

1. PURPOSE

To present to the Company's employees and other contractors and service providers the concepts and responsibilities related to Anti-Corruption Law No. 12.846/2013, "FCPA" (Foreign Corrupt Practices Act), and the guidelines for relations with Public Entities and participation in electoral processes.

2. TUTORING AREAS

Compliance Board – DC;
Institutional Relations and Sustainability Board – DRIS.

3. INVOLVED AREAS

This Policy applies to Vasta Educação ("Vasta") and all its subsidiaries and business units and must be complied with and considered by all employees, including administrators (officers and directors) and any third party with whom they maintain contractual relationship.

Third parties representing Vasta as consultants, service providers, business partners, and suppliers must become aware of this Policy and undertake to follow all guidelines set forth therein.

DC, together with the Vice-Presidency of People, Culture, and Innovation, has the duty to disclose and communicate the content of this Policy to all Vasta's employees, partners, and people linked to the Company.

4. INTRODUCTION AND COVERED ASPECTS

Vasta values honesty, transparency, and respect in all its relations. Therefore, it does not allow and encourage, under any circumstances, the obtaining of an illegal advantage.

The Anti-Corruption Law and the FCPA must be complied with. If compliance with this Policy implies violation of these laws in any aspect, the laws must be followed, and DC must be previously informed of the conflict for proper handling and measures.

Based on these principles, Vasta and its respective employees must observe the guidelines contained in our Code of Conduct, in addition to guiding the conduct of business in an honest, responsible, ethical, transparent, and professional manner and in compliance with the law.

Vasta values fair and economically sustainable business practices. Like economic indicators, public perception is an indicator of our Company's success. Essentially: Vasta's reputation is our greatest asset and, therefore, needs to be protected.

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As detailed below, this Policy is intended to help employees understand the obligations, premises, and rules of the Anti-Corruption Law and the FCPA and how they impact the business carried out by the Company. Additionally, this material also provides guidelines related to the conduct of the Company and its administrators/employees in electoral processes, at the federal, state, and municipal levels, considering the rules for interaction with candidates and political parties.

Any actions not provided for in this Policy and related to the topics covered herein, as long as they do not result in non-compliance with legal/regulatory aspects in force, must be submitted for prior analysis by a committee composed of DRIS, DC and the Legal Department members.

Note: This Policy is a supplement to the Company's Code of Conduct. This material does not replace it.

4.1. Background

On January 29, 2014, Law No. 12.846/13, known as the "Anti-corruption Law", ("Law 12.846/13" or "Anti-corruption Law"), which seeks to combat and prevent acts of corruption, came into force. It is an ordinary law issued by the Federal Executive Branch that deals with the objective administrative and civil liability of companies for the practice of acts against the Public Administration, national or foreign.

In the same vein of the Anti-Corruption Law, there is also the North American Law on acts of corruption abroad, the "FCPA" (Foreign Corrupt Practices Act), which defines a series of requirements that must also be followed by the Company, its administrators (officers and directors), employees, and third parties. Like the Brazilian Anti-Corruption Law, the FCPA provides for the application of civil, administrative, and criminal sanctions for cases that violate the law.

This Policy was prepared with the purpose of clarifying to employees the content, scope, and provisions of these Laws, and promoting awareness of the relevance and responsibility of acts performed on behalf of Vasta, restating the commitment to transparency and integrity in the conduct of our business.

The Anti-Corruption Law and the FCPA allow companies to be punished and held responsible for acts of their employees, at any hierarchical level, practiced against the national or foreign Public Administration (the Federation, States, Municipalities, public bodies, etc.). In addition to punishing companies, employees involved in acts harmful to the Public Administration may also be held administratively, civilly, and criminally liable, and may be dismissed for cause, indemnifying all financial losses incurred by the company through prosecution.

Employees who have any questions about the explicit content of this Policy or the Anti-Corruption Law (Law No. 12.846/13), and the FCPA, must promptly request clarification from their immediate manager or from DC. If necessary, DC may seek support from the Legal Department or even external lawyers for clarification.

The Anti-Corruption Policy is available for consultation on the institutional websites of Vasta and the group companies, and also on the internal corporate portal (Portal Informa).

