

ALMAVERDE ENERGIA Anti-corruption Policy

Version: 1

Date: 26.09.2024

ALMAVERDE ENERGIA aims at long-term business maintenance and development and risk evaluation and mitigation; ALMAVERDE embraces sustainability criteria, and respect for all employees, workers, business partners, and stakeholders.

ALMAVERDE ENERGIA refuses corruption and requires that suppliers comply with this Policy, that forbids corruption of anyone and payments of bribes or kickbacks of any kind, whether in dealings with public officials or individuals in the private sector.

No one from ALMAVERDE ENERGIA shall pay or offer to pay a bribe or provide another gift of value for obtaining an inappropriate benefit, to any third party, public or private, with whom ALMAVERDE ENERGIA is doing business.

Compliance with Anti-Corruption Laws

Each ALMAVERDE ENERGIA representative shall conduct itself with high ethical standards and comply with all applicable anti-corruption laws. No ALMAVERDE ENERGIA representative shall, directly or indirectly, promise, authorize, offer or pay anything of value (including, but not limited to gifts, travel, hospitality, charitable donations or employment) to any government official or other party to improperly influence any act or decision of such official for the purpose of promoting the business interests of ALMAVERDE ENERGIA in any respect, or to otherwise improperly promote the business interests of ALMAVERDE ENERGIA. "Government Official" is defined below.

"Government Official" refers to all of the following: (1) any employee of a government entity or subdivision, including elected officials; (2) any private person acting on behalf of a government entity, even if just temporarily; (3) officers and employees of companies that are owned or controlled by the government; (4) candidates for political office; (5) political party officials; and (6) officers, employees and representatives of public international organizations, such as the World Bank and United Nations.

Anticorruption measures

ALMAVERDE ENERGIA has established the following measures to prevent corruption and illegal activities related to its business:

- ALMAVERDE ENERGIA Due Diligence system ensures verification of the feedstock suppliers as for ownership of timber and fulfilment of legal obligations in harvesting and trading timber;
- ALMAVERDE ENERGIA does not pay in cash and invoicing is mandatory in any kind of business relationship with suppliers or other parties;
- Any likely or evidence of corrupt practises will result in the termination of relations with the people involved, and business activities with the companies they represent will be reconsidered.
- Any kind of proven corruption, bribery or illegal activities are not tolerated and will be reported to the authorities.

ALMAVERDE ENERGIA will not tolerate retaliation against anyone who has reported a possible violation of this Policy or has refused to participate in activities that violate this Policy.