

The logo for RADIX features the word "radix" in a white, lowercase, sans-serif font. The letter "i" is stylized with a dot that is a bright green leaf-like shape. The background of the entire page is a deep purple color with a complex, abstract pattern of overlapping, thin, light purple lines that create a sense of movement and depth.

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Integrity Channel



# Integrity Channel

Our integrity program also comprises the Compliance Report Channel. It allows whistleblowers, questions or even clarifications related to our Compliance rules. The Compliance Report Channel foundations and principals are:

- Confidentiality
- Professionalism
- Agility
- Effectivity
- No Retaliation
- Whistlelower Protection

## Integrity Channel

Any act not in full compliance with the law and internal company procedures and rules, specially those related to the company ethics code, shall be reported to the Ethics Committee. There are two electronic emails that can be used for this purpose.

Those integrity channels are available through the company website. Anyone with access to the website can email the channels, whether they are an employee, contractor, or anyone else.

### How to utilize the Compliant Channel ([canaldedenuncia@radixeng.com.br](mailto:canaldedenuncia@radixeng.com.br)):

Whether the misconduct happened in the past, present or future it doesn't matter, or even if an action has really taken place or if it was just in intention, these are not in compliance with the law or Company Code of Ethics.

Therefore it is important to inform the company of any suspension the person may have. The whistleblower should provide as much information as possible:

- a) Identify yourself (just as a matter of allowing further clarification) or, if the person prefers to remain anonymous, please provide a private email as way for future communication
- b) How did the whistleblower come to find the misconduct out? Did he or she see or hear anything? Did he or she hear from a third person?
- c) What are the facts that can be reported?
- d) What happened?



- e) When did it happen? Is it still happening?
- f) Who is involved?
- g) Are there any other companies involved?
- h) Is anyone else aware of the situation?
- i) Are there any witnesses? Who?
- j) Is there any evidence? Do he or she have other suggestion on how to find other evidence?

The information will be helpful for the compliance committee to quickly analyze the situation and respond to it in order to prevent or avoid misconducts and damages to the company and also to protect the whistleblower.

Those that make a complaint in good faith are fully protected from any sort of punishment. However, the company will consciously monitor the channel to avoid misuse by misconduct or gross negligence and proper discipline action will be applied accordingly. Same way, discipline action will be properly applied in case of any employee that is aware of acts or facts that should be reported to the Compliance Report Channel, but fails to do so.



Therefore, any employee, manager, or supervisor should not punish a whistleblower with good faith that provided proper information and concerns relating to a possible violation of the company rules. It is also protected those who provide additional information in the course of an investigations related to complaints.

It is important to highlight the whistleblower will be given full confidentiality once the report is made throughout investigation. The purpose of this is to protect the whistleblower who has good faith, from any retaliation, in case the report is declined. Doing so, the whistleblower can safely provide their credentials and be assured it will be confidential during investigation.

In case of any employee threatening, or even tentatively threatening to retaliate against someone reporting in good faith, the person who intimidates will be subject to disciplinary sanction, including being dismissed from Radix for cause.

### **How to utilize the Inquiry Channel ([canaldedeuvida@radixeng.com.br](mailto:canaldedeuvida@radixeng.com.br)):**

This channel is free for anyone to use. In case you are not sure if your action is properly supported by the ethic code, feel free to send your query through this channel. Contact us to ensure you will be following good practices and your action will be considered adequate for your own protection and the company business.

In case of an immediate response, we recommend stating it on the email. Remember, the Ethics Committee members can also be reached by different means.

### **RED FLAGS**

In an effort to provide guidance and avoid/minimize risks, we list red-flags that should appear when making a complaint to the Ethics Committee. These can be considered signals of possible corruption, fiscal, or tax evasion practices.

#### **Red Flag – Location where the contract will be awarded:**

When the business involving the public or private sector are already well-

known for its generalized corruption practices..

