

Code

2023

Code

Guideline Title

VERSIONING AND CONTROL INFORMATION

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1 PURPOSE

Bring together, in a clear and objective manner, a set of guidelines aligned with Ocyan's values and principles, and present the conduct expected of our members.

2 COVERAGE

Ocyan S.A. Compliance System Policy applies to all our members, including members from Ocyan's Board of Directors, as well as members and administrators of controlled companies without a board of directors.

It serves as a guidance to members of the board of directors from companies controlled by Ocyan, as appointed by the latter, in line with other directors, so that they can approve and implement a commitment based on set and clear principles, concepts and guidelines, without, however, failing to foster complements and other guidelines required to adequate characteristics of their respective business and contributions from other directors.

3 TERMS AND DEFINITIONS

- *Compliance system: prevention, detection and remediation measures of risks and bad conducts promoting an organizational culture that supports the Code of Conduct.*
- *Conflicts of interest: situations in which our private interests or of close relatives interfere or seem to interfere in our capacity to judge or make decisions without bias, on behalf of the company. Such conflicts may also occur when members, or their close relatives, receive unfair personal benefits due to their position in the company.*
- *Entertainment: action, event or activity with the purpose of entertaining and attracting the interest of an audience (e.g.: tickets to concerts, theater, exhibitions etc.).*
- *Gift: gratification, favor, benefit, discount or an item with monetary value (e.g.: courtesies, gift cards, etc.).*
- *Hospitality: structure and network of services to facilitate movements (e.g.: travel, ticket, transportation, etc.).*
- *Money laundering: process that seeks to mask the nature and source of the money associated with illegal activities, by introducing such amounts in the local economy, by means of integrating the illegal money to the commercial flow, in such a manner that it seems legit or to conceal its true source or to prevent its owner from being identified.*
- *Moral harassment: practice of abusive behaviors or committed by one or more individuals against one, usually in a repetitive and extended manner, to coerce, humiliate, disrespect, depreciate or embarrass the targeted individual.*

- *Personal information: data that can be used to identify, directly or indirectly, an individual, such as name, address, record numbers, telephone, physical attributes, e-mail, as well as any information that can be associated with the individual, such as health data, dependents, properties, financial status, performance and behavioral assessments, among others.*
- *Promotional Items: item without commercial value distributed to meet certain ends such as disclosing the mark and/or in appreciation (e.g.: notebook, pen, calendar etc.).*
- *Related parties – individuals: (i) Key persons, such as administrators with management powers, officers and members of the board of directors, who plan, guide or control activities. (ii) Relatives close to a related party are also considered related parties*
- *Related parties – legal entities: (i) Hold actions of the company or may exercise significant influence on them. - Are, direct or indirectly, controlled or controllers or are under common control of shareholders exercising significant control or influence on the company. (ii) Be a company that is controlled, jointly or individually, by any entity considered as a related party or that is under its significant influence. - Be a controlled company with equity interest of third party(ies).*
- *Sexual harassment: when someone in a privileged position makes use of such condition to coerce or offer benefits to an individual in exchange for advantages or sexual favors.*

4 DEVELOPMENT

4.1 Our Commitment

*We have assumed by conviction the commitment of acting ethically, with integrity and transparency. This commitment supported by our **compliance system** is essential for Ocyan's survival, growth and perpetuity.*

The “Code of Conduct – Our commitment to acting ethically, with integrity and transparency” (“Code of Conduct”) gathers, in a clear and objective manner, a set of guidelines in line with Ocyan's values and principles, and presents the expected conducts of our members. The practice of our commitment generates respect and consolidates people's trust, thus solidifying Ocyan's reputation.

Our commitment is materialized daily and in the execution of our Action Programs (“PAs”) by means of the definition of priorities, philosophy, goals and results agreed by our members. We are responsible for the awareness, implementation, observance, dissemination, and supervision of compliance with the conducts detailed in this Code.

*All our members and directors have the obligation to comply with it. Situations involving possible deviations from this commitment must be discussed with leaders or with the Chief Compliance Officer (R-Conformidade) in a clear and sincere manner. In the event of existing any discomfort in an explicit positioning, or if there are reasons to keep an anonymous report, then using the **Ethics Line Channel** must*

be encouraged.

Working in compliance with this Code of Conduct depends on the attitudes of all and each one of our members.

