

## Ethics and compliance

In operation since 2015, our Compliance Program is the management platform that ensures the application of the principles and guidelines of the Code of Ethical Conduct in all the company's processes and relationships, including the performance of third parties and contractors. Structured management and control mechanisms are constantly evolving, responding to identified opportunities for improvement.

One of the fronts for action, between 2021 and 2022, was the update of the Code of Ethical Conduct and the Anti-Corruption Policy. Among other relevant topics, the two normative instruments guide the conduct of administrators, employees and third parties in their relationship with public agents, expressing total disagreement with the payment of bribes, kickbacks or the offer of undue advantages.

In addition to disclosing updated documents, the Compliance area worked

on training and strengthening an ethical culture among employees. The training carried out throughout 2022 reinforced the conduct guidelines and mechanisms for guidance and clarification of doubts.

These actions totaled 20 hours in the Compliance Agents program and another 1 hour for each employee among the 142 trained in the new Code of Conduct and Ethics. Compliance Agents, one of our main initiatives on this front, is a program that trains employees to disseminate corporate rules and guidelines in their areas of operation.

A distance training module (e-learning) was also launched on Enauta's Code of Ethics, mandatory for 100% of the workforce. We also carry out specific training for the supply area, with the aim of reinforcing partner monitoring and evaluation practices, in addition to promoting training on sustainability aspects (specific ESG) for the entire workforce.

All suppliers and social organizations that receive sponsorships from the company are registered in a portal that makes it possible to carry out documental procedures and are evaluated by the Compliance area.



### 15%

of Enauta employees participated in the Compliance Agents program in 2022



### 100%

of suppliers undergo due diligence assessment

### Confidential Channel

The main channel for communicating behaviors and attitudes that are not in line with corporate values or governance guidelines is the Confidential Channel. The tool is part of Enauta's Compliance Program and is managed by an external company, ensuring the confidentiality of information and the anonymity of whistleblowers who choose to do so.



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