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5. CONCEPTS AND APPLICATION OF ANTI-CORRUPTION LAWS (12.846/13) AND FCPA

To facilitate understanding of the Anti-Corruption Law and the FCPA, it is important that you know these concepts:

5.1. Corruption

It is any act harmful to the Public Administration, national or foreign, that violates public assets, against principles of public administration or the international commitments assumed by

5.2. Harmful Act

It is the action of the individual and/or the Company that causes harm.

For the purposes of applying this Law, the harmful act is unlawful, that is, contrary to the Law. Therefore, for the Anti-Corruption Law, the Company will be responsible if any employee:

- I – Promise, offer or give, directly or indirectly, undue advantage to a public official, or a third person related to it;
- II – Demonstrably finance, fund, sponsor, or otherwise subsidize the practice of unlawful acts provided for in this Law;
- III – Demonstrably use an interposed individual or legal entity to hide or disguise its real interests or the identity of the beneficiaries of the acts performed.

The Company will also be held liable if, as to bids and contracts, the employee:

- a) frustrates or defrauds, through adjustment, combination, or any other arrangement, the competitive nature of a public bidding procedure;
- b) prevents, disturbs, or defrauds the performance of any act of public bidding procedure;
- c) removes or seeks to remove a bidder, through fraud, or offering of any kind of advantage;
- d) defrauds public bidding or contract resulting from it;
- e) creates, fraudulently or irregularly, a legal entity to participate in public bidding or enter into an administrative contract;
- f) obtains undue advantage or benefit, fraudulently, from amendments or extensions of contracts entered with the public administration, without authorization by law, in the call of the public bidding or the respective contractual instruments; or
- g) manipulates or defrauds the economic and financial balance of contracts entered with the public administration.

In addition, “hindering the investigation or inspection activities of public bodies, entities, or agents, or intervening in their performance, including within the scope of regulatory agencies and inspection bodies of the national financial system”, is classified as an act harmful to the public administration.

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5.3. Public Administrations

For the purposes of the Law, it is the entire structure and organization of the Public Authorities, comprising the Federation, States, Municipalities, bodies, companies, and people (public officials) that carry out governmental activities.

5.4. Public Official

Any person who holds, even if temporarily or without compensation, whether by election, appointment, designation, hiring, competition, or any other form of relationship, office, position, employment, or function in the Municipality, State, Federation, Public Agencies, or any Public Company or controlled by national or foreign governments (foundations, autarchies, public companies, etc.).

Examples of public officials:

- 1. Officers and employees of any government entity at the national, state, regional, municipal, or local level;*
- 2. Any individual acting temporarily on an official basis for or on behalf of any government entity (such as a consultant employed by a government agency);*
- 3. Officers and employees of companies with government participation;*
- 4. Candidates for political office at any level, political parties, and their representatives; and*
- 5. Officers, employees, or official representatives of any public international organization such as the World Bank, the United Nations, and the International Monetary Fund.*

5.5. Item of Value

It is understood as a “Item of value” money, gifts, trips, entertainment, job offers, and meals at work. Any item of value may also include event sponsorship, scholarships, research support, and solicited charitable contributions, or for the benefit of a government official, family members, even if they are for the benefit of a legitimate charitable organization.

5.6. Undue Advantage

It is any item of value, not necessarily economic (not limited to an advantage), which is offered with the intention of receiving favors in exchange (examples: scholarships, discounts, etc.).

5.7. Bribery

A bribe is the promise, offer, donation, or receipt of something of value in exchange for favorable treatment by a company, official authority, or public agent. It can be characterized through cash payments and any transfer of value, tangible or intangible.

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6. SANCTIONS

The Anti-Corruption Law and the FCPA provide for sanctions that provide opportunities for the recovery of public assets in a more effective way, not only punitive, but also for repairing the damage caused.

The wording of these laws protects the interests of the public administration, considering the responsibility of the legal entity in an objective way. This means that demonstrating that the Company was not responsible for an act performed by an employee will not exempt the Company from its responsibility.

