

**DATEN**

# ANTI-BRIBERY MANAGEMENT SYSTEM

SGAS N°	REVISION	DATE	TOP MANAGEMENT
0.1	03	24/03/2023	Silvio Comin

## ANTI-BRIBERY POLICY

### A DATEN TECHNOLOGY:

- It undertakes to carry out its activities in a dignified and honorable manner, with integrity and honesty, not tolerating any forms of bribery, adopting prevention and continuous improvement measures to combat possible practices, direct or indirect, guiding its employees, representatives, partners to respect strictly the Anti-Bribery Policy and other relevant requirements
- It expressly prohibits interested parties from offering, promising, giving, receiving or asking for any illegal benefit or arrangement, of different natures or possible forms, directly or indirectly, with the aim of creating an illegitimately advantageous commercial agreement in one of the parties.
- Provides an open communication channel for society, in order to receive possible reports of noncompliance with the implemented anti-bribery policy, code of conduct and other documents and procedures to combat bribery, also

guaranteeing the anonymity of those who provide information in good faith. All information is treated confidentially and the protection of those responsible for the information is guaranteed.

- DATEN appoints in its own document the person(s) responsible for the anti-bribery compliance function who has total independence and authority in accordance with the requirements of Standard ABNT NBR ISO 37001:2017. Also making it clear that interested parties who violate anti-bribery precepts will be subject to consequences in the administrative and criminal and civil judicial spheres.
- The organization operates in accordance with the legislation (Law n° 14,133/2021 – Bidding Law; Law n° 12,846/2013 – Anti-Corruption Law; Law n° 8,429/1992 – Administrative Improbability Law; Decree n° 11,129/2022 – Administrative and civil liability , among others mentioned in the legislation spreadsheet ) and current standard (ABNT NBR ISO 37001:2017 – Anti-Bribery Management System).