

# Code of Conduct



**Sustainable**  
Uprightness Program

# Word from the Leader

Dear employees,

I invite everyone to take active part in the Sustainable Integrity Program (SIP) coordinated by Solví Participações, and tailored to each of the companies that make up the culture of responsibility, ethics and integrity that guides our actions and values.

Acting with integrity for good purposes means more than a corporate commitment from our UVSs – it's the attitude we expect from our employees in all activities and operations. This is our contribution to the environmental preservation, ensuring that our operations are safe, in addition to our involvement in building a better society by promoting an ethical and honest business environment.

Our continuous growth, technology advances, and sustainability are results achieved by a healthy, ethical, and respectful work environment, which we disseminate to the audiences we have a relationship with, such as shareholders, customers, communities, competitors, suppliers, service providers, government, among other related parties.

Our Code of Conduct guides and must be followed by every employee in all situations, regardless of their role or position. The guidelines in this document serve as the basis for our companies' commitment to integrity. In any situation, we must always act based on the highest ethical principles, always valuing the business continuity and the reputation of our companies.

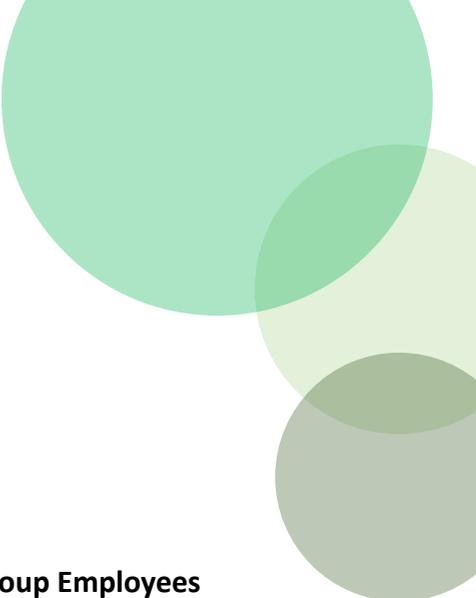
I thank everyone for adhering to and sharing the principles of our Code of Conduct, and for each one's personal commitment to act with integrity for good purposes.

**Celso Pedroso**

Chief Executive Officer of Solví Participações S.A.



# Summary



- 1. Organizational Principles**
- 2. Definitions**
- 3. Scope of the Code of Conduct**
- 4. Management Principles**
- 5. Objectives of the Code of Conduct**
- 6. Conduct and Commitments of Solví Group Employees**
- 7. Conduct and Commitments of Solví's Suppliers and Service Providers**
- 8. Solví's Conduct and Commitments**
- 9. Responsibilities of the Leaders of Solví Companies**
- 10. Conduct Committee**
- 11. Dissemination**
- 12. Penalties**
- 13. Queries**
- 14. Reporting Violations of the Code of Conduct**
- 15. Conduct Hotline**
- 16. Commitment Statement**
- 17. Final Considerations**
- 18. Exhibit I – Receipt and Commitment Statement**





# 1. Organizational Principles

Being a company of Solví Group means having employees who act as business leaders and work for good purposes and in a sustainable manner, in order to deliver solutions to society for life, leading to results for Solví Group and value for all its stakeholders.

## **VISION**

To be the best group of management companies in engineering solutions for life, and a reference in offering unique, integrated, and innovative services.

## **MISSION**

To offer solutions in waste, sanitation, and energy recovery, operating and managing concessions and contracts for public and private customers.

Promote the development of our employees and communities, generating value for shareholders, customers, suppliers, and the government, through sustainable growth and respect for the environment.

## VALUES

**Team:** To have a team of employees specialized in different areas, who complement each other in a harmonious, supportive manner, promoting a detailed and comprehensive approach in analyzing scenarios and developing solutions for the market.

**Excellence with Push:** Act in an extraordinary way in all actions, services and attitudes, and to be a benchmark for the market, seeking continuous improvement. Behave in a quick, integrated, flexible, and proactive manner, adapting to the requirements and movements of customers and the market.

**Innovation:** Seek new ways of doing things, assessing, redesigning and continuously updating our processes, systems, methodologies, and technologies.

**Integrity:** Keep an ethical attitude and a transparent relationship with everyone, ensuring moral principles and working with integrity for good purposes.

**Safe Operation:** Operate in a safe way, establishing interdependence as the correct attitude when carrying out any activity, preserving the health, environment, and physical integrity.

**Partnership:** Establish a strong and lasting relationship with customers and suppliers, backed by an honest attitude, sharing of causes and fluent communication.

**Social and Environmental Responsibility:** Promote improved quality of life for people and communities by acting in a responsible and sustainable manner, preserving the environment for current and future generations.



