





## Procedure for the Application of Disciplinary Measures

Acting in accordance with the Code of Conduct, QGEP's policies, procedures and regulations and anticorruption laws is obligatory. Violations may result in administrative, criminal or civil liability for QGEP and for the Collaborators involved.

**In this regard, Collaborators who violate or fail to observe these provisions will be subject to the following disciplinary measures, taking into account the seriousness of the conduct involved and potential recidivism in violation of the Code of Conduct and related policies:**

- 1 verbal warning;
- 2 written warning;
- 3 suspension for up to 30 (thirty) days, when applicable; and/or
- 4 termination of the relationship between QGEP and the offender.

Notwithstanding the measures set out above, Collaborators may be urged by the Compliance Officer to immediately stop conduct considered inappropriate or improper under the terms of the Code of Conduct.

QGEP adopts a policy of zero tolerance in relation to situations involving corruption, which may lead to the application of the highest

penalty (i.e. dismissal or terminating the contractual relationship) for individuals proven to be involved in situations considered inappropriate or improper.

If QGEP learns of any wrongdoing, it may report such conduct to the relevant authorities, for potential civil, administrative or criminal liability.

**Attention!**

Do bear in mind that reporting circumstances that may indicate a violation and accusations of a violation of the Code of Conduct, QGEP's policies, procedures and regulations or anti-corruption laws are very serious and, therefore, reports or accusations made erroneously may be a reason for applying a disciplinary measure.

The C.E.O, supported by a report from the Compliance Officer, to decide on the measures to be adopted, which will be fair and in accordance with labor rights. If the alleged conduct in question involves the C.E.O., the Board of Directors shall be responsible for the decision to apply disciplinary measures and their application.

**WHAT IS IT?**

For purposes of application of this Policy, Collaborators include employees, interns, outsourced personnel, members of the Board of Directors, the Statutory Audit Committee, officers, executives, representatives and other collaborators of QGEP, whether suppliers, temporary consultants, agents or third parties acting on behalf of QGEP.

## Complaints Handling Procedure

This procedure aims to establish the complaints handling process relating to supposed violations of QGEP's Code of Conduct, Policies and Procedures.

It is the Compliance Officer's responsibility to deal directly with complaints involving situations of public or private corruption, fraud, conflicts of interests, or the formation of partnerships in violation of our policies.

The Compliance Officer will direct complaints of any other nature to the relevant manager based on QGEP's organizational structure. When the Compliance Officer has evidence that the complaint involves the responsible manager, the Compliance Officer should handle the complaint directly.

If the complaint involves the Compliance Officer, the Chief Executive Officer will handle the complaint directly.

Any investigation of irregularities should be conducted in a confidential, impartial, respectful and cautious manner, ensuring a proper forum for the adequate handling of the complaint and observing the right to a full defense and to an adversarial system during the investigative process.

### **Important!**

The Compliance Officer must be sought to provide assistance in the event of any inquiries regarding this Procedure.

## ● 1. Receipt and Analysis of complaint

### 1.1. Complaint from the Confidential Channel (web and voice)

#### Step 1: Denúncia e Análise Primária

The Confidential Channel can be accessed:



by web

[www.canalconfidencial.com.br/qgcp](http://www.canalconfidencial.com.br/qgcp)



or by telephone **(0800-741-0022)**

All complaints, whether submitted by web or by telephone, will go through a first analysis by ICTS prior to being received by QGEP.

#### Step 2: Receipt and Investigation

Once the complaint is received by QGEP, the Compliance Officer will use the ICTS<sup>1</sup> system to forward the complaint according to the preamble of this procedure. Investigation of the complaint will fall on the responsible person who will proceed with the objective of: (i) checking the origin of the complaint; (ii) determining its nature; (iii) recommending actions to the relevant department's Director and; (iv) providing recommendations to QGEP's Chief Executive Officer on applicable penalties according to the Procedure for Application of Disciplinary Measures and/or other rights under law or contract.

<sup>1</sup> The system adopted by QGEP to manage the Confidential Channel is supplied by ICTS, a consulting, audit and risk management company.

#### Step 3: Conclusion

Once the investigation process has been concluded, it will fall on the responsible person to provide the Compliance Officer<sup>2</sup> with the findings to be uploaded to the Confidential Channel, including the history of the investigation, as well as supporting documentation and a description of substantiated conclusions. Where disciplinary measures are applied, or any penalties (as per "Step 2"), they should be reported in the final report. The investigation will be regarded as concluded when the responsible person changes the status of the complaint to "completed" in the Confidential Channel.

### 1.2. Personal Complaint

It will fall on the responsible person – whether the complaint was received directly through the Confidential Channel, or indirectly, through the Compliance Officer or even through any other QGEP employee – to register the complaint in the online Confidential Channel. Once registered, the procedure in Item 1.1, beginning with "Step 2" will be used.

## ● 2. The Report to the Ethics and Governance Committee

It is the responsibility of the Compliance Officer to generate a quarterly report for the Ethics and Governance Committee, which will compile all complaints reported through the Confidential Channel. In addition to this, the Compliance Officer may also generate other reports according to the substance of the incident reported.

After receiving these reports, it is the responsibility of the Ethics and Governance Committee to certify that the complaint handling process was conducted in accordance with the ethical standards defined in QGEP's Code of Conduct, to review the Compliance Program and to suggest pertinent changes to the Board of Directors, as the case may be.

<sup>2</sup> Or the Chief Executive Officer, as appropriate.