

ANTI-BRIBERY POLICY

CODE
PO-SGA-001

REVISION
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DATE
13/04/2020

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TITLE

Anti-Bribery

ISSUANCE

Prof. Maria Cristina Thomaz, Ph.D.

ENDORSEMENT

Curator Council

REVISION LOG

[illegible]

1 PURPOSE

This Anti-Bribery Policy of the **Foundation to Support Research, Education and Extension – Funep** is intended to delimit the actions of all those involved, directly or indirectly, with the Foundation, regarding corruption and bribery practices, in addition to our Code of Ethics and Conduct.

Funep is committed to executing its activities in a fair, ethical, transparent and honest manner, compromising with laws, regulations, norms and guidelines in all jurisdictions in which it operates.

In compliance and in the Funep's Code of Ethics and Conduct, any activity which involves offering, promising, soliciting or receiving (directly or indirectly) money or any other benefits to ensure undue advantage regarding our activities or as inducement or reward for improper acts, whether these are committed by Funep's employees, business partners or someone else operating on its behalf, is inadmissible and illegal.

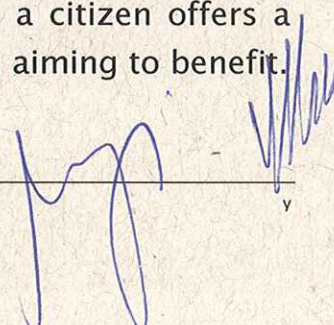
2 COVERAGE

This policy applies to all Funep's employees and others who operate on its behalf.

3 DEFINITIONS

- **Corruption:** Under the Administrative Improbity Law, the concept of "Corruption" is embedded on the "administrative misconduct" understanding, which are known to cause damage to the public money, illicit enrichment and violation of administrative principles.

The "Corruption" term was also typified in the Brazilian Penal Code to refer to public service misuse in order to have an advantage. Passive corruption occurs when a public official requests money or other benefits in order to do or not do something. Active corruption comes when a citizen offers a financial or any other kind of advantage to a public agent, aiming to benefit.



- **Bribery:** Offering, promising, giving, accepting or soliciting any amount of improper advantage (financial or non-financial), directly or indirectly, regardless of place, in violation of applicable laws, as an incentive or reward to someone who is acting or not acting in relation to the performance of its obligations.

4 RESPONSIBILITIES

4.1 Board of Trustees

- Approve Funep's anti-bribery policy.

4.2 Compliance Officer

- Maintain this Policy Updated;
- Make this Policy available to Funep's employees and to others who operate on its behalf.

4.3 Funep Managers

- Demand that the requirements of this Policy are implemented and enforced in its departments and roles.

4.4 Funep's employees

- Respect and apply this Policy.

5 DESCRIPTION OF THE POLICY

Funep, a Foundation created with the purpose of making scientific, educational, cultural, environmental and assistance production activities easier, establishes as fundamental anti-bribery premises:

- The bribery practice is forbidden.;
- It is a duty to comply with the Code of Ethics and Conduct;
- It is a duty to comply with the Brazilian Anti-Corruption Law 12.846/2013, other laws and other requirements which the Funep is subscribed;
- Meet and continuously improve the Anti-Bribery Management System;
- Ensure *Compliance Officer* authority and complete independence to deal with any Bribery issue.



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In case of awareness or suspicion of bribery practices, the employees must report this situation to the Reporting Channel, which is treated confidentially, may be made anonymously, and no retaliation or sanctions will be tolerated against those who have made good faith reports.

All Funep's employees are required to comply with this Policy and others who operate on its behalf, which consists of a violation when its precepts are not respected, which may result in disciplinary measures according to the Consequence Balance Policy (PO-SGA-002).