

Ethical Conduct for Business Partners

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ETHICAL CONDUCT FOR BUSINESS PARTNERS

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REVISION CONTROL

REV.	DATE	DESCRIPTION	PREPARED BY	REVIEWED BY	APPROVED BY
00	15/05/2023	Initial Issue	Mariana Braga	Marcelo Monteiro	João Araújo
01	15/08/2023	Change of Registration Data; Update of the Whistleblowing Channel	Mariana Braga	João Araújo	Haroldo Mendes
02	20/02/2025	Document Revision	Mariana Braga	João Araújo	Haroldo Mendes

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1 OBJECTIVE

Respect for life, people, and the environment, as well as integrity, transparency, meritocracy, and value creation, are the principles that underpin the guidelines of this **Supplier Code of Ethical Conduct**.

INNOVA GLOBAL BUSINESS is committed to the highest standards of integrity, social responsibility, and ethical behavior. Our suppliers must provide safe working conditions, treat their employees with dignity and respect, act with integrity and ethics in accordance with the principles and requirements of this Guide, and remain in full compliance with applicable laws and regulations. Compliance with this Guide by all suppliers is essential for **INNOVA GLOBAL BUSINESS** to achieve its goals and objectives in an ethical and transparent manner.

2 REFERENCE DOCUMENTS

ABNT NBR ISO 37001:2017 – Anti-Bribery Management System – Requirements

INN MAN SGA 001 – Anti-Bribery Management System Manual

3 APPLICATIONS

This Guide applies to all suppliers, whether or not they are residents of Brazil, including their affiliates and subsidiaries, that are involved in business processes with **INNOVA GLOBAL BUSINESS**, such as pre-qualification procedures and direct contracting processes.

4 DESCRIPTION

4.1 Ethics and Integrity

4.1.1 Prevention of Fraud, Corruption, and Money Laundering

INNOVA GLOBAL BUSINESS is committed to promoting integrity within both public and private business environments and operates in full compliance with national and international anti-corruption legislation and other applicable regulations.

In this regard, as established in its **Code of Ethical Conduct**, **INNOVA GLOBAL BUSINESS** maintains a zero-tolerance policy toward all forms of fraud and corruption — including bribery, extortion, money laundering, or insider trading — throughout its entire supply chain. Consequently, all suppliers are strictly prohibited from engaging in such practices and are required to ensure that their (sub)suppliers adopt the same ethical standards.

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4.1.2 Integrity and Transparency in Relationships

Suppliers must, and shall require similar conduct from their (sub)suppliers:

- a) Act with integrity, honesty, innovation, cooperation, trust, responsibility, continuous improvement, focus on results, good reputation, and transparency;
- b) Maintain transparent, truthful, easily understandable, and accessible communication with all interested parties in every business relationship with **INNOVA GLOBAL BUSINESS**, always observing information security requirements;
- c) Report, in a timely, honest, reasonable, and responsible manner, any misconduct or irregularity of which they become aware to the **INNOVA GLOBAL BUSINESS** Whistleblowing Channel.

4.1.3 Prevention of Conflict of Interest

Conflicts of interest, as defined by Federal Law No. 12,813/2013, are detrimental to **INNOVA GLOBAL BUSINESS** and its internal control environment, as they may improperly influence the conduct of our employees in pursuing personal interests that conflict with those of **INNOVA GLOBAL BUSINESS**, or cause any form of harm to **INNOVA GLOBAL BUSINESS** and its corporate holdings.

It is the duty of suppliers, and they must require the same conduct from their (sub)suppliers, to:

- a) Refrain from engaging in any act that may place **INNOVA GLOBAL BUSINESS** employees in a situation of real or potential conflict of interest;
- b) Act diligently to prevent or eliminate any situation of real or potential conflict of interest;
- c) Disclose any personal relationship between suppliers and **INNOVA GLOBAL BUSINESS** employees involved in the business relationship, such as family relationships between the supplier or its employees and **INNOVA GLOBAL BUSINESS** employees or managers.

4.1.4 Offering of Gifts, Courtesies, Hospitality, and Sponsorship Considerations to **INNOVA GLOBAL BUSINESS** Employees or Service Providers

The occasional receipt or offering of gifts, giveaways, or hospitality must comply strictly with the provisions of the law, **INNOVA GLOBAL BUSINESS** internal regulations, and the normative acts issued by public authorities, as such actions have the potential to create opportunities for fraud or corruption. Therefore, this practice is prohibited when done in exchange for any personal benefit or advantage to the giver or third parties.

4.1.5 Competition and competitiveness in contracting processes

INNOVA GLOBAL BUSINESS operates within its economic sector in compliance with the principles of free enterprise and free competition. At the same time, it does not condone any practices aimed at market cartelization or concentration, which it deems entirely incompatible with the economic order established by the Brazilian Constitution.

