

1. PURPOSE AND SCOPE

The purpose of this Anticorruption Policy (“Policy”) is to provide and unify standards and internal rules, reinforcing preventive practices to fight against corruption, as well as setting forth rules, guidelines to every contact or interaction of CBMM Collaborators with Public Authorities at all levels, and procedures aiming at preventing corruption risks.

This Policy reflects the values and principles presented in the [CBMM Code of Ethics and Conduct](#) (“Code”), to ensure a business environment based on ethics, integrity, and transparency.

All shall follow the behavior standards below for compliance with CBMM values and ethical principles:

- Prohibition of bribery of any nature;
- Compliance with the [Code](#) of Ethics in the activities;
- Compliance with this Policy;
- Compliance with other CBMM policies, procedures, and internal rules;
- Compliance with the Brazilian Anticorruption Law (Federal Law No. 12.846/20130 and its regulations in addition to the foreign anticorruption law applicable to CBMM activities;
- Compliance with requirements of [ISO 37001](#), aiming at continuous improvement of the CBMM Antibribery Management System.

This policy applies to all CBMM Collaborators and affiliates for activities in or outside the Brazilian territory, as well as to CBMM Third Parties, as defined in this Policy.

2. SCOPE

This policy incorporates CBMM compliance guidelines and the scope of the CBMM Anti-Bribery Management System – SGAS, which is reflected in the fight against corruption and Bribery, in any of its forms, in the public and private sphere, in the production and supply of products of niobium in Brazil and abroad.

3. DEFINITIONS

For purposes of this Policy, please consider the definitions of the terms below:

- **“Government Agents”** mean individuals in positions, jobs or functions of Public Entities, including: (i) government officials of any level or department, agency or branch of the government, including, but not limited to, public or government controlled companies; (ii) individuals who hold or have applied for public positions; (iii) members of political parties; (iv) officials or representatives of international public organizations of which governments are members, such as the World Bank and the United Nations; (v) members

of the royal family; or (vi) any other individual performing activities on behalf of or representing any of the mentioned individuals. **This concept includes national and foreign Government Agents and may vary depending on the country, therefore, in case of questions, please consult the Compliance Management.**

For example, Government Agents include: city councilors, house representatives, senators and political candidates, civil and military policemen, including Firefighters, employees of municipal, state, or federal governments, employees of notary offices, employees of the National Department of Mining Production / National Mining Agency (like agents, inspectors, and supervisors), employees of public companies or companies controlled by the government (like Petrobras, BNDES, Banco do Brasil), public universities, companies controlled by foreign government, inspectors from IBAMA and the Federal Revenue, diplomats, among others.

- **“Freebies”** are small promotional items, usually branded with the CBMM or a Business Partner logo, offered, received, or exchanged as courtesy, advertisement, publicity and celebration of events or special dates (for example, diaries, calendars, or key rings).
- **“CBMM”** or **“Company”** means CBMM and its affiliates.
- **“Collaborators”** means all the employees, members of the Board of Directors and interns who work at the headquarters or any branch or affiliate of CBMM.
- **“Compliance Management”** is CBMM area responsible for the management of CBMM Compliance Program as well as for the performance of Compliance Function in the ABMS.
- **“Donation”** means voluntary payment of resources of any nature, including but not limited to donation in cash, goods, or services, from CBMM to Public or Private Entities, as provided in the CBMM Donation and Sponsorship Policy, including those carried out through Tax Incentive Laws.
- **“Private Entity”** includes any private legal entity that interacts with CBMM.
- **“Public Entity”** means (i) any agency, body, department or subdivision of any direct or indirect Public Authorities, or foundation of any of the Federal, State, or Local Spheres, the Federal District and Municipalities, including autarchies, public companies, mixed economy companies and public foundations; (ii) state bodies or entities or diplomatic representations from a foreign country, in any level of government sphere, as well as legal entities directly or indirectly controlled by the public authorities of a foreign country; and (iii) international public organizations, such as the World Bank and the United Nations Organizations. This concept may vary depending on the

country, therefore, should there be any question, always consult the Compliance Management.

