

GLOBENET CABLE SYSTEM — GLOBENET CABOS SUBMARINOS S.A.

THIRD-PARTY RISK MANAGEMENT POLICY



THIRD-PARTY RISK MANAGEMENT POLICY

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1 Version Control

VERSION	DATE	MADE BY	REVIEWED BY	VERIFIED BY	APPROVED BY	COMMENTS
1.0	20-Jan-2023	Pedro Magalhaes (Procurement)	Alexandra McLaughlin (Legal) Rebecca Cheung (Compliance)	Fernanda Belem (Procurement) Priscila Pires (Legal)	Marcelo Del Vigna (Legal)	

2 Purpose

This document describes the Globenet third-party risk management policy and establishes governance for the management of Business Partners at different levels that provide goods and services to Globenet, to identify, rank, assess and report on Globenet third-parties current security posture. This includes a process to reduce risk exposure to the organization from third parties and to meet various compliance requirements and contractual obligations.

3 Scope

This policy is applicable to all third-party service providers and material Business Partner relationships who provide goods and services to Globenet. In most scenarios, Business Partners will also have a contract; therefore, this document incorporates the “Contracts Administration Process” as defined by the relevant approvers.

4 Roles and Responsibilities

Roles	Responsibilities
Compliance Team Member	The Compliance team member is responsible for the oversight of the third-party risk management policy and effective management of the process. The team member will have the following responsibilities: • Coordinating Business Partner risk assessment • Reviewing initial Business Partner risk assessment form (Compliance On Board Questionnaire) • Reviewing the Business Partner risk assessment form on an annual basis • Facilitating completion of annual, bi-annual or tri-annual Business Partner risk reviews (frequency is determined by Business Partners risk rating) • Complying with the requirements set forth in the Globenet third party risk management policy • Leading the due diligence process
Procurement Team Member	The Procurement team member plays a critical role in the effective management of Business Partners due to their interaction with Business Partner contacts. Their responsibilities include, but are not limited to: • Reviewing the Globenet third party risk management policy on an annual basis • Assuring the policy is reflective of Globenet business practices • Informing the Globenet senior management team of any material contracts • Obtaining and reviewing necessary documentation for the evaluation of the Business Partner

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	• Creating and coordinating a Business Partner sourcing team if necessary • Leading the Business Partner selection • Working with legal to finalize a contract • Assisting with contract renewal process
Legal Department	The legal department provides oversight to ensure terms and conditions stipulated within Business Partner contracts are not in conflict with Globenet policies or any laws or regulations. Other responsibilities include, but are not limited to: • Reviewing Globenet contracts as requested by Procurement or Requestor • Participating in legal negotiation with the Business Partner's legal team when requested by Procurement or Requestor • Advising on legal issues and business risks arising under contracts performance
Information Technology	The information technology department is responsible for ensuring that risks that may result in exposure to customer information or Globenet technical infrastructure are fully considered when establishing a relationship with a Business Partner. Other responsibilities include, but are not limited to: • Overseeing the ongoing assessment of risk from a logical and physical security perspective • Participating in the Business Partner selection process • Assisting with any technical implementations that may be necessary • Installing and supporting software that may be necessary
Business Owner	The Business Owner works directly with Business Partners by receiving goods or services provided by the Business Partner and has oversight of: • Managing the relationship with the Business Partner • Monitoring Business Partner compliance and service level agreements • Completing routine Business Partner assessments, as applicable • Ensuring appropriate individuals and groups are notified in situations where there are legal or compliance issues with the Business Partner's performance • Initiating contract renewal process with Procurement
Business Partner	A third party Globenet has engaged to secure goods or services including any supplier, vendor, provider, consultant, agent, distributor or merchant

5 Information Statement

5.1. Overview

Globenet has outsourced some of its operations and services to external Business Partners. This enables the business to focus on its core functions. Through the effective use of Business Partners, Globenet can, among other things, optimize operations, restructure functions, and reduce costs. However, outsourcing functions does not exclude the company from its obligations of maintaining the safety and soundness of its operations.

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Reliance on Business Partners can change GlobeNet's risk profile. In some cases, the reliance on a Business Partner can increase risk. This increased risk could arise from poor planning and lack of oversight or control by GlobeNet. There is also inherent risk from outsourcing services to the Business Partner that may result in increased legal costs, loss of revenue or impairment of GlobeNet reputation. Whether the function is performed internally by GlobeNet or outsourced to a service provider, it is expected that the same risk management rigors and oversight be employed. The degree of oversight of the Business Partner will depend on the risk level associated with the good or service the Business Partner provides to the company. Business Partners who provide high risk goods or services will face greater scrutiny than those providing low risk goods or services.