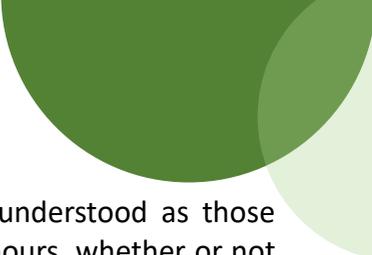
## 2. Definitions

For the purposes of this Policy, the following definitions apply:

**Public Agent:** whenever mentioned in this Policy, the term covers both Brazilian and foreign Public Agents.

- Brazilian: consist of any government official, political agent, civil servant, and public employee, working for the direct and indirect Public Administration of any of the branches of the federal, State, Federal District, and Local governments; a company incorporated into the government property or an entity for whose establishment or funding the treasury has contributed or still contributes with more than fifty (50) percent of the equity or annual revenue; even temporarily holding a position or role, and without compensation.

- Foreign: consist of those who – although temporarily or without compensation – hold a public office, job or role at agencies, government entities or diplomatic representations of a foreign country, as well as legal entities directly or indirectly controlled by the Government of a foreign country, or at international public organizations.



**Parallel Activities:** parallel activities should be understood as those that Employees carry out outside their working hours, whether or not paid.

**Employees:** all employees of Solví and direct and indirect subsidiaries thereof, regardless of the hierarchical level, as well as non-employees holding positions at any corporate or governance body, including board members, officers, and committee members.

**Political campaign:** The electoral period when parties and their candidates present themselves to the population in search of votes.

**Conflict of Interest:** a scenario created by the clash between public and/or private interests, which could compromise the interests of Solví and/or the direct and indirect subsidiaries thereof, or inappropriately influence the Employee's performance.

**Bribery:** Giving or receiving money, gifts, valuable items, or any other advantage, as a way of inducing any dishonest or illegal action or the breach of confidence in the performance of their duties.

**Undue Advantage:** Any benefit of value – either monetary or not – even if valuable to the beneficiary only, given in consideration for any action or failure to act of the beneficiary.

**Third parties:** Includes all representatives, service providers, outsourced employees, consultants, self-employed individuals, brokers, outsourcers, business agents, or any other individual or entity representing or acting on behalf of Solví Group and other business partners.



### **3. Scope of the Code of Conduct**

The rules of conduct provided for in this Code must be complied with by all Employees of the Solví Group, defined as all employees of the Group and direct and indirect subsidiaries thereof, regardless of the hierarchical level, as well as non-employees holding positions at any corporate or governance body, including board members, officers, and committee members.

For companies in which third parties hold interests, this Code of Conduct must be validated by the respective Board of Directors.

## 4. Management Principles

The management principles set out below are intended to harmonize the expectations of customers and users with the search for business results and development of our Employees, through decentralized, planned, and corporate-controlled operations.

### **Ethics**

Ethics is the human conduct ideal, and an intrinsic part of the civilization's very development process, which guides each individual in his decisions about what is good and correct for himself and his life in relation to his fellowmen, aiming at the common good.

Solví's development is based on strict ethics, built upon respect for the laws and principles that have established the Group's reputation and the growth of our companies.

Personal and business ethics are inseparable. Therefore, the expected conduct of each Employee must express Solví Group's organizational identity, guiding the content and the decision-making process.

The individual standard of values must be compatible with that of Solví Group. In this sense, this code seeks to establish the ethical and conduct principles that must be observed by Employees, suppliers, and service providers, so that they act in an integrated and consistent fashion when conducting their relations and business with different stakeholders, ensuring interfaces for common success.



## 5. Objectives of the Code of Conduct

**To be the individual and collective benchmark** for the attitudes and behavior of each Employee of Solví Group, so that everyone acts based on the same ethical values and principles.

**Strengthen the reputation and the internal and external image of Solví**, its companies and its Employees, characterizing their attitudes as correct, fair, appropriate, and aimed at the common good.

**Consolidate the values of Solví Group** through permanent practice.

**Define guidelines and parameters of ethical conduct to be observed in the relationship** with Employees, shareholders, customers, communities where we operate, competitors, related companies, suppliers, service providers, the environment, governments, and other stakeholders.

**Create tools for query and compliance with the ethical conduct** expected from Employees, suppliers, and service providers.



## 6. Conduct and Commitments of Solví Group's employees

In order to comply with the principles defined in this Code of Conduct, Solví Employees are required to:

6.1 Seek excellence in services, in the day-to-day work, as well as in the achievement of business and financial goals.

6.2 Avoid any conflict between business interests and personal interests, so as not to obtain or offer undue advantages arising from the role or position held at Solví Group's companies.

6.3 Never obtain earnings from equity held or work of any nature in which Solví Group, its shareholders and their interests are directly or indirectly involved.

6.4 Keep a safe and secure work environment by complying with the companies' environmental policies and the health and safety programs.

6.5 Never perform any task under the influence of alcohol or psychotropic substances.

6.6 Preserve the confidentiality of non-public information related to business and the market, committing not to use for personal benefit or for the benefit of third parties any strategic data to which the companies of the Solví Group have access.

