

**OBJECT: NOVA PARTICIPAÇÕES  
STANDARDIZATION**

**TITLE: INTEGRITY POLICY  
HOSPITALITIES, GIVEAWAYS, GIFTS, ENTERTAINMENTS,  
DONATIONS AND SPONSORSHIPS**

REV	DATE	DESCRIPTION AND/OR REVIEW OF SHEETS	ELAB.	VERIF.	APPROV.
0	6/28/2019	Initial Issue	AdCS	JCE	YF
A	10/22/2019	Company logo and corporate name replacement.	BSL	WLC	YF
B	8/24/2020	Inclusion of Caption of the Responsible People.	CFR	AdCS	YF
C	11/03/2022	Review of items 2.2 and 4.6: change of Regulatory decree of the Anti-Corruption Law and of the Ethics Channel.	CFR	AdCS	YF

Caption of the responsables		
Initials	Full Name	Role
YF	Yoshiaki Fujimori	President Director
AdSC	Adjair da Cunha dos Santos	Director of Governance and Integrity
JCE	José Carlos Esquaiela	Human Resources Manager
WLC	Wagner Luna Cavalcante	SIG Coordinator
CFR	Camila Franciele Righetti	Compliance Coordinator
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BSL	Bruna Sabina Lucio	Quality Analyst

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## **1 - PURPOSE**

This policy has the purpose to establish guidelines regarding payment, receipt or offering giveaways, gifts, entertainment, hospitalities, donations and sponsorships by Nova Participações Group companies.

## **2 - ADDITIONAL REGULATIONS**

The following policies, regulations and procedures must be used on its last review or in addition to laws, standard technical rules and contractual requirements.

### **2.1 - Of Nova Participações**

- M0-NA-0030 - Code of Ethics and of Conduct;
- M0-PC-0002 - Policy of Third Parties *Due Diligence*;
- M0-PC-0003 - Policy of public sector relationship.

### **2.2 - Nationals**

- Law nº 12.846/2013- Anti-corruption Law;
- Decree No. 11.129/22 - Regulates the Anti-corruption Law;
- Law No. 12.813, of May 1st, 2013 – Government Officials Conflict of Interests Law.

### **2.3 - Internationals**

Every legislation related to fight corruption (placed on Nova Participações anti-corruption Integrity Policy).

### **2.4 - Terms and Definitions**

For the purpose of this Policy, some terms must be understood as follows:

- giveaways: objects with no commercial or market value, usually given as a business courtesy or marketing, such as notebooks, planners, pens and calendars;
- gifts: objects that may have a commercial value and cannot be categorized as giveaways;
- entertainments: events to provide leisure or fun to its participants, such as concerts, sports events or parties;
- donation: every transference of goods, rights, values or advantages from Nova Participações Group patrimony to another person or entity;
- political donation: every donation to political candidates or parties and alliances, in terms of electoral legislation;
- philanthropic, charity or non-profit organization: every non-profit entity which purpose is to provide services in the areas of social assistance, health, education, culture, science and leisure;
- sponsorship: every transference of values with a definite counterpart from the recipient, or provision of Nova Participações Group's movables or immovables assets, with no

transference of property, intended for sports or cultural projects and events, such as conferences, congresses or fairs.

### **3 - SCOPE**

This policy includes all Nova Participações companies and its collaborators, either individuals or entities and at any hierarchical level, which should act to ensure this policy adherence by every third parties who work on public or private entities, in the interest of or to benefit Nova Participações.

### **4 - DESCRIPTION**

As prescribed in the Nova Participações Code of Ethics and of Conduct, it is prohibited to promise, offer, deliver and receive, direct or indirectly, any hospitality, gifts, entertainments and giveaways to government officials or a third person related to them, third parties, suppliers, clients and partners.

#### **4.1 - Gifts and Giveaways**

The receipt or offering of giveaways and gifts is considered a violation of Nova Participações' Code of Ethics and of Conduct and integrity policies, according to description of item 2.4 of this policy.

Requesting gifts or favors, whether for their own benefit or their family members, from third parties bound to Nova Participações is prohibited and unacceptable.

In case of receiving a gift or a giveaway, those should be properly returned and the event should be reported to the Governance and Integrity Director. In case of impossibility to return them, in a way to make any undue advantage impersonal, those gifts or giveaways must be hand over to HR, responsible for drawing them among Nova Participações collaborators and/or donate them to a non-profit, a charity or a philanthropic entity, as prescribed under item 4.4 of this policy.

It is prohibited to accept or offer any amount in cash, out of courtesy, giveaways, gifts or in order to obtain any undue advantage.