The third-party risk management policy establishes corporate policies, procedures, and strategies to assist GlobeNet in preventing, managing, and mitigating risks that could affect its shareholders, policyholders, and the operations. Emphasis has been placed on the effective management of Business Partners, including the development of a third-party risk management policy that is capable of identifying, measuring, monitoring, and controlling the risks associated with the use of Business Partners. The third-party risk management policy must have controls that govern the entire life cycle of the Business Partner from inception to termination of the relationship and these controls must be effective in mitigating the risks presented to GlobeNet. The Business Partner management policy is intended to promote consistent organizational behavior by providing guidelines to GlobeNet management who are responsible for:

1. Ensuring the appropriate due diligence is performed by designated members of the company before entering a Business Partner relationship.
2. Implementing a Business Partner assessment process which will identify the level of risk potential associated with GlobeNet Business Partners and the threats they present to the safety and soundness of GlobeNet operations.
3. Providing effective oversight after the relation GlobeNet has been established.
4. Ensuring routine assessments of the Business Partner continue after the relationship is established.

5.2. Business Partner Assessment

A key requirement of the Business Partner selection process is the completion of: (i) Business Partner assessment form by Procurement team and (ii) compliance due diligence by the Compliance Team (see section 5.4). A Business Partner assessment form asks a series of questions designed to determine the potential risk level of the purchase of a good or service being requested and aids in determining the ability and fitness of the Business Partner to provide the good or service to GlobeNet.

A Business Partner assessment and compliance due diligence form must be completed for all new Business Partners.

For the Business Partner assessment, each Business Partner should be categorized as high, medium, low or nominal potential based upon the assessment which can be subjective depending on factors such as the critical nature of the good or service being provided, the Business Partner ownership structure, Business Partner business location, ease or replacement of the Business Partner, the experience of the

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Business Partner and key Business Partner personnel, input provided by management or additional knowledge of other activities related to the Business Partner.

This inherent risk-based classification uses a scale of Tier 1 (Very High) – Tier 4 (Low), with Tier 1 and 2 Vendors designated as being the most significant/critical to Globenet and who may expose the company to the most risk. In addition, based on information collected during the request process the Business Partner is given a critical or non-critical designation.

The Tier assigned to the Business Partner determines the level of due diligence required to on-board the Business Partner and manage the Business Partner lifecycle through termination. Business Partners who provide multiple products/services to Globenet will be classified based on the highest inherent risk rating of the products/services provided. Individual products and services may be tiered and assessed individually where product characteristics differ.

The following chart provides a guideline for determining how to rank a potential Business Partner:

	Tier 1	Tier 2	Tier 3	Tier 4
	Very High	High	Medium	Low
Customer Contact	Business Partner has direct interaction with Globenet customers.	Any interaction with Globenet customers is Indirect.	No contact with Globenet customers	No contact with Globenet customers
Data Access	Business Partner stores or has systematic access Globenet customers or employee personally identifiable information	Business Partner has non-systematic interaction with confidential company information, customer, or employee PII on a transactional or intermittent basis	Information exchanged is public knowledge or does not allow for a unique identity to be known	No access to NPI, sensitive or confidential data or information
Service Model	Material product or service provided by offshore resources or 4 th parties	Important and necessary. Less complex service delivery model. Team supporting Globenet are direct employees of the Business Partner and work in the Location	Simple, straight-forward, repeatable service or product delivery	Highly transactional
				Off the shelf products with no customization or integration with Globenet
				Indirect purchases

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Business Reach	Business Partner's product or service are integral part of Globenet offerings, support critical and time sensitive Servicing or Origination processes or are utilized Enterprise wide	Business Partner's products or services support less critical functions but may cross channels or be used by multiple departments	Business Partner's products or services support a single team or department and support administrative or support functions	Highly transactional
Ease of Replacement	No viable alternatives or difficult or expensive to replace	Limited alternatives or multiple Business Partners supplying similar products	Multiple alternatives. High segmentation	Easily replaced.
Annual Contract Value	More than \$1,000,000	\$50,000 to \$1,000,000	Less than \$50,000	Transaction/order based. Controllable spend
Compliance	Critical to Globenet ability to comply with applicable legal requirements (particularly consumer protection laws), or the Business Partner's non-performance could subject Globenet to material breaches of applicable legal requirements. (Particularly consumer protection laws).	Interacts with Globenet obligations to comply with applicable legal requirements	Tangentially interacts with Globenet obligations to comply with applicable legal requirements on a limited basis	Does not impact Globenet obligations to comply with applicable legal requirements
Business Reliability	Maximum allowable Business Partner outage with no regulatory, financial or production impact to Globenet is < 24 hours	Maximum allowable Business Partner outage with no regulatory, financial or production impact to Globenet is > 24 hours but < 48 hours	Maximum allowable Business Partner outage with no regulatory, financial or production impact to Globenet is > 48 hours but < 72 hours	Maximum allowable Business Partner outage with no impact to Globenet is > 72 hours