6.7 Keep Solví Group's confidential and strategic information confidential, even after the termination of the Employee's employment, and information/documents, such as the following should not be disclosed:

- a. Contracts/agreements;
- b. Service prices;
- c. Development of new methods and processes;
- d. Marketing actions;
- e. Employees' personal information, including compensation;
- f. Corporate operations in which Solví is involved;
- g. New prospected projects and potential proposals drafted;
- h. Personal usernames and passwords of computer systems;
- i. Costs and financial details;
- j. Grant interviews or testimonials to external media in general (TV stations, radio stations, newspapers, magazines, social media, etc.) without the prior authorization of the board.



6.8 Draft accounting records, internal reports, and external disclosures in a complete, accurate, and reliable manner, containing updated, accurate, truthful, and complete information.

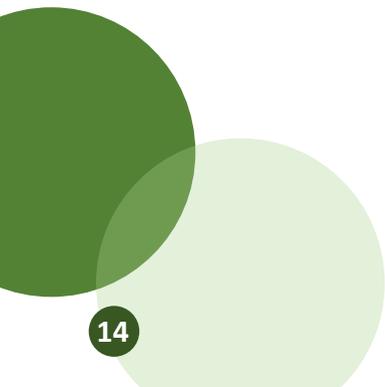
6.9 Use electronic mail (e-mail), the Internet, and social media in accordance with the guidelines set out in the Law and the internal Information Security rules adopted by the Solví Group, which was communicated to each Employee during the onboarding procedure, being updated according to the best practices.

6.10 Comply with the laws, rules, and regulations that govern business operations, with special attention to the rules regarding transactions with related parties.

6.11 Base dealings with all stakeholders on the highest ethical standards, following the principle of transparency, avoiding any form of discrimination or injustice at the workplace.

6.12 Ensure the principles of free competition when dealing with competitors or suppliers.

6.13 Report the hiring of relatives (parents, children, siblings, spouses, partners, cousins, etc.) to the line manager and to Human Resources. At Solví, relationships between Employees is not an obstacle for them to be part of the teams, as long as they are not hierarchically subordinate within the same company of the Group.





6.14 Engage your teams, as leaders, in the enforcement of this code, both being a role model and taking active part in disseminating and demanding compliance with good ethical conduct practices.

6.15 Never campaign politically or request resources from other Employees for any candidate or political party within the work environment and during office hours.

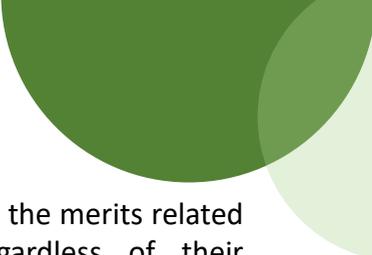
6.16 Keep relationships with authorities, politicians and public agents guided by transparent, professional and ethical attitudes, immediately reporting to the company's management and/or the Conduct Committee any form of request or pressure from public agents that does not correspond to such definitions.

6.17 Refrain from campaigning for a political party or union within the work environment, UVS facilities, and during office hours.

6.18 Ensure the proper and correct use of goods, vehicles in general, computers, laptops, cell phones, facilities, operating equipment, and work tools, using them for the exclusive benefit of the Solví Group, avoiding waste.

6.19 Refrain from parallel activities during office hours (e.g., selling cosmetics, food, clothing, jewelry, etc.).

6.20 Limit the receipt and offering of gifts and giveaways from/to customers, suppliers, and service providers to those without significant value (organizers, calendars, books, and institutional office supplies), which do not characterize any kind of influence in decisions relating to activities and roles.



6.21 Respect intellectual property and recognize the merits related to the work developed by colleagues, regardless of their hierarchical position.

6.22 Mandatory reporting to the line manager and the local Human Resources, which must report to the Compliance and Internal Audit area, when a company that, having an Employee of a Group company or his/her family member (parents, children, siblings, spouses, partners, cousins, etc.) as a member or employee, becomes able to provide services or do business with the Group, exempting him/herself, through a formal document, from the commercial/contractual relationship between the parties, and may not be part of the supply or service agreement management team.

6.23 Report to the line manager and Human Resources, which is required to report to the Compliance and Internal Audit area, when faced with a situation in which his/her personal interest conflicts with the company's interests.

6.24 Respect diversity and foster an environment where all Employees, including third parties, are treated with respect and courtesy, not engaging in conduct that causes embarrassment or intimidation, such as threat, blackmail, false testimony, moral harassment, sexual harassment, insults, exposure to ridicule, offense, innuendo, or discrimination, whether based on race, nationality, sex, sexual orientation, age, religion, social position, opinion, political belief, role, or any other individual differentiating factor.

6.25 Report any violation of this Code to Solví Conduct Committee, through the Conduct Hotline.

## 7. Conduct and Commitments of Suppliers and Service Providers of Solví

In order to comply with the principles defined in this Code of Conduct, Solví suppliers and service providers are required to:

7.1 Preserve the confidentiality of non-public information related to business and the market, committing not to use for personal benefit or for the benefit of third parties any strategic data to which they have access.