Our commitment to acting ethically, with integrity and transparency is structured as follows:

- 1. Combat and not tolerate corruption in any way whatsoever.*
- 2. Say no, with firmness and determination, to business opportunities that conflict with this commitment.*
- 3. Adopting principles for ethics, integrity and transparency in the relations with public and private agents.*
- 4. Never invoke cultural or usual market conditions to justify improper actions.*
- 5. Ensure transparency in information about Ocyan, which must be accurate, comprehensive, accessible and disclosed on a regular basis.*
- 6. Being aware that deviations of conduct whether by action, omission or complacency harm society, violate laws and damage the image of Ocyan.*
- 7. Ensuring at Ocyan the practice of the Compliance System, always updated with the best references.*
- 8. Contribute both individually and collectively towards the necessary changes in markets and environment where there may be induction to deviations of conduct.*
- 9. Incorporate in Actions Programs of members a performance assessment of their adherence to the Compliance System.*
- 10. To have the conviction that our Survival, Growth and Perpetuity depend on this Commitment.*

Know more about the subject in "Compliance System Policy".

4.2 Our Work Environment

We value a work environment that is safe, reliable, diverse, and fair that allows all our members to succeed and prosper. All of us, especially our leaders, are responsible for ensuring this work environment, with relationships based on cordiality, discipline, respect, and trust.

We ensure our members have equal opportunities to develop and improve their skills and are treated in a fairly, equally and with respect to our differences. Equity is what enables the equivalence of opportunities.

Know more about the subject in "Personnel Policy".

4.2.1 Work Conditions

We do not allow and tolerate slave work or similar conditions, child labor, sexual exploration, and human traffic in the activities of the company, its agents, suppliers, clients, or business partners in the chain of

value.

4.2.2 Discrimination and diversity

We value and respect the diversity in all its forms, and we do not tolerate any discriminations and prejudice of any kind. The abundance of different perspectives and experiences in life helps us to see opportunities and challenges under different angles.

The plurality of perceptions and knowledge improves and multiples our capacity to deliver.

4.2.3 Abuse of power and harassment

*We do not tolerate **moral and sexual harassments**, abuse of power, situations of disrespect, intimidations, or threats in relationships between members and third parties.*

We do not admit the use of a leadership position to request personal favors and services to subordinates or demands that conflicts with the guidelines of the company or with the laws and regulations in effect.

4.2.4 Health and welfare

We are primarily responsible for the continued care of our health. We know and comply with the requirements related to health and well-being, including the care of all other team members, subcontractors and people directly involved in our activities.

We trust that well-being is full when there is health, a basic condition for pleasure at work and in other dimensions of life.

Know more about the subject in "Personnel Policy".

4.2.5 Safety at work

Safety, which is our highest value, is a fundamental commitment of Ocyan with our members, third parties, communities where we work and with the society.

Our leaders are responsible for ensuring the necessary resources to provide a safe work environment and for guaranteeing that all members are trained in specific safety rules for the performance of their activities as well as the risks in their work environments. In turn, our members are committed to knowing and strictly complying with all such guidelines.

The misuse of alcohol and psychoactive substances in the work environment is prohibited, as well as working under the influence of alcohol or under the influence of legal and illegal psychoactive substances, which may interfere with our behaviors and which may affect the safety of our activities.

In case of accidents at facilities owned by Ocyan, suppliers or clients our members that had contact or involvement in the incident must immediately inform the ones in charge of safety at work, as well as their immediate leaders and start the formal process to investigate them.

Learn more about the subject in “Sustainability Policy” and Sustainability Guidelines.

4.3 How we operate

*When carrying out our activities we act with ethics, integrity and transparency in accordance with the applicable laws and in line with the best interests of Ocyan, avoiding any of type of **conflict of interests**. We decided without letting personal interests to affect our decisions.*

We also ensure the protection of our tangible and intangible assets, which are vital to perform our work. Information, records, information systems and sound and reliable assets strengthen the relationships among our team members, clients, shareholders, suppliers and other stakeholders.

We observe the applicable law, company policies and other guidelines when giving and/or receiving gifts, making sponsorships, charitable contributions and exercising our political rights.

4.3.1 Conflicts of interest

At Ocyan, as we conduct our professional or even personal responsibilities, we take care that there is no conflict or perception of conflict of interest.

