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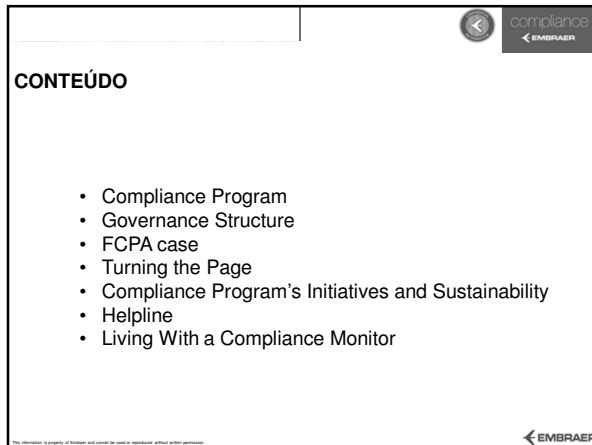
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## ELEMENTOS DO PROGRAMA

Leadership and Organizational Structure
Risk Management
Policies, Procedures and Controls
Training and Communication
Monitoring, Auditing and Helpline

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## POLICIES, PROCEDURES AND CONTROLS

- Policies and Procedures with global applicability, adapted to the various businesses and jurisdictions:
  - Code of Ethics and Conduct;
  - Global Anticorruption Policy.
- Main control tools:
  - *Due Diligence*;
  - *Know Your Customer*;



POLÍTICA GLOBAL ANTICORRUPÇÃO DA EMBRAER

**1. POLÍTICA**

A Política Anticorrupção Global da Embraer (a "Política") obriga a Embraer S.A. e suas subsidiárias e afiliadas (coletivamente, "Embraer" ou a "Empresa"), em todas as operações ao redor do mundo, a conduzir negócios de maneira ética e com absoluta integridade. A Política exige o cumprimento do Código de Ética e Conduta da Embraer ("Código de Ética") e de todas as leis e regulamentações aplicáveis contra suborno e corrupção, incluindo, sem limitação a tanto, as leis do Brasil, a Lei contra Práticas de Corrupção

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## POLICIES, PROCEDURES AND CONTROLS – KYC

Customer: KYC 223

Nome: [Redacted]

Sigla: [Redacted]

País: [Redacted]

Endereço: [Redacted]

Telefone: [Redacted]

E-mail: [Redacted]

Website: [Redacted]


Indústria: [Redacted]

Setor: [Redacted]

Atividade: [Redacted]

Classificação: [Redacted]


Atualizado em: [Redacted]



**Purpose**  
[Redacted]

**Applicability**  
[Redacted]

- Know Your Customer ("KYC") procedure in effect since august 2017;
- Analysis based on risk factors (embargoed countries, corruption perception index, conflict of interest, government or private client and adverse media);
- "Screening" by Dow Jones;
- "Go Live" of KYC Portal in jan/2018.



**Purpose**  
[Redacted]

**Applicability**  
[Redacted]

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**TRAINING AND COMMUNICATION**

- Online modules and F2F;
- Different formats (case studies, policy reading sessions, workshops, etc.)
- Customization of matters by function/business, defined upon risk assessment.



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Internal Communications Campaign, throughout all sites in Brazil and abroad and affiliates 2017-2018

**VISUAL IDENTITY**  
35 big banners at industrial facilities  
1.500 banners and posters in meeting rooms, office space, etc.

**FOLDER | ETHICS FUNDAMENTALS**  
23.000 copies distributed

**BANDEIRANTE MAGAZINE**  
20.000 copies distributed

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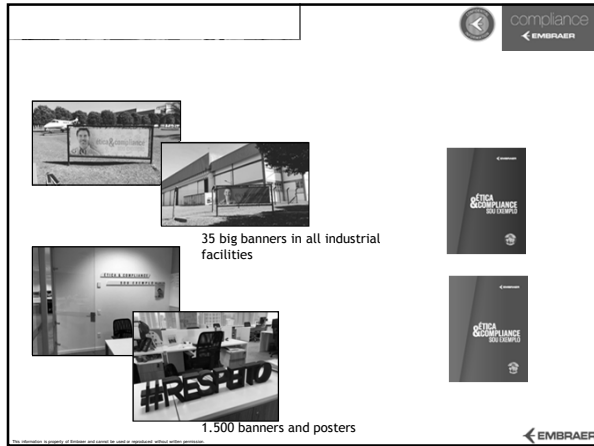
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35 big banners in all industrial facilities

1.500 banners and posters

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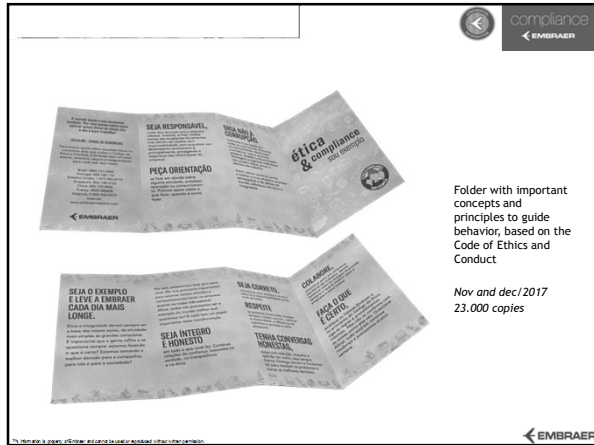
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Folder with important concepts and principles to guide behavior, based on the Code of Ethics and Conduct

