of a political party or any candidate for a political office;
- f) Any manager or employee of a public company or State-owned, as well as public service concessionaires or utility companies (such as ports and airports, electrical power distribution, power generation, water and sewage companies or power plants);
- g) Any member of a royal family (who, despite not having formal authority, can otherwise exert influence in favor of OGMA's commercial interests, either because they hold partial ownership of public companies or State-owned companies, or manage such companies in any manner whatsoever).

The family members of any of the natural persons mentioned above may also be qualified as Public Authorities if the Employee or Third Party Intermediary interactions with them have the purpose or effect of granting Anything of Value to a Public Authority. Any doubts regarding the qualification of a natural or legal person as a Public Authority shall be addressed to the Compliance Department.

4.2. The term "Anything of Value" is broad and may include any item of value, including, for example:

- a) Cash or cash-equivalent (including gift cards);
- b) Benefits and favors (such as special access to any public department);
- c) Provision of services that otherwise would have to be paid or acquired;
- d) Presents and Gifts;
- e) Contracts or other business opportunities granted to a company held by a Public Authority or upon which the Public Authority has some legal right;
- f) Job or consulting opportunities;
- g) Donations to charities;
- h) Political contributions;
- i) Medical or educational expenses;
- j) Expenses with travel, meals, accommodation, shopping or entertainment.

4.3. The term "Improper Advantage" applies to all improper payments carried out in a business context, such as paying or providing Anything of Value to a Public Authority, natural person or legal person, in a direct or indirect manner, in order to:

- a) Influence or prevent a government action, or any other action, such as the awarding of a contract, the imposition of a tax or fine, or the cancellation of an existing contract or contract obligation;
- b) Obtain any license, permit or other authorization from a public entity or Public Authority to which OGMA would not be entitled;
- c) Obtain confidential information about business opportunities, tenders or competitor activities;
- d) Influence the awarding of a contract;
- e) Influence the termination of a contract that is not advantageous to OGMA;
- f) Ensure any Improper Advantage.

4.4. The term "Third Party Intermediary" means any natural person (other than an OGMA employee) or legal person hired (formally or informally) by OGMA to act for or on behalf of OGMA, regardless of the name or position of the natural or legal person. This definition includes, in particular:

- a) Any natural person or legal person used to obtain and/or retain business, such as agents, advisors, consultants, subcontractors, sales representatives and partners in a joint venture;
- b) Any natural person or legal person acting to obtain a license, visa, permit or other form of authorization from a Public Authority, or intervening in a regulatory issue before a Public Authority;
- c) Any natural person or legal person used to represent the Company or its interests before a government, a state entity, public company or State-owned company;

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- d) Any natural person or legal person used to represent OGMA in tax or legal matters;
- e) Any natural person or legal person used to represent OGMA in customs processes.

4.5. The term "Facilitating," "Accelerating" or "Expediting" payment means:

- Any payment made to a Public Authority to normally accelerate and/or guarantee the performance of non-discretionary routine public actions. This type of payment is prohibited by the Company (in accordance with § 6 below).

As an example, such routine public actions may be as follows:

1. Obtaining of permits, licenses or other official documents to qualify a natural person or legal person to do business in a foreign country;
2. Processing of official documentation such as visas and work requests;
3. Provision of police protection services, collection and delivery of mail or scheduling of inspections;
4. Provision of telephone, power supply and water services, transportation of cargo or protection of goods against deterioration; or
5. Similar actions.

5. Prohibited and restricted payments

This Policy explicitly prohibits, without prejudice to any other similar situations that may be considered contrary to the spirit of this Policy, the offer, promise, authorization or payment of cash or Anything of Value, directly or indirectly, through a Third Party Intermediary, to a Public Authority, a natural person or a legal person, intended to ensure any Improper Advantage.

It should be noted that the main anticorruption standards, including FCPA, prohibit such payments in cash or Anything of Value, whether they are made directly or indirectly through Third Party Intermediaries.

The provision of cash or Anything of Value in such a manner as described above is prohibited, whether or not the cash or valuable item are accepted by the intended recipient.

