

# Anti-bribery Policy

The Anti-bribery Policy of MA Automotive Brasil, active in the Molding and Assembly of metallic parts, provides guidance on the fundamental standards of behavior that will be required to be complied with by all employees. This Anti-bribery Policy is governed by the high management of MA Automotive Brasil, represented by the Regional Leader. The fundamental standards of behavior are as follows:

- The practice of bribery is prohibited;
- Compliance with the Anti-bribery Policy is mandatory;
- Compliance with other policies and procedures related to the Anti-bribery Management System is mandatory;
- Compliance with Brazilian corporate anti-corruption law 12,846/13 and other subscribed requirements applicable to MA Automotive Brasil is mandatory;
- Compliance with the requirements of the Anti-bribery Management System is mandatory;
- Compliance with the guidelines set forth in the Business Ethics Policy and Code of Conduct of CLN Group is mandatory;
- MA Automotive Brasil must seek continuous improvement of the Anti-bribery Management System.

In case of knowledge or suspicion of bribery practices, employees are committed to report such situation to the confidential reporting channel (<https://leaks.gruppocln.com>) and no retaliation or sanctions will be tolerated against whistleblowers who make records in good faith or for refusing to participate in bribery.

MA Automotive Brasil has an Integrity Committee, which works independently to ensure the dissemination of ethical values and principles and conduct and ensure that they are complied with.

The COMPLIANCE function has full independence to deal with matters related to the Anti-bribery Management System of MA Automotive Brasil.

Compliance with this policy is required to all Employees of MAB Automotive Brasil. The non-compliance of the precepts described therein constitutes a violation, and may lead to the application of disciplinary measures.

Additionally, for all actions on behalf of MA AUTOMOTIVE BRASIL LTDA, compliance with the guidelines set forth in the CLN Group's Business Ethics Policy and Code of Conduct is mandatory.

Porto Real, July 19th of 2021



Victor Hugo Mandrini

Regional Leader