

REVISION CONTROL:

Review	Date	Description
0	06/28/2019	First issue
B	08/24/2020	Inclusion of the Caption of Responsible Persons
C	11/03/2022	Revision of items 2.2 and 4.6; Amendment of the Decree regulating the Anti-Corruption Law and the Ethics Channel.
D	05/24/2024	Change to the current document standard; Adaptation to ISO 37301.

***The history of the last 3 revisions is kept in addition to the "0" revision line, which will inform you of the document's issue date.**

(Electronic signature, in accordance with Provisional Measure 2.200-2/2001 in force in Brazil).

Signatory (*)			
Type	Sector	Code	Name
Elaborator(s) /reviewer(s):	<i>Compliance</i>	CFR	Camila Franciele Righetti
Verifier(s):	IMS	BODM	Beatriz Oliveira da Mata
Approver(s):	PRX	FDSS	Fernando da Silva Schmidt

(*): Signatories are the Employees responsible for Elaborating, Verifying and Approving the issued document.

Validator = "In agreement" (**)	
Sector	Names
Dir. Governance and Integrity	Adjair da Cunha dos Santos

(**): In the electronic signature system, the employee who is "in agreement" with the document is called the validator.

CONTENTS PAGE

1	- PURPOSE	3
2	- SCOPE	3
3	- TERMS AND DEFINITIONS	3
4	- REFERENCED DOCUMENTS	3
4.1	- Nova Participações	3
4.1.1	- Standards and Procedures	3
4.1.2	- Templates and forms	4
4.2	- National	4
4.3	- International	4
5	- PROCEDURE	4
5.1	- Flowchart	4
5.2	- Responsibilities and authorities	4
5.3	- Systematic	5
5.3.1	- Giveaways and Gifts	5
5.3.2	- Entertainment and Hospitality	5
5.3.3	- Government Relations	6
5.3.4	- Donations and Sponsorships	6
5.3.5	- Sanctions	7
6	- QUALITY, HEALTH, SAFETY AND ENVIRONMENTAL CONSIDERATIONS AND MEASURES	7
7	- CORRECTIVE ACTIONS FOR RISKS AND OPPORTUNITIES	7
8	- ETHICS CHANNEL	8
9	- VALIDITY	8
10	- ANNEXES	8

1 - PURPOSE

The purpose of this Policy is to establish guidelines on the receipt or offering and payment of giveaways, gifts, entertainment, hospitality, donations and sponsorships by companies in the Nova Participações Group.

2 - SCOPE

This document covers all Nova Participações companies, their employees, whether individuals or legal entities and at any hierarchical level, without exception, who must act to ensure compliance with this policy by Stakeholders and other third parties who act before public or private entities, directly or indirectly, for the interest or benefit of Nova Participações.

3 - TERMS AND DEFINITIONS

For the purposes of this Policy, certain terms should be understood as follows:

- **Giveaways:** objects with no commercial value or market value, usually distributed as a business or advertising courtesy, such as notebooks, diaries, pens and calendars;
- **Gifts:** objects that have commercial value and are not characterized as giveaways;
- **Entertainment:** events intended to provide leisure or entertainment for their participants, such as concerts, sporting events or parties;
- **Donation:** any transfer of goods, rights, values or advantages from the assets of the Nova Participações Group to those of another individual or legal entity;
- **Political donation:** any donation, to candidates or political parties and coalitions, under the terms of electoral legislation;
- **Philanthropic, charitable or non-profit organization:** any non-profit legal entity whose purpose is to provide services in the areas of social assistance, health, education, sport, culture, science and leisure;
- **Sponsorship:** any transfer of values with a counterpart from the beneficiary, on a definitive basis, or the provision of movable or immovable property of the Nova Participações Group, without transfer of ownership, intended for sports or cultural projects or for holding events such as conferences, congresses or fairs.

4 - REFERENCED DOCUMENTS

4.1 - Nova Participações

4.1.1 - Standards and Procedures

- M0-NA-0030 - Code of Ethics and Conduct;

- M0-PC-0002 - Third Party *Due Diligence* Policy;
- M0-PC-0003 - Government Relations Policy.

4.1.2 - Templates and forms

Not applicable.