5.1. Types of bribery

5.1.1. Bribery of Public Authorities

Under this Policy, offering, giving, promising or authorizing the offer, giving or promising of cash or Anything of Value to a Public Authority, either directly or indirectly, in order to obtain an Improper Advantage, is considered as bribery.

5.1.2. Private sector bribery (Commercial)

Private sector bribery is furthermore prohibited under this Policy. In this regard, no Employee shall offer, give, promise or receive cash or Anything of Value to or from a private sector natural person or a legal person, in order to obtain an Improper Advantage.

6. Authorized practices and conduct

Under this Policy, Employees are authorized to offer modest gifts, meals or entertainment classified as "Hospitality", as well as travel benefits or other things of value to the Public Authorities and to private natural persons, provided that the provision of such items is lawful and directly related to:

- a) Promotion or demonstration of OGMA's products and services;
- b) Performance of a contract entered into between OGMA and a government, State-owned or State-operated company.

Below are OGMA's requirements under this Policy related to the circumstances in which certain items of value may be offered.

6.1. Gifts and hospitality (including meals and entertainment)

Business decisions of OGMA and its partners shall be made objectively, without the influence of gifts or favors. A small, reasonably priced gift or a gesture of respect or thanks may be an appropriate way for certain business people to show respect for others. Nevertheless, regardless of value, the act of giving or receiving a gift, a meal, entertainment or other hospitality benefit shall not be undertaken with the purpose of improperly influence, any Public Authority, or any other OGMA's business partner.

In this regard, OGMA authorizes the offering of gifts, meals, entertainment, OGMA promotional items and other items of reasonable value, under specified circumstances, to Public Authorities or any other OGMA's business partner. The guidelines and requirements set out in OGMA Code of Ethics and Conduct and related policies and procedures shall be taken into consideration prior to offering gift, meal, entertainment or other hospitality benefits. Any doubts regarding gifts and hospitality shall be addressed to the Compliance Department.

Therefore, gifts and hospitality shall:

- a) Not be offered with the purpose of influencing the recipient to obtain or retain any improper business advantage for OGMA, for any other natural or legal person, or as an implicit or explicit exchange of

favors or benefits, especially for any other less clear or corrupt purpose;

- b) Not be provided to any Public Authority, natural person or legal person related to a contract, or while an OGMA's regulatory decision is pending from such authority, natural person or legal person;
- c) Not include cash or cash equivalent (such as gift certificates or proofs of payment);
- d) Not be luxurious or extravagant and, on the contrary, be of reasonable value (for instance, insignificant if compared with local average wage);
- e) Be provided (or received) on a sporadic basis – a maximum 4 (four) times within 12 months, with each individual offer of a gift, meal, entertainment or other hospitality benefit counting as one (1) time for frequency purposes;
- f) Not include expenses for recipient relatives;
- g) Be provided in a clear, transparent manner;
- h) Be related with the promotion, demonstration or explanation of OGMA products or services;
- i) Comply with local laws and culture;
- j) Be fully documented by means of invoices and related documents;
- k) Be timely and accurately entered in OGMA records.

6.2. Travel, education and related expenses

OGMA may be requested to host Public Authorities, as a result of training events or other business appointments held in facilities provided by OGMA, or of training events sponsored by external suppliers. OGMA may, likewise, be requested to host Public Authorities in operational meetings, project meetings or other events. Any request for payment of travel expenses made by a Public Authority, whether within or away from their place of residence, shall be thoroughly reviewed for consistency with this Policy and with the applicable laws of such authority's country.

Moreover, even where local laws may allow OGMA to pay for the expenses of a Public Authority, further legal requirements may apply to the procedures, accounting and reporting of such payments. Such requirements shall be considered upon planning of Public Authority or private natural person trips to be paid by OGMA.

The guidelines and requirements set out in OGMA Code of Ethics and Conduct and related policies and procedures shall be taken into consideration prior to paying travel, education or related expenses to a Public Authority. Any doubts regarding the payment of such expenses shall be addressed to the Compliance Department.

6.3. Donations and sponsorships

OGMA supports contributions to the communities in which it operates and authorizes reasonable donations to charities. However, OGMA shall always take reasonable steps to confirm that such contribution does not constitute an illicit payment made to a Public Authority in violation of this Policy and of any applicable anticorruption standards.