#### **4.2 - Entertainment and Hospitality**

Invitations and tickets for events (entertainment and hospitalities) sponsored or promoted by Nova Participações' business partners, suppliers or representatives must be reported to the immediate manager and to Governance and Integrity Director for analysis and approval. In case of impossibility to return them, in a way to make any undue advantage impersonal, those gifts or giveaways must be hand over to HR, responsible for drawing them among Nova Participações collaborators and/or donate them to a non-profit, a charity or a philanthropic entity, as prescribed under item 4.4 of this policy.

Payments for Nova Participações collaborators traveling and accommodations by suppliers, business partners and/or third parties are not accepted, either them being a person or an entity.

### **4.3 - Public Authority Relationship**

Collaborators and third parties working on behalf of Nova Participações are prohibited to accept and offer, direct or indirectly, giveaways, gifts, hospitality, money or favors to a government official on behalf of this company. This act could be seen as a gaining of advantages or influence in decision making for its own or the company's benefit, and this is intolerable by Nova Participações Group.

Payment of meals and any expenses with government officials is also prohibited.

It is prohibited to promise, offer or grant facilitations payments, directly or by third parties, to government officials or private company representatives.

### **4.4 - Donations and Sponsorships**

Donations and sponsorships for Charity, Non-profit or Philanthropic Entities must occur clearly and in accordance with the laws applicable to each case. Furthermore, they are duly accounted in the company accounting records, by means of specific and self-explaining note of resources spent.

All donations and sponsorships must be made in a strict observance of applicable laws and must be formalized through a contractual instrument. Sponsorship and Donation contractual instruments must attribute to the beneficiary exclusive responsibility for usage of the received value or good, making it prohibited to use such resources in a way that may conflict with legal provisions, especially Law No. 12.846/2013 and Nova Participações' Code of Ethics and of Conduct. The benefited entity must deliver accountability of usage of resources received by the project sponsorship.

It is not permitted:

- donations and sponsorships made by third parties on behalf of Nova Participações;
- donations and sponsorships to individuals, unless if purposely approved by the Governance and Integrity Director;
- donations intended to obtain, direct or indirectly, dubious or illegal benefits;
- political donations or donations to electoral campaigns;
- direct or indirect donations that benefit collaborators or third parties who act on behalf of Nova Participações, as in the case of entities that might have some kind of shareholding with management power, avoiding any kind of conflict of interests;
- donations or sponsorships to an entity controlled, direct or indirectly, by Politically Exposed People, Government Officials or Authority, except when approved by the Governance and Integrity Director.

The Collaborator or Third Party acting on behalf of Nova Participações who receives any kind of Donations and Sponsorships pledges or even when it is intended to do it must first request the pledge approval to their Immediate Manager. Once approved by the responsible manager, the pledge must be submitted to the Ethics and Integrity area for evaluation, in a reasonable advance to the event (minimum 20 days, which might be extended due to the pledge's nature). If the Collaborator or Third Party acting on behalf of Nova Participações identifies possible

irregularities/illegalities when receiving Donation or Sponsorship pledge, they must formally refuse the request and send a copy of the refusal to the Ethics and Integrity area.

Note.: Nova Participações preserves the right of each Collaborator and Third Party, on their own behalf (individual), to make individual donations to electoral campaigns, political parties and alliances or financial committees. However, donations must be made with their own resources, outside Nova Participações facilities and not during the working hours. It is important to highlight that it must be guaranteed that Nova Participações image is not be bind to this action, therefore, the Company cannot be linked to this action, under no circumstances and nowhere.

#### **4.5 - Violation**

Any collaborator or third party acting on behalf of Nova Participações who violates this Policy is subject to sanctions, according to the Policy of Disciplinary Measures criteria.

In case the violation is characterized as a violation of Law 12.846/2013 anti-corruption and other current ones, other sanctions will be imposed and there might be a possibility of a contract termination. Furthermore, Collaborators and Third Parties must be aware that violations may be subject to applicable legal penalties.

#### **4.6 - Ethics Channel**

It is essential that everyone covered by its Policy immediately reports any acts or suspected conducts that violate this Policy and/or the Code of Ethics and of Conduct. Accordingly, we provide the Ethics Channel:

- website: [www.novaengevix.com.br/novaparticipacoes](http://www.novaengevix.com.br/novaparticipacoes);
- website: [www.canaldeetica.com.br/novaparticipacoes/](http://www.canaldeetica.com.br/novaparticipacoes/)
- telephone: 0800 300 4721 - 24 hours a day.

This channel is operated by an independent and specialized company to ensure a greater confidentiality and safety. It is not required to identify yourself when using the channel, but it is primordial to act responsibly when making a report, which should be consistent and truthful.

It is not permitted nor tolerated any kind of retaliation against people who, by chance, make good-faith complaints or complaints of violation of this Policy or the anti-corruption law.

#### **5 - VALIDITY**

This Policy comes into force on the date of its disclosure.