Anti-Corruption Policy

Nyverra Tecnologia Ltda Version 1.0 — November 2026

1. Purpose

This Anti-Corruption Policy sets out Nyverra Tecnologia Ltda's ("Nyverra") rules and commitments in combating corruption, fraud, bribery, and any form of undue advantage. It complements the Code of Conduct and applies to all individuals and organizations acting on behalf of or for the benefit of the company.

2. Scope

This Policy applies to partners, directors, employees, service providers, consultants, sales representatives, distributors, resellers, intermediaries, suppliers, and partners acting on behalf of Nyverra or having access to the company's information, systems, or resources.
Nyverra requires relevant third parties to assume equivalent commitments through contractual clauses and, where applicable, specific integrity declarations.

3. Definitions

For the purposes of this Policy:

- **Public official:** any person holding a public office, position, or function, whether temporary or unpaid, in any public body, entity, or state-owned company, as well as political party leaders and candidates for public office.
- **Undue advantage:** any asset, value, service, favor, opportunity, or benefit offered, promised, authorized, or received for the purpose of improperly influencing an act or decision.
- **Facilitation payment:** a small payment made to a public official to expedite or secure the performance of a routine act to which the person is already entitled.
- **Third party:** any individual or legal entity that provides services to, represents, intermediates for, distributes for, or maintains a business relationship with Nyverra.
- **Due diligence:** an integrity and risk assessment carried out before and during the relationship with a third party.

4. Principles and prohibitions

Nyverra conducts its business with legality, integrity, transparency, and accountability. It is expressly prohibited, directly or indirectly, through third parties or intermediaries, to:

1. offer, promise, authorize, give, request, or accept an undue advantage from public officials or private individuals;

2. make or authorize facilitation payments;
3. use intermediaries, consultants, representatives, or partners to carry out acts prohibited by this Policy;
4. create, maintain, or use false or incomplete records, or records that conceal the true nature of a transaction;
5. destroy, alter, or conceal relevant documents and evidence;
6. obstruct internal or external investigations;
7. retaliate against anyone who reports, in good faith, suspected corruption or irregularities;
8. fund political campaigns or parties with company resources, unless expressly permitted by electoral law and approved by management.

Nyverra complies with Law No. 12,846/2013 (Anti-Corruption Law), Decree No. 11,129/2022, Law No. 13,709/2018 (LGPD), Law No. 14,133/2021, and other applicable rules.

5. Gifts, meals, travel, and hospitality

1. **Public officials:** Nyverra does not offer, promise, or authorize gifts, promotional items, meals, travel, accommodation, entertainment, or any other advantage to public officials, unless expressly permitted by applicable law and previously approved in writing by management.
2. **Clients and partners:** gifts and courtesies 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, loans, equity interests, invitations to travel funded by third parties, or any benefit that could improperly influence a decision is prohibited.
4. **Recording and consultation:** 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.

6. Relations with public officials and public procurement

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.

Meetings, visits, and contacts with public officials must be professional, recorded where necessary, and free from any promise of advantage.

7. Third parties and intermediaries

Nyverra does not use third parties to do what it cannot do directly. Representatives, consultants, distributors, resellers, and intermediaries must:

- act with integrity and in compliance with this Policy;
- provide truthful information about their activities and controls;
- immediately report any suspicion of corruption or conflict of interest;
- accept integrity, confidentiality, and audit clauses where applicable.

Third-party compensation must be consistent with the nature and complexity of the services, without atypical payments, hidden commissions, or disproportionate amounts.

8. 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.

9. Records, accounting, and transparency

Nyverra keeps clear, complete, and accurate records of its operations, expenses, contracts, and relevant interactions. No expense may be recorded in a generic or fictitious manner or for a purpose different from the one actually carried out.
Documents, receipts, and approvals must be preserved for the period necessary to comply with legal, tax, and contractual obligations. Nyverra cooperates with competent authorities and legitimate audits.

10. Whistleblowing channel and non-retaliation

Questions, reports, and requests related to this Policy 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 Policy 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. Review and effective date

This Policy 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.
This Anti-Corruption Policy 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.