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Business Reputation	Newly established thirdparty or many adverse media findings; adversemedia findings from reliable sources	Few adverse media findings; adverse media findings from unreliable sources	Good reputation (e.g., referred by a trusted party, etc.) No adverse findings	Benchmark company, knownfor best practices
Tier Designation	IF any (1) of "Customer contact", "Data Access" or"Service Model" criteria is met THEN = HIGH; If any (4) other criteria aremet, THEN = HIGH	IF either (1) of "Customer contact", or "Data Access" criteria is met THEN = MEDIUM; If any (4) other criteria are met, THEN = MEDIUM	If any (5) other criteria are met, THEN = LOW	IF NOT High, Medium, or Low THEN Nominal

Business Partners can change risk levels during Globenet relationship with the Business Partner. A Business Partner may be ranked as high risk for the initial relationship but later monitored as a medium risk Business Partner due to various factors. Globenet Procurement, Compliance and Legal teams should determine the risk level and the Business Partner due diligence required on a case-by-case basis.

Globenet Business Owner shall forward each purchase requisition to the Procurement team, for the Business Partner assessment process prior to the creation of a Purchase Order.

For the Business Partner compliance due diligence, each Business Partner should be categorized using a scale based on the assessment depending on factors such as beneficiary ownership, political exposure, presence (directly or through affiliates) in sanctioned jurisdictions, prior investigations, convictions and/or fines, amongst others.

Business Partner risk assessments are performed prior to contracting with a new Business Partner as part of the compliance due diligence procedures performed by the Compliance and IT teams.

Business Partner risk assessments must consider the nature of any information that will be disclosed and that the appropriate controls are in place for the safeguarding of Client and Company confidential information and systems. Business Partner risk assessments include, as applicable, the following areas:

Compliance On Board Questionnaire Business Partner- The Compliance On Board Questionnaire will request general information including but not limited to about the Business Partner's organization, locations, employees, and accreditations. The Questionnaire is also used to determine the Business

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Partner's compliance with all laws, regulations, and regulatory requirements applicable to its products and services. Areas reviewed include, but are not limited to, policies and procedures, Business Partner complaints, compliance monitoring and testing, compliance training and applicable certifications or licensing. In addition, this questionnaire asks for information pertaining to the executive management structure, Human Resources practices, legal actions, and BCP/Dr plans.

Business Partner Information Security Questionnaire - The Business Partner information security questionnaire will solicit information from the Business Partner where applicable and may include evidence requests to determine whether the Business Partner has the necessary controls and the effectiveness of these control related to information security. If necessary, additional information regarding cybersecurity controls and practices will be requested.

5.3. High Risk Business Partners

The Requestor Vice-President (N1) should approve Business Partners determined to have a high-risk potential. Business Partner Selecting a competent and qualified Business Partner is essential to managing risks. Therefore, assembling a competent Business Partner sourcing team that can conduct adequate evaluation of the Business Partner is critical to the process. The Business Partner sourcing team should be a cross functional team including Procurement, the business owner and other functional business area experts. The Business Partner sourcing team will evaluate the fit of the Business Partner's goods or services to the overall corporate strategic goals. The guidelines below should be followed for these Business Partners.

5.3.1. Number of Business Partners

The Procurement team is responsible for analyzing the supply market and narrowing the list of Business Partners to a group to be evaluated in more depth. Purchase of goods and services greater than \$50K in a calendar year generally requires three written bids be submitted to Globenet for evaluation before a contract is made. The pursuit of a single Business Partner to satisfy the sourcing effort rather than comparing the abilities and pricing of numerous Business Partners is not recommended. A single Business Partner is permissible if the Business Partner is the only supplier of the good or service, using another Business Partner would void a maintenance agreement or a Vice President or above determines there is strategic rationalization substantiating the need to have a single Business Partner. If a single Business Partner is evaluated, justification must be provided in writing by the Business Owner and requires the review of the Procurement senior team members. Written justification and approval must be kept on file in the Business Partner document repository.