7.2 Comply with the laws, rules, and regulations that govern business operations.

7.3 Base their dealings on the highest ethical standards, following the principle of equality, justice, and transparency, avoiding any form of discrimination or injustice.

7.4 Mandatory reporting to the area that contracted the supply and/or service, and the local HR, which must report to the Compliance and Internal Audit area, when any of the family members (parents, children, siblings, spouses, companions, cousins etc.) of employees of its technical, management and/or commercial staff, may become an Employee of one of the Solví Group's companies. This new employee must, upon hiring, exempt himself/herself through a formal document, from the commercial/contractual relationship between the parties, and cannot be part of the supply or service agreement management team.



7.5 Limit the offering and receiving of gifts and giveaways to Employees of Solví Group companies and their respective end customers to items without significant value (organizers, calendars, books, and institutional office supplies), which do not characterize any type of influence on decisions regarding commercial/contractual conditions. Within 12 (twelve) months, Gifts, Giveaways and Similar Benefits may be accepted and offered a maximum of once time per Public Agent. The value of Gifts, Presents, and Similar Benefits should not exceed one hundred reais (R\$ 100.00) or equivalent in another currency. This provision applies to Gifts and Presents, cumulatively.

7.6 Ensure an environment where all its employees, including third parties, are treated with respect and courtesy, embracing diversity and standing against any forms of prejudice, such as conduct that causes embarrassment or intimidation, such as threat, blackmail, false testimony, moral harassment, sexual harassment, insults, exposure to ridicule, offense, innuendo, or discrimination, whether based on race, nationality, sex, sexual orientation, age, religion, social position, opinion, political belief, role, or any other individual differentiating factor.

7.7 Repudiate child labor and any form of forced labor that reduces man to the condition of slavery or equivalent.

7.8 Report any violation of this Code of Conduct, regarding the ethic and conduct concepts defined therein, to the Conduct Committee through the Conduct Hotline.

# 8. Solví's Conduct and Commitments

The expected behaviors and commitments of Solví Group include:

## 8.1 Towards Customers and Prospects

8.1.1 Safeguard sensitive, private or confidential information to which it has access.

8.1.2 Alert when there are risks to users of the services provided.

8.1.3 Have a transparent relationship based on ethical principles.

8.1.4 Ground the performance of Solví Group's companies on continuous service quality improvement and technological advances.

8.1.5 Perpetuate the companies as agents contributing to raise the standard of the services provided in the markets where they operate.

8.1.6 Repudiate actions considered anti-competitive, monopolistic or contrary to good market practices, or that are characterized as a violation of the principles of free competition.

8.1.7 Treat customers with honesty and transparency, respecting all contractual conditions, not seeking to obtain undue advantages in the contracts entered into.

8.1.8 Avoid establishing commercial relationships with companies that do not share their ethical and conduct standards and are proven to fail to comply with laws and regulations.

## 8.2 Towards Employees

8.2.1 Promote working conditions that enable everyone to balance their business, personal, and family lives.

8.2.2 Ensure safety and health at work, providing training programs and all conditions and equipment necessary to perform the job.

8.2.3 Ensure the right of refusal of its Employees, accepting the suspension of their activities in the event of a situation of serious and imminent risk to life or their physical integrity and/or that of others.

8.2.4 Respect the personal life and privacy of every Employee, maintaining the confidentiality of their medical, business, and personal information.

8.2.5 Ensure an environment where all Employees, including third parties, are treated with respect and courtesy, embracing diversity and standing against any forms of prejudice, such as conduct that causes embarrassment or intimidation, such as threat, blackmail, false testimony, moral harassment, sexual harassment, insults, exposure to ridicule, offense, innuendo, or discrimination, whether based on race, nationality, sex, sexual orientation, age, religion, social position, opinion, political belief, role, or any other individual differentiating factor.

8.2.6 Maintain and improve transparent hiring, training, promotion, and career development policies, committing to promote equal opportunities, so that the career advancement process is guided by individual merit, according to parameters that include performance assessment.

8.2.7 Provide the facilities and means necessary for Employees to perform their tasks.

8.2.8 Repudiate child labor and any form of forced labor that reduces man to the condition of slavery or equivalent.

### **8.3 Towards Communities**

8.3.1 Contribute to the sustainable development of the communities where Solví Group's companies operate, working so that the projects promote local development and achieve effective, lasting results, strengthening the communities as agents of their own transformation.

8.3.2 Encourage all Solví Group's Employees to voluntarily participate in the economic and social development of local communities, respecting each other's cultures and business customs.

8.3.3 Take responsibility before the communities where it operates, considering compliance with all laws and regulations regarding the environment, health and safety essential for its work. Thus, Solví is committed to complying with the environmental regulations and the internal QHSE – Quality, Health, Safety, and Environment policies, as well as to preserving the environment and making rational and conscious use of natural resources.