- **“Hospitality”** comprises expenses paid to strengthen relationships, such as lodging, transportation, meals and entertainment promoted, supported, or sponsored by CBMM or a business partner.
- **“Business Partners”** are CBMM’s corporate contacts, and these could be Entities or Private or Government Officials.
- **“Relative”** refers to the spouse of Collaborator and its blood relatives or relatives by affinity, in direct or collateral line until the 4th degree, as described in the table below:

RELATIVE:		Spouse, that is, husband, wife or partner in common law marriage.		
OTHER RELATIVES:				
Degree	Blood relative (related to the Collaborator's family)		By affinity (related to spouse)	
	Direct Line	Collateral	Direct Line*	Collateral
1 st	Father, mother, natural or adopted son, daughter	-	Stepfather, stepmother, in-laws and natural or adopted stepson	-
2 nd	Grandparents and grandchildren	Brother, sister	Spouse's grandparents and grandchildren	Brother and sister in-law and their spouses
3 rd	Great-grandparents and great grandchildren	Uncle, aunt, niece, and nephew	Spouse's great-grandparents and great- grandchildren	-
4 th	Great-great-grandparents and great-great grandchildren	Cousin (1st degree), great-uncle, great-aunt and grandchildren nephew and niece	Spouse's great-great-grandparents and great-great grandchildren	-

* For direct line, the kinship by affinity is not terminated with the end of the marriage or common-law marriage, that is, even separated/divorced or widow, relatives by affinity in direct line with the Collaborator shall remain as “Relative” according to this Policy.

Table 1: Relatives up to 4th degree

- **Stakeholders:** individual or organization, either internal or external to CBMM that may affect or be affected by a CBMM decision or activity.
- **“Sponsorship”** means any kind of voluntary transfer (including, but not limited to, sponsorship in cash, goods and services) to any Public or Private Entities. As a rule, the consideration of the sponsor is publicity/exposure of its brand and/or institutional image.
- **“Sponsorship under Incentive”** means the Sponsorship based on incentive laws.

- **“Related Persons”** refers to people who are in an intimate relationship with the Collaborator, including without limitation, boyfriend/girlfriend, fiancé/fiancée, close friends, godparent, people with whom the Collaborator maintains a partnership and people with whom the Collaborator maintains any type of relationship.
- **“Public Power”** means the Public Authorities and Government Officials, jointly.
- **“Gifts”** are perishable goods (for example, wine or chocolate) and non-perishable goods (for example, books or electronic items), with commercial value, offered, received, or exchanged in business relationships or in ceremonial situations and intended for personal use.
- **“Antibribery Management System or ABMS”** is a set of elements that comprise the Compliance Program of an organization and are interrelated to set forth policies, objectives and processes of the antibribery management.
- **“Bribery”** is an offer, promise, donation, acceptance or request of undue advantage of any value (either financially or otherwise), directly or indirectly and regardless of location, that breaches applicable laws, such as an incentive or reward to an individual (either from the public or private sector) who acts or fails to act regarding the performance of their obligations.
- **“Third Party”** means any individual or legal entity that acts on behalf, in the interest or for the benefit of CBMM, provides services and/or delivers goods, including distributors, agents, brokers, custom agents, middlemen, consultants, resellers, commercial representatives and includes, for the purpose of this Policy, individuals or legal entities subcontracted by CBMM Third Parties.

4. CBMM CONTEXT

CBMM is a corporation operating globally with Brazilian shareholding control. Worldwide leader in technical solutions for niobium products, it provides for approximately 400 clients in more than 40 countries. CBMM's headquarter and industrial plant are located in the State of Minas Gerais, in the city of Araxá and the company also has offices and subsidiaries located in São Paulo, in China, Netherlands, Singapore and the United States.

5. STAKEHOLDERS

Stakeholders related to the Antibribery Management System – ABMS as well as their needs and expectations are listed in document [NEPI-SIG-01](#) – Needs and Expectations of Stakeholders.

6. AUTHORITIES AND RESPONSIBILITIES

6.1. Governing Body

The Governing Body is a collegiate body referred to as Risks and Audit Committee, responsible for complying and applying the guidelines from ABMS, as presented below:

- supervise the compliance of the Anticorruption Policy;
- ensure alignment of CBMM strategy to the Anticorruption Policy;
- periodically receive and critically analyze the information related to content and operation of the Antibribery Management System;
- ensure that proper and necessary resources are allocated and nominated for the efficient operation of ABMS and CBMM Compliance Program; and
- reasonably supervise the deployment of CBMM Compliance Programs and ABMS, by the Senior Management, thus ensuring its efficiency.