5.3.2. Request for Proposal (RFP)

An RFP is recommended for all acquisitions. An RFP is a solicitation sent to potential Business Partners seeking specific solutions to a sourcing need. It is generally used as an aid to analyze the

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market and make preliminary comparisons between goods and services offered by several Business Partners.

Requirements should be recorded directly in the RFP and serve as the basis of understanding between Globenet and prospective Business Partners as to the requested goods or services. They also serve as the baseline from which control measures can be established and risks assessed. The level of detail for requirements should be commensurate with the size, complexity and risks associated with the sourcing effort.

The RFP should include but not be limited to:

- A concise overview of what is being requested of the Business Partner
- Business Partner Information
- Identified requirements
- Required format for responses
- Globenet contact for questions
- Proposal due date and time
- Selection process description
- Proposal selection date

5.4. Compliance Due Diligence

Prior to contracting with a Business Partner / service provider, Globenet will validate the Business Partner understands and can comply with applicable laws and other applicable requirements. The scope and depth of the compliance due diligence review depends on the Business Partner rating during the initial Business Partner assessment which includes, but not limited to, the scope and significance of the relationship, and the complexity of the services to be performed as described in section 5.2. above.

Due diligence for all potential new Business Partner / service provider relationships should involve a review of available information, which include, as applicable:

- Applicable policies, procedures, internal controls, and training materials to ensure the service provider can comply with all requirements and conducts appropriate training and oversight of employees that have consumer contact and/or Federal law compliance responsibilities
- Business reputation, complaints, and litigation, including checking references, the Better Business Bureau, state attorney general offices, state consumer affairs offices, CFPB complaintportal, state bar associations, and audit reports and regulatory reports (when applicable)
- Qualifications, backgrounds, and reputations of key figures in the Business Partner's management team, to include criminalbackground checks when appropriate.
- Information Security Policies and Procedures

Any risks or concerns that arise based on any responses received during due diligence should

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be shared with the business owner and legal for consideration in the selection and contracting phase.

The approval authority to proceed with hiring after Compliance's due diligence review is completed is as follows:

Risk	Approval Authority
Low	No need of approval
Medium	Governance, Risks and Compliance Manager Or Compliance Officer as applicable
High	Requestor Vice-President (N1) Or Compliance Officer as applicable
Very High	Requestor Vice-President (N1) Or Compliance Officer as applicable

5.4.1. Required Documentation

Access to current and relevant information is critical in evaluating the risk a Business Partner may pose to GloboNet; therefore, it is the responsibility of the Compliance team member to review and maintain the required material related to Business Partner risk assessment. The required documentation will be retained for safekeeping in the department's Business Partner document repository. Documentation includes the Compliance On Board Questionnaire and the Business Partner Risk Assessment results.

5.4.2. Reassessment and Monitoring

Periodic risk reviews of Business Partners are performed at GloboNet by the Compliance team. The level of monitoring and reporting will be determined based upon the Business Partner risk level. Refer to the table below as a guideline for this assessment process.

Risk Ranking	Required Documentation
Low Risk	An assessment, completed via the compliance tool (Comply Advantage) is completed annually.
Medium Risk	An assessment, completed via the compliance tool (Comply Advantage) is completed bi-annually.
High Risk	An assessment, completed via the compliance tool (Comply Advantage) is completed bi-annually.
Very High	An assessment, completed via the compliance tool (Comply Advantage) is completed tri-annually.

The risk ranking for the reassessment is calculated using the same criteria as the initial risk assessment for a new Business Partner. The approval authority to maintain relationship with the

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Business Partner after Compliance's reassessment is as follows:

Risk	Approval Authority
Low	No need of approval
Medium	Governance, Risks and Compliance Manager
High	Requestor Vice-President (N1)
Very High	Requestor Vice-President (N1)

5.5. Business Partners Who Provide Multiple Services

Some of Globenet Business Partners may serve multiple functions within the company. Efficiencies and economies of scale are gained when sourcing multiple functions through a single Business Partner. However, risks can also increase. These multiple touch points can multiply the severity of consequences should the Business Partner experience an event that would render them unable to perform for Globenet.