8.3.4 Provide all conditions and equipment required to enable a healthy and safe work environment.

8.3.5 Stimulate an attitude of respect for people, their traditions and values.

8.3.6 Adopt and maintain a transparent process for defining social actions.

8.3.7 Respect the interests and needs of the communities where it operates.

8.3.8 Contribute knowledge and technical information that can bring about public benefits.

8.3.9 Participate in the discussion of public policies related to the business it carries out, and other topics of interest to society.

## **8.4 Political Contributions, Donations and Sponsorship**

With regard to political contributions, donations, and sponsorship of initiatives, the Solví Group's Employees are expected to:

8.4.1 Support contributions to the communities where the company operates and donations to charities, observing the internal procedures and bylaws of each company, as well as the applicable laws and regulations.

8.4.2 Make sure that contributions and donations cannot be used to improperly influence business decisions.

8.4.3 Support donations for community events, such as “volunteering day,” prevention and/or treatment of diseases or epidemics, and support for art and culture.

8.4.4 Make sure that requests for donations include the appropriate supporting documentation in order to allow for proper accounting records.

8.4.5 Determine that any political contribution from any company in Solví Group or on behalf thereof, or from any Employee and/or third party on behalf of the companies, may only be made within the limits, terms and amounts allowed by the each country's electoral legislation.

8.4.6 Make sure that donations to parties and candidates do not coincide with situations that could lead to any improper advantage for Solví.



## **8.5 Anti-Corruption**

8.5.1 The values and principles of the Solví Group, as well as its commitment to ethics, prevent tolerance with any form of corruption and bribery. No unlawful act will be allowed or may be justified to obtain any advantage and/or benefit in favor of Solví.

8.5.2 Any corrupt action potentially carried out by any member of Solví in any and all situations of interaction with a public agent will be reproached.

8.5.3 Any Employee should make sure that any offer, promise, grant or gift complies with Solví's policies and does not constitute an attempt to influence the public agent or to bribe a business counterpart in order to obtain any business advantages.

## 8.5.4 Interaction with the Government, Political Parties and Public Agents

When interacting with the Government, Political Parties, and Public Agents in general, employees of the Solví Group are required to act in order to:

8.5.4.1 Comply with the laws and rules applicable to dealings with domestic or foreign Governments or any agency or entity controlled by the direct (federal, State, local) or indirect (authorities, public foundations, government-owned companies, mixed-capital companies, regulatory agencies) levels of any of the Executive, Legislative and Judiciary branches.

8.5.4.2 Keep relationships with authorities, politicians and public agents based on transparent, professional and ethical attitudes, immediately reporting to the company's management and/or the Conduct Committee any form of request or pressure from public agents that does not correspond to such definitions.

8.5.4.3 Ground any and all activities that involve dealings with public agents on the highest integrity, transparency, and formality standards.

8.5.4.4 Make the interaction with the public agent transparent for the company. In this sense, carrying out all interactions with public agents in the presence of at least two Employees of the Solví Group is recommended. The meetings must be formally scheduled in advance. For meetings with a public agent that has any decision-making power over a subject matter of interest to Solví, the record of the conversation contents must be forwarded to the Compliance Department, according to the applicable policy.

8.5.4.5 Refrain from offering gifts and/or presents with significant commercial value (only organizers, calendars, books, and institutional office supplies are allowed) to public or political agents, or to people related thereto, in exchange for private benefits or for companies of the Solví Group.

8.5.4.6 Do not promise, offer or give, either directly or indirectly, undue advantages to a public agent or the third person related thereto.

8.5.4.7 Refrain from using any individual or entity to conceal interests or the identity of those who will benefit from the illegal actions committed.

8.5.4.8 In dealings with the Government, responsibility and the spirit of cooperation should be a tenet.

8.5.4.9 In case of tenders and contracts with the Government, the Solví Group prohibits and repudiates the following actions by its Employees:

- a. Make prior agreements or deals with competitors so as to thwart or defraud the competitive nature of the public tendering procedure;
- b. Defraud any public tendering procedure or contract resulting therefrom, including actions that intended to illegally remove a bidder by offering an advantage of any kind;
- c. Incorporate, in a fraudulent or irregular manner, a legal entity to participate in public tenders or enter into an administrative contract;

d. Hinder the investigation or auditing activity by public bodies, entities or agents, or intervene in their work;

e. Influence any action or decision of a public agent or induce such public agent to perform, omit, delay or expedite any action in violation of his/her legitimate or official duty;

f. Induce a public agent to use his/her influence because of his/her role to affect or influence any action or decision of the Government;

g. Thwart the legitimacy of the tendering procedure, with or without the purpose of benefiting a public agent.

## **8.6 Competition Advocacy**

In case of interaction with actual or potential competitors, Solví Group's Employees are required to:

8.6.1 Comply with all competition-related laws and repudiate any practice that could limit free competition, especially illegal cartel-forming and competition fraud practices.

8.6.2 Refrain from participating, either directly or indirectly, in any agreement or practice between actual or potential competitors to set prices, share markets, combine participation in public tenders, or actions whose object includes any aspect that impacts free competition.

