

ANTICORRUPTION POLICY

INTRODUCTION

This anticorruption policy aims to ensure that all MINASLIGAS' employees and its representatives meet the requirements of the Brazilian Anticorruption Federal Law (No. 12,846, enacted on August 1st, 2013), which stands for the legal responsibility, administrative and civil, of actions against the public, national or foreign administration, as well as the guidelines of this policy in order to ensure, during the conduct of business, the adoption of the highest standards of integrity, fairness and transparency.

MINASLIGAS is recognized for its honesty, integrity in its administrative practices and business operations. This policy aims to combat and prevent any form of corruption and also works as a prevention tool to guide people to recognize and avoid conflicts and violations of this law.

To solve your doubts about the applicability of this policy or any related matter contact your immediate manager, the Human Resources Department, the Legal Department or Company's Directors.

This policy is available for consult at MINASLIGAS site: <http://www.minasligas.com.br>

APPLICABILITY

This policy applies to all employees of MINASLIGAS, owned or outsourced workers, as well as employees of its subsidiary ML Florestal and even service providers, suppliers, business partners and any person acting on behalf of the company.

DEFINITIONS

EMPLOYEES – All MINASLIGAS employees, Directors, Members of the Board, trainees, apprentices and other people working in the company as well as employees of its subsidiary ML Florestal. The term "employees", for the purpose of this policy, also covers employees from contracted companies.

OUTSOURCED EMPLOYEES - Service providers, suppliers, business partners or any person acting on behalf of MINASLIGAS (e.g. broker)

CORRUPTION - It's the abuse of power or authority, by a person to obtain advantages for himself or others. Bribery is the most common form of corruption.

BRIBERY - Offering, giving, receiving money or anything with value in exchange for favorable treatment by a public employee or official authority.

PUBLIC EMPLOYEE OR EMPLOYEE OF THE GOVERNMENT – Shall be considered all employees or directors of public companies or controlled by the government, in all entities of the executive, legislative or judiciary, or any department and agency from the state or city or anyone officially representing or acting on behalf of the Government. Falls in this category an employee from a company or entity in which a public institution holds a share and / or over which may, directly or indirectly, has a dominant influence.

For the purpose of our policy shall also be considered as a public employee the political party or a member of a political party or a candidate to a politic career.

An extra careful with relatives or people suspected to be relatives of public employees, or relative of public employees controlling companies, in order to avoid such people to serve as channels for illegal payments to public servers.

ADVANTAGE OR IMPROPER PAYMENT - Payment in cash and any transfer of value, tangible or intangible, to influence or reward any official act or decision of a public server.

GOVERNMENTAL ENTITIES - For the purpose of this policy, a government entity refers to

commercial companies, institutions, agencies and departments owned or controlled by the government and other public entities (being the participation or control either total or partial).

COMPLIANCE – A set of disciplines to enforce the accomplishment of legal standards, policies and guidelines established for the business and activities of the institution or company as well as aiming to prevent, detect and treat any deviation or non-conformity that might occur.

ANTICORRUPTION RULES AND PROCEDURES

The anti-corruption law prohibits the offer, payment, promise of payment or authorization to payment of any amount of money, gifts or any goods, materials or any value to any public employee (or person related to him), for the purpose of:

- ∴ Influence any act or decision from a public employee;
- ∴ Induce him to perform any act in violation of their legal duties;
- ∴ Ensure undue advantage, or;
- ∴ Induce him to use his influence on a government agency to help you achieve, maintain, or directing business to any person.

1) BRIBERY

Employees or people acting on behalf of MINASLIGAS are prohibited from offering, promising, make, authorize or provide (directly or indirectly through third parties) any undue advantage, payments, gifts, or transfer any goods, material or any value for any public employee (including their families) in order to influence or reward any official act or decision of such person for the benefit of the company.

It won't be tolerated that any person approves the payment of any bribes, provide or accept false invoices, blind the payment of bribes or knowingly cooperate in any way for the payment of bribes.