In situations where a Business Partner is used in multiple functions or in multiple locations, the Procurement and Compliance team will assess the Business Partner's risk and work with others within Globenet to confirm the assessment and adherence to the contract.

6 Annexes

1. GN-Vtal Compliance Business Partner Onboard Questionnaire
2. Information Security Requirements

7 Reference

1. National Institute of Standards and Technology (NIST) Special Publication 800-161 Rev.1 Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations

Documentation: Please provide the information requested below as an attachment to an email.

- Articles of Incorporation and/or bylaws
- Full organization chart showing participation until the ultimate beneficiary (any shareholder with more than 10% ownership rights).

Third Party Compliance Questionnaire:

If you do not know the answers to these questions, please send this questionnaire to the person within your organization who is able to answer them.

Globenet is committed to maintaining the highest standards of business ethics and integrity. We, in turn, rely on all third parties with whom we do business to behave accordingly; with the highest standards of honesty, fairness and integrity. In addition, we expect all our employees and third parties to comply with all applicable laws, including applicable anti-corruption laws and regulations in all jurisdictions in which they and Globenet do business.

This Third-Party Compliance Questionnaire must be completed by a duly authorized representative of your organization. The deadline to complete the questionnaire is 5 days from the receipt of this Questionnaire. Contact the Compliance Department by email (compliance@globenet.net) if you have any questions.

Thanks in advance for your participation.

Sincerely,

Globenet

Terms and Consent:

Use of information and express consent:

This information about you and your company (collectively, "you" and "your") will be in order for Globenet (the "Company") to comply with the rights and obligations under the laws against bribery, corruption, money laundering and other related laws (the "Applicable Law"). The information you provide under this questionnaire will be used exclusively for these purposes. You agree that the Company may collect, store, process and share this information with Globenet subsidiaries and affiliates in other countries or with potential Globenet investors. You agree that we may independently collect additional information on you or your shareholders, directors, employees, or agents to verify your answers and confirm them with other sources. You have the right to access the information we have about you and to request the correction of any error. Your information is protected by the data protection laws that are applicable in your jurisdiction.

By completing this Questionnaire, **You** understand and agree that: GlobeNet has engaged or may engage a third party to administer and analyze the attached Questionnaire on GlobeNet's behalf for the purpose stated above.

GlobeNet and any third party it engages in relation to this Questionnaire, its subcontractors, and their respective personnel (the "Diligence Parties") are not responsible for the Questionnaire or its contents, the collection of Your information, GlobeNet's use or reliance on Your information, or any decisions that GlobeNet may make based on Your information. In addition, the Diligence Parties will not be responsible for the disclosure, use, or other treatment of Your information by GlobeNet or its agents. In no event shall any Diligence Party be liable for any loss of use, data, goodwill, revenues, or profit, or any consequential, special, indirect, incidental, punitive, or exemplary loss, damage or expense relating to the Due Diligence Questionnaire or the collection of Your information.

The Diligence Parties are hereby released from all claims, liabilities, and expense relating to each of the matters for which the Diligence Parties are not responsible or liable as described above in the immediate two paragraphs.

I agree with the terms above.

Company: _____
Name: _____
Title: _____
Date: _____

Section A: Corporate Information

1.	Name and Contact Information:	
(a)	Entity Name:	
(b)	If it is a subsidiary or part of a group, name its parent company:	

(c)	Address:	
	City:	
	State:	
	Country:	
	Zip Code:	
	Telephone:	
	E-mail	
	Company website:	

(d)	Officer(s) or Legal Representative(s)		Officer(s) or Legal Representative(s)	
	Name:		Name:	
	Title:		Title:	
	DOB:		DOB:	
	Telephone		Telephone	
	E-mail:		E-mail:	
	Officer(s) or Legal Representative(s)		Officer(s) or Legal Representative(s)	
	Name:		Name:	
	Title:		Title:	
	DOB:		DOB:	
	Telephone		Telephone	
	E-mail:		E-mail:	
	Officer(s) or Legal Representative(s)		Officer(s) or Legal Representative(s)	
	Name:		Name:	
	Title:		Title:	
	DOB:		DOB:	
	Telephone		Telephone	
	E-mail:		E-mail:	

2.	Date of incorporation of the company (YYYY-MM-DD):	
3.	Country of incorporation:	
4.	List of all countries and locations where you operate:	