8.6.3 Refrain from exchanging, receiving or sending competition-sensitive information with, from or to an actual competitor or potential competitors, even if in the form of unions or associations.

8.6.4 Refrain from obtaining competition-sensitive information through bribery, theft or information interception, nor knowingly communicating to any third party false information about an actual or potential competitor.

8.6.5 Meetings with competitors should preferably be held in the presence of at least two Employees of the Solví Group, and, whenever possible, one of them from the Legal or Compliance area.

## **8.7 Towards Suppliers and Service Providers**

8.7.1 Adopt equitable and fair practices in the dealings with suppliers and service providers.

8.7.2 Carry out transparent pricing procedures, through fair benchmarking practices, such as tendering, price quotation, reverse auction, etc.

8.7.3 Select and contract suppliers and service providers based on strictly legal and technical criteria – quality, cost and timeliness.

8.7.4 Repudiate practices that may characterize a violation of the free competition or market reserve principles, such as offering privileged information on market research or agreement terms.

8.7.5 Demand from suppliers and service providers an ethical profile in their management and social and environmental responsibility practices, pursuant to the provisions of Solví Group's "Procurement Policy," refusing suppliers and service providers that apply unfair competition practices, use child, forced or compulsory labor, as well as other practices contrary to the principles of this Code of Conduct.

8.7.6 Demand an environment where all Employees, including third parties, are treated with respect and courtesy, embracing diversity and standing against any forms of prejudice, such as conduct that causes embarrassment or intimidation, such as threat, blackmail, false testimony, moral harassment, sexual harassment, insults, exposure to ridicule, offense, innuendo, or discrimination, whether based on race, nationality, sex, sexual orientation, age, religion, social position, opinion, political belief, role, or any other individual differentiating factor.

8.7.7 Make the same healthy and safe conditions offered to Solví's Employees available to Employees of companies, suppliers and service providers when they are working at the facilities of the Group's companies.

8.7.8 Avoid entering into business relationships with companies that do not share our standards.

## **8.8 Towards Shareholders and Capital Markets**

8.8.1 Promote open, direct communication with all shareholders, irrespective of their shareholding, providing information to monitor the activities and performance of the Group's companies in a transparent manner, enabling decision making.

8.8.2 Treat confidential information not yet made public on a totally confidential basis, safeguarding the assets and market image of Solví Group.

8.8.3 Provide support to shareholders in understanding the investment proposals, capital increases, and other topics that should be reviewed and decided by them.

8.8.4 Make sure that accountability is based on qualitative and quantitative elements that allow identifying economic, financial, social, environmental and sustainability risks, while also committing to the advocacy, proposition, and application of appropriate measures to eliminate or mitigate the risks involved.

## **8.9 Towards Related Parties**

8.9.1 Ensure transparency and balance in dealings between the Group's companies, so that the information shared between them is accurate and true.

8.9.2 Never obtain earnings from equity held or work of any nature in which Solví Group, its shareholders and their interests are directly or indirectly involved.

## **8.10 Towards the Environment**

8.10.1 Ground all activities on the strict compliance with environmental regulations and standards, seeking to optimize the use of natural resources; sustainable development, and the preservation of nature and biodiversity.

8.10.2 Conduct all activities and projects with the utmost respect for the environmental preservation and conservation, whether properly handling, storing and disposing of all its waste, in addition to complying with the environmental licenses applicable to Solví Group's operations. Remember that the environmental protection is also carried out in everyday practices, such as the correct disposal of household waste and care for the work environment.

8.10.3 Report to the competent entities, customers, and other stakeholders any environmental damage resulting from emergency situations.

## **8.11 Information Confidentiality**

8.11.1 Privileged information includes relevant data about a company that has not been disclosed to the market and, for this reason, must be kept confidential.

8.11.2 Confidential information is information that has not yet been disclosed to the market, and whose disclosure could affect the company's operations and, therefore, must be treated on a strict basis.

8.11.3 Employees, customers, service providers and business partners are required to keep the confidentiality and privacy of Solví's information, and compliance with domestic and international laws and regulations in this regard is mandatory; further, keeping the confidentiality of the information is mandatory even after the business relationship is terminated, since such disclosure could be detrimental to the business of Solví or customers thereof.

8.11.4 Preserve the confidentiality of non-public information related to business and the market, committing not to use for personal benefit or for the benefit of third parties any strategic data to which the companies of the Solví Group have access.

8.11.5 Keep confidential and strategic information received from Solví Group companies, or that has come to their attention, even after the termination or expiry of the agreement (either employment agreement or otherwise).

## **8.12 Conflict of Interest**

Conflict of interest situations are potentially damaging to Solví Group's business, so that Solví Group's Employees are expected to act so as to:

8.12 Avoid any conflicts between business interests and personal interests, so as not to obtain or offer undue advantages arising from the role or position held at Solví.