### Red Flags – Third Party:

Relating to a person:

- *When the business is directly or indirectly benefiting from a public authority.*
- *Existing Civil or Criminal law suits, whether in the public or private sector, against the person in question containing any illegal behavior, unethical or improper action not in compliance with the existing legislation.*
- *Any news or information that questions the integrity of the person, their reputation or (one time or frequently) misconduct of any unethical or improper action (forbidden or inadequate).*
- *No compliance program in place.*
- *No code of ethics in place or a refusal to adopt or accomplish one already in place.*
- *Any news or information of previous contract termination due to misconduct or ethic code infringement.*
- *Any information regarding a third party stating their services are not formally verified by the proper means.*
- *Lack of information on the history of products and services, and the purpose of a contract.*
- *Lack of a proper administrative structure or personnel to puts together a scope of work.*
- *Inexistence of local office to execute the contracted job. For example, virtual address or local address that are not adequate for the execution of the contract. Example of inadequate spaces: P.O. Box or small private locations not adequate to perform the scope of work.*

- *Lack of business know-how, e.g., not long enough in the industry but claiming to provide experience.*
- *Any information that the person or third party has about another beneficiary not clearly identified (regardless private or public officials).*
- *If the performance is suspiciously superior to their competition or their peers*

### Red Flags related to an attitude or behavior:

- *Asking for budget approval significantly higher and uncommon, or asking for unusual expenses*
- *Acting on different business units different from what was contracted beforehand*
- *When the execution plan is weak, vague or incomplete, or needs a third party to perform the scope of work not stated in the original contract.*
- *Execute scope of work not related to the original scope of work established.*
- *Finance or cash flow problems that diminishes the bank credit.*
- *Offering, or committing to offer counterfeit, incorrect, or suspicious invoices for no reason (e.g. incorrect measurement, price different than originally approved, no clear information, vague description, or missing information)*
- *Requesting improper payment in advance, unusual or unexpected as the contracted scope or work.*
- *Requesting unusual discount that differ significantly from what is usually used in the market.*
- *Requests cash payment, without a proper receipt or back-up fiscal and tax documentation*



- *Requesting payment to be done in location different from the place where the service is performed or the location of their headquarters, or other company branch. Special attention shall be paid when payments are requested to be done in places well-known for its offshore companies.*
- *Requesting payment to a third party or an agent not clearly listed in the contract.*
- *Propose using a secondary intermediary fake company.*
- *Requesting donations to non-profit organizations.*
- *Denying providing adequate back-up fiscal or tax documentations.*
- *Denying to present adequate expense reports*
- *Request urgent payments or to be paid before due date.*
- *Requesting, without proper justification, confidentiality of the contract or scope of work.*
- *Denying to comply with the anti-corruption legislation applied in various countries, as well as denying to comply with the anti-evasion law or crimes against economic business.*
- *Denying agreed upon contracts.*
- *Denying disclosing the identity of a company board of directors, participants and any other beneficiary.*
- *Denying to answer questions related to due diligence.*
- *Denying adding clauses for audits.*
- *Suggesting ton not comply with the rules and regulations in the anti-corruption policy (or anti-corruption legislation).*
- *Suggesting adoption of illegal conduct in the country of execution or carrying out of business due to, in their country of origin, such conduct it is standard or custom specific*

## Red Flags: Governmental Bodies and Public Officials

- *Red Flags: Governmental Bodies and Public Officials*
- *When the Third Party has a direct relationship with public official (or any board of director or company beneficiary).*
- *When it is known that a third party previously worked for the Government in a high level positions, and they are in quarantine time and therefore not allowed to perform such business or activity.*
- *When it is well-known the third party received insider information not formally received from public officials that are directly related to the scope of work that is planned to be done.*
- *When any public official strongly suggests, insists or mandate to proceeds the service with a specific third party (person or company). This situation is even more relevant if the public official has decision authority to approve the service.*
- *When the third party, person or company, contribute to political party or is a major contributor to political party or groups or politicians.*
- *Information from a private and confidential meeting with public officials related to the scope of work.*
- *Information that the person or company offers gifts or any other benefit to a public official not in compliance with the applicable policy.*
- *When the person or company, intended to be contracted, prefers to solve an outstanding or pending item directly with a public official, not using the proper channel provided in the contract.*





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