4.1.6 Integrity Due Diligence

INNOVA GLOBAL BUSINESS adopts the Integrity Due Diligence procedure to support decision-making regarding the initiation or continuation of commercial relationships and to define the level of monitoring for potential fraud and corruption risks identified.

To meet the Integrity criterion, suppliers must provide information about their organizational and business structure, relationships with public officials, integrity history, relationships with third parties, and integrity program.

This information supports the Supplier Qualification Form. Failure to meet these requirements obliges the supplier to adhere to the principles stated in this procedure.

4.2 Commitment to Operational Excellence

INNOVA GLOBAL BUSINESS maintains a permanent goal of achieving excellence in the execution of its activities and, to that end, expects the same level of commitment from its suppliers.

INNOVA GLOBAL BUSINESS monitors supplier performance through the Supplier Performance Index, which evaluates compliance with obligations related to deadlines, quality, management and safety, environment, health, and anti-bribery requirements.

The data resulting from the performance evaluation may be made available to the supplier, contributing to improvements in contract execution and enhancing the supplier's performance within its market of interest.

4.3 Protection of Personal Data and Corporate Information

It is the supplier's duty, while requiring the same conduct from its sub-suppliers, to ensure compliance with the applicable data protection and privacy legislation, particularly Law No. 13.709/18 (LGPD), as

well as to observe INNOVA GLOBAL BUSINESS's personal data protection and privacy standards, guidelines, and policies.

4.4 Human Rights and Compliance with Legislation

The supplier, while requiring the same conduct from its sub-suppliers, commits to:

a) Respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, Decree No. 9.571 of November 21, 2018, and other applicable legislation;

b) Remedy any harm caused to communities as a result of its activities;

c) Refrain from acts involving excessive use of force in interactions between security forces, communities, and workers.

4.4.1 Diversity

Honesty, integrity, fairness, equity, truth, and consistency between speech and practice guide INNOVA GLOBAL BUSINESS's relationships with people and institutions. These values are reflected in respect for differences and diversity in ethnic, religious, social, cultural, linguistic, political, aesthetic, age-related, physical, mental, and psychological conditions, as well as gender, sexual orientation, gender identity, and others.

Accordingly, the supplier commits to promoting diversity by ensuring respect for differences and equal opportunities in access, compensation, and career advancement, while requiring the same conduct from its sub-suppliers.

4.4.2 Inclusion of People with Disabilities

Every person with a disability has the right to equal opportunities alongside others and shall not be subjected to any form of discrimination. Therefore, the supplier must contribute to ensuring equal employment opportunities by including, whenever possible or as required by law, people with disabilities in its workforce. The supplier must also promote, on an equal basis, the exercise of the fundamental rights and freedoms of these individuals, aiming at their social inclusion and citizenship, while requiring the same conduct from its sub-suppliers.

4.5 Whistleblowing Channel

It is everyone's duty to protect INNOVA GLOBAL BUSINESS from any and all misconduct they become aware of, even if it is merely a suspicion. Therefore, situations that may constitute nonconformities must be reported to INNOVA GLOBAL BUSINESS's Whistleblowing Channel in a timely, honest, reasonable, and responsible manner, detailing actions or practices that fail to comply with this procedure's guidelines, the company's internal rules, or applicable laws.

INNOVA GLOBAL BUSINESS provides secure and reliable communication channels, including an external and independent Whistleblowing Channel that also covers its subsidiaries. This channel features security mechanisms to ensure the whistleblower's anonymity and allows them to track the progress of their report.

The Whistleblowing Channel can be accessed via the following address and email:

<https://www.innova-develop.com/contact/compliance@igbd-group.com>

4.6 Audits and Assessments

The supplier, while requiring the same conduct from its sub-suppliers, commits to cooperating with and supporting audit, verification, or investigation processes conducted by INNOVA GLOBAL BUSINESS or a third party designated by it, concerning any alleged, suspected, or confirmed nonconformity — whether related to applicable national and international Anti-Corruption Legislation or to its contractual obligations with INNOVA GLOBAL BUSINESS. The supplier, while requiring the same conduct from its sub-suppliers, must make every necessary effort to correct any deficiencies or violations identified through an audit, assessment, inspection, investigation, or internal or external review.

5 SUPPLEMENTARY PROVISIONS

Failure to comply with the principles and commitments set forth in this procedure may result in measures being taken by INNOVA GLOBAL BUSINESS, including contractual consequences and administrative sanctions, which may lead to the supplier being blocked from future engagements or even to the termination of existing contracts, in accordance with INNOVA GLOBAL BUSINESS's applicable requirements.