The following are some non-exhaustive situations of conflicts of interest which are prohibited:

- *Use confidential information to make decisions resulting in personal advantage.*
- *Keep an intimate relationship with direct subordination of Leader-Subordinate.*
- *Accept an external position, task or responsibility of personal nature that may affect his/her performance and productivity at the company or aiding in the business of competitors.*
- *Hire, either direct or indirectly, close relatives or someone part of a personal relation, or influence another member to hire them, out of the set principles to recruit by competence and potential.*

- *Use resources from Ocyan to satisfy private interests.*

Know more about the subject in “Guidelines on Conflicts of Interest”.

4.3.2 Promotional items, gifts, entertainment and hospitality

Receiving or offering promotional items, gifts, entertainment or hospitality may be considered as situations involving conflicts of interest and thus are highly discouraged.

We only offer or receive promotional items, gifts, entertainment or hospitality according to institutional and legitimate commercial practices, by strictly following specific guidelines which contemplate the following guidelines:

- *Strict compliance with the applicable laws.*
- *Respect to local customs.*
- *Reasonability concerning frequency.*
- *Souvenirs offered always with the name or logotype of Ocyan.*
- *Rules, procedures, and limits established by theme.*

However, we are forbidden to offer, promise or receive souvenirs, gifts, entertainment, or hospitality that:

- *Involve Public Agents.*
- *Unduly influence decisions affecting business of the company.*
- *Provide personal benefits.*
- *Have sexual connotation, drugs or any kind of illegal items or activities.*
- *Include cash or similar, such as bonds, securities or discounts.*

Know more about the subject in “Guideline of Promotional Items, Gifts, Entertainment and Hospitality”.

4.3.3 Charitable contributions and sponsorships

We are allowed and encouraged to make charitable contributions seeking the cultural, social, and environmental development. They can be offered on behalf of Ocyan, provided they strictly respect applicable acts and regulations, and are not used in a way to influence decisions in an inappropriate manner.

We sponsor events or projects promoting cultural, social, environmental or sport activities. We also sponsor projects or events for commercial, technical or advertising purposes for our brands, services, projects or actions. Our sponsorships comply with the applicable laws and regulations and are not used as way to influence business decisions in an inappropriate manner.

We make charitable contributions and sponsorships provided previous assessments on the beneficiary are carried out.

Know more about the subject in “Donations and Sponsorships Guideline”.

4.3.4 Political contributions

Political contributions include, but are not limited to, financial resources or provisions of goods and services (e.g.: transportation, meeting space/facilities, printing, or office services) for political parties, candidates or their staff. Ocyan does not make political contributions even if they are allowed by the local laws. Our members are forbidden to foster, offer, authorize, or give, directly or indirectly, political contribution to political parties or candidates to public offices with resources or on behalf of Ocyan.

As individuals exercising our citizenship, we have the freedom to make political contributions on our own behalf. In such cases, our contributions or political opinions must not be connected to Ocyan and we shall not allow any disclose to be made linking such contribution act to Ocyan.

4.3.5 Exercise of political right

Ocyan adopts no political position whatsoever. It is forbidden to link the company to political activities and gather votes, directly or indirectly, in establishments or via media owned by the company.

We respect rights of our members to express their opinions, participate in political campaigns, affiliate themselves to political parties and run for public offices. Our members must not use their position in the company or resources from the company to exercise such rights. Since their candidacy, they must leave their activities, through unpaid leave, and leave the company, if elected.

4.3.6 Use and protection of assets, data, and preservation of records

We care for the conservation of Ocyan’s assets, which includes facilities, machinery, equipment, systems, furniture, trademarks, patents, technologies, and others. Information technology assets such as telephone, emails, Internet, hardware must be used to comply with our working needs. In cases of private matters, we must use such resources consciously and sparingly.

Data, records, and information produced by us are solely owned by Ocyan. We are aware that Ocyan keeps Internet usage records, mails and other information stored in our computers, as well as usage records of mobile and fixed telephony resources.

It is our duty to know and comply with legal requirements and specific guidelines of the company to identify, maintain and safekeep records.

4.3.7 Personal, confidential, and privileged information

We respect our members, clients, suppliers and other by keeping the secrecy of their registers, information, operations, and contracted services. Ocyan may have access to their personal data recorded in assets owned by the Company. In face of the need to access Internet usage records, as well as emails and other information stored in our computers, including records related to the use of mobile and fixed telephonic resources, Ocyan acts in strict compliance with the applicable laws and regulations, always respecting the privacy of personal, confidential and privileged information.

Personal information in possession of the company are protected against loss, theft, undue and unauthorized access, use, disclosure, reproduction, change or destruction.