Nov and dec/2017  
23.000 copies

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Special edition to strengthen ethical and compliance culture and become a reference in Brazil and the world

20.000 copies distributed  
December 2017

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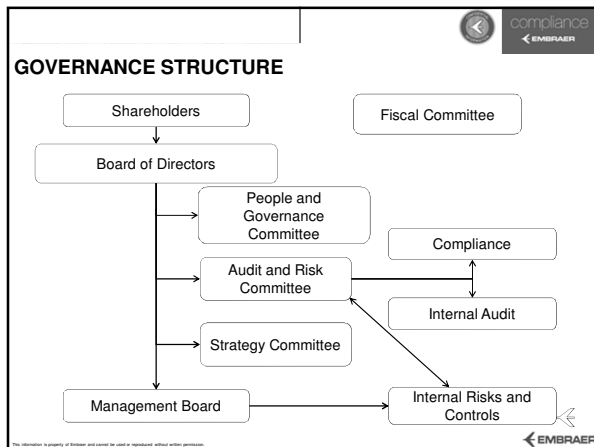
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### GOVERNANCE STRUCTURE (Cont.)

- Direct line to CAR: Compliance, Internal Audit and Internal Risks and Controls;
- CAR is comprised of 4 independent Directors, with the Chairman's support and participation in all meetings;
- CEO has the leadership role as to initiatives and Compliance messaging – Tone at the Top;

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### FCPA CASE

- SEC *subpoena* received on September 1st, 2010;
- Embraer collaborated with the authorities and voluntarily hired outside counsel in Brasil and in the US to investigate;
- More than 100,000 documents produced and more than 100 interviews;
- 4 transactions between 2007 and 2011 – Saudi Arabia, India, Dominican Republic and Mozambique, involving the sale of 16 aircraft;

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### SETTLEMENT

- October 24, 2016 – simultaneously executed with DOJ/SEC and MPF/CVM;
- US\$ 205 million between fines and disgorgement;
- 20% discount for collaboration;
- It was the first FCPA settlement executed by the DOJ and the SEC with a Brazilian company.

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### TURNING THE PAGE

- Transparency in the disclosure of the settlement;
- Utilize the case as example in training sessions, meetings, leadership townhalls, etc.;
- **#betheexample** campaign;
- **"Zero Tolerance"** policy implemented;
- Strengthen leadership as ethics role model (**Tone at the Top**);
- Compliance as a priority and job condition;
- New core value: "Ethics and integrity are at the core of everything we do."
- **Helpline** as the main tool for detection of violations: **non-retaliation**;

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### COMPLIANCE PROGRAM'S INITIATIVE AND SUSTAINABILITY

- The company is fully collaborating with the independent monitor. We view the monitorship as na opportunity to enhance our processes;
- **Ethics survey**, carried out by "Ethics and Compliance Initiative", in the first half of 2017;
- Training sessions focused on gray zones, ethical dilemmas and lessons learned;
- **250 Compliance Agents** throughout the company globally, providing capilarity to the policies and procedures.





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### HELPLINE

- ❖ Channel for reporting conduct deviations [www.embraerhelpline.com](http://www.embraerhelpline.com)
- ❖ Global
- ❖ Available 24/7
- ❖ Confidential
- ❖ Anonymous
- ❖ Non-retaliation
- ❖ Independent investigation
- ❖ Disciplinary measures
- ❖ Think, Rethink videos



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**LIVING WITH A COMPLIANCE MONITOR**

- ✓ How can a company leverage the work of the monitor and minimize its disruption to the business?
  
- ✓ What happens during the different years?
  - Review compliance program and make recommendations [Year 1]
  - Implement recommendations, review discrete aspects of the compliance program, and make additional recommendations [Year 2]
  - Sustainability and certification, if appropriate [Year 3]
  
- ✓ Key considerations to have in mind during the term of the monitorship –  
**DONT WAIT TO START IMPLEMENTATION**

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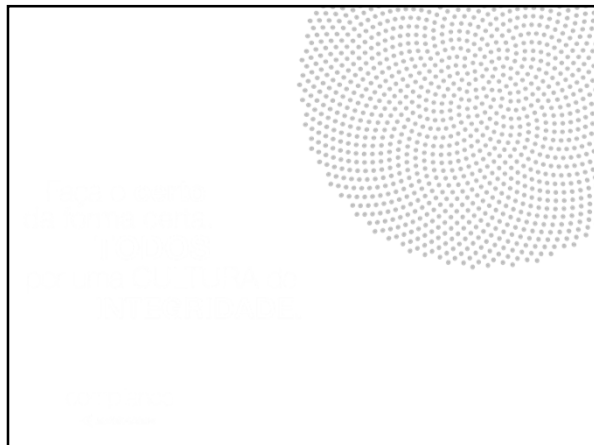
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