Companies that violate the Anti-Corruption Law are subject to the following penalties:

- a) Fine of up to 20% of gross sales for the fiscal year prior to the filing of the administrative proceeding. In cases where it is not possible to determine the company's billing, the judge in the case will set the fine amount, which may range from R\$ 6 thousand to R\$ 60 million;
- b) Repairing the damage caused to the Public Administration;
- c) Publication of the decision on the conviction of the company involved, in national widespread media vehicles (which will cause serious damage to the image and reputation of the company involved);
- d) Prohibition of receiving funds from public financial institutions or those controlled by the government, for a minimum period of one year and a maximum period of five years. The prohibition includes incentives, subsidies, grants, financing, donations, and loans;
- e) Prohibition to participate in bids and to be contracted by the government during the period of compliance with the sanction;
- f) Suspension or partial interdiction of its activities;
- g) Compulsory dissolution; and
- h) Loss of assets, rights, or values, that represent an advantage or benefit directly or indirectly obtained from the violations.

The Anti-Corruption Law also determines that the existence of internal mechanisms and procedures that promote integrity, audits, incentives to report irregularities, application of codes of ethics and conduct can serve to mitigate penalties.

The Law also assesses the Compliance programs practiced by companies and the effectiveness of the Controls, Audit, and Compliance structure as a tool for mitigating possible practices of illegal conduct with public officials.

Companies that violate the FCPA are subject to the following penalties:

- a) Fine of up to US\$ 5,000,000 or up to 5 years in prison for an individual for deliberately violating accounting provisions. In the case of legal entities, the fine can reach US\$ 25,000,000
- b) Fine of up to US\$ 250,000 or up to 20 years in prison for an individual for deliberately violating anti-bribery provisions. In the case of legal entities, the fine can reach US\$ 2,000,000;
- c) Refund of profits obtained from the performance of unlawful practices;

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d) Statement of disreputable status and removal from the securities market.

7. RULES AND INTERNAL PROCEDURES

Due to the penalties imposed by the Law, all employees and third parties acting on behalf of Vasta are required to comply with the rules and procedures listed below, prepared and disclosed to ensure compliance with the guidelines of the Anti-Corruption Law 12.846/2013 and the FCPA.

Payments to obtain any kind of undue advantage are not allowed. This guideline applies to those who encourage or execute payments, considering (without limitation):

- a) Approve the payment of bribes;
- b) Provide or accept false invoices;
- c) Retransmit instructions for paying bribes;
- d) Hide the payment of bribes
- e) Consciously cooperate with the payment of bribes;
- f) Pay, even with own resources, for unlawful acts.

No employee will be penalized for delay or loss of business resulting from their refusal to pay/receive a bribe.

7.1. Amenities and Trips

Business amenities and trips must be directly related to the legitimate purpose of the business, and it is not allowed to offer meals, trips, or entertainment to public officials to improperly influence or compensate an official act or decision, as actual or intended compensation for any benefit to Vasta.

Some examples of amenities are meals, entertainment, services, improvement or “upgrade” in goods or services, transportation, lodging, parties, events, concerts, loans, favors, discounts, among others.

In general, amenities and trips with public officials must comply with the following guidelines:

- a) They must not be fully funded by the Company. For situations like these, each party must bear its cost individually, thus avoiding any conflict of interest or suspicion of benefiting Vasta.
- b) In the event where a meal is offered by a public official and it takes place in an institutional environment, it may be accepted by us. However, if there is any type of charge at the end, regardless of the amount, our employee shall always bear its costs.
- c) Provide amenities, trips, or other hospitality in periods of less than 12 months to a public official, may be indicative of improper activity and, therefore, is prohibited. Allowances must not be paid to public officials for any reason.
- d) Under no circumstances may money in kind be provided to a public official to organize a trip.

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In all of the above situations, you must ensure that expense records associated with amenities and trips are accurate and clearly reflect the true reason for the expense. Reimbursements for these expenses, when applicable, will only be made after proof that none of them was used in violation of this Policy and that the information provided is correct.

All payments for meals and trips must also comply with the Limits of Allowance Policy, and travel expenses will only be reimbursed if the items contained in the Company's policy on travel expenses are observed.

Eventually, if these expenses are outside this rule, formal communication must be forwarded to the DC, which will assess the need for approval by Vasta's CEO or Chief Financial Officer.

