



Anti-Bribery and Anti-Corruption

1. Leading the fight against corruption and bribery

NETMOVE strictly prohibits actual use or attempts of any form of bribery or corruption, directly or indirectly. NETMOVE is determined to conduct business with integrity, always acting ethically and in compliance with all such applicable laws and regulations. This policy applies to all employees, business partners and suppliers and any other individual or company acting on behalf of NETMOVE in Brazil and abroad.

2. What is bribery?

Bribery is the act of taking or receiving something with the intention of influencing the recipient in some way favorable to the party providing the bribe. Bribery is considered illegal.

A bribe is something valuable (such as money) that is given in order to get someone to do something.

3. What is corruption?

Corruption is the lack of integrity or honesty, especially susceptibility to bribery; use of a position of trust for dishonest gain. It can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs.

4. NETMOVE will not tolerate bribery

Corruption, bribery or bribery attempts are unacceptable. This applies both to the offer of a bribe or to the acceptance. NETMOVE repudiates any practice that would be linked to actions that favor people and characterize situations of corruption or bribery. Everyone will ensure that such situations are not practiced under any circumstances.

NETMOVE makes the commitment to conduct all their business with ethics, integrity, honesty and in accordance with applicable laws.

5. Policy Statement

Obligation with immediate effect

All employees, business partners and suppliers are required to maintain a legal and ethical behavior and to comply with all guidelines set forth in this policy.

NETMOVE takes actions to ensure that everyone is fully informed of all applicable regulations, regularly conducting audits to assess and ensure compliance of this policy.



Legal compliance

All employees, business partners and suppliers must be aware of all applicable laws against bribery and corruption in all the jurisdictions in which they act, and that they will obey and comply with those laws.

Ethical behavior

As a demonstration of its commitment, NETMOVE promises to take a zero tolerance approach to bribery and corruption. NETMOVE, employees, business partners and suppliers will act professionally, fairly and with utmost integrity in all business dealings and trade relations whenever they act.

6. Code of Conduct

By agreeing and committing to this policy, employees, suppliers and business partners are responsible for:

1. Never get involved in any kind of bribe, either directly or through any second or third party.
2. Never offer or make a payment improperly or authorize payment (cash or otherwise) to any person, including any local or foreign agents anywhere in the world.
3. Never attempt to induce an individual or local or foreign agent, to act unlawfully or improperly.
4. Never offer or accept money or anything of value, such as gifts, kickbacks or commissions related to business acquisition or implementation of a contract.
5. Never offer or give any gift or hospitality benefit to any public employee or government official or representative if there is any expectation or implication for a return favor.
6. Never accept any gift from any trading partner if there is any suggestion that a favor in return is expected or is implied.
7. Never facilitate payments to obtain a level of service which one would not normally be entitled to.
8. Never ignore or fail to report any indication of improper payments to the respective authorities.
9. Never induce or assist another individual to break any applicable law or regulation.
10. Communicate to superiors any second or third party action which has seen and / or witnessed, that violate the policy.