Our members are forbidden to negotiate actions based on confidential and privileged information and to disclose such information to third parties, relatives, and friends.

4.3.8 Integrity of records

Integrity of records, including accounting ones, is a fundamental pillar of reliability and transparency of our Company.

Maintenance of full, accurate and consistent records foster our organizational efficiency, helps us to meet legal and regulatory obligation, protects our reputation and provides to shareholders, creditors, governmental agencies and other stakeholders the required data to assess the results of the company.

We comply with legal and regulatory obligations concerning the safekeeping of full and correct records and we can be audited by governmental regulatory agencies at any time and in any jurisdiction. We are prepared to submit organized, comprehensive, and faithful information, whenever requested by official agencies.

False, misleading, or incomplete records are prohibited. To make sure they are accurate and organized is the work of us all, not only of the financing and accounting areas.

4.3.9 Mergers and acquisitions

We carefully assess any entity with which we consider partnering, whether by acquisition, merger, investment, joint venture or other transactions.

For such type of partnerships, those responsible for the matter in the company and members involved must ensure the execution of due diligence about fighting corruption, accounting assessment, legal, environmental and integrity of the potential partner.

4.4 How we relate

We interact daily basis with clients, shareholders, suppliers, public agents, and other stakeholders. An ethical, with integrity and transparent relationship is fundamental to build relations based on trust.

Our contracts with third parties are objective, without ambiguities or omissions, and include specific clauses on the commitment to comply with local and anticorruption laws.

At Ocyan we do not hire, keep, or renew relationships with individuals or third parties working against the guidelines of our “Code of Conduct for Third Parties”.

4.4.1 Clients

A satisfied client is essential to the survival, growth, and perpetuity of Ocyan. We earn the trust of our clients by anticipating their needs and by overcoming expectations, delivering quality, price, time, productivity and the innovation they expect.

We do business with clients through efforts and positive results, never by exchanging favors of any kind. We respect laws in negotiations with clients and their representatives and we will neither offer nor promise anything of value to influence their decision or obtain an unfair advantage.

We believe in the importance of free competition and thus, we adopt the following guidelines:

- *We do not coerce clients to refrain from acquiring products or services from our competitors or make territorial restrictions generating harmful effects to the market.*
- *We do not refuse contracts without a justification.*
- *We close commercial relations based on solid negotiation or commercial justifications.*
- *We do not involve in agreements with client to terminate a commercial relation with other clients.*
- *We do not demand a client to buy something from us as a condition to acquire a product or service from him.*

- *We do not practice dumping and/or predatory prices below the average variable cost with the goal of eliminating competitors.*

4.4.2 Related parties

Related parties are individuals or legal entities whose actions can exert significant influence on the company. We interact with related parties by transferring recourses and goods and providing services. In such transactions, we follow the guidelines below:

- *Transparent and independent negotiation, respecting the legitimate interests of each party.*
- *Formalization of the transaction, specifying conditions and characteristics, such as the method to contract, prices, terms, guarantees and main rights and obligations.*
- *Approval of transactions in compliance with the applicable laws and Ocyan's articles of incorporation.*

Know more about those subjects in "Related Parties Guideline"

4.4.3 Suppliers and service providers

Suppliers and service providers are essential to our efficiency and success. Our process to identify, hire and retain suppliers is fair, objective and based on technical, professional, and clear criteria.

*Thus, third parties are submitted to the **integrity due diligence** process, before contracting, with the purpose of identifying and assessing third party compliance risks, mainly concerning risk of corruption, money laundering, fraud, and conflict of interests.*

To ensure ethics and transparency in our commercial relations with suppliers we follow the guidelines below:

- *We do not refuse contracts without a reason.*
- *We close commercial relations based on solid negotiation or commercial justifications.*
- *We do not engage in agreements with suppliers to terminate a commercial relation with another supplier.*
- *We do not coerce suppliers to stop selling, negotiating or submitting quotes to our competitors or make territorial restrictions capable of generating harmful effects to the market.*
- *We negotiate to obtain the best negotiations in a legal manner, based on best prices, deductions, and most favorable acquisition conditions.*
- *We do not induce, purposely, prices, deductions or services configuring an unfair and unjustified*

treatment for commercial or market reasons.

- *We do not deceive a supplier with untrue information, such as hypothetical purchase volumes to obtain commercial proposals in more competitive conditions.*
- *We only sign agreements for collective acquisitions if there is an economic justification to do so, with higher efficiency and lowest cost and the agreement must not generate anti-competition effects.*

Know more about the subject in “Third Party Compliance Guideline”.