2) GIFTS, ENTERTAINMENT AND TRAVEL

It's not allowed to offer gifts, entertainment or travel to public employees to influence or compensate in an improper way an official act or decision for any company benefit.

It is accepted to give small value gifts, if they don't have a corrupt purpose, such as pens, mugs, shirts, key chains, calendars etc. containing the name and / or company logo.

Inappropriate gifts can cause negative consequences for the company, so the gifts can not be given for favoritism or retribution.

It is expressly forbidden to give money to anyone for any purpose. If any money is offered to any employee or third part, it should be refused.

In case of a travel of a public employee, the reason must be previously defined and approved. The refund is subject to the presentation of documents evidencing the expenditures and this documents shall be archived. It is also prohibited to provide money to organize travels.

3) POLITICAL CONTRIBUTIONS

Contributions or donations to political parties, political campaigns, political and / or candidates for a public career, may only be made in accordance with applicable law, noting the requirements and limits set by the TSE (Superior Electoral Court) and all requirements for public disclosure must be fully observed. These contributions are subject to the approval of MINASLIGAS' Board of Directors.

4) CHARITABLE CONTRIBUTIONS

MINASLIGAS policy states that contributions should not be made in exchange for favors to any public employee, even if the favored one is a genuine charity institution.

Bribes can take the form of charitable contributions or sponsorships. So make sure that the money paid to a charity institution is not an exchange of a specific treatment for the company by a public employee.

Here are some rules and procedure to be observed when contributing to charitable causes:

- Applications must be made in writing and must be specified the organization, the purpose of it and the amount requested;
- The contribution will only be made to the charity institution constituted as required by the law and, under no circumstances, can be given to individuals.
- These benefits will be analyzed by the Department of Human Resources, with the support from the Legal Department. It will be checked if the contribution will provide personal benefit to a public employee;
- All contributions must be approved by the President Director;
- MINASLIGAS must obtain the receipt of any contribution made to a charitable cause.

CORRUPTION BETWEEN PRIVATE ORGANIZATIONS

Although the Anticorruption Law aims only acts involving public employees, MINASLIGAS will not accept any act of corruption involving private companies or anyone. The company cares for honesty and integrity in all actions taken on your behalf in administrative practices and in their business operations.

COMPLAINT POLICY AND WARNING SIGNALS

To ensure compliance with anticorruption laws, employees and third parties should be aware of warning signs that may indicate improper payments or benefits. Warning signs are not necessarily evidence of corruption, but acts that raise suspicions and, therefore, shall be investigated, ensuring no problem was detected.

Thus, for any warning sign or evidence of corruption, the employee or third party must immediately inform his superior, Human Resources Department, the Legal Department or Company's Directors, or even use the whistleblowing channel.

This policy does not cover all the corruption possibilities, therefore employees and third parties are encouraged to use common sense and if in doubt, ask support from the Department of Human Resources, Legal Department or Company's Directors.

Regardless of the complaints being identified or anonymous, the Company will take measures, according to the law, to protect the confidentiality of any complaint made.

VIOLATIONS AND PENALTIES

It is the responsibility of all employees and third parties to report any violation or suspected violation according to this Policy.

Reports of violations and suspected violation may be made, identified or anonymous, to the immediate supervisor or directly to Human Resources Department, Legal Department, Company's Directors, or even using the whistleblowing channel.

The Company will not permit or tolerate any form of retaliation against any person, making in good faith a complaint of violation of this policy or the Anticorruption Laws. Any employee or third party

who engages in retaliation will be subject to Company's disciplinary actions or even with the termination of its employment.

Violations of this policy may result in severe civil and criminal penalties for the Company and for the employees and third parties involved.

Fines imposed on individuals for violation of this Policy may not, under any circumstances, be paid by the Company, and people involved are also subject to penalties according to the law.

GENERAL ISSUES

∴ The compliance of this policy is mandatory. Therefore, it is important that everyone knows that contrary conduct may lead to the application of disciplinary measures, including termination of employment or contracts in place, and subject to the penalties according to the law.