4.2 - National

- NBR ISO 9001:2015 - Quality Management System;
- NBR ISO 14001:2015 - Environmental Management System;
- NBR ISO 37001:2017 - Anti-Bribery Management System;
- NBR ISO 37301:2021 - *Compliance* Management System;
- NBR ISO 45001:2018 - Occupational Health and Safety Management;
- Law No. 12.846/2013 - Anti-Corruption Law;
- Decree No. 11.1239/22 - Regulates the Anti-Corruption Law;
- Law No. 12.813, of May 1, 2013 - Conflict of Interest Law for Public Agents

4.3 - International

All legislation related to the fight against corruption (set out in Nova Participações' anti-corruption Integrity Policy).

5 - PROCEDURE

5.1 - Flowchart

Not applicable.

5.2 - Responsibilities and authorities

- **Senior Management:**
 - Ensure material and human resources for the implementation and enforcement of this standard;
 - Assign responsibilities and duties to Senior Managers and others when necessary.
- **Employees:**
 - Pay attention to the internal guidelines of this policy;
 - Ensure that partners and other interested parties are aware of its content.

- **Compliance:**
 - Provide training on the content of this standard;
 - Keep the policy up to date.
- **Department coordination or leadership (immediate superior):**
 - Disseminate this policy in relation to your area of activity;
 - Train those involved so that the policy is complied with.
- **Corporate IMS:**
 - Publish and disseminate this policy;
 - Check the validity of the document and request a review from the area responsible;
 - Monitor its application and use through internal audits and/or routine checks. Failure to do so will be recorded in an incident report.

5.3 - Systematic

The giving and receiving of giveaways, gifts, entertainment and hospitality to public agents or third parties related to them, as well as third parties, suppliers, clients and partners must take place as set out in the following items:

5.3.1 - Giveaways and Gifts

It is considered a violation of Nova Participações' Code of Ethics and Conduct and integrity policies to receive or offer giveaways, gifts as described in item 3 of this policy.

Soliciting gifts or favors, whether for your own benefit or for members of your family, from third parties linked to Nova Participações, is prohibited and intolerable.

If you receive a giveaway or gift, it must be returned immediately. In the event that they cannot be returned, in order to disqualify any undue advantage, these items must be handed over to *Compliance* or local HR, to be raffled off or donated to a non-profit, charitable or philanthropic organization in the manner provided for in item 5.3.4 of this Policy.

It is forbidden to accept or offer any sums of money (in cash) in the form of courtesies, giveaways, gifts or to gain any undue advantage.

5.3.2 - Entertainment and Hospitality

Invitations and tickets to participate in events (entertainment and hospitality) sponsored or promoted by business partners, suppliers or representatives of Nova Participações must be reported to the immediate manager and *Compliance* for analysis and possible approval.

Payments for travel and accommodation to Nova Participações employees by suppliers, business partners and/or third parties, whether individuals or companies, are not accepted.

5.3.3 - Government Relations

Employees and third parties acting on behalf of Nova Participações are prohibited from accepting or offering, directly or indirectly, giveaways, gifts, hospitality, money or favors to public agents on behalf of this company. The act can be seen as obtaining advantages or influencing decision-making to benefit oneself or the company, and this is intolerable by the Nova Participações Group.

It is also forbidden to pay for meals and any expenses incurred by civil servants.

It is forbidden to promise, offer or grant facilitation payments, directly or through third parties, to public officials or representatives of private companies.

5.3.4 - Donations and Sponsorships

Donations and sponsorships made to philanthropic, charitable or non-profit organizations must be made transparently and always in compliance with the laws applicable to each case. In addition, they are duly recorded in the company's accounting records, by means of a specific and self-explanatory note of the funds spent.

All donations and sponsorships must be made in strict compliance with the applicable laws and must be formalized through a contractual instrument. The contractual instruments for Sponsorship and Donation must assign to the beneficiary entity exclusive responsibility for the use of the amount or asset received, obliging it not to use such resources in a way that conflicts with legal provisions, in particular Law No. 12,846/2013, as well as Nova Participações' Code of Ethics and Conduct. The beneficiary organization must account for the use of the funds received in sponsoring the project.

