

MAY 2019



## ANTICORRUPTION POLICY

GLOBAL FOREST BOND

### Global Forest Bond –Anticorruption Policy

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|------------|--|---------------|
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## GOAL

The Global Forest Bond Anti-Corruption Policy aims at clarifying to all employees the Company's position regarding actions considered as acts of corruption. It refers to all its employees, third parties, in all its activities. The Company requires all its collaborators and third parties to comply with its Code of Conduct and all its policies in force, as well as the strict observance of the laws and regulations regarding corruption in force in Brazil and in any place where it carries out its activities.

Global Forest Bond recognizes its role in society and the importance of ethical, transparent and fair conduct in the relationship with the Public and Private Sector. Thus it is through this Policy to bring its guidelines of combat and prevention to the corruption, mainly in its businesses next to the governmental organs.

Global Forest Bond does not conform to practices of active corruption, passive corruption, payment for facilitation, money laundering, influence peddling, concussion, and any other corrupt practice in conducting its business.

The issues discussed here are crucial for the business continuity and, therefore, noncompliance will not be admitted.

## APLICABILITY

This policy applies to Global Forest Bond employees, suppliers and third parties, service providers and business partners who have any activity with the Company. Everyone must state formally that they know and accept this policy.

## DEFINITIONS

**Corruption:** to promise, offer or give, directly or indirectly, an undue advantage to a national or foreign public official, or to the third person, in order to determine, to practice, omit or delay an official act.

**Public Employee:** Regardless of the hiring through Public Tender, it is considered a civil servant, for legal purposes, a person who, although temporarily or without remuneration, holds a position, job or public function. It is equated to a civil servant who holds a position, job or function in a parastatal entity, and who works for a company that provides services or is contracted for the execution of a typical Public Administration activity.

**Acts of Corruption:** acts of corruption are practiced by people and/or companies that corrupt (solicit actions and offer/promise something in return) and by people and/or company that they allow themselves to be corrupted (accept something in





return to do or not to do determined action), seeking favor or benefit to the one who corrupts.

**Undue advantage:** payments, offers or promises of payment or offer of any type of gift, gratuity, money or benefit to gain an undue advantage to which Global Forest Bond is not legally guaranteed. Ex: obtaining confidential information, influencing contracts, influencing bidding processes, etc.

**Payment for facilitation:** payment for facilitation are disbursements made to accelerate the process or provision of service to which the company has a right guaranteed by law. Ex. Obtaining permits, licenses, visa applications, police protection, etc ...

**Influence traffic:** corruption is not always manifested through disbursement of money but also through exchanges of favors. Influence traffic is characterized by the use of a third person with the intention of influencing the decision or action of public official (national or foreign) in the exercise of their functions.

**Money Laundering:** The practice of money laundering corresponds to the attempt to camouflage the illicit origin of financial resources through the use of these resources in legal operations, in an attempt to make it appear that their origin is lawful.

## FORBIDDEN PRACTICES

Global Forest Bond prohibits any offer, promise, authorization or payment in cash or any good of value to public officials or their family members, directly or indirectly, through third parties, for an improper advantage. These actions are considered a crime by the Brazilian Anti-Corruption Law and international laws. Global Forest Bond fully complies with current legislation and other regulations.

Payment for facilitation is also considered a crime under Brazilian law (Law 12.846/13). Thus, Global Forest Bond prohibits payments to be made for facilitation, either by its Employees or by Third Parties acting on behalf of the Company.

It is therefore prohibited to offer or promise money, gifts, favors or any form of benefit to the individual with the intention that it influences the performance of a public official, so that it grants benefits or benefits of any nature to the Global Forest Bond.

All gifts or hospitality (travel, dining, entertainment) offered to Public Authorities must strictly follow the procedure and limits set forth in the Global Forest Bond Gifts and Hospitality Policy.



Money laundering is also considered a crime under Brazilian law and a prohibited practice in business conducted by the Company.

## RELATIONSHIP WITH THE PUBLIC SECTOR

Contracts signed with the Public Administration make up an important part of the Global Forest Bond business. And in view of the Company's commitment to society, all Employees involved in bidding, waiver, unenforceability and other modalities of negotiation, in accordance with the law, with the Public Sector must be engaged so that best practices are applied.