5. Company business records:		
Company registration number or equivalent:		
Chamber of Commerce where registered (if any):		
Registration date (YYYY-MM-DD):		
Expiration / renewal date (YYYY-MM-DD):		
State / Province:		Country:
Is evidence of tax exemption (0% rate) required? ☐ Yes ☐ No Tax exemption may apply to telecom, reseller, global non-profits organization and government/ quasi-government entities.		Tax Exemption Certificates Please forward the applicable Tax Exemption Certificates to: Tax_Billing@globenet.net
Is your company or its beneficiary owners listed in the stock market? ☐ Yes ☐ No	Country	
	Market	
	Code	

Section B: References

1.	Provide commercial references			
Reference No. 1				
Name of Contact:			Title:	
Email:				
Address:				
City:		State:		
Country:		Zip Code:		
Telephone:		Fax:		
Reference No. 2				
Name of Contact:			Title:	
Email:				
Address:				
City:		State:		
Country:		Zip Code:		
Telephone:		Fax:		
2.	Globenet references:			
Name of Contact:			Title:	
Email:				

Section C: Beneficiary Owners

(a)	List the information of the beneficial owners (including their nominees, if their shares are held by nominees) who own, control, or have power to vote for 10% ownership interest or more of any class of voting securities or other voting interests. <i>*DOB should be replaced with incorporation date for entities</i>				
	Name	DOB	Title	Nationality	Ownership Percentage
(b)	¿Does the company have commercial relationships with governments or governmental entities, international organizations or with any authority group or association?				
	☐ Yes ☐ No		IF yes, please explain		

Section D: Ethics and Compliance

Is your company or any affiliated company subject to the United States Securities Exchange Commission (SEC) rules?	☐ Yes ☐ No	IF yes, please explain.
Is your company wholly or partially owned by the government?	☐ Yes ☐ No	IF yes, please explain.
Will your company have interactions with Government Officials or Entities in relation to the services from GlobeNet?	☐ Yes ☐ No	IF yes, please explain.
Does your company have any relationships with Government Entities that are not related to sales (e.g., political contributions, charitable or product/service donations, receipt of government funding, etc.)?	☐ Yes ☐ No	IF yes, please explain.
Do you (or any of your first-degree relatives) or any of your company's employees or representatives (or any of their first-degree relatives) currently hold a position with a Government Entity or Political Organization?	☐ Yes ☐ No	IF yes, please explain.
Have any of your company's current employees or representatives previously held a position with a Governmental Entity or Political Organization?	☐ Yes ☐ No	IF yes, please list: (First & last name; Title at your company; Name of Government Entity/Political Organization; Title at Government Entity/Political Organization)
In the past 7 years, have you or your company including any principals, owners, partners, directors, officers, or employees of the company had any of the following occur:		

Been arrested or charged with a business crime or offense?	☐ Yes ☐ No	IF yes, please explain.
Been a defendant in any criminal or securities matter in a court of law?	☐ Yes ☐ No	
Been suspended, sanctioned, or debarred by (i) any government agency or (ii) public international organization, such as the World Bank or United Nations?	☐ Yes ☐ No	IF yes, please explain.
been the subject of an internal and/or government/regulatory investigation involving bribery or corruption issues?	☐ Yes ☐ No	IF yes, please explain.
Been involved with governmental inquiries, investigations, criminal proceedings, regulatory or enforcement actions?	☐ Yes ☐ No	IF yes, please explain.
Does the company have a formalized and widely publicized Code of Ethics or Conduct?	☐ Yes ☐ No	IF no, please explain.
Is the Code of Ethics or Conduct applicable to all employees and administrators, regardless of position or function held?	☐ Yes ☐ No	IF no, please explain.
Does the company periodically review the Code of Ethical Conduct?	☐ Yes ☐ No	IF no, please explain.
Does the company formalize the obligation of awareness of the Code of Ethics/Conduct Policy for all employees, regardless of position or function?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal commitment from Senior Management, including Directors, evidenced by visible and unequivocal support for the integrity program?	☐ Yes ☐ No	IF no, please explain.
Does the company apply an integrity and risk due diligence, when necessary, to third parties such as suppliers, service providers, intermediary agents, and associates?	☐ Yes ☐ No	IF no, please explain.
Does the company have mechanisms to detect irregularities in its supply chain, such as, for example, slave laboring, child exploitation, violation of human rights, etc.?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal policy documents or guidelines that deal with Conflicts of Interest?	☐ Yes ☐ No	IF no, please explain.