Donations and sponsorships are permitted provided that they strictly comply with the internal procedures, OGMA Statutes and any applicable laws and regulations in force, and shall not be used as a way to improperly influence business decisions. OGMA shall ensure that donations and sponsorships, consisting of money, services or Anything of Value, are not used to promote illegal payments and shall lead the appropriate due diligence procedures to prevent that the recipient charity does not act as a channel to fund illicit activities, in violation of this Policy and of any applicable anticorruption standards.

OGMA Employees making a request for a donation to a charity shall submit the appropriate supporting documents, so that such donation can appropriately registered and entered in OGMA records.

The guidelines and requirements set out in OGMA Code of Ethics and Conduct and related policies and procedures shall be taken into consideration prior to making a donation or sponsorship. Any doubts regarding donations and sponsorships shall be addressed to the Compliance Department.

6.4. Promotions and marketing

OGMA uses promotional and marketing activities as a means of furthering its business. Promotional and marketing expenses involving people from the public or private sectors may be authorized through appropriate approvals. This Policy shall apply every time Public Authorities or other potential OGMA customers receive gifts, meals, entertainment or expense reimbursement as part of a promotional activity, and any doubts regarding thereto shall be addressed to the Compliance Department.

Approved expenses shall be paid by OGMA directly to the supplier, shall be directly related to OGMA's promotion or of its products and services, and shall be properly documented and recorded.

6.5. Political contributions

This Policy prohibits OGMA from making any political contribution, including to any political party or candidate for political office, by OGMA or on its behalf, without the authorization of the Board of Directors, in accordance with the Code of Ethics and Conduct, this Policy and all applicable laws and regulations.

However, this Policy is not intended to prevent OGMA Employees from participating in the political process in their country of residence (or wherever they are located), or from making personal political contributions. Nevertheless, should they wish to do so, OGMA Employees shall not declare that their own political contributions (or any related opinions or affiliations) are related to OGMA.

Any doubts regarding political contributions shall be addressed to the Compliance Department.

6.6. Conflict of interest

OGMA Employees shall avoid conflicts of interest and are expected to perform their duties with integrity and in OGMA's best interest. Employees shall not take advantage of their positions, use confidential information improperly for their own gain or of Third Party Intermediaries, and have any direct involvement in any business that is contrary to OGMA's business interests or somehow compromises its independence and impartiality.

The Code of Ethics and Conduct provides additional guidelines on conflict of interest issues.

6.7. Mandatory Due Diligence procedure for hiring Third Party Intermediaries and other Business Partners

OGMA may be held liable for the actions carried out by associated persons, agents, suppliers, consultants, service providers and other business partners that conduct business – mainly Third Party Intermediaries – especially when a Third Party Intermediary is providing services or conducting business, discussions or negotiations on behalf of OGMA with public or private organizations (and/or related authorities, directors, or other employees).

In accordance with the applicable laws, OGMA may be held responsible for the illegal actions carried out by such Third Party Intermediaries, regardless of whether or not having effective knowledge of the alleged misconduct.

Therefore, Employees shall never ask a Third Party Intermediary to get involved in (or tolerate), in any manner, any conduct in which the Employee is prohibited to engage according to the terms of this Policy. Moreover, the Employee shall never neglect any suspected violation of this Policy by Third Party Intermediaries, or disregard other suspicious circumstances. Any effective or suspected misconduct shall be immediately reported through appropriate channels or directly to the Compliance Department.

All Third Party Intermediaries conducting business with or on behalf of OGMA shall act with the highest level of commercial, professional and legal integrity. Any OGMA employee seeking to establish a business relationship between OGMA and a Third Party Intermediary shall, before engaging such Third Party Intermediary, carefully review and comply with OGMA's Due Diligence Procedure.

The time and effort necessary to carry out Third Party Intermediary due diligence depends on the number and complexity of the issues raised during the due diligence procedure itself and of the countries involved. Likewise, the scope of the due diligence procedure should be sufficient to define the Compliance-related risks OGMA may face when doing business with the potential Third Party Intermediary or other business partner.