6.2. Senior Management

The Senior Management is represented by the CEO of CBMM, responsible for the deployment and compliance of the CBMM Compliance Program, in addition to ensuring that responsibilities and authorities are designated for the relevant roles and notified throughout CBMM, as follows:

- ensure that the Compliance Program, including this Policy and the ABMS objectives, are provided, deployed, maintained, and critically analyzed to properly address the corruption risks of the organization, with the support of the Compliance Function;
- ensure the integration of ABMS requirements in the organization processes;
- provide reasonable and proper resources for the efficient operation of the ABMS;
- foster internal and external communication on the Anticorruption Policy;
- foster internal communication on the importance of an efficient anticorruption management and compliance;
- ensure that the ABMS is properly designed to achieve its goals;
- direct and assist CBMM Collaborators, with the support of Compliance Function, to contribute for CBMM Compliance Program efficiency;
- promote an appropriate compliance culture at CBMM;
- ensure and support the Compliance Function to promote continuous improvements on suitability, sufficiency, and effectiveness of the ABMS – Antibribery Management System;
- support other relevant roles of CBMM management, presenting how leadership in the prevention and detection of bribery and other illicit acts apply to the areas under their responsibility;

- encourage the use of the Confidential Line to report, in good faith, bribes and other illicit acts, actual and suspected; and
- ensure that CBMM collaborators do not undergo retaliation, discrimination or disciplinary measures related to reports, provided in good faith or based in reasonable belief, of breach or suspected breach of law, of the Code of Ethics and Conduct, this Policy, as well as other CBMM internal policies and regulations, or by refusal to take part in bribery or other illicit act, even if such refusal may cause loss of business for the organization (except when the individual participated in the breach).

6.3. Compliance Function

CBMM's Compliance Function is performed by the Executive Manager of the Legal, Investor Relations and Compliance, and the Compliance Manager of the Compliance Management and has the competence, autonomy and independence to:

- ensure the performance of activities provided by the Senior Management on the Compliance Program and the ABMS – Antibribery Management System;
- supervise the preparation and deployment of the CBMM Compliance Program;
- ensure that the ABMS complies with the requirements of the Anticorruption Policy and the requirements of regulation ISO 37001;
- provide advice and guidance for Collaborators and Third Parties on the ABMS and other issues related to corruption and illicit acts; and
- report the performance of the ABMS and Compliance Program to the Governing Body and Senior Management, as applicable.
- Have direct and unrestricted access to the Governing Body and Senior Management to deal with matters related to the SGAS and other anti-corruption and anti-bribery practices and guidelines, in addition to the other guidelines of the CBMM Compliance Program.

6.4. Collaborators and Third Parties

- learn, comply, and ensure compliance of the CBMM Compliance Program guidelines and policies, including compliance with the law, the Code of Ethics and Conduct, this policy, as well as other CBMM internal policies and regulations;
- not to offer and expressly refuse any type of Bribery and undue advantage on behalf of CBMM or on the performance of direct and indirect activities related to CBMM interest;
- remain constantly updated regarding documents and policies that comprise the Compliance Program and the ABMS of CBMM;
- carry out trainings related to the Compliance Program;
- actively perform for the preservation and dissemination of the integrity culture at CBMM;
- report in good faith to the Compliance Management or through the Confidential Line of CBMM any breach or suspected breach of law, of the

Code of Ethics and Conduct, this Policy as well as other CBMM internal policies and regulations.

7. GUIDELINES

7.1. General Rules

The CBMM Code of Ethics and Conduct expressly prohibits payment or reception of any undue advantage, in any manner, for whatever reason and in any context, regardless of individuals involved or of the circumstances. It is also prohibited the performance of any other illegal conduct.

The concept of undue advantage should be understood in a broad sense and not only as of the mere payment of cash. Undue advantage is anything that has some value for the Private or Government Official, even if there is no value for the giving party. Therefore, the promise, offer or reception of any undue advantage is forbidden, whether in cash or as assets, gifts, freebies, employment positions, lunches, dinners, services, donations, sponsorships, or any other advantage to/from Government or Private Official with the intention of gaining or which results in improper benefit (financial return, more beneficial treatment, preferred contracting, illegal act or omission, and others).

The prohibitions provided in this Policy apply both for conducts carried out directly or through any other third party, either individual or corporation. This includes situations when the offer, promise or payment is made by the Collaborator or CBMM directly, as well as situations when the offer, promise or payment is made by third party or individuals related to the recipient.