7.2. Gifts/Giveaways

As defined by the Public Ethics Commission: *"a gift is a souvenir distributed as a courtesy, advertising, customary disclosure, or in events or commemorative dates of a historical or cultural nature."*

No gift or giveaway, under any circumstances, must be given in exchange for inappropriate favorable treatment by a public official, aiming at any benefit to Vasta.

To avoid the impression of improper relationships with public officials, some guidelines are followed, pursuant to Resolution No. 3/2020, of the Public Ethics Commission:

- a) Employees are authorized to give gifts to any public official, as long as they do not exceed the amount of R\$ 100.00 (one hundred Reais) and are identified with Vasta's name and/or logo. If gifts or giveaways exceed this amount, formal communication will be required to DC, which will assess the need for approval by Vasta's CEO or Chief Financial Officer;
- b) Giveaways must be given in small quantities and of low cost, that is, the maximum limit established above must be respected;
- c) No gifts or giveaways must be given as cash or have their value transferred between bank accounts;
- d) Giveaways must be made available in a diffuse manner, without focused destination to specific bodies or agents, always respecting periods exceeding twelve (12) months;
- e) Giveaways must be given out openly, so that the managers of a public official can see that the giveaways have been offered;
- f) Employees must be very careful with high-level government authorities or employees who have direct authority over an outstanding matter of the Company's business;
- g) It is forbidden to offer giveaways to relatives of public officials;
- h) Likewise, in these situations, it is necessary to ensure that records of expenses associated with gifts or giveaways are accurate and reflect the true reason for the expense.

Any and all giveaway distribution programs must undergo review and approval by DC and DRIS before being carried out.

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7.3. Records and Accounting

All Employees must ensure proper documentation and maintenance of records of financial operations under their responsibility, paying attention to the accuracy and completeness of such recorded information. Additionally, responsible Employees must ensure that these financial transactions are:

- a) only carried out upon approval by the competent authority, when applicable;
- b) correctly registered, according to the need for each one of them, enabling the collection of complete information for the preparation of the Company's financial statements;
- c) accurately reflected by Company's financial and accounting records.

7.4. Contracts

All contracts of the Company, especially those with the government (public administration), before being signed, must necessarily pass through the approval of the Legal Department.

7.5. Third-Party Representatives

These rules and procedures apply to all third parties representing Vasta, such as consultants, service providers, business partners, suppliers, etc.

A third-party contract must be based on Vasta's business needs and the merits of the company or individual contracted. All third parties must be aware of this Policy.

7.6. Sponsorships

All sponsorships must be based on contracts formalized between Vasta and the institutions benefiting from the sponsorship.

Vasta has an internal approval process for these sponsorships, with the participation of the Legal Department and DC and, when necessary, sponsorships must also be approved by the CEO.

8. GUIDELINES FOR PARTICIPATION IN ELECTORAL PROCESSES

8.1. Political Contributions

Vasta is a non-partisan company. Within the political context, Vasta defends democratic pluralism and the legitimate debate of ideas and will always be favorable to thoughts that seek the continuous improvement of education in our Country. Vasta does not encourage political financial donations by its administrators/employees, whether individual beneficiaries, political parties, or political entities. Vasta, within the context allowed by federal legislation, recommends to its administrators/employees, at the individual and personal level of each one, that, as they make political donations, they do so with thoughts focused on public morality and impersonality towards Vasta. We require that if you are an administrator (Statutory or Board member) or N1 Director of the Company and

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choose to make a political donation, you immediately inform DC and DRIS through the e-mail duvidas.eleicoes@cogna.com.br.

Any contributions or donations made by Vasta to political parties, campaigns, and/or candidates for public office at the federal, state and municipal levels are prohibited, as well as the use by employees of private resources for donations on behalf of the Company, pursuant to Law 13.165/2015 and STF decision (ADI No. 4.650), and internal corporate policies.

9. WARNING SIGNS

To ensure compliance with Anti-Corruption Law 12.846/13 and the FCPA, employees must be aware of warning signs that may indicate that benefits or undue payments may be taking place.

Warning signs are not necessarily evidence of corruption, or automatically disqualify third parties representing Vasta. However, they raise suspicions that should be investigated until it is ensured that these signs do not indicate problems.