8.12.2 A conflict of interests occurs when there are secondary interests of one of those involved in a certain dealing, conflicting with the interests of members, customers or partners thereof, and that do not necessarily result in a benefit for the company.

8.12.3 Avoid conflicts of interest and perform their roles in a conscious, honest manner, in accordance with Solví's best ethical interests.

8.12.4 Demand from Employees and third parties that they refrain from taking advantage of their positions to obtain or relay confidential information in an improper way, aiming at personal or third-party gain, avoiding direct involvement in any dealing that conflicts with Solví's business interests or that in any way compromises its independence and impartiality.

8.12.5 Report the hiring of relatives (parents, children, siblings, spouses, partners, cousins, etc.) to the line manager and to Human Resources. At Solví, relationships between Employees is not an obstacle for them to be part of the teams, as long as they are not hierarchically subordinate within the same company of the Group.

8.12.6 Make decisions in an objective manner, free from any personal influence. If an Employee is faced with any situation in which his or her judgment or objectivity is questioned and/or biased, or if s/he is aware of any potential conflict of interest existing at the company, immediate reporting to his/her line manager and the Human Resources area is essential.

## **8.13 Prevention of Money Laundering**

Money laundering is the action or sequence of actions committed to conceal the nature, origin, location, disposition, movement, or ownership of goods, values and rights from criminal offenses or misdemeanor, with the purpose of reinserting these in the economy with apparent lawfulness. In order to avoid actions considered money laundering, Solví Group Employees are expected to act so as to:

8.13.1 Conduct business only with reputable customers and partners whose business is compliant with the law.

8.13.2 Refrain from engaging in or facilitate transactions involving values and rights of illicit origin.

8.13.3 Require that all payments and transactions with customers, service providers, and other partners are carefully reviewed.

8.13.4 Comply with all accounting and internal control rules so that the accounting records contain accurate and correct information.

## **8.14 Data Protection and Security**

For the protection and security of Solví Group's and third-party data, Solví Group Employees are required to:

8.14.1 Protect and secure the privacy of third-party information, pursuant to the applicable laws and contractual obligations.

8.14.2 Collect, process, and use personal data for legitimate, previously defined, clear, and legitimate purposes, according to the applicable laws.

8.14.3 Secure personal data, including against unauthorized access, taking all necessary precautions for the transmission thereof.

8.14.4 Safeguard the rights of data owners with respect to the information accuracy and requests for data blocking or deletion.

8.14.5 Prepare detailed, analytical accounting records with a history, and adopt strict internal controls and procedures to ensure that all transactions are in line with the internal policies and approval levels.

8.14.6 Refrain from carrying out covert, unregistered and/or unreported transactions.

8.14.7 Refrain from making inappropriate, ambiguous, or fraudulent accounting entries.

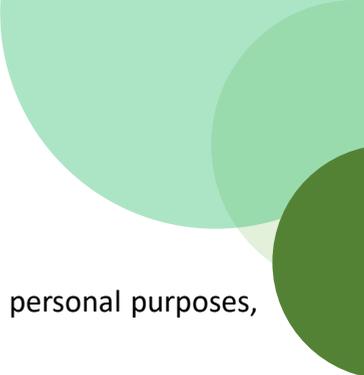
8.14.8 Refrain from using accounting devices intended to conceal or in any way cover up illegal payments.

8.14.9 Refrain from forging or requesting the reimbursement of expenses that fail to comply with the requirements and internal procedures of each company.

## **8.15 Commitment to the Use of Assets**

Solví Group's assets should only be used for legitimate, business-related purposes. In this sense, Solví Group's Employees are expected to act so as to:

8.15.1 Use Solví's assets only in the context of carrying out their duties, in an ethical, responsible manner, and in perfect harmony with the functions inherent to their respective positions.



8.15.2 Refrain from using any of Solví's assets for personal purposes, under penalty of disciplinary or corrective action.

## **8.16 Violations of the Code of Conduct and Disciplinary Action**

Any violations of the Code of Conduct shall give rise to the application of disciplinary actions, so as to:

8.16.1 Repudiate any conduct that is inconsistent with ethical principles and that violates the clauses of this Code of Conduct. Thus, violations of the Code of Conduct, the applicable law, and Solví's values shall not be tolerated and may result in the application of disciplinary action, according to the responsibility, nature, and seriousness of the violation committed.

8.16.2 Make sure that the required behavior standards are followed by all Employees. The application of such actions shall depend on the assessment of the seriousness of the violation and other circumstances of the case, and pursuant to the laws and other policies of each company.

8.16.3 Terminate the business relationship of agents, consultants and third parties contracted and/or who work for Solví and who have engaged in any violations.

## **8.17 Reporting Violations of the Code of Ethical Conduct**

The objectives related to Reporting of potential violations of the Code of Conduct include:

8.17.1 Identifying, in a timely manner, any violations of the rules of conduct set forth in this Code of Conduct or the applicable laws, in order to enable a rapid response to misconduct, avoiding damage to Solví and ensuring successful cooperation.