4.4.4 Competitors

We interact and relate with competitors in a legitimate way, whether in meetings or within the scope of class associations and trade unions. In such occasions, we do not exchange information that may harm the free competition and favor Ocyan or harm a competitor.

Our competitors can also be our clients, partners or suppliers. In such cases, we limit our communication with them to the matters that strictly involve the mutual commercial relationship.

Joint activities with competitors may result in complex competitive issues. Upon submitting a joint proposal with a competitor regarding a certain project, we must document proposals correctly so that their legitimacy and economic rationality are crystal clear.

We ensure that our commercial relations with competitors are in compliance with the competition defense laws and we do not engage in agreements, understandings or arrangement with competitors whose goal is to split the market, fraud bids and set prices.

4.4.5 Public Administration

We engage and respect public interest, by seeking public-private relationships based on ethics, integrity, and transparency.

In our business activities we may meet public agents or politically exposed persons (“PEP”). Such meetings must always be preceded of a formal written request and held, preferably, in the worksite or public buildings and offices during business hours. We keep records of such meetings according to their nature and in line with the Guidelines on Relationship with Public Agents and Politically Exposed Persons.

In our relationships with the public administration it is expressly forbidden to:

- *Prevent, disrupt or fraud the competition and public bidding procedure acts, as well as contracts resulting*

from them.

- *Disqualify bidders by means of fraud or offering an advantage of any kind.*
- *Create, by means of fraud or another irregular manner, a legal entity to join public bids or enter into administrative agreements.*
- *Obtain unfair advantage or benefit by means of fraud with the purpose of changing or extending the agreements signed.*
- *Manipulate or fraud the economic and financial balance of the agreements signed.*
- *Carry out acts that may harm the principles of isonomy and free competition.*
- *Carry out acts that prevent activities intended to investigate or supervise agencies, entities, or public agents.*

Know more about the subject in “Guideline on Relationship with Public Agents and Politically Exposed Individual” and in “Guideline on Participation in Bids with the Public Administration”.

4.4.6 Society

We fulfill our social responsibility through the work performed productively, with the provision of good services and quality products, complying with legislation and avoiding waste, respecting the environment, cultural values, human rights and social organization in communities. Thus, we create job opportunities and contribute to the sustainable development of countries and regions where we operate, generating wealth for society.

We encourage and value the voluntary participation of members in community actions and in the organized civil society, such as non-governmental organizations (“NGO’s”), social partners, base organizations, and class associations.

4.4.7 Environment

We make decisions on projects, assets and services considering life cycles in each case, the rational use of natural, renewable and non-renewable resources, employment of cleaner technologies, efficient control of greenhouse gas emissions, reduction of waste, mitigation of environmental impacts from operations and protection of ecosystems and biodiversity.

Know more about the subject in “Sustainability Policy”.

4.5 Respect to laws

We have an unconditional commitment with respect to laws and regulations. Disrespecting laws causes financial and reputational damages threatening Ocyan's very survival. We have procedures to detect illegalities, and if required, we immediately adopt corrective and disciplinary measures. Our operations are based on the compliance with laws, as well as to demonstrate our respect towards them.

When in doubt, ask! If you are not certain on the legality of an actual or potential conduct, contact the legal department to obtain assistance.

4.5.1 Defense of free competition

Competition defense laws protect and foster a free and open competition, in addition to encourage creativeness continuous improvement and productivity. We compete with our metis and refrain from using unfair competition practices. We earn and serve our clients thanks to our legitimate and competitive efforts.

We work in strict compliance with the law and standards that seek to preserve free competition. We do not deploy actions that may produce the following effects or that are intended to:

- *Limit, fake or somehow harm free competition or free initiative.*
- *Dominate the relevant market of goods and services in an illegal way.*
- *Arbitrarily increase profits.*
- *Exert in an abusive manner a dominant position.*

This subject is also addressed in previous chapters on how we interact with competitors, clients, suppliers and service providers.

4.5.2 Prevention against money laundering

We comply with acts and regulations concerning money laundering and terrorism support. Violation of such acts may cause several civil and criminal penalties to Ocyan and to our members, individually.