In addition to the warning signs contained in the Code of Conduct, employees must view with doubled suspicion any of the following warning signs referring to any operation in which payment or benefit may be received by a government official or member of its family:

- a) Counterparty has a reputation for bribery;
- b) Counterparty has asked for a commission that is excessive, paid in cash, or otherwise irregular;
- c) Counterparty is controlled by a public official or its family members, or has a close relationship with the government;
- d) Counterparty is recommended by a public official;
- e) Counterparty provides or requests an invoice or other questionable documents;
- f) Counterparty refuses to include reference to anti-corruption measures in the written contract;
- g) Counterpart proposes an unusual financial scheme, such as requesting payment from a bank account in a country other than the one in which the service is being provided or requesting payment from more than one bank account;
- h) Perception that the donation to a charity at the request of a public official is an exchange for a government action.

10. REPORTING AND ASSESSMENT

Employees must report any suspicious conduct or action contrary to Laws 12.846/13 and the FCPA, and contracts, partnerships, and negotiations through DC may also be inspected.

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10.1. Reporting cycle

Reports of violation, identified or anonymous, shall be directed to Cogna Confidential Channel (CCC), an independent reporting channel that shall be used to report situations in which the Company's values and ethical principles are being put at risk. This channel is available on Vasta's institutional website and on Portal Informa. Regardless of whether reports of violations are identified or anonymous, Vasta will take steps to protect the confidentiality of any report subject to applicable law, regulation, or legal procedure.

Vasta does not permit or bear retaliation of any kind against any person who makes a good faith report or complaint of a violation of this Policy. Employees who engage in retaliation will be subject to disciplinary action by the Company, including termination of employment.

We remind you that false reports or acts of bad faith are considered crimes and, if cases of this nature are proven, the Company will take the actions provided for internally and according to the laws applicable to the cases analyzed.

11. PUBLIC BODIES MAINTAINING RELATIONSHIP WITH VASTA

Below is a list of the public bodies and entities with which Vasta, its companies, and partners maintain relationship. This list does not exhaust the possibilities of interactions with public entities; therefore, the guidelines of this Policy must be applied to any activity that involves public bodies and officials.

- Brazilian Health Surveillance Agency
- Caixa Econômica Federal
- Brazilian Securities Commission – CVM
- Administrative Council for Economic Defense – CADE
- Education Councils
- Professional Councils
- Fire Department
- Magistrates
- Ministry of Education
- Ministry of Labor
- Public Ministry
- Political Parties
- Civil Police
- Military Police
- City Halls
- Internal Revenue Service
- Education Departments
- Finance Departments
- Brazilian Service for Industrial Learning – SENAI
- Brazilian Social Service for Industry – SESI
- Brazilian Social Service for Commerce – SESC
- Unions
- Administrative and Judiciary Courts
- Brazilian Congress
- Legislative Assemblies

11.1. Matrix of Responsibilities

Vasta has a matrix of responsibilities (Exhibit 1, Exhibit 2, and Exhibit 3) specific for the relationship of its employees and partners with public bodies and/or official. The matrix determines the employees able to relate to each public body and/or official.

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All decisions related to these bodies must be shared, at a minimum, with the employee assigned to each one of these decisions in the matrix of responsibilities.

In case of questions about the proper application of the rules and procedures contained in this policy and/or in the matrix of responsibilities, the employee must contact its immediate manager and/or DC.

Approval

- Compliance Board (DC);
- Institutional Relations and Sustainability Department;
- Legal Department;
- Presidency.

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EXHIBIT 1 – GENERAL HIERARCHICAL REPORTING MATRIX

(For the Ministry of Education, see Exhibit 2 for a specific Reporting Matrix)

This matrix does not exhaust the possibilities of relationship with the Government. Any exception to this matrix must respect the rules contained in this Policy. Positions higher than those designated in the Hierarchical Reporting Matrix are automatically authorized to perform the activities described below.