Does the company have formal documents or guidelines in place that set out rules and guidelines on offering and receiving presents, gifts, meals, entertainment, travel, hospitality and any other benefits or advantages, economic or otherwise, to public servants or employees, suppliers, and other business partners?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on relationships with public agents?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on donations and sponsorships?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on supply chain responsibility?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on privacy and personal data protection?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on diversity and inclusion?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on slave labor and child exploitation?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on conflict minerals?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines on anticorruption practices?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal documents or guidelines that provide for the segregation of duties and definitions of approval levels for revenues and expenses?	☐ Yes ☐ No	IF no, please explain.
Does the company have rules for authorization and approval of purchases and payments?	☐ Yes ☐ No	IF no, please explain.
Does the company have accounting records that completely and accurately reflect the transactions of the legal entity?	☐ Yes ☐ No	IF no, please explain.
Does the company have mechanisms to detect non-standard revenues and expenses when making accounting records and provisions?	☐ Yes ☐ No	IF no, please explain.
Does the company have an independent audit of the financial statements and balance sheet?	☐ Yes ☐ No	IF no, please explain.
Does the company operate in any regulated market?	☐ Yes ☐ No	IF no, please explain.
Does the company have an area or a person responsible for compliance/integrity program activities?	☐ Yes ☐ No	IF no, please explain.

Does the company have periodic training and communication actions on the integrity program and awareness of the Code of Ethics for all employees?	☐ Yes ☐ No	IF no, please explain.
Does the company have periodic training and communication actions related to ESG?	☐ Yes ☐ No	IF no, please explain.
Does the company have whistleblowing channel or any kind of hotline to receive reports of activities in violation of its policies?	☐ Yes ☐ No	IF no, please explain.
Does the company formally establish disciplinary measures in case of conduct violation?	☐ Yes ☐ No	IF no, please explain.
Does the company have independent whistleblowing channels, open and widely publicized to employees and third parties, and mechanisms to protect good-faith whistleblowers?	☐ Yes ☐ No	IF no, please explain.
Is there a process in place for formalizing agreements/contracts signed by the company?	☐ Yes ☐ No	IF no, please explain.
Does the company's contract have an anti-corruption clause?	☐ Yes ☐ No	IF no, please explain.
Does the company's contract have a sustainability clause?	☐ Yes ☐ No	IF no, please explain.
Does the company's contract have a data privacy clause?	☐ Yes ☐ No	IF no, please explain.
Does the company have specific procedures to prevent fraud and illicit acts in bidding processes, in the execution of administrative contracts or in any interaction with the public sector, even if intermediated by third parties, such as paying taxes, being subject to inspections, or obtaining authorizations, licenses, permits and certificates?	☐ Yes ☐ No	IF no, please explain.
Does the company perform appropriate due diligence for hiring and, as the case may be request, supervising, third parties such as suppliers, service providers, intermediary agents, and associates?	☐ Yes ☐ No	IF no, please explain.
Does the Company make donations to NGOs, political parties, associations, or other institutions related to the Public Administration?	☐ Yes ☐ No	IF no, please explain.
Does the company have formalized procedures regarding mergers, acquisitions, or other corporate operations?	☐ Yes ☐ No	IF no, please explain.

Is there continuous monitoring of the integrity program to prevent, detect and combat the occurrence of corruption actions as provided for in the Brazilian anti-corruption law as well as the FCPA (where applicable)?	☐ Yes ☐ No	IF no, please explain.
Does the company hold initiatives to promote an ethical and integrity culture in its business through lectures, seminars, workshops, debates, and events of the same nature, for example?	☐ Yes ☐ No	IF no, please explain.
Any partners, administrators, directors, officers, managers, or bosses (regardless of the nomenclature used by the company), are or have already been a public servant? (consider a public servant to be anyone who, although temporarily or without remuneration, holds a public post, job, or function, including employees, directors, and any representative of state-owned or mixed-capital companies, political parties, or candidates for elective office, a job or function in state entities or diplomatic representations of a country or foreign country, or anyone who holds a post, job, or function in companies controlled, directly or indirectly, by the government of a foreign country or in public international organizations).	☐ Yes ☐ No	IF no, please explain.
Any the partners, administrators, directors, officers, managers, or bosses (regardless of the nomenclature used by the company), are or have already been investigated or convicted for acts related to corruption, money laundering, fraud, or misconduct?	☐ Yes ☐ No	IF no, please explain.
Any the partners, administrators, directors, officers, managers, or bosses (regardless of the nomenclature used by the company), are or have already been included in any kind of sanction list (national or international) as OFAC, Interpol, etc.?	☐ Yes ☐ No	IF no, please explain.
Is the Code of Ethics or Conduct applicable to all employees and administrators, regardless of position or function held?	☐ Yes ☐ No	IF no, please explain.
Does the company periodically review the Code of Ethical Conduct?	☐ Yes ☐ No	IF no, please explain.

