



radix

Engenharia e Software

Ethics Committee

Composition

The Ethics Committee is a group of three employees from the company: the CEO and two other people linked to the company, preferably with expertise in compliance, human resources, and law.

The Committee should be able to communicate well/effectively with all levels within the company, quickly identify risks, be trustworthy, and not only talk the talk, but walk the walk.

The Board makes the final decision on the committee. The members do not receive monetary bonus for their task. There is also an election to appoint alternates in order to ensure that the Committee is always functioning in case someone is unable to attend meetings or perform their task.

If the CEO is terminated or unable to perform a task, the Board of Directors appoints a person responsible to carry out the tasks within the Ethics Committee.

Operation

The Ethics Committee meets once a month, whenever one of the members requests a meeting, or if an irregular complaint is made.

Responsibility

- Update and disseminate the Code of Ethics guidelines.
- Interpret the text, clarify any concerns and quickly respond to conduct that was unforeseen in the Code.
- Analyze suspected ethical misconduct that were referred by other employees and determine the path to investigate.
- Resolve any violation, and submit the opinions and issues deemed relevant to the company's Board.

Immunity

The company guarantees to the members of the Committee that no punishment, directly or indirectly (for example, being transferred between departments or cities), will be applied as a form of punishment for carrying investigations and reports of illegal or unethical acts, even if approved by the officers, board members, or the CEO himself.

Members of the Committee and the Compliance Coordinator should have unlimited and unrestricted access to any department and/or company documents.

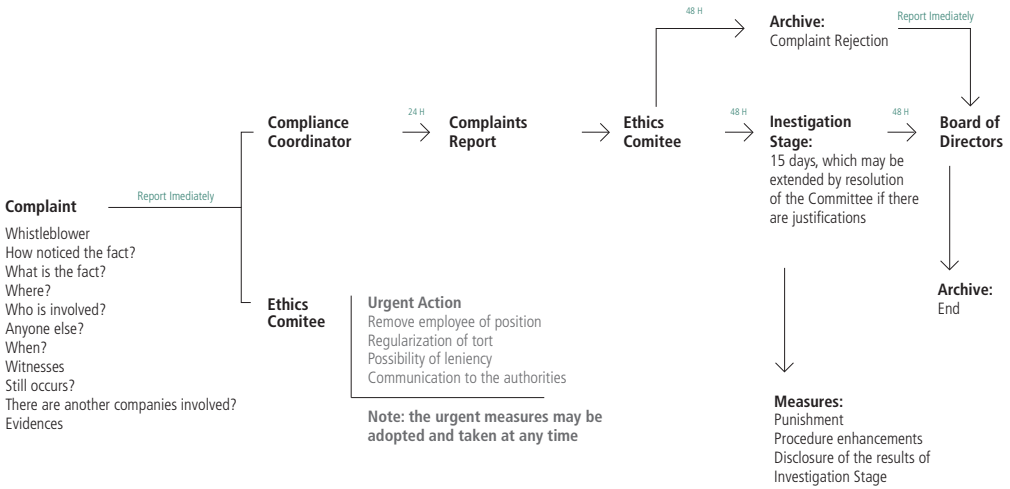
The Committee's choices must be followed by everyone at Radix, including the top management.

The failure to comply with the Committee procedures and guidelines is considered a serious misdemeanor, being punishable by dismissal.



Uncovering Complaints and Communication with the Public Authorities

When a complaint is made, an investigation takes place in the following flowchart:



During the “Investigative Stage”, the Committee evaluates the possibility to put together a specific team (including hiring specialized personnel, if necessary) in order to assist in the investigation.

The defendant should be given the opportunity to argue their case, by providing evidence they deem appropriate, for example presenting witnesses.

In order to collect data on the facts alleged, the Committee may conduct interviews. The Committee’s own members or the staff appointed during the “Investigation Stage” can make the interviews.

The Ethics Committee should receive legal advice before carrying out an investigation and placing a punishment if there is a legal implication (for example, removal of a position, a leniency agreement, or reporting to the authorities).

Punishment

Radix will punish in case of a noncompliance issue with the laws and/or company's policies. The severity of the punishment depends on the act, defedant's intend, age, professional service time and how long they've been at Radix.

Some of the penalties are already set out in the Code, for example: warning, suspension, and dismissal. In any case, the penalties should take the following into account:

SEVERITY	NONCOMFORMITY	DISCIPLINARY ACTION	TYPE
Mild	Small misconduct	Warning	Formal
Average	Misconduct	Suspension	Formal
Severe	Unaccptable	Dismissal	At will or Just-Cause

**Note: The employee accused may be temporarily removed from the position in order to avoid interference during investigation.*

Communication with Authorities

If there is misconduct that may be characterized as criminal offense, the Committee, along with some legal advice, will communicate the facts to the authorities as soon as possible, following the model below:

MISCONDUCT RELATED TO:	AUTHORITIES
Bids & Procurement	Public Ministry
	Federal State
	Public Authority
	Court of Auditor of the respective federative entity
Other Crimes	Public Ministry
	Administrative Council for Economic Defense
Corrupção	Public Ministry
	General Controllershship of the respective federative entity
	Public Authority
Corrupção Transnacional	Public Ministry
	Foreign Authority
	Eventual national public authority involved
Demais Crimes	Public Ministry

Quarterly Report

The reports will be categorized by the types of conduct (acts of corruption, illegal procedures, conflicting behavior with the code, among others).

The Committee shall prepare a quarterly report containing the number of reports received, the types of conduct, the severity, the area, and the business sector where the misconduct possibly occurred, the information described in the complaint, and the way it became known (through integrity channel, correspondence etc.).

This report is published to Radix, through its internal network (inhouse media, emails, and messages on the board).

Radix will also integrate the new reports with the old ones where the investigations have already taken place, to disclose the number or percentage of cleared reports, and the number of reported cases.

The logo for RADIX, featuring the word "radix" in a lowercase, bold, sans-serif font. The letter "i" is stylized with a green checkmark-like shape above it. The letters "r", "a", "d", and "x" are in white. The background is dark grey with abstract, overlapping, curved lines in a lighter shade of grey.

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