These are forbidden:

- Donations and sponsorships made by third parties on behalf of Nova Participações;
- Donations and sponsorships for individuals, unless expressly approved by the Governance and Integrity Director;
- Donations intended to obtain, directly or indirectly, improper or illicit benefits;
- Political or campaign donations;
- Direct or indirect donations that benefit employees or third parties acting on behalf of Nova Participações, such as in the case of legal entities in which they hold some type of shareholding with management power, avoiding any type of conflict of interest;

- Donations or sponsorships to legal entities controlled, directly or indirectly, by Politically Exposed Persons, Public Agents or Governmental Authorities, unless approved by the Governance and Integrity Director.

Employees or Third Parties acting on behalf of Nova Participações who receive requests for Donations and Sponsorships of any kind or even when they wish to do so. Once the Manager in charge has approved this request, it must be submitted to *Compliance*, within a reasonable timeframe, for integrity *due diligence*. If the Employee or Third Party acting on behalf of Nova Participações who has received the Donation or Sponsorship request identifies a possible irregularity/illegality, they must formally refuse the request and report the fact to *Compliance* and/or the Ethics Channel.

Note: Nova Participações preserves the right of each Employee and Third Party, in his or her own name (individual), to make personal donations to electoral campaigns, political parties and coalitions or financial committees. However, donations must be made from your own resources, outside Nova Participações' premises and outside your working hours. It should be emphasized that Nova Participações' image must be disconnected from this action, and the company cannot be linked to this action in any way, under any circumstances.

5.3.5 - Sanctions

Anyone who fails to comply with any of the provisions of this policy will be subject to a sanction corresponding to the seriousness of the infraction, including a warning, suspension and dismissal with just cause, notwithstanding the appropriate legal measures to repair the damage caused.

When a third party is involved, the service contract signed by the parties may also be terminated, notwithstanding the penalties provided for in the contract and the legal actions that may be taken to repair the direct and/or indirect damage caused.

6 - QUALITY, HEALTH, SAFETY AND ENVIRONMENTAL CONSIDERATIONS AND MEASURES

It is everyone's commitment, regardless of level, to provide unconditional support for the implementation of the Quality, Safety, Environment and Occupational Health guidelines, respecting and complying with the provisions contained in all QHSE procedures, thus promoting the integrity of the Management System.

7 - CORRECTIVE ACTIONS FOR RISKS AND OPPORTUNITIES

Failure to comply with this document will be dealt with in accordance with standard **M0-NQ-0004 – System Improvements**.

Note: the word document can be replaced by the terms: standard, manual, procedure or instruction.

8 - ETHICS CHANNEL

It is essential that everyone covered by this Policy immediately reports any acts or suspicions of conduct that violate this Policy and/or the Code of Ethics and Conduct. To this end, we have made the Ethics Channel available:

- website: www.novaparticipacoes.com;
- website: www.canaldeetica.com.br/novaparticipacoes;
- Phone: 0800 300 4721 - 24 hours a day.

This channel is operated by an independent and specialized company, guaranteeing even greater confidentiality and security. It is not necessary to identify yourself when using the channel, but it is essential to act responsibly when making reports, which must be consistent and truthful.

Any form of retaliation against people who make good faith reports or complaints of violations of this Policy or anti-corruption law is not permitted or tolerated.

9 - VALIDITY

This document comes into force as soon as it is published and must be revised within a maximum of two years.

10 - ANNEXES





Not applicable.

M0-PC-0004-E Hospitalidades e Brindes - Final.pdf [Hospitality and Giveaways - Final]

Document number #0d848dd3-6f52- 4e19-b3b0-760feb6b09d6

Original document hash (SHA256): 6d54763c582f7b5db4580541a2ea82155bb96af825eda6440ac44cb6932bc214

Signatures

-  **Camila Franciele Righetti**
CPF [Individual Taxpayer's ID]: 383140008-33
Signed on May 28, 2024 at 12:13:26 pm
-  **Adjair da Cunha dos Santos**
CPF: 326113168-30
Signed as validator on May 28, 2024 at 11:29:26 am
-  **Beatriz Oliveira da Mata**
CPF: 415321528-76
Signed as validator on May 28, 2024 at 11:16:25 AM
-  **FERNANDO DA SILVA SCHMIDT**
CPF: 036994019-95
Signed to approve on May 28, 2024 at 4:47:52 pm