In general, the due diligence procedure should determine, inter alia: (i) whether the natural or legal person proposing to provide a service to OGMA in return for payment is a Public Authority; (ii) whether the legal person employs a Public Authority or is a company in which a Public Authority has an equity interest or has a seat on the Board of Directors; (iii) whether the services the person or entity wishes to provide are necessary to further an existing business initiative or contract; (iv) whether the person or entity has the expertise, experience and other qualifications to legitimately perform the necessary services; and (v) whether the person or entity is likely to engage in practices that could expose OGMA to liability.

Any issues or Red Flags (as defined in § 9) raised during the due diligence procedure shall be appropriately addressed as determined by the Compliance Department, before the relationship is formally entered into or maintained. If necessary, OGMA may engage the services of external entities to research the ownership, expertise, experience and other qualifications of the Third Party Intermediary considered for the provision of services under a proposed or existing contract with OGMA

OGMA's due diligence efforts are developed under the leadership of the Compliance Department, in conjunction with the rules, guidelines and processes described in the Company's Due Diligence Procedures for Business Partners. Any questions regarding the need for due diligence or the most appropriate way to perform a role in the due diligence process shall be addressed to the Compliance Department.

OGMA is committed to perform appropriate and reasonable due diligence procedures on the reputation and integrity of any company in which it invests. Accordingly, due diligence procedures shall apply to mergers, acquisitions and joint ventures. Guidelines for appropriate due diligence in relation to such affiliations are provided for in the Company's applicable policies and procedures

Finally, OGMA shall require written contracts for all Third Party Intermediary and other business partner engagements. Only in certain, limited circumstances involving the purchase of goods and services from a

supplier, may the written contract be in the form of a Purchase Order, which will include appropriate anti-corruption agreements.

7. Facilitating payments

The use of facilitating payments (as defined in § 4.5.) may be considered a customary way of doing business in some countries. However, it should be noted that such payments are prohibited by the anticorruption laws of many countries. Also, customers whose projects OGMA may be supporting may prohibit such payments. In addition, facilitating payments are generally illegal under the local laws of most countries. Based on the foregoing, this Policy prohibits Employees or Third Party Intermediaries from making facilitating payments on behalf of OGMA.

8. Financial records and payment practices

In compliance with the applicable laws, it is OGMA's policy to maintain accurate financial documentation reflecting its operations. Compliance with this Policy is regularly audited and is subject to the internal control procedures in place within the Embraer Group. Accordingly, records of all payments made or received shall reflect such transactions in an accurate, appropriate manner. Moreover, OGMA prohibits confidential, unrecorded and unreported transactions

In order to ensure compliance with this Policy and related applicable laws, it is of paramount importance that all financial and business documentation of OGMA fairly and accurately reflects all transactions involving the Company's business and/or disposition of the Company's assets. Accordingly, all expenses shall be accurately accounted for, include appropriate supporting documentation and be promptly entered into the Company's records prior to being reimbursed.

This includes, for example, the accurate identification (in expense reports and related financial and business reports) of all payments to Third Party Intermediaries representing or acting on behalf of OGMA, as well as donations to charities, gifts, meals, entertainment or other involving Public Authorities and private natural or legal persons.

It shall constitute a violation of this Policy to falsify or claim reimbursement for any expense that does not meet the requirements of this Policy, and to tolerate or improperly accept falsified documents or reimbursements made on the basis of such documents.

9. Red Flags

While all proposed payments related to business operations, contracting or the like must be evaluated based on specific facts, special attention must be paid to Red Flags related to bribery and corruption. Red flags shall be

considered to exist where any fact or circumstance suggests that a particular transaction, relationship or hiring involves a probable risk of bribery or corruption

Upon identification of a Red Flag, careful consideration should be given to the steps that need to be taken in order to minimize or eliminate the risk of bribery or corruption that such relationship may present, including the possible termination of the relationship.

