

DECLARATION OF COMPLIANCE AND COMMITMENT TO ETHIC

The **SYSTECH Group**, through the term strand, declares that it pays full respect and strictly observes the entire normative and deontological system enshrined in the plans national and international, with emphasis on the Anti-Corruption Law (Law 12.846 / 2.013), Law Money Laundering (Law 9,613 / 1,998), Administrative Improbity Law (Law 8.492 / 1.992), Penal Code (Decree-Law n° 2.848 / 1.940), Convention of the Nations United Nations Against Corruption (ratified by Decree 5,687 / 2,006), Convention American Convention Against Corruption (ratified by Decree 4.410 / 2.002), Convention on Combating Corruption of Foreign Public Officials in Transactions International Commercial Law (ratified by Decree 3,678 / 2,000) and the Federal Law on United States of America Against Corruption Practices Abroad (“US Foreign Corrupt Practices Act of 1977”, amended by “15 US Code 78dd & 78dd-2”, in hereinafter “FCPA”).

The **SYSTECH Group** recognizes, in the foreground, that private efforts or the called entrepreneurship does not turn to profit tout court, but represents the main focus on which the realization of human material needs is based, which, in their turn, are only fully satisfied also with the full support of the triple column, forged by Wisdom, for Strength and Beauty. And it is with views facing this moral north that the Group started its activities in 1999, consolidating reputation once and for all in honest, transparent and serious business practice. Reputation that has become its indelible mark and on which it is not admitted and will not admit that the slightest error is thrown.

Indeed, it is to be solemnly endorsed, for any and all purposes that serve, that the **SYSTECH Group** conducts its activities in accordance with all laws, regulations and in accordance with the highest ethical standards, being well prepared to carry out its activities based on the best national or international practices. In this regard, it is imperative and a non-negotiable standard within the **SYSTECH Group**, which **all**, directly or indirectly related to their activities, are guided by the guidelines in focus and cooperate with the Compliance Department, so that the terms described herein are **fully** observed, with emphasis on the **anti-corruption system**. It is highly recommended that **everyone** involved address the normative instruments cited, for example, lines behind.

This **Declaration of Conduct** must therefore be **fully followed** by all employees, collaborators and partners, **without exceptions**. Any type of denunciation and / or suspicion of undue actions can be communicated confidentially by e-mail ouvidoria@systechtecnologia.com.br or by

0800.642-3781.

Best regards,

“Winning with integrity means we operate legally and ethically, everywhere we are and in everything we do“

Michael Dell