Log

- May 28, 2024, 11:06:06 AM Operator with email compliance.sign@novaengevix.com.br in the Account e782d809-5b19-40c2-8c59-8320675ec2b4 created this document number 0d848dd3-6f52- 4e19-b3b0-760feb6b09d6. Deadline for signing the document: June 27, 2024 (11:02 AM) Auto-terminate after last subscription: Enabled. Language: Brazilian Portuguese.
- May 28, 2024, 11:06:06 AM Operator with email compliance.sign@novaengevix.com.br in Account e782d809-5b19-40c2-8c59-8320675ec2b4 has added the Signature List: camila.righetti@novaengevix.com.br to sign, via Email, with the authentication points: Token via Email; Full Name; CPF; IP address. Data informed by the Operator for signer validation: Full name Camila Franciele Righetti.
- May 28, 2024, 11:06:06 AM Operator with email compliance.sign@novaengevix.com.br in Account e782d809-5b19-40c2-8c59-8320675ec2b4 has added the Signature List: adjair.santos@novaengevix.com.br to sign as validator, via Email, with the authentication points: Token via Email; Full Name; CPF; IP address. Data provided by the Operator for validation of the signatory: full Adjair da Cunha dos Santos and CPF 326.113.168-30.

- May 28, 2024, 11:06:06 AM Operator with email compliance.sign@novaengevix.com.br in Account e782d809-5b19-40c2-8c59-8320675ec2b4 has added the Signature List: beatriz.mata@ecovix.com to sign as validator, via Email, with the authentication points: Token via Email; Full Name; CPF; IP address. Data informed by the Operator for signer validation: Full name Beatriz Oliveira da Mata.
- May 28, 2024, 11:06:06 AM Operator with email compliance.sign@novaengevix.com.br in Account e782d809-5b19-40c2-8c59-8320675ec2b4 has added the Signature List: fernando.schmidt@novaengevix.com.br to sign to approve, via Email, with the authentication points: Token via Email; Full Name; CPF; IP address. Data informed by the Operator for signer validation: Full name FERNANDO DA SILVA SCHMIDT.
- May 28, 2024, 11:16:25 AM Beatriz Oliveira da Mata signed as validator. Authentication points: Token by e-mail – beatriz.mata@ecovix.com CPF informed: 415321528-76. IP: 179.213.203.43. Location shared by the electronic device: latitude -23.503097 and longitude -46.827863. URL to open the location on the map: <https://app.clicksign.com/location>. Signature component version 1.873.0 available at <https://app.clicksign.com>.
- May 28, 2024, 11:29:26 AM Adjair da Cunha dos Santos signed as validator. Authentication points: Token by e-mail – adjair.santos@novaengevix.com.br CPF informed: 326113168-30. IP: 179.213.203.43. Location shared by the electronic device: latitude -23.49948 and longitude -46.82272. URL to open the location on the map: <https://app.clicksign.com/location>. Signature component version 1.873.0 available at <https://app.clicksign.com>.
- May 28, 2024, 12:13:26 PM Camila Franciele Righetti signed. Authentication points: Token by e-mail – camila.righetti@novaengevix.com.br CPF informed: 383140008-33. IP: 179.213.203.43. Location shared by the electronic device: latitude -23.5068018 and longitude -46.8307423. URL to open the location on the map: <https://app.clicksign.com/location>. Signature component version 1.873.0 available at <https://app.clicksign.com>.
- May 28, 2024, 04:47:52 PM FERNANDO DA SILVA SCHMIDT signed to approve. Authentication points: Token by e-mail – fernando.schmidt@novaengevix.com.br CPF informed: 036994019-95. IP: 191.251.44.164. Location shared by the electronic device: latitude -27.68896 and longitude -48.49664. URL to open the location on the map: <https://app.clicksign.com/location>. Signature component version 1.873.0 available at <https://app.clicksign.com>.
- May 28, 2024, 04:47:53 PM Subscription process ended automatically. Reason: auto-terminate after last enabled subscription. Signature process completed for document number 0d848dd3-6f52-4e19-b3b0-760feb6b09d6.



Document signed with legal validity.

To check the validity, access <https://validador.clicksign.com> and use the password generated by the signatories or send this PDF file.

The digital and electronic signatures have legal validity provided for in Provisional Measure no. 2200-2 / 2001

This Log is exclusive to, and shall be considered part of, document number 0d848dd3-6f52-4e19-b3b0-760feb6b09d6, with the effects prescribed in the Clicksign Terms of Use available at www.clicksign.com.