Should such facts or circumstances be known or suspected, they shall be reported through the appropriate channels or to the Compliance Department. Examples of non-compliance with this Policy or that represent corruption risk are as follows:

- a) Operations involving countries known for corrupt payments;
- b) Payments provided or carried out in cash;
- c) Extravagant or luxurious gifts or hospitality involving a Public Authority;
- d) Payments made to offshore companies or in countries traditionally known as tax havens;
- e) Inappropriately documented payments or expenses;
- f) Requests from Employees or Third Party Intermediaries for a transaction to be structured in such a way as to disguise relevant facts or circumvent local laws;
- g) The Third Party Intermediary requests payment in a country other than the one where its headquarters or main administrative offices are located or where it has a permanent establishment directly involved in the performance of the business for which it was hired;
- h) The Third Party Intermediary is not qualified or does not have the experience and resources necessary to carry out the duties for which it has been hired;
- i) The Third Party Intermediary is newly formed or otherwise lacks historical information;
- j) The Third Party Intermediary refuses to certify compliance with anticorruption practices or objects to anticorruption declarations, warranties, covenants or due diligence procedures related to contracts with OGMA;
- k) The Third Party Intermediary is linked with current or previous corruption cases or other legal violations;
- l) The Third Party Intermediary has questionable or duplicated responsibilities;
- m) The Third Party Intermediary has been recommended by a Public Authority;
- n) The Intervening Third Party has a personal, family or commercial relationship with a Public Entity;
- o) The Third Party Intermediary requests unusual contractual terms or payment arrangements that raise concerns under the standards cited in § 1. of this Policy, such as cash payments, payments in foreign currency, payments to a third party unrelated to the business transaction, or payments prior to the conclusion of a purchase contract (or any other form of prepayment);
- p) The Third Party Intermediary commissions or fees exceed the usual rate charged for similar services in that geographic area, or unreasonably exceed the prices paid by OGMA for similar services elsewhere.

10. Other issues relating to this Policy and to Anticorruption Compliance standards

10.1. Penalties

By complying with these rules and regulations, OGMA and its Employees may be investigated by regulatory authorities in different jurisdictions and, depending on the circumstances, be subject to administrative, civil or criminal prosecution. Such investigations may result in severe fines and penalties, debarment or imprisonment, if OGMA and its Employees are found to be in actual violation of applicable anticorruption laws or regulations.

Any Employee found to be in violation of this Policy shall be subject to disciplinary action, which may include termination for cause, in accordance with the applicable laws and OGMA policies.

Agents, consultants and other Third Party Intermediaries working for OGMA who violate this Policy shall be subject to termination of their business relationship, as well as any to other remedies available to OGMA under the applicable law.

10.2. Notification of facts and suspicions

It is the responsibility of all Employees to ensure compliance with this Policy.

Any doubts, suspicions or concerns about past or proposed actions by any person at OGMA (or any Third Party Intermediary working for the Company in any capacity) that may violate this Policy or the applicable law, shall be reported to the Compliance Department.

10.3. No retaliation

Regardless of the validity of the fact or suspicion reported, or of the method used for that purpose, and also regardless of the results of OGMA's investigation of allegations, retaliatory actions against the person responsible for reporting, in good faith, an alleged violation of the Code of Ethics and Conduct, this Policy, other applicable policies or applicable laws and regulations shall not be tolerated.

10.4. Training

Periodic training on OGMA anticorruption program shall be administered as established in the annual planning approved by the Management. Training classes shall include, not limited to, OGMA senior management, Employees whose responsibilities require them to interact with Public Authorities, and employees with job functions in the financial, commercial and quality departments, as well as Third Party Intermediaries, as necessary and appropriate.

11. Clarification of doubts and reporting of facts or suspicions

OGMA Employees are encouraged to clarify doubts regarding this Policy.

Any doubts or concerns about a specific situation that relates, in any manner whatsoever, to this Policy (or related policies and procedures) shall be reported to the Compliance Department before any action is taken.

Employees shall immediately report any situation related to bribery and improper request or offer of payment or advantage.

OGMA Compliance Department shall be contacted to clarify any doubts or concerns, or report an allegation. OGMA's whistleblowing channel may also be used if any assistance or additional information is needed.

CEO

The text hereinabove, provided on the Intranet – ONS, is conforming to the paper original, signed by the competent approver and kept by the issuer, who provided for its register. This Directive is signed on 18 November 2021 by the CEO, Mr. Alexandre Solis.