All the relationship with public agencies must follow the rules set forth in the notice, in the Law of Tenders (8,666/13) and in the Anti-Corruption Law (12,846/13), as well as in all applicable laws. Therefore, when interacting with a public administration body, Global Forest Bond and all its employees commit to:

- a. Maintain absolute transparency in all information exchanged and discussed;
- b. Internally record the action, clearly and precisely;
- c. Formalize all documentation submitted;

Some situations may indicate the occurrence of improper practice and in these cases there is a need to investigate in order to verify the legality of the situation. Examples of situations that require attention are:

- a. Atypical or extremely complex contracting structures with no reasonable basis for such structure;
- b. Travel expenses or gifts involving public officials and related persons;
- c. Request for the Company to hire a third person, indicated by a public official;
- d. Multiple payments to the same entity;
- e. Excessively high value for the service in question or not commensurate with the contractor's stature;
- f. Payments in cash or for unidentified accounts;
- g. Payments for services not rendered;
- h. Contracted company belonging to a public official or related persons;
- i. Payments in bank accounts in a country other than the contractor's headquarters or in places where the service has not been performed; and
- j. Payments on individual accounts.

The situations presented above are not exhaustive and are not evidence of unlawfulness in actions, but are points of attention that need to be monitored and analyzed.



## HIRING OF PUBLIC EMPLOYEES, THEIR FAMILIES OR RELATED PERSONS

The hiring of civil servants, their advisors or family members is sometimes used to cover up acts of corruption. As a result, Global Forest Bond establishes the following rules for hiring in these situations:

- a. The hiring of civil servants, their families and advisors will only occur if there is no legal provision that prevents, and should occur only according to the technical qualifications and never with the intention of obtaining any form of advantage, benefit or favor;
- b. They should not be carried out with the purpose of influencing, directing the action or obtaining any kind of advantage or benefit, either for the Global Forest Bond itself or for the Global Forest Bond;
- c. Candidates to fill a vacancy in Global Forest Bond employees who are public servants, family members or civil servants' advisers must follow the recruitment and selection process without benefit of any kind;
- d. The hiring must occur in the face of real need and pre-existing vacancy.

and. Contracting of ex-servants must be carried out with the approval and formalization of the Director of the contracting area and after verifying the existence of some type of quarantine required by the Public Administration where the candidate was in charge.

The hiring of a former public servant should be treated as an exceptional case, assessing the technical attributes of the person, disassociating him from the position he held and setting the values in the market parameters.

In the case of movements, any Global Forest Bond Employee having a first-degree relative in the civil service must report to the immediate manager.

## CONTRATAÇÃO DE TERCEIROS

A legislação vigente prevê a resposanbilização das pessoas jurídicas mesmo que os atos entendidos como corrupção sejam praticados por terceiros, agindo em seu benefício. Desta forma, a contratação de terceiros para atuarem na Global Forest Bond, seja como prestadores de serviços, ou realizando qualquer forma de negócio, deve seguir regras claras.

O terceiro deverá declarar, formalmente, que conhece e aceita o Código de conduta da Companhia, bem como as políticas de integridade aplicadas por esta.

A Global Forest Bond somente contratará Terceiros em face de real necessidade dos serviços contratados e não deve conceder privilégios ou benefícios de qualquer natureza. Nos casos em que o terceiro atue em algum projeto

relacionado a Orgão Governamental, as análises quanto à idoneidade, integridade e atuação ética devem ser aprofundadas, baseando a contratação estritamente em pressupostos técnicos do contratado.

As contratações em caráter simplificado devem apresentar capacidade técnica adequada.

Somente devem ser estabelecidas relações comerciais com empresas comprometidas com aspectos éticos e com o combate à corrupção.

O Departamento contratante deve preencher o questionário de compliance, bem como deve encaminhar o questionário para o devido preenchimento pelo potencial fornecedor.

Deve ser esclarecido o projeto em que o Terceiro irá atuar e o motivo que gerou a necessidade da contratação.