Does the company formalize the obligation of awareness of the Code of Ethics/Conduct Policy for all employees, regardless of position or function?	☐ Yes ☐ No	IF no, please explain.
Does the company have formal commitment from Senior Management, including Directors, evidenced by visible and unequivocal support for the integrity program?	☐ Yes ☐ No	IF no, please explain.

The undersigned, on behalf of the company and its officers, directors, employees, and agents (collectively, the “Company”), makes the following declarations, acknowledgments, and certifications:

The Company will comply with all applicable local laws, including those against bribery, corruption, and money laundering. In addition, whether or not applicable to the company, it will comply with the United States Foreign Corrupt Practices Act of 1977, which prohibit offering anything of value, improperly, either directly or indirectly to any person, including government officials, to obtain or maintain business or to achieve any other commercial advantage. In addition, the Company will not make facilitation payments or payments to facilitate government officials performing routine functions that they are otherwise required to perform. The definition "government officials" includes any government employee; candidate for public office; and employee or officer of companies owned or controlled by the state, public international organizations, and political parties.

The Company will also comply with all applicable public procurement laws and regulations, which prohibit, among other things, fraud in public procurement procedures, including but not limited to, actions that limit the competitiveness of tender procedures, provide undue assistance to public entities to write the documents of a public tender, arrangements between competitors to determine the winner of public tenders, or payments or favors to competitors to exclude them from public bids.

The Company declares that it has not paid, offered, or accepted, directly or indirectly, any political contribution in relation to the fulfillment of the obligations derived from its agreement(s) with GloboNet and will not do so in the future.

In connection with the fulfillment of obligations under its agreement(s) with GloboNet, the company will not provide any business courtesy that may: (i) violate any law or regulation, (ii) is excessive or extravagant, (iii) may reasonably be perceived as an attempt to unduly influence official actions or functions to win or maintain business on behalf of GloboNet or otherwise gain an inappropriate or improper business advantage for GloboNet, (iv) be provided secretly to a government official, (v) be provided to a family member of a government official, (vi) to embarrass or negatively affect the reputation of GloboNet (for example, adult entertainment, gambling, and visits to places where the adult entertainment or gambling is frequent), or (vii) you may not give gifts in cash or that are equivalent to cash (for example, payment cards or gift certificates).

The Company will not hire or retain any contractor, subcontractor, consultant, agent, representative or other third party (collectively, “intermediary”) to work, provide services or do anything in relation to the fulfillment of the company's obligations, by virtue of its agreement(s) with GloboNet, without confirming in a documented way that an exhaustive and reputational background check has been carried out and that, derived from it, it has been concluded that the intermediary will conduct business of ethically, in accordance with all applicable laws, including anti-bribery laws.

The Company agrees to keep books, records, and accounts accurate and complete, including a complete record of expenses incurred in connection with your work for Globenet.

All payment requests submitted by the Company to Globenet will be accompanied by supporting documentation that details in detail the work, services, or works for which payment is requested.

The Company further confirms that, if you learn of any violation of applicable bribery or public procurement laws in connection with the sale or distribution of Globenet products and / or services, Globenet will be notified immediately.

The Company accepts and acknowledges that, if Globenet has grounds, in its judgment, to consider that any of the foregoing statements is false, inaccurate, or incorrect, it may, at its discretion, withhold any amount pending payment to the Company, and shall also be entitled to terminate the existing commercial agreements between the company and Globenet immediately and without the need for a judicial declaration. The Company agrees to immediately notify Globenet if any of these statements change or become inaccurate during the course of the business relationship between the company and Globenet.

Sign in accordance with the previous statements under protest of telling the truth.

Company: _____
Name: _____
Title: _____
Date: _____

E. FOR INTERNAL GLOBENET SPONSOR/REQUESTOR

1.	For internal Use Only – To be completed by Sponsor		
Name:		Title:	
Email:			
Sign:			
2.	Was this company recommended by a government official?		
	☐ Yes, please describe in detail.	☐ No	
3.	Are you aware of whether you or someone within Globenet has a personal or business relationship with any of this Company's employees?		
	☐ Yes, please describe in detail.	☐ No	