



Anti-Corruption Policies

Guidelines for Prevention, Detection, and Combatting Corruption



1. PURPOSE

The Anti-Corruption Policies of **QLP SUPPLY OFFSHORE LTDA** (“QLP”) aims to reinforce the company’s commitment to integrity, transparency, and ethics in all its commercial and institutional relationships.

This program seeks to ensure compliance with anti-corruption laws applicable in Brazil and in the countries where we operate, preventing, identifying, and combating any unlawful practices such as corruption, fraud, and conflicts of interest.

QLP SUPPLY OFFSHORE LTDA understands that the company’s reputation and the trust of its clients, partners, and employees depend directly on the adoption of ethical and responsible conduct that permeates all operations and decisions of the organization.

This document formalizes the guidelines that govern the behavior of all **QLP SUPPLY OFFSHORE LTDA** employees, executives, suppliers, and commercial partners, strengthening a culture of compliance and zero tolerance for any act that violates applicable ethical and legal principles.

2. SCOPE

This Anti-Corruption Policies applies to all employees, directors, service providers, suppliers, and commercial partners of **QLP SUPPLY OFFSHORE LTDA**, covering all operations and activities related to the company’s business, regardless of where they are carried out.

Adherence to this program is a fundamental condition for maintaining contractual and commercial relationships and must be observed throughout all stages of contract and partnership initiation, execution, and termination.

3. KEY GUIDELINES

QLP SUPPLY OFFSHORE LTDA reaffirms its commitment to ethics, integrity, and legal compliance by strictly observing the following guidelines to prevent corruption and illicit practices:

- The offering, promising, giving, receiving, or soliciting of bribes, kickbacks, facilitation payments, or any undue advantages is expressly prohibited, whether at the national or international level.
- This policy aligns with key applicable anti-corruption laws, such as Brazil’s Law No. 12,846/2013 (Brazilian Anti-Corruption Law), the United States’ Foreign

Corrupt Practices Act (FCPA), the United Kingdom's Bribery Act, and other relevant regulations in countries where **QLP SUPPLY OFFSHORE LTDA** operates.

- Gifts and hospitality are only permitted if of low symbolic value, commemorative in nature, transparent, and properly documented, and must never influence business decisions or create any obligations.
- It is mandatory that all employees, suppliers, representatives, and commercial partners understand, respect, and comply with **QLP SUPPLY OFFSHORE LTDA's** Code of Conduct and Anti-Corruption Policy, formalizing their commitment through signature.
- Any real or potential conflicts of interest must be immediately disclosed and addressed with transparency to avoid compromising impartiality, loyalty, and transparency in business dealings.

4. GOVERNANCE AND RESPONSIBILITIES

The implementation, oversight, and maintenance of the Anti-Corruption Program at **QLP SUPPLY OFFSHORE LTDA** are the responsibilities of the company's Executive Board, which ensures the necessary commitment for effective compliance with the established guidelines.

Although there is currently no specific compliance department, the Executive Board is responsible for:

- Promoting the dissemination of a culture of integrity and ethics at all levels of the organization;
- Ensuring that all employees, suppliers, and commercial partners receive adequate training and guidance on the anti-corruption policy and Code of Conduct;
- Monitoring the application of the program, assessing its effectiveness, and implementing improvements when necessary;
- Designating, in the future, a specific person responsible for compliance to directly manage the program;
- Ensuring the existence of appropriate channels for communication and reporting of possible irregularities, guaranteeing confidentiality and protection against retaliation for whistleblowers.

5. PARTNER DUE DILIGENCE

QLP SUPPLY OFFSHORE LTDA recognizes that the integrity of its suppliers, representatives, and commercial partners is fundamental to maintaining the company's reputation and compliance.

- Therefore, it performs basic due diligence procedures to assess and mitigate risks related to corruption and other illicit practices, including:
 - Requesting and analyzing documents proving integrity, corporate structure, and legal compliance;
 - Requiring the signature of **QLP SUPPLY OFFSHORE LTDA's** Code of Conduct and Anti-Corruption Policy;
 - Annual evaluation for registration renewal, which includes updating commitments and reviewing potential risks;
 - Continuous monitoring of any "red flags," such as investigations, lawsuits, negative history, among others;
 - If significant risks are identified, **QLP SUPPLY OFFSHORE LTDA** reserves the right to suspend or terminate commercial relationships as provided in its internal procedures.
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6. INVESTIGATION AND PENALTIES

QLP SUPPLY OFFSHORE LTDA is firmly committed to the thorough investigation of any suspicions or reports of violations of the Anti-Corruption Program, ensuring appropriate corrective measures.

- All complaints or indications of irregular conduct will be investigated impartially, confidentially, and in accordance with applicable internal policies and laws.
- The company guarantees protection against any form of retaliation towards employees or third parties who, in good faith, report suspected irregularities.
- If violations are confirmed, penalties proportional to the severity will be applied, which may include warnings, suspensions, contract termination, and other applicable legal measures.
- **QLP SUPPLY OFFSHORE LTDA** reserves the right to terminate contracts and commercial relationships with suppliers or partners involved in illicit practices, safeguarding its reputation and integrity.

7. COMMUNICATION AND TRAINING

QLP SUPPLY OFFSHORE LTDA understands that the continuous dissemination of a culture of integrity is fundamental to the success of the Anti-Corruption Program.

- All employees, suppliers, and commercial partners shall participate in periodic training on ethics, compliance, and corruption prevention, with content updated according to the company's needs and applicable laws.
 - Communication regarding policies, procedures, and reporting channels will be clear, accessible, and continuous, reinforcing everyone's commitment to the program.
 - The company will maintain records of completed training and policy adherence, ensuring traceability and monitoring the program's effectiveness.
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8. REPORTING CHANNEL

QLP SUPPLY OFFSHORE LTDA provides a secure and confidential channel for employees, suppliers, partners, and other stakeholders to report, in good faith, any suspicion or occurrence of violations of the Anti-Corruption Program.

- The reporting channel can be accessed via email: **report@qlpgroup.com.br**.
 - The company ensures the confidential handling of information, guaranteeing the anonymity of the whistleblower whenever requested, and protecting against any form of retaliation or reprisal.
 - All received reports will be analyzed and investigated with the utmost impartiality and seriousness, as outlined in internal policies.
 - **QLP SUPPLY OFFSHORE LTDA** encourages a culture of transparency and integrity, reinforcing that the reporting channel is an essential tool for maintaining ethics and compliance in its operations.
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ACKNOWLEDGMENT AND COMMITMENT

I, the undersigned, hereby acknowledge that I have received, read, and understood the Anti-Corruption Program of **QLP SUPPLY OFFSHORE LTDA**, and commit to fully comply with its guidelines and report any situations that may violate its provisions.

I acknowledge that non-compliance may result in disciplinary measures as provided by the company.

Name: _____

Company: _____

Role / Function: _____

Signature: _____

Date: ____ / ____ / _____