



GIFTS AND HOSPITALITY POLICY

SYSTEM PROCEDURE (NTQA)

NTQA	1380	-	01
ABBREVIATION	NUMBER/PART		REVISION

Approval Date:	15/10/2021
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1 – PURPOSE

The practice of giving gifts and hospitality to business partners is very common in business relationships. However, the rules established by the anti-corruption legislation impose necessary limits that need to be observed.

This policy aims to regulate the practices of offering and receiving gifts and hospitality accepted by TIGRE, guiding its employees and partners on the correct stance to be adopted, in accordance with the Anti-Corruption Law and the Tigre Code of Ethics and Business Conduct, in order to avoid actual conflicts of interest and situations that may characterize bribery or corruption, ensuring transparency and integrity for business relationships.

It is important to emphasize that although maximum values are set to allow for the receipt or offer of gifts and hospitality, these should never represent undue advantages to those involved or have the purpose of influencing decisions, even if they are lower than the values accepted by TIGRE.

The TIGRE group has multi-national operations and, therefore, in countries where local laws are stricter than company policies, the stricter rules will prevail.

2 – ADDITIONAL DOCUMENTS

Código de Ética e Conduta Tigre
Política Anticorrupção e de Relacionamento com o Poder Público
Carta de Agradecimento

3 – DEFINITIONS

Gifts: Objects that do not have commercial value and are normally distributed as a courtesy, due to disclosures, campaigns, holidays, visits and events. Some examples: promotional pens and key chains, calendars and notebooks.

Gifts: Objects or benefits that have commercial value and are intended for personal use or consumption, with the exception of prizes resulting from campaigns or sweepstakes, and are distinguished from gifts generally because they do not contain the supplier's logo. Some examples: wines, non-institutional DVDs, pens without a logo engraving, electronic devices and shirts without a printed logo.

Entertainment: These are activities or events whose main purpose is to provide leisure to its participants, such as parties, concerts, sporting events or celebratory meals.

Hospitality: Includes transfers (air, land and/or sea), accommodation, meals and other gatherings offered for specific occasions.

Bribery: It is the act of giving or receiving any amount of money or any other favors in order to influence or secure an improper advantage related to a transaction, contract, decision, or result.

4 -SCOPE

This covers all Employees (Own and Third Parties) and other business partners of the Grupo TIGRE, acting on its behalf, whether individuals or companies, for profit or not, such as, but not limited to associations, suppliers, subcontractors, brokers, consultants, service providers, customers, among others.

5 – PRINCIPLES

The practice of offering, receiving, or granting gifts, presents and hospitality may, in some situations, generate expectations or claims for favors, practicing bribery or an improper advantage, representing a

situation of conflict of interest, and to avoid this scenario, this policy infers compliance with the following mandatory principles:

- The practice takes place in an ethical and transparent manner and in compliance with applicable laws and principles;
- No gifts, presents or hospitalities in kind (money or any other means of financial transaction) are allowed;
- Although permitted by this policy, it should not be prohibited by local law;
- They can never be characterized as undue advantages to those involved, or have the purpose of influencing decisions;
- Does not exceed the amount limits defined in this policy, in order to prevent them from being interpreted as bribery;
- A criterion of reasonableness as to values should be followed in order to avoid being interpreted as a bribe;
- The period of offers to the same partner should not be exaggerated, in order to configure bribery or attempt to influence decisions;
- Any offer or concession must always be approved by the immediate superior, according to TIGRE's hierarchy chart;
- Employees are prohibited from soliciting favors or gifts to third parties with whom they conduct business;

6 – GIFTS AND PRESENTS

Gifts and presents offered by suppliers or partners of TIGRE may be accepted, as long as they do not exceed the value of USD 50.00 (fifty US dollars).

It is important to emphasize that, despite the establishment of price limits allowing the receipt or offering of gifts and hospitality, these events shall never represent improper advantages to those involved or have the purpose of influencing decisions, even if lower than the amount limits allowed by TIGRE.

Gifts must have an institutional, educational and/or scientific purpose;

When it is not possible to ascertain the price, through a tax document, order or receipt, it must be estimated for adequacy and compliance with this policy.

In case of receiving gifts or presents above the allowed value, the immediate superior and the Compliance department must be reported. Also, the recipient should arrange for the return of the gift or present by filling out the Acknowledgement Letter (available on the intranet/connect).

The offering of gifts and presents to Public Agents is regulated by the Anti-Corruption Policy and Relationship with Public Authorities.

7 - MEALS

Business lunches and dinners are very common and routine practices throughout the business, also being accepted by TIGRE, as long as you observe some guidelines, listed below:

- Meals must be related to TIGRE's business matters, with a strictly professional purpose, and cannot be a reason for personal interests of those involved
- The values should not be exaggerated, avoiding exuberance, and should be equivalent to a normal business meal, according to local standards;
- Meals should not include the spouses of those involved, when they are not directly involved in the business.
- They shall not involve the expectation of something in return.

Compliance department approval is required if the meal:

- Exceed the value of R \$ 200.00 (two hundred reais) per person;
- Include the other party's spouse or guests;
- It is not directly related to TIGRE's business.

8 – TRAVEL and LODGING

When third-party travel and accommodation is the result of events supported or promoted by TIGRE, there is no need for approval by the TIGRE Compliance department, with the approval of the immediate superior being sufficient.

There is also no need for internal approval, when the obligation to fund travel and accommodation is provided for in the contract.

For all other reasons, including when invited by the partner, travel and accommodation must be previously approved by the Compliance department.

The amounts must not exceed the limit established for the directors, in accordance with the TIGRE Travel and Stay Expenses standard. Exceptionally, in cases where the amounts are above what is allowed, expenses must be authorized by the Compliance department.

Travel must have a clear business purpose.

9 - FAIRS, EXHIBITIONS and OTHER EVENTS

At events, fairs and exhibitions in which TIGRE is a participant or supporter, tickets for its business partners may be paid for, without the need for approval by the Compliance department, with the approval of the immediate superior being sufficient.

For all other cases in which TIGRE is only an interested party, offering tickets to business partners is also permitted, however, it will depend on prior approval by the Compliance department.

10 – ENTERTAINMENT

Invitations to concerts, dance presentations, concerts, games and other forms of entertainment deserve special attention, as they are usually not related to the corporate business.

Therefore, except for events promoted by TIGRE or that it is part of, any offer of invitations must be previously approved by the Compliance department.

Emphasizing that the invitation must never assume undue advantages or be offered with the expectation of influencing decisions.

11 – QUESTIONS

If you have any questions about this Policy or whether a gift is appropriate or allowed, please contact the Compliance area.

12 - CANAL DE ÉTICA

Be aware that the attitudes and behaviors of professionals are in accordance with the principles and values of TIGRE, is your commitment!

Therefore, whenever you notice something that doesn't seem correct, please check our Code of Ethics and Business Conduct and our policies. If you notice something is wrong, please report it.

TIGRE will not tolerate any form of retaliation against anyone who makes a good faith report or allegation of an offense to the company's principles and values.

ETHICS CHANNEL

www.contatoseguro.com

Telephones:

Brazil	0800-602-1350
Argentina	0800-333-9101
Bolivia	800-100-871
Chile	1230-080-8966
Colombia	01800-518-2172
Ecuador	1-800-000-268
Paraguay	009-800-110-137
Uruguay	000-416-205-2744
Peru	0800-55308
United States	1-800-986-9306

8- BIBLIOGRAPHY

Not applicable.

9 – ANNEXES

Not applicable