

DATEN	ANTI-BRIBERY MANAGEMENT SYSTEM		
SGAS N°	REVISION	DATE	TOP MANAGEMENT
0.1	04	05/12/2026	Silvio Comin

Anti-Bribery Policy

DATEN TECNOLOGIA:

- Is committed to carrying out its activities in a dignified and honorable manner, with integrity and honesty, not tolerating any forms of bribery, adopting preventive measures and continuous improvement actions to combat possible practices, whether direct or indirect, guiding its employees, representatives, and partners to strictly comply with the Anti-Bribery Policy and other applicable requirements, as well as providing guidelines for the establishment of the objectives and goals of the Anti-Bribery Management System.
- Expressly prohibits interested parties from offering, promising, giving, receiving, or requesting any illegal benefit or arrangement, of any nature or in any possible form, directly or indirectly, with the purpose of inducing one of the parties to obtain an illegitimate commercial advantage.

CLASSIFICATION: PUBLIC

- Provides an open communication channel to society in order to receive possible reports of non-compliance with the implemented Anti-Bribery Policy, the Code of Conduct, and other anti-bribery documents and procedures, encouraging the raising of concerns made in good faith or based on reasonable belief, ensuring anonymity and confidentiality of information, without fear of retaliation against those responsible for the communication.
- DATEN appoints, through its own document, the person(s) responsible for the anti-bribery compliance function, with full independence and authority, in accordance with the requirements of ABNT NBR ISO 37001:2025. It also makes clear that interested parties who violate anti-bribery principles will be subject to consequences in the administrative, civil, and criminal spheres, as defined in the Code of Conduct on Anti-Bribery Compliance and Information Privacy.
- A organização atua em conformidade com a legislação aplicável (Lei nº 14.133/2021 – Lei de Licitações; The organization operates in compliance with applicable legislation (Law No. 14,133/2021 – Public Procurement Law; Law No. 12,846/2013 – Anti-Corruption Law; Law No. 8,429/1992 – Administrative Misconduct Law; Decree No. 11,129/2022 – Administrative and Civil Liability, among others mentioned in the legislation spreadsheet) and with the requirements of ABNT NBR ISO 37001:2025 – Anti-Bribery Management System, requiring its employees, representatives, partners, and other interested parties to

strictly comply with and commit to the anti-bribery laws applicable to the organization and other relevant requirements.