CBMM and all its Collaborators shall comply with the principles provided by the ABMS, including, but not limited to, this Policy and the Code of Ethics and Conduct, as well as several anticorruption laws in Brazil and abroad. The best-known laws are: Criminal Code (Decree - Law No. 2.848/1940); Anticorruption Law (Law No. 12.846/2013, regulated by Decree No. 11.129/20228); Improbity Act (Law No. 8.249/92); and the American anticorruption law known as US Foreign Corrupt Practices Act (FCPA).

For improvements on suitability, sufficiency, and effectiveness of the ABMS, CBMM plans and manages the necessary procedures for continuous improvements.

The results of the monitoring and measurement process, internal audits and critical analysis from the Governing Body, Senior Management and Compliance Function, jointly with actions to address risks and opportunities, achieve ABMS goals, comply with applicable legal requirements, remedy non-conformities and investigate/treat reports are taken into consideration for the deployment of improvements necessary to increase the effectiveness of ABMS.

CBMM and all its collaborators shall be committed to the continuous improvement of the ABMS.

7.2. Specific Rules

a) Bidding procedures and/or hiring of Public Entities

CBMM shall not tolerate, under any circumstances, acts that damage Public Administration, either domestic or foreigner, including without limitation, any act that aims to: (i) frustrate or defraud the competitive nature of bidding processes with any Public Entity; (ii) obtain improper benefits from changes and extensions of contracts executed with Public Entities; (iii) manipulate or defraud the financial-economic balance of contracts executed with Public Entities.

b) Response to Request or Demand of Undue Advantage

In case of request, requirement or demand of any advantage not allowed in this Policy – directly by the Public Official or Private Employee or related person – the Collaborator shall immediately, expressly, and unequivocally refuse it. By refusing such request, the Collaborator may mention the Code of Ethics and Conduct and this Policy.

Moreover, the Collaborator shall notify the Compliance Management as soon as possible.

c) Interaction with Government Official or Public Entity

The offer, delivery, promise or authorization for others to deliver, directly or indirectly, any undue advantage to any public official, either national or foreigner, or any related third party is deemed as corruption. Such conducts are expressly prohibited by the legislation in force and by CBMM Policies.

Furthermore, CBMM Collaborators and Third Parties must always be assured that their conducts do not interfere, render difficult, prevent, obstruct, or disturb the work or activities held by Public Entities or Government Officials, including their investigation and inspection activities.

All personal interactions with Government Officials (for instance, meetings, presentations, inspections, and others) should be attended, preferably and whenever possible, by at least two (2) Collaborators.

In the case of visits to CBMM offices or facilities by candidates to public positions, mayors, city councilors, secretaries and/or delegates, the two collaborators should be: a Manager or Director, accompanied by a member of the Legal Department or the Institutional Relations Department.

Routine and periodical inspections (for instance, inspections by fiscal authorities, labor authorities, the Firefighters, and others), in general, shall be

attended by the party responsible for the unit visited and the relevant technical area, accompanied by a member of the Legal Department. In any event, the participation in inspections at CBMM units must be immediately notified to the general management of the unit and the Legal Department.

Personal interactions with Government Officials should occur at CBMM facilities or at the worksite of the Government Official. Personal interactions with Government Officials at sites that could be deemed as suspicious illegal situation (for instance, meetings held in hotel rooms) should be avoided.

As part of its activities, CBMM may execute a Conduct Adjustment Agreement (TAC) or judicial or extrajudicial agreements with Public Entities. These adjustment agreements or other agreements should be executed in a transparent fashion and in full compliance with current legal principles, as well as with the mandatory involvement of the Legal Department. Eventual obligations that should be complied with by CBMM as a result of the adjustment agreement or other agreements executed with Public Entities (for instance, compensation or environmental remediation terms) should be compliant with applicable legislation. Moreover, the outsourcing of Third Parties for due compliance with the obligations shall be in accordance with CBMM internal procedures.

The relationship between Collaborators and Government Officials who are competent or hold jurisdiction or authority over CBMM shall be solely professional. Should there be any personal relationship or connection outside the scope of professional activities (for instance, friendship, kinship, or any social relationship), said relationship must be informed to the manager, whom, in turn, should guarantee that such relationship shall not interfere or influence the professional activities or interests of CBMM. Moreover, it is recommended that the Collaborator should avoid engaging in any issue or process where there is involvement of the Government Official with whom there is a personal or social relationship.

d) Registry of interaction with Government Official or Public Entity

The communication with Government Officials should be clear and direct, avoiding texts or expressions that allow for questionable interpretations.

