Code of Conduct

Nyverra Tecnologia Ltda Version 1.0 — November 2026

1. Introduction

Nyverra Tecnologia Ltda ("Nyverra") provides IT infrastructure, security, backup, monitoring, and support services to public and private organizations. This Code of Conduct sets out the ethical and integrity standards that guide the company's activities and everyone who represents it.
Nyverra is committed to conducting business with legality, transparency, respect, confidentiality, and accountability. This document does not replace applicable law, signed contracts, or specific internal policies. In the event of conflict, the stricter rule and formal guidance from management prevail.

2. Scope

This Code applies to:

- partners, directors, and employees, regardless of their employment status;
- service providers, consultants, freelancers, and interns;
- sales representatives, distributors, resellers, and intermediaries;
- suppliers and partners acting on behalf of Nyverra or having access to the company's information, systems, or resources.

Compliance with this Code is a condition for maintaining business and working relationships with Nyverra. Third parties must be informed of the commitments set out here and, where applicable, accept them contractually.

3. Principles and commitments

Nyverra and the people covered by this Code undertake to:

1. **Legality:** comply with the Brazilian Constitution, Brazilian law, and the rules applicable to their activities, including Law No. 12,846/2013 (Anti-Corruption Law), Law No. 13,709/2018 (LGPD), and Law No. 14,133/2021 (Public Procurement and Administrative Contracts).
2. **Integrity:** reject any form of corruption, fraud, bribery, extortion, influence peddling, or undue advantage.
3. **Transparency:** keep clear, complete, and accurate records of relevant activities, expenses, and decisions.
4. **Respect:** treat all people with dignity, without discrimination, harassment, retaliation, or abuse of power.
5. **Confidentiality:** protect confidential information belonging to clients, partners, employees, and Nyverra itself.
6. **Information security:** follow policies, access controls, and procedures for protecting data and

technology assets.

7. **Accountability:** report risks, irregularities, and concerns in a timely manner and in good faith.

4. Professional conduct

Everyone covered by this Code is expected to:

- act with honesty, diligence, and loyalty toward Nyverra and its clients;
- use the company's resources, systems, and information only for legitimate and authorized purposes;
- not access, copy, disclose, or misuse client, employee, or third-party data;
- respect people's privacy and dignity in and outside the workplace;
- not engage in moral or sexual harassment, discrimination, or any form of violence;
- not use their position, role, or business relationship to obtain personal advantage;
- protect Nyverra's reputation and the accuracy of information provided to the market, public authorities, and clients.

Failure to meet these expectations may result in the measures set out in section 11.

5. Conflicts of interest

A conflict of interest arises when personal, family, financial, or third-party interests may influence, or appear to influence, decisions made on behalf of Nyverra.
Covered individuals must:

- disclose in advance any situation that may constitute a conflict of interest;
- refrain from participating in decisions in which they have a direct or indirect interest;
- not contract, on behalf of Nyverra, companies or individuals with whom they have a personal, family, or financial relationship without transparency and management approval;
- not accept or offer advantages that could compromise impartiality.

Disclosure of a conflict does not, by itself, prevent the person from acting. Management will assess the case and define appropriate measures, which may include segregation of duties or abstention from a specific decision.

6. Gifts, hospitality, travel, and entertainment

Nyverra adopts the following standards:

1. **Public officials:** no gifts, promotional items, meals, travel, accommodation, entertainment, or any other advantage are offered, promised, or authorized to public officials, unless expressly permitted by applicable law and previously approved in writing by management.
2. **Clients and partners:** gifts and courtesy gestures are permitted only when symbolic in value, without consideration, without expectation of return, and consistent with legitimate business practice.
3. **Prohibitions:** offering or receiving cash, facilitation payments, loans, equity interests,

invitations to travel funded by third parties, or any benefit that could improperly influence a decision is prohibited.

4. **Recording:** offers and receipts of gifts, hospitality, or courtesies must be recorded and reported to management when there is any doubt about their appropriateness.

In case of doubt, the individual must decline the offer and consult the compliance channel before accepting anything.

7. Anti-corruption

Nyverra does not tolerate corruption in any form. It is prohibited, directly or indirectly, through third parties or intermediaries, to:

- offer, promise, authorize, give, request, or accept an undue advantage from public officials or private individuals;
- fund, pay for, or reimburse expenses intended to obtain an undue advantage;
- use intermediaries, consultants, representatives, or partners to carry out acts that would be prohibited if carried out directly by Nyverra;
- create or maintain false or incomplete records, or records that conceal the true nature of a transaction;
- obstruct investigations or retaliate against anyone who reports, in good faith, suspected irregularities.

Nyverra maintains the Anti-Corruption Policy as a complementary document to this Code. In the event of divergence, the stricter rule applies.

8. Relations with public authorities and public procurement

In dealings with public bodies and entities, Nyverra undertakes to:

- participate in public procurement and contracting with truthful information, complete documentation, and strict compliance with Law No. 14,133/2021 and the tender rules;
- not offer, promise, or grant an undue advantage to public officials, civil servants, advisors, or related third parties;
- not use privileged information, improper influence, or any artifice to favor the company or third parties;
- keep records and evidence of relevant interactions with public officials;
- comply with contractual obligations and report any conflicts or risks.

Nyverra does not fund political campaigns or parties with company resources, unless expressly permitted by electoral law and approved by management.

9. Third parties and due diligence

Nyverra assesses suppliers, distributors, representatives, and partners before contracting and throughout the business relationship, in proportion to the risk of the transaction.

The assessment may consider:

- the third party's integrity and reputation;
- corporate registration and tax compliance;
- history of sanctions, convictions, or investigations related to corruption, fraud, or money laundering;
- existence of internal controls and integrity measures appropriate to the size and criticality of the relationship;
- relevant links to public officials or politically exposed persons;
- beneficial ownership, where applicable.

Contracts with relevant third parties must include integrity, confidentiality, and legal compliance clauses, as well as the possibility of audit or termination in the event of breach. Nyverra keeps records of assessments and contracting decisions for the period necessary to comply with legal and contractual obligations.

10. Compliance channel

Questions, reports, and requests related to this Code, the Anti-Corruption Policy, or inappropriate conduct should be sent to:
compliance@nyverra.com.br

Nyverra undertakes to:

- treat reports confidentially, to the extent possible and permitted by law;
- accept identified or anonymous reports;
- seek to confirm receipt within 5 (five) business days;
- review good-faith reports and take appropriate action;
- not retaliate against, pursue, or harm anyone who reports a concern in good faith or participates in an investigation.

The absence of retaliation does not prevent legitimate disciplinary measures based on independent facts that have been duly investigated.

11. Consequences

Failure to comply with this Code may result in:

- guidance and training;
- verbal or written warning;
- suspension or termination, according to the relationship and applicable law;
- contractual termination with third parties;
- referral to competent authorities, where appropriate;
- legal action to repair damages.

Measures will be applied in proportion to the seriousness of the conduct and will respect the right to defense and due process, in accordance with applicable law and contracts.

12. Questions, exceptions, and review

Exceptions to this Code may only be authorized by management, expressly, with reasons, and on record, after review by the compliance channel. Situations not covered here must be assessed in light of the principles of this document and applicable law.
This Code will be reviewed annually or whenever there is a relevant change in legislation, business, or Nyverra's risks. The current version will be published on the company's official channels.

13. Approval and effective date

This Code of Conduct was approved by the management of Nyverra Tecnologia Ltda and takes effect on the date of its publication.
Rose Meyre Barbosa Moreira
Managing Partner
Senador Canedo – GO, November 2026.