



COMPLIANCE AND ANTI-BRIBERY POLICY

Estaleiros do Brasil is a company dedicated to the Execution of Project Management, Design, Engineering, Procurement, Construction and Industrial Assembly, Commissioning and Integration of Modules for Offshore Production Platforms, related to the Oil and Gas sector.

Estaleiros do Brasil conducts its business with ethical and honesty principles, in a transparent manner and adopting good market practices.

This policy is applicable to shareholders, investors, managers, members of the board of directors, professionals and any individuals or companies that represent **Estaleiros do Brasil**.

The communication and understanding of the Compliance and Anti-Bribery Management System requirements by all organization levels involved is the basis for the correct and unambiguous determination of what must be done to ensure the compliance with the law and to safeguard the organization integrity.

Estaleiros do Brasil is committed to and determines the compliance with the following guidelines:

- Bribery of any kind is prohibited.
- Compliance with anti-bribery laws applicable to the organization is mandatory.
- The performance of the Compliance and Anti-Bribery Management System must be critically analyzed to ensure its continuous adequacy, sufficiency and effectiveness.
- The requirements established by the Compliance and Anti-Bribery Management System procedures must be fully met.
- Any concern, based on good faith or reasonable belief in trust, must be reported by the appropriate channels. Non-retaliation is guaranteed for good faith whistleblowers.
- Adopt actions aimed at the continuous improvement of the Compliance and Anti-Bribery Management System.

The Governance and Integrity Director, reporting to the Board of Directors of **Estaleiros do Brasil**, is responsible for the implementation and maintenance of the Compliance and Anti-Bribery Management System in the organization.

The Governance and Integrity Director has sufficient authority, independence and organizational freedom to implement the necessary actions to ensure the compliance with this policy and other requirements of the Compliance and Anti-Bribery Management System.

Failure to comply with the requirements set out in this policy will be subject to applicable disciplinary measures.

São José do Norte, October 17, 2022.

Wataru Nosaka
Chairman of the Board of Directors

Dorian Luís Valeriano Zen
C.E.O.
Marcelo Ribeiro de Mendonça Lima
Governance and Integrity Director