

A background image showing a man in a dark suit, white shirt, and dark tie, sitting and writing in a notebook with a pen. He is wearing a watch on his left wrist. The image has a blue tint.

MANUAL ANTI-CORRUPTION TTY

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1.Introduction

TTY and its employees are committed to conducting the Company's business in a legal, ethical, transparent, and professional manner. This document aims to ensure that its employees and representatives understand and comply with the requirements of anti-corruption laws.

Managers and Authorized Representatives must take measures to ensure that employees under their supervision comply with the rules and guidelines set forth in this manual. TTY considers anti-corruption laws applicable to all employees, including the Board of Directors, as well as third parties acting on behalf of the Company, such as consultants, service providers, business partners, suppliers, representatives, and others.

2.Glossary

Corruption

The abuse of power or authority by an individual to obtain personal benefits. The most common form of corruption is bribery.

Bribery

The offering, giving, receiving, or soliciting of anything of value in exchange for favorable treatment from a company, public official, or government employee.

Public Official

All managers and employees of state-owned or government-controlled enterprises (the term "public official" includes family members such as spouses, partners, parents, children, siblings, nephews/nieces, uncles/aunts, grandparents, and first cousins).

Facilitation Payment

A payment made to a public official to secure or expedite the performance of a routine governmental action to which a person or company is legally entitled.

Improper Advantage or Undue Payment

Cash payments or any transfer of value, whether tangible or intangible, made to influence or reward any official act or decision by a public official.

3. Anti-Corruption Standards

All TTY employees and representatives are required to comply with the following policies:

- Employees of TTY and third parties acting on its behalf are prohibited from offering, promising, making, authorizing, or providing, directly or indirectly, any undue advantage, payments, gifts, or transfer of anything of value to any public official in order to influence or reward any official act or decision by such person for the benefit of the company.
- Meals, entertainment, travel, or other business courtesies must be reasonable, consistent with local law, and directly related to a legitimate business purpose. It is prohibited to offer meals, travel, or entertainment to public officials in order to influence or compensate an official act or decision for the benefit of the Company. Such courtesies must not exceed the value of R\$150.00 (one hundred and fifty Brazilian reais) per person.
- No gift or giveaway may be given in exchange for favorable treatment by a public official for the benefit of TTY. Giveaways to any public official must not exceed the value of R\$150.00 (one hundred and fifty Brazilian reais), and the item must bear the Company's name or logo.
- Facilitation payments are prohibited, even if permitted by the laws of other countries.
- The rules set forth herein apply to all third parties representing TTY. A third-party contract must be based on TTY's business interests and the merits of the company or individual being contracted.
- Contributions to charitable causes may not be made in exchange for favors from any public official, even if the beneficiary is a genuinely charitable organization.
- Employees are prohibited from using TTY to make donations to political parties, political campaigns, or candidates for public office on behalf of the Company.
- Any sponsorship must be based on formal agreements between TTY and the institutions receiving the sponsorship.
- Employees have a duty to maintain books and accounting records in a manner that ensures all transactions are recorded accurately. This requirement extends to all original documents, including invoices, receipts, and expense reports. Inappropriate, ambiguous, or fraudulent accounting entries are not permitted.

4.Avoiding Penalties

Certain signs may indicate to employees the occurrence of an undue advantage being granted to a public official or their relatives. Therefore, to avoid sanctions, pay close attention to the following behaviors:

- A participant in the business has a reputation for corruption;
- There is a request for a commission to be paid in cash or through irregular means;
- The company is controlled by a public official or their relative, or has a very close relationship with government agencies;
- The company is recommended by a public official or refuses to include references to Anti-Corruption measures in contracts, among other things.
- It is the responsibility of all employees to report any violation or suspected violation of the Anti-Corruption law requirements, as outlined in this Manual.
- In case of knowledge or suspicion of any irregularity or violation, the employee must report it to the Whistleblower Channel via email at wanderlmartins@gmail.com (MARTINS Advogados), or by phone at +55 (38) 99810-5461. Reports may be made anonymously or with identification and will be received by an independent company and handled confidentially by the Compliance Office.
- Violations of Anti-Corruption laws may result in severe administrative sanctions and civil and criminal penalties for TTY, its employees, officers, and representatives involved.
- Retaliation of any kind against employees who, in good faith, report violations will not be tolerated and may result in disciplinary action.

Violations of Anti-Corruption laws may result in severe administrative sanctions and civil and criminal penalties for TTY, as well as for the employees, executives, and representatives involved.