



COMPLIANCE POLICY

DETIN

In its endeavor to meet the highest compliance standards, strengthen its businesses and conduct them in a sustainable, legal, ethical and transparent way in line with its Organizational Identity and in accordance with the applicable law and regulations, CENIBRA hereby establishes the following commitments:

- ⇒ Promoting a culture of integrity by enhancing its employees' and business partners' awareness and education, taking as a basis its principles, values and Code of Ethical Conduct;
- ⇒ Promoting a participative, inclusive workplace environment through open and transparent communication among all the organizational levels, while fostering a respectful, propositional and constructive questioning in every activity;
- ⇒ Enhancing a healthy common sense, the perception of potential non-compliance risks and the determination to take action whenever necessary;
- ⇒ Promoting the conformity and compliance with the legislation and applicable regulations, particularly the anticorruption act;
- ⇒ Adopting a preemptive approach in order to avoid risks of losses and frauds, and fighting possible corruption and bribery situations or conducts that could cause material losses and damage the corporate image;
- ⇒ Strengthening and disseminating a culture of internal controls with an aim to ensure that the internal tools and policies are in compliance with, suited to and in line with the applicable legislation;
- ⇒ Ensuring the suitability, strengthening and enforcement of reliable internal controls with an aim to mitigate the risks, taking into consideration the complexities of each process.

CREATION DATE	EFFECTIVENESS/REVISION DATE	MANAGEMENT MEETING	REVISION
June 25, 2015	June 25, 2015	1204^a- 25/06/15	R-0