Cargos	President	Vice-Presidency	Board	Managers	Other
Minister	President and Board of Directors' members	Vice-Presidents when nominated by the President	Institutional Relations and Sustainability Board (DRIS)	-	-
Head of Office	President and Board of Directors' members	Vice-Presidents when nominated by the President	Responsible Board Reporting to the VP or Presidency	Institutional Relations and Sustainability Management	-
Secretary	-	Vice-President	Responsible Board Reporting to the VP or Presidency	Institutional Relations and Sustainability Management	-
Advisory Council	-	Vice-President	Responsible Board Reporting to the VP or Presidency	Institutional Relations and Sustainability Management	Analysts when nominated by the Management
Head of Office	-	Vice-President	Responsible Board Reporting to the VP or Presidency	Institutional Relations and Sustainability Management	-
Board	-	Vice-President	Responsible Board Reporting to the VP or Presidency	Management Reporting to the Board	-
Coordination or below	-	-	-	Managers	Analysts formally reporting to the Management

All activities performed by third parties shall be aligned and reported to Vasta's contractor and this employee shall be responsible for complying with the authority established in this matrix.

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Any relationships not included in the table above can only be carried out with prior authorization from DRIS and DC.

This matrix does not exhaust the possibilities of relationship with the Government. Any exception to this matrix must respect the rules contained in this Policy. Positions higher than those designated in the MEC Hierarchical Reporting Matrix are automatically authorized to perform the activities described below.

Cargos (MEC)	President	Vice-Presidency	Board	Managers	Other
Minister	President	Vice-Presidents when nominated by the President	Institutional Relations and Sustainability Boards (DRIS) or Officers when nominated by the President	-	-
Head of Office	President	Vice-Presidents when nominated by the President	Institutional Relations and Sustainability Board (DRIS) or Regulation Board (DDI)	Institutional Relations and Sustainability Management	-
Secretary	-	-	Institutional Relations and Sustainability Board (DRIS) or Regulation Board (DDI)	Institutional Relations and Sustainability Management	-
Advisory Council	-	-	Institutional Relations and Sustainability Board (DRIS) or Regulation Board (DDI)	Institutional Relations and Sustainability Management	Analysts when nominated by the Management
Head of Office	-	-	Institutional Relations and Sustainability Board (DRIS) or Regulation Board (DDI)	Institutional Relations and Sustainability Management	-
Board	-	-	Institutional Relations and Sustainability Board (DRIS) or Regulation Board (DDI)	Boards and Managements Reporting to the Board	-
Coordination or below	-	-	-	Managers and Coordinators of the Board (DDI)	Analysts formally reporting to the Management

All activities performed by third parties shall be aligned and reported to Vasta's contractor and this employee shall be responsible for complying with the authority established in this matrix.

Any relationships not included in the table above can only be carried out with prior authorization from DRIS and DC.

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EXHIBIT 2 – MATRIX OF ACTIVITIES AND RESPONSIBILITIES

This matrix does not exhaust the possibilities of relationship with the Government. Any exception to this matrix must respect the rules contained in this Policy. Positions higher than those designated in the Matrix of Activities and Responsibilities are automatically authorized to perform the activities described below.

Activities	President	Vice-Presidency	Board	Managers	Other
Bids /Auction /Public Tender					
Intention to Participate in Public Tenders	-	-	Board reporting to the Vice-Presidency or Presidency	-	-
Submission of Documentation to Public Bodies	-	-	Legal Department and Responsible Board	Corporate Manager or Unit Director reporting to the Boards	-
Signing of Bidding Agreements	-	Vice-Presidency	-	-	-
Tax Audits (Federal Revenue, Finance Departments, and City Halls)					
Service to Auditors /Inspectors	-	-	Financial Control Board and Legal Department	Corporate Manager or Unit Director reporting to the Boards.	-
Request and forwarding of Request Documentation of Audits/ Inspections	-	-	-	Financial Control Corporate Manager	Finanacial Control Analyst reporting to the Management
Receipt and forwarding of Notifications and Penalty Notices	-	-	Financial Control Board and Legal Department	Corporate Manager Reporting to the Financial Control Board and Legal Department.	-
Brazilian Exchange and Securities Commission – CVM					
Service, Communication, and Relationship	-	-	Investor Relations Board	IR Management reporting to the Board	IR Analysts reporting to the Board/ Management
City Halls, Caixa Econômica Federal, Labor Audits (Public Ministry, Ministry of Labor ,and Internal Revenue Service)					
Service to Auditors/Inspectors	-	-	-	Unit Director or Corporate HR Manager	Coordinator and/or responsible for local HR reporting to the HR Management and Responsible Board

