



Attitude Compliance: a commitment by everyone to ethics and integrity at BRK

With the Compliance Program, the company guarantees an end-to-end integrity performance in the sanitation sector

BRK is committed to promoting the universalization of sanitation in its concession areas, following the highest standards of ethics and transparency. Therefore, the company has a zero-tolerance policy for acts of corruption, discrimination and unethical behavior in all its activities.

To ensure this form of action, BRK has established in its governance the adoption of a Compliance Program, aligned with the best national and international market practices, which determines the guidelines for the conduct of all its employees.

The Program has as its main objective consolidating all initiatives for the promotion and strengthening of the culture of ethics and integrity and for the mitigation of risks by means of mechanisms to prevent, detect and respond to illicit and undesired acts.

At BRK, the company's Compliance Program is supervised by Senior Management. In this sense, the members of the Board of Directors and the Executive Board assume responsibility for the Program and, according to their attributions, actively participate in its conception, sponsorship, management, supervision and maintenance. This means approving the guidelines (Codes, Policies and Standards) and other practices of the Compliance Program and monitoring its indicators on a quarterly basis.

BRK also has an Ethics and Integrity Committee, whose main objective is to ensure the dissemination of the principles and values contained in the Code of Ethics, promoting their compliance, disseminating the culture of Compliance and risk mitigation, and the prevention of fraud and corruption. The Committee is made up of eight members, as follows: CEO, VP Finance, VP Operations, VP Corporate and Regulatory Affairs, VP Shared Services, Director of Compliance and Director of HR at BRK, in addition to the Compliance Manager at Brookfield, our controlling shareholder.

Among its attributions, the Committee is responsible for deciding on cases reported in the Confidential Channel that have been corroborated after analyses and investigations. The Committee is also responsible for proposing corrective actions in case of possible violations of the Code of Conduct and other regulatory instruments of the Company, as well as evaluating the occurrence of situations that constitute or may constitute a conflict of interest, and decide on the respective appropriate measures.

The Compliance area, responsible for implementing the Program, reports immediately to the Company's CEO and has direct access to the controlling shareholder, the Board of Directors and Senior Management.

Compliance Program Assessment

The Compliance Program covers 100% of BRK's operating units and can be quickly implemented in any new business that the company acquires.

Periodically, the Compliance area conducts a survey with employees to assess the maturity of BRK's Compliance Program. This assessment is conducted by a specialized third-party company and considers a set of nine different criteria.

Among the nine criteria analyzed, the company achieved the maximum score in "People and Structure", "Policies" and "Training and Communication". The consultancy also assessed that BRK's Compliance Program is 100% compliant with the requirements of the Anti-Corruption Act (12,846/13) and the United States Department of Justice (DoJ).

In 2021, the overall rating obtained by the company in the survey was 4.6, on a scale from 1 (lowest maturity) to 5 (highest maturity). The average maturity of integrity programs in a benchmarking performed by the consultancy that conducted the survey is approximately 3.5.

73% of the invited professionals answered the questions, with the main highlights being:

Perception survey with employees about the Compliance Program

99% believe in BRK's commitment to ethics and integrity
 98% believe that BRK has an adequate level of compliance
 96% stated that there are frequent campaigns and communications on Compliance topics

Risk Assessment

At BRK, a risk assessment is carried out periodically in order to identify and assess the risks of bribery and corruption to which the Company is exposed. As a result, we have a matrix that lists the main risks, as well as the impact and probability of their materialization and their respective mitigation factors.

The company's Integrity Risk Matrix ("ABC Risk Matrix") is constantly being updated, observing the identification of new risk factors (such as, for example, when we have a new acquisition), and the reclassification of risks already identified.

We also implement procedures that allow BRK to know and understand the risks of corruption and bribery in amalgamation, acquisition and merger processes of companies and/or assets, as the case may be.

Training and Communication

To ensure that employees are always aligned with the company's values, BRK promotes periodic training on the Compliance Program for 100% of its professionals, either in person or through distance learning initiatives.

These trainings involve discussions and updates on Program topics, such as conflicts of interest, interaction with the Government, participation in bidding processes and combating bribery and corruption.

For new employees, online training is provided related to the Code of Ethics, Conflict of Interest and Anti-corruption as part of the hiring process, and the topic is addressed again during integration.

Finally, we have online training courses related to ethical conduct and practices to prevent and combat corruption for third parties classified as high risk in our Third Party Risk Assessment process. This training takes place before hiring the third party and periodically with each renewal of the assessment.

In addition to training, communication actions about the Program are launched annually, with the aim of continuously expanding the engagement of employees and other stakeholders with BRK's purposes and integrity practices. The sending of the "Compliance in Focus" newsletter, the distribution of the "Attitude Compliance" comic book and the Compliance podcast are examples of how the company works to keep its professionals informed and updated on Compliance topics.