Every email communication sent by Collaborators should be made using official and institutional email accounts of CBMM and preferably to official and institutional email accounts of recipient Government Officials. The use of personal or non-institutional email accounts (for instance, Gmail, Yahoo!, Hotmail, Globo, UOL, and others) by Collaborators is not allowed and by Government Officials should be avoided. The definition of agenda topics, follow-up on pending or previously discussed issues, as well as communications that are relevant to the ongoing activity should be preferably formalized by email.

If any interaction with Government Official is not according to regular terms or is a reason for concern to the Collaborator, regarding violation of any Law or CBMM Internal Policy, this situation must be immediately presented to the Manager or immediate supervisor in the area. Should the Manager or immediate supervisor understand that there should be adoption of mitigation measures, the Compliance Management should be consulted.

e) Payment of Fees to Government

Payments which aim to accelerate or speed up the practice of routine acts by Government Officials (for instance, issuance of licenses, permits, or authorizations, running of inspections or visits) known as “speed-up,” “acceleration,” or “urgency” payments or fees will be allowed solely when expressly provided for under the law and officially, paid directly to the public entity (using appropriate slips) and never to the individual Government Official or intermediate. Situations like this should be pre-approved by the area Director.

No Collaborator or Third Party may offer, promote, pay, or authorize such payments extra-officially or with no legal provision.

f) Freebies, Gifts and Hospitality

The offer and receipt of freebies, gifts, and hospitality aiming to start or strengthen relationships is a common practice in the corporate world. However, it is important that these situations have a legitimate purpose and that they are not linked to any type of improper benefit to CBMM.

In this sense, prior to offering or accepting freebies, gifts, or hospitality, either regarding a Government or Private Official, the Collaborator shall comply with the limits, rules and procedures described in the [PLC-GXJC-04](#) – CBMM Policy on Freebies, Gifts and Hospitalities.

g) Donations and Sponsorship

Donations and Sponsorships seek to support cultural, social, educational, sports, environmental, urbanization and health initiatives in the community where CBMM operates. These actions may never be performed with the intent to get any improper benefit to CBMM and must be accounted for in an accurate and transparent manner in the Company records. Furthermore, donations with political party purposes are not allowed to be made on behalf of CBMM.

Each and every donation or sponsorship must always be in accordance with applicable laws, as well as meet CBMM rules and procedures provided for in the [PLC-GXJC-02](#) – CBMM Donation and Sponsorship Policy.

h) Hiring Third Parties

CBMM aims to work with partners, vendors, and service providers that share the same ethical and conduct standards of the Company. This includes clear non-tolerance with any type of corruption.

Under specific circumstances, CBMM and its Collaborators may be held responsible for acts committed by Third Parties who act in their name, interest, or benefit. To mitigate the risk of liability, and in line with the best practices in integrity programs recognized by the Brazilian and foreign anti-corruption legislation, the selection and contracting of Third Parties by CBMM should be solely based on objective criteria, either technical, legal, or economic, and should be compliant with CBMM's Policies. Upon identification of compliance risks in the relationship with Third Parties, measures should be adopted to mitigate and/or run a thorough analysis related to the Third Party.

Detailed information about the guidelines and contracting process of CBMM are described in the [PLC-GXJC-05](#) - CBMM Third-Party Engagement Policy.







8. COMMUNICATION CHANNELS

The reputation and success of the Company depends on the compliance with legal and ethical rules provided in applicable laws, in the Code of Ethics and Conduct of CBMM and in this Policy.

Any potential infringement to this Policy should be immediately reported to the Compliance Management, in person or using the CBMM's Confidential Line of the Ethics and Claim Line of CBMM, which may be accessed through the website or phone numbers listed on www.cbmmcompliance.com, as shown below:

Ethics Channel, which can be accessed via the website
www.cbmmcompliance.com or by the following telephone numbers:

AVAILABLE 24H A DAY, 7 DAYS A WEEK

-  **BRAZIL – 0800-721-0754**
-  **USA – 1-800-982-0934**
-  **SWITZERLAND – 0800-835-088**
-  **NETHERLANDS – 0-800-022-2352**
-  **SINGAPORE – 800-852-3836**
-  **OTHER COUNTRIES: +55 11 2739-4508**

This telephone number accepts collect calls.

