



*An Aligned Data Centers Company*

POLÍTICA DE REPORTE DE DENÚNCIAS E NÃO RETALIAÇÃO  
/ REPORTE DE DENÚNCIAS Y NO REPRESALIAS /  
COMPLAINT REPORT AND NON-RETALIATION POLICY

UNIDADE: TODAS AS UNIDADES / TODAS LAS  
UNIDADES / ALL UNITS

LOCAL: TODAS LAS LOCALIDADES / TODAS  
LAS LOCALIDADES / ALL UNITS

## Summary

1. OBJECTIVE .....	15
2. SCOPE .....	15
3. REFERENCES FOR THE PREPARATION OF THIS DOCUMENT .....	15
4. DEFINITIONS .....	15
5. RESPONSIBILITIES AND AUTHORITIES .....	16
6. DESCRIPTION .....	16
6.1 Roles and Responsibilities .....	16
6.2 Guidelines .....	16
6.2.1 ODATA Reputation .....	16
6.2.2 Associate Encouragement .....	17
6.2.3 Non-Retaliation .....	17
6.2.4 Ethics Channel .....	18
6.2.5 Confidentiality .....	18
6.3 Term, Amendments and Updates .....	19

## 1. OBJECTIVE

This Complaint Report and Non-Retaliation Policy aims to establish ODATA's guidelines with regard to complaint report and non-retaliation, in addition to the definitions contained in the Code of Conduct and Anti-Corruption and other applicable Standards and Policies.

## 2. SCOPE

It refers to:

- All ODATA Areas; and
- ODATA Suppliers and Clients.

## 3. REFERENCES FOR THE PREPARATION OF THIS DOCUMENT

- ISO 9001
- ISO/IEC 20000-1
- ISO/IEC 27001
- Code of Conduct and Anti-Corruption
- ISO 14001
- ISO 45001

## 4. DEFINITIONS

- **Company or ODATA:** All the companies that are part of the ODATA Group;
- **Ethics and Conduct Committee:** Committee formed by the Chief Executive Officer, Financial Officer/ Vice-president, Legal Officer, EHS Officer, in addition to the Country Manager for companies located in another countries, for analysis of compliance with ODATA Policies, as well as receipt and investigation of occurrences and complaints received;
- **Policy:** This Complaint Report and Non-Retaliation Policy.

## 5. RESPONSIBILITIES AND AUTHORITIES

- **Chief Financial Officer:** Associate responsible for the macro management of Legal, Finance, *Business Development*, and Human Resources;
- **Managing Director:** Associate responsible for the broad management of the Company;
- **Legal Director:** Associate responsible for the Legal Area.

## 6. DESCRIPTION

### 6.1 Roles and Responsibilities

It is the responsibility of the Company's *Compliance Officer* to clarify any doubts related to this Policy, establish the procedures required for its implementation, as well as to verify and communicate the rules established herein.

The Company's Ethics and Conduct Committee is responsible for analyzing and dealing with complaints received through the pertinent channels, defining investigation procedures (whether internal or external, by hiring third parties).

All associates/employees, suppliers and clients of the Company and its subsidiaries are responsible for complying with the guidelines established in this Policy.

### 6.2 Guidelines

#### 6.2.1 ODATA Reputation

The Company's reputation is its greatest asset and each employee/associate, as well as its suppliers and customers, must protect it. The maintenance and longevity of the Company's business is strengthened by filing a complaint that may be characterized as a potential violation of the provisions of the Code of Conduct and Anti-Corruption and other applicable Company Rules and Policies

### 6.2.2 Associate Encouragement

The Company encourages its associates, suppliers, and clients to report any conduct that is practiced in disagreement with applicable laws and/or the Company's Integrity Program. If anyone becomes aware of any actual or potential violation (i) of the Code of Conduct and Anti-Corruption; (ii) other applicable Company Rules and Policies; or (iii) of any National or Foreign Legislation applicable to the Company, this person must immediately inform through the Company's Ethics Channel.

For example, complaints about the following issues can be reported through the reporting channel: discrimination; sexual and moral harassment; conflict of interests; receipt or delivery of inappropriate gifts, entertainment and presents; fraud; thefts, robberies and losses; corruption, bribery and inappropriate/irregular government relations; fraudulent financial statements; money laundering practices; anti-competitive practices; violations of privacy and confidentiality obligations; violations of the Company's or third parties' intellectual property; violations of environmental laws and regulations; issues related to occupational health and safety and deliberate concealment of any of the matters described above.

Although the use of the Ethics Channel is not mandatory, the Company encourages its use. Nevertheless, everyone should feel free to use any other means available for reporting complaints, including directly contacting their manager, the *Compliance Officer*, the Human Resources Department, or any member of the Company's Ethics and Conduct Committee.

### 6.2.3 non-Retaliation

The Company is committed to protect from retaliation any person who, acting in good faith, has reported a complaint, or is assisting in an investigation, including but not limited to suspension, harassment, threats, intimidation, coercion, loss of benefits, resignation or any other form of discrimination or punishment.

**The Company strongly condemns any form of retaliation against complainants.**

People who believe they have been the victim of any form of retaliation or have questions about it should report it to their Manager, the *Compliance Officer*, one of the members of the Ethics and Conduct

Committee, the Human Resources Department, the Legal Department, or make a report through the Ethics Channel. Reports of retaliation will also be reviewed and investigated.

#### 6.2.4 Ethics Channel

The Ethics Channel is maintained by specialized service providers and is available to associates, as well as to business partners, service providers, clients, and suppliers, whether direct or indirect. It is possible to file a complaint by phone or through the website. To access the Company's Ethics Channel and obtain guidance on how to use it, please visit our website: [www.odatacolocation.com/en/](http://www.odatacolocation.com/en/)

The Company's Ethics Channel is a service provided by a specialized company, therefore operated by an independent third party that collects all the data provided by complainants and stores it. This independent third party, upon receiving a complaint, registers the information in its own system and forwards it to the members of the Ethics and Conduct Committee and shareholder representatives, as the case may be, so that the necessary measures can be taken. All those who receive information about the complainant (reporting channel provider, members of the Ethics and Conduct Committee, and representatives appointed by shareholders) have a legal and contractual obligation to maintain confidentiality and protect the complainant's data from unauthorized use and/or access.

When filing a complaint, the complainant will be asked to provide as much information as possible that he/she knows about the reported fact. Through the protocol number provided when the complaint is registered, the complainant can follow up on it and update the information provided. In case an anonymous complaint has been made, it is even more important that the complainant follows up on its progress by phone or website, as these will be the only means of contact with the complainant. Additionally, he/she can be contacted for clarification of any questions that may arise during the investigation.

All complaints submitted to the Company, regardless of the position of the person reported, will be carefully reviewed and, if warranted by the circumstances, will be investigated. In the event that a violation is proven, the Company may apply the most appropriate disciplinary and/or legal sanction. The complainant motivated by good faith will not suffer any form of retaliation, even if the complaint cannot be substantiated.

#### 6.2.5 Confidentiality

All complaints are made confidentially and handled by a limited group of people. The Company encourages complainants to identify themselves when making a complaint, as it makes the investigation more efficient. However, it is possible to make an anonymous complaint in a secure way, where the identity of the complainant does not need to be informed, without harming the progress of the investigation.

### 6.3 Term, Amendments and Updates

This Policy will come into effect on the date of its publication and may be revised periodically, being subject to alteration or updating whenever necessary.