A análise dos resultados dos questionários será feita pelo responsável pelo Compliance que avaliará se existe algum impedimento ético ou risco para essa contratação.

Caso nenhum impedimento seja identificado, o Diretor da área fará sua análise e aprovará ou não a contratação.

#### QUANTO AOS LIMITES DE ATUAÇÃO

Terceiros atuando em nome da Global Forest Bond devem se ater ao escopo definido em contrato e não estão autorizados a realizar quaisquer negociações com o setor público ou privado que não estejam expressamente previstas em contrato.

São proibidos de realizar qualquer tipo de oferta ou promessa a funcionários públicos, familiares e seus assessores, seja na forma de presente, brinde, viagem, hospitalidade, convites para entretenimento, dinheiro, favores ou vantagens.

#### PAGAMENTOS AOS TERCEIROS

Os pagamentos aos Terceiros devem seguir as normas internas da Global Forest Bond, as disposições contratuais, bem como devem ser tomados os seguintes cuidados:

- a. Não devem ser realizados pagamentos em dinheiro ou via documento ao portador;
- b. Somente serão realizados pagamentos em conta bancária em nome da Pessoa Jurídica contratada ou, excepcionalmente, no caso de contratação de Pessoa Física, em conta corrente de sua titularidade;
- c. Não devem ser realizados pagamentos em conta bancária em país distinto daquele que foi prestado serviço, ou ainda, em país em que a



- empresa contratada não possua sede ou filial, ou ainda em praças bancárias qualificadas pelo Banco Central do Brasil como paraísos fiscais;
- d. Será requerido comprovante com o valor real do serviço prestado e demais informações necessárias para o devido registro da operação.

## REPORTE DESDESCUMPRIMENTOS OU SUSPEITAS DE VIOLAÇÕES

O previsto nesta política não é exaustivo. Qualquer situação de dúvida deve ser apresentada ao responsável pelo Compliance ou seu superior hierárquico, que poderão orientá-lo na melhor atitude a ser tomada.

Os colaboradores poderão se utilizar do e-mail [compliance@gfbond.com.br](mailto:compliance@gfbond.com.br) para obter esclarecimentos.

É responsabilidade de todo colaborador zelar pelo cumprimento de todas as políticas da Global Forest Bond. Assim, caso saibam ou suspeitem de violações, as mesmas devem ser comunicadas Pelo e-mail [compliance@gfbond.com.br](mailto:compliance@gfbond.com.br).

## NÃO RETALIAÇÃO E CONFIDENCIALIDADE

Conforme definido pelo Código de Conduta os relatos e denúncias recebidos serão tratados como confidenciais durante o processo de análise e investigação, caso necessário.

A Global Forest Bond não admite qualquer tipo de retaliação aos colaboradores que fizerem um relato ou uma denúncia, desde que estes sejam de boa-fe.

## PENALIDADES PREVISTAS EM CASOS DE VIOLAÇÃO

O desrespeito aos princípios da Política Anticorrupção sujeitará os Colaboradores às ações disciplinares e legais cabíveis.

No caso de Terceiros atuando em nome da Global Forest Bond que venham a contrariar o disposto nesta Política, ações devem ser tomadas, inclusive a aplicação de penalidades contratuais, o encerramento do contrato e acionamento legal de reparações por prejuízos sofridos pela contratante.

A Lei 12.846/13 prevê penalidades para empresas envolvidas em casos de corrupção, sanções rígidas que impactam os Colaboradores.

A Lei 8.666/93 prevê penalidades para as pessoas físicas que pratiquem atos contrários à execução de licitações públicas, conforme estabelecido na referida Lei. Penalizações para as pessoas jurídicas em face de descumprimentos são previstas na lei 12.846/13.







As penalizações da pessoa jurídica previstas pela Lei 12.846/93 não impedem que as pessoas físicas que cometeram a ação definida como crime sejam punidas também nessa esfera.

## TREINAMENTO

Todos os funcionários receberão treinamento específico sobre a Política Anticorrupção e suas implicações. Os treinamentos serão de atendimento mandatório.

Esta política poderá ser revista a qualquer tempo, desde que necessário.