CBMM encourages Collaborators and Third Parties to identify themselves, to facilitate the ascertainment of facts and respond to doubts presented. However, if Collaborator or Third Party does not wish to be identified, the Compliance Management shall take all steps available to determine the facts. If an information is provided anonymously, CBMM shall respect the anonymity.

If an information is made confidentially (but not anonymously), CBMM shall preserve such confidentiality as much as possible, always considering the need for the proper performance of investigations and, if necessary, the obligation to respond appropriately to any investigation or enquiry carried out by public entities.

Any internal investigation shall be carried out avoiding the exposure of Collaborators or CBMM.

Under no circumstances violations or potential violations notified in good faith by a Collaborator or Third Party shall give rise to any type of retaliation. Clear cases of retaliation shall not be tolerated and are subject to disciplinary measures, as mentioned in item 9 of this Policy.

CBMM values and incentivizes an open and transparent communication environment. On the other hand, any false accusation or untrue information with the intent to harm any person shall be deemed as a violation of this Policy and the Code of Ethics and Conduct of CBMM.

CBMM encourages communications made in good faith, in a responsibly and ethical manner. If any Collaborator or Third Party believes that their

query/complaint was not given proper attention, the Compliance Management is always available to provide any necessary clarification.

9. DISCIPLINARY MEASURES

In addition to penalties provided for in the law, non-compliance with any of the terms related to this Policy shall cause the Collaborator to be subject to disciplinary measures, to be applied according to the nature and seriousness of the infringement.

- Verbal or written warning;
- Suspension; or
- Termination of employment agreement for cause.

Any Third Parties involved in the practice of any infringement of this Policy and/or the Code of Ethics and Conduct of CBMM shall be subject to the specific sanctions set forth in the respective agreements or the applicable law, including termination of said agreement or termination of the business relationship.

10. APPROVAL SYSTEM

The individuals responsible for the preparation, update and approval of this Policy are defined and maintained in a system called Document Control System, upon permissions of revision groups and approval flows. The critical analysis and final approval for the Anticorruption Policy of CBMM is carried out by the Governing Body. The periodical updates of this document shall also be approved by the Governing Body.

The system parameters for the control, creation, insertion, revision, approval, version, availability, and proper access to documents are defined in the Document Control System. The system ensures the protection of the documents against loss of confidentiality, improper use or loss of integrity.

11. EXHIBITS

Exhibit 1 – History of Revisions.



HISTÓRICO DAS REVISÕES
HISTORY OF REVISIONS
ANEXO 1
EXHIBIT 1

Nº: **PLC-GXJC-06**
Versão/Version: **3.0**
Página/Page: **28/28**

VERSÃO VERSION	ITEM	HISTÓRICO DA REVISÃO HISTORY OF REVISION	DATA DA REVISÃO REVISION DATE
1.0	- 3	Emissão do documento em substituição a ADM-DECE-11 ver. 2.0 e ADM-DECE-12 ver. 2.0. <i>Issuance of document replacing ADM-DECE-11 ver. 2.0 and ADM-DECE-12 ver. 2.0.</i> Alterados os números das normas ADM-DECE-01, ADM-DECE-02, ADM-DECE-03, ADM-DECE-04, ADM-DECE-05 e ADM-DECE-06 por PLC-GXJC-04, PLC-GXJC-02 e PLC-GXJC-05. <i>Changed the standards numbers ADM-DECE-01, ADM-DECE-02, ADM-DECE-03, ADM-DECE-04, ADM-DECE-05 and ADM-DECE-06 by PLC-GXJC-04, PLC-GXJC-02 and PLC-GXJC-05.</i>	21.01.23 01.21.23
2.0	Todos All	Revisão geral para implantação da ABNT NBR ISO 37001:2017. <i>General Revision to deploy ABNT NBR ISO 37001:2017.</i> Aprovado pela diretoria em reunião dia 31/01/2023 <i>Approved by the board in a meeting on 01/31/2023.</i> Aprovado pelo Órgão Diretivo em reunião dia 13/03/2023. <i>Approved by the Governing Body in a meeting on 03/13/2023.</i>	24.03.23 03.24.23
3.0	6.3 7.1	Especificadas as funções que exercem a Função Compliance <i>Specified the duty that perform the Compliance Function</i> Alteração para o novo Decreto nº 11.129/2022 <i>Amendment to the new Decree No. 11.129/2022</i>	17.11.23 11.17.2023