We perform due diligence in our relationship with third parties to detect and avoid possible association with suspected, wrongful, or illegal activities with the following signs of alert:

- *Business partner or agent that is reluctant in providing complete and accurate information or that submits suspected, false, or insufficient information.*
- *Request payments in cash by intermediation of a third party of business partner.*

- *Orders, acquisitions, or payments that are neither common nor consistent with the business of the third party.*
- *Transactions involving locations identified such as tax havens or areas of known terrorist activities, drug dealing or money laundering.*
- *Incapacity or difficulty to check the corporate history of an entity or history and specialty of an individual.*
- *Existence of negative publications in the media or in the local business community related to integrity or legitimacy of the entity or individual.*

This subject is also addressed in previous chapter at “How we related”.

4.5.3 Fighting corruption

We have zero tolerance with corruption. Therefore, we contribute to the social, economic, and business development of countries where we work and value our moral and material assets.

We respect and comply with the laws, regulations and practices fighting corruption and we are forbidden to do the following:

- **Payment of facilitation:** *Money given to speed up routine services or administrative actions, such as permits, licenses, customs documents, and other official documents, as well as police protection.*
- **Bribe:** *Give, offer, or promise things of value to obtain unfair commercial advantages.*
- **Fraud:** *Dishonest business practice intended to obtain an unfair business advantage of any kind.*
- **Extortion:** *Practice intended to obtain money or anything of value upon a serious and imminent threat to the physical integrity of an individual or asset. We must not react to extortion threats, except in circumstances where life or safety of a company member is at risk. In such case, we inform the direct leader and R-Compliance.*
- **Obstructing investigations:** *practices intended to hinder investigation or supervision of agencies, entities, or public agents, or intervening in such investigations or supervisions.*

This subject is also addressed in previous chapters on “How we relate and How we operate”.

Know more about the subject in “Anti-Bribery and Anti-Corruption Policy” and “Anti-Bribery Management System Manual”.

5 ASSIGNMENTS AND RESPONSABILITIES

Not applicable.

6 VALIDITY

This Code will be effective after its Communication to the target audience and will remain in force for a maximum of 2 years.

7 GENERAL PROVISIONS

If there is any doubt concerning the contents of the Code of Conduct, we must not omit ourselves and shall seek clarifications from our direct leaders or from the respective areas in charge of the subject.

7.1 Violations

We constantly find ourselves in situations where it is not clear whether an action is acceptable or not. Guidelines contained in the Code of Conduct allow us to assess and identify most of such situations, avoiding behaviors that are not ethical, straight forward and clear. If in doubt, we must discuss the situation with our direct leaders or with the Compliance team, openly and sincerely, until such doubt is no more.

In situations of possible deviation from this code, we also encourage the utilization of our Ethics Line. This channel is available so that all stakeholders may, in a safe and responsible manner, inform the situation and provide information that allows us to maintain a corporate environment that is safe, ethical, straightforward, clear and productive. We do not allow and shall not tolerate retaliation against good faith complainants.

Any deviations of conduct, either by actions, omission or complacency are prone to damage society and destroy the image and reputation of Ocyan. Any individual that is found violating the provisions of this code or allows a team member to do so or yet is aware of a violation but refrains from reporting it is subject to the appropriate disciplinary measures.

7.2 Access the Ethics Line Channel

7.2.1 Free contact number

Available 24 hours/day and 7 days/week. The system provides information on how possible deviations of conduct must be reported. For reports related to Ocyan S.A. and its controlled companies the number in Brazil is 0800 377 8020.

7.2.2 Portal

Reports via internet must be done at www.linhadeeticaocyan.com.br.

8 REFERENCES

- *OCYAN-PE-003 - Anti-Bribery and Anti-Corruption Policy*
- *OCYAN-ME-001 - Anti-Bribery Management System Manual*
- *OCYAN-PE-001 - Ocyan S.A. Compliance System Policy*
- *OCYAN-DZ-016 - Donations and Sponsorships Guideline*
- *OCYAN-DZ-014 - Promotional Gifts, Presents, Entertainment and Hospitality Guideline*
- *OCYAN-DZ-020 – Relationship with Public Agent and Politically Exposed Person Guideline*
- *OCYAN-DZ-015 - Conflict of Interests Guideline*
- *OCYAN-PE-012 - Policy on People*
- *OCYAN-DZ-038 - Guideline on Sustainability*
- *OCYAN-DZ-038 - Policy on Sustainability*
- *OCYAN-DZ-021 - Third Party Compliance Guideline*
- *OCYAN-DZ-019 - Participation in Bids with the Public Administration Guideline*