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Activities	President	Vice-Presidency	Board	Managers	Other
Request and forwarding of Request Documentation of Audits/ Inspections	-	-	HR, Financial Control, and Legal Department	Corporate HR Manager	Coordinator and/or responsible for local HR reporting to the HR Management and Responsible Board
Receipt and forwarding of Notifications and Penalty Notices	-	-	HR Department	Unit Director or Corporate Manager reporting to the Department	Coordinator and/or responsible for local HR reporting to the HR Management and Responsible Board
Unions (Negotiations and Agreements)					
Services	-	-	-	Corporate Human Resources Coordinator	Local HR
Performance of Negotiations and Agreements	-	-	HR Department	Corporate Management reporting to the HR Department	Corporate HR Coordinator reporting to the Management
Judiciary (Judges, Prosecutors, and Lawyers)					
Interlocution with the Judiciary Branch	-	-	Legal Officer	Internal/External Lawyers or Officers reporting to the Legal Department	-
Licenses, Permits, and Other Documents					
Assistance to inspection by the Fire Department, Environmental Police, and City Halls (Auditors/Inspectors)	-	-	-	Unit Director Reporting to the Technical Documentation and Legalization Management	-
Request and forwarding of Request Documentation of Audits/ Inspections	-	-	-	Technical Documentation and Legalization Manager	Coordinator and/or Operational Managers reporting to the Management
Receipt and forwarding of Notifications and Penalty Notices	-	-	Infrastructure and Legal Department	Unit Director or Corporate Manager Reporting to the Reporting to the Department	HR Coordinator reporting to Management and Responsible Board

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Activities	President	Vice-Presidency	Board	Managers	Other
Prior Consultation – (RIB Basic Information Reports; FOB – Basic guidance form; AOP – Analysis and preliminary guidance)	-	-	-	Technical Documentation and Legalization Manager	Coordinator and/or Operational Managers reporting to the Management
PPCI – Fire Prevention and Fighting Project	-	-	-	Technical Documentation and Legalization Manager	Coordinator and/or Operational Managers reporting to the Management
Building Permit	-	-	-	Technical Documentation and Legalization Manager	Coordinator and/or Operational Managers reporting to the Management
Work License	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Project approval / hydro sanitary license and/or drainage	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Minor repairs permits	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Prior License and Environmental Facilities (state and municipality)	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Traffic License	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Licenses of Historical Heritage (e.g.: Conpresp and Condephaat)	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management

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Activities	President	Vice-Presidency	Board	Managers	Other
Assessments regarding Projects, Licenses for Works, Environmental Licenses, Sanitary Agency Authorizations and Operating Permits	-	-	-	Responsible for unit/work or Management of Technical Documents and Legalization	-
Inspections (works and units)					
Service to Auditors/Inspectors	-	-	-	Unit Officer or Corporate Manager Technical Documents and Legalization	Manager of Works and/or Contractor reporting to the Managers
Request and submission of Request Audit/Inspection Documents	-	-	-	Unit Officer or Corporate Manager of Technical Documents and Legalization	Manager of Works and/or Contractor reporting to the Managers
Receipt and submission of Notices and Assessments	-	-	-	Unit Officer or Corporate Manager reporting to the Board of Executive Officers	Manager of Works and/or Contractor reporting to the Managers
Occupancy Permit	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Licenses to Operating Activities					
VISA - Sanitary Agency (e.g.: clinics, biomedicine courses, restaurants and cafeteria inside campi)	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
AVCB - Fire Department Inspection Certificate	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management
Operation License/Permit	-	-	-	Manager of Technical and Legalization Documents	Operating Coordinator and/or Administrators reporting to the Management

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POLÍTICA CORPORATIVA



Activities	President	Vice-Presidency	Board	Managers	Other
Unions and other Institutions or “public” Associations					
Donations, Payments and Transfer of Amounts	Financial and HR Committee and/or Board of Directors	-	-	-	-
Contributions to charitable causes	Chairman	-	-	-	-

All Activities carried out by third parties must be aligned and reported to Vasta’s contractor and this employee must be responsible for complying with the authority established in this matrix.

Any relationships not included in the table above can only be carried out with prior authorization from DRIS and DC.

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