8.17.2 Encourage Employees – when faced with any conduct or practice that is inconsistent with this Code of Conduct or with the highest ethical standards – to immediately report the situation and the violation to Solví’s Compliance Department or the Conduct Hotline.

8.17.3 Vehemently reject and prohibit any retaliatory measure against a whistleblower acting in good faith or against a person who assists in any internal investigation of reports.

8.17.4 Keep the reports confidential, except as required by law, and make sure that no adverse action is taken against a whistleblower for reporting in good faith an actual or potential violation.

8.17.5 Establish any penalties and disciplinary actions, in line with the principles of proportionality and adversary system.



## **8.18 Investigations of Reports**

The investigations conducted in relation to any reports made through the Conduct Hotline or by other means are intended to:

8.18.1 Conduct investigations to ascertain the truthfulness of the facts in the face of reports of suspected violations of this Code of Conduct. The information obtained during this procedure will be kept confidential.

8.18.2 Determine the need for collaboration with the internal investigations to be initiated, responding to requests, submitting documents, and answering to any questions asked.

8.18.3 Investigate any reports made, and implement, monitor, and update this Code of Conduct.

## **8.19 Training and Monitoring**

8.19.1 Promote periodic training to Employees, focusing on this Code of Conduct and integrity. Solví Employees will be reviewed on an annual basis on the topics contained in this Code of Conduct.

8.19.2 Make sure that all managers (directors, managers, supervisors, and others in a management position) ensure compliance with the rules set forth herein and report any actual or potential inconsistencies to the Compliance Department.



## 9. Responsibilities of the Leaders of Solví Companies

9.1 All Companies are required to ensure the use of any existing means, when necessary, to enforce the provisions of this Code of Conduct.

9.2 Employees holding leadership positions at Solví Group's companies have an additional duty to disclose to their teams and ensure compliance with this Code of Conduct at their respective work areas.

## 10. Conduct Committee

The Conduct Committee is an advisory body to Solví's Board of Directors on issues involving ethical values and conduct of the entire Group, including violations by Employees, suppliers and service providers. Its duties include:

10.1 Acting with confidentiality, regardless of the subject, including in relation to those who identify and report conduct out of line with this Code of Conduct, in order to preserve rights and protect the whistleblower and the decision neutrality;

10.2 Ensuring responses to reports and/or queries received;

10.3 Forward to the appropriate decision-making body of the company involved in the report all recommendations for the cases reviewed;

10.4 Contributing, on a non-exclusive basis, with updates to Solví's Code of Conduct and other internal rules of the Group companies that are oriented to guide the ethics and conduct of Employees and third parties;

10.5 Taking preventive action, suggesting corrective actions arising from the inquiries received, before the management of the Group's companies.

10.6 Reporting to the Board of Directors the status of the cases reviewed by the Conduct Committee.

The procedures of the Conduct Committee are detailed in the Internal Rules approved by the Board of Directors.

## 11. Dissemination

The Code of Conduct and any updates and changes thereto must be made widely available to all Employees, in both the printed and electronic versions.

## 12. Penalties

Failure to comply with any of the provisions of this Code of Conduct shall subject those responsible to internal penalties, according to the nature and severity of the violation. Such penalties can range from a simple warning to the end of the employment or contractual relationship (in the case of suppliers and service providers), subject to potential criminal liability.

In case of compliance with the Consequence Policy criteria, after review by the Conduct Committee, non-compliance events will be reported, via confidential internal report, to Solví's Board of Directors, which will decide on which sanction should be applied, in line with the Group Solví policies and the applicable balance of consequences.

## 13. Queries

The Conduct Hotline should be used for formal queries to the Conduct Committee regarding the best procedure to be taken by the Employee in view of any situation where s/he does not feel comfortable or even any violations of this Code of Conduct.

For queries to the Conduct Committee, Solví encourages Employees to be proactive in any circumstances, so as not to incur a violation of the Code of Conduct.



## 14. Reporting Violations of the Code of Conduct

Any violations of this Code may be reported to the Conduct Committee, through the Conduct Hotline, which will ensure confidential handling to anyone who reports events of non-compliance with the terms of this Code. The confidentiality of the investigation will be strictly maintained, and appropriate action will be taken, if necessary.

Violations of the Code of Conduct, when reported in good faith by any Employee, will not lead to any retaliation whatsoever. However, making false reports or providing incorrect and untrue information constitutes a violation of this Code.

Solví encourages only reports made in good faith, with responsibility and ethical commitment.

## 15. Conduct Hotline

Actions or behaviors contrary to those described in this Code of Conduct have appropriate channels for reporting, with confidential and secure handling ensured. Employees and third parties can submit their reports to the Conduct Committee through Solví Conduct Hotline.

**The Conduct Hotline is available in four different forms:**

**Website:** [www.codigodecondutasolvi.com](http://www.codigodecondutasolvi.com)

**Toll-free phone numbers:**

Brazil: 0800 721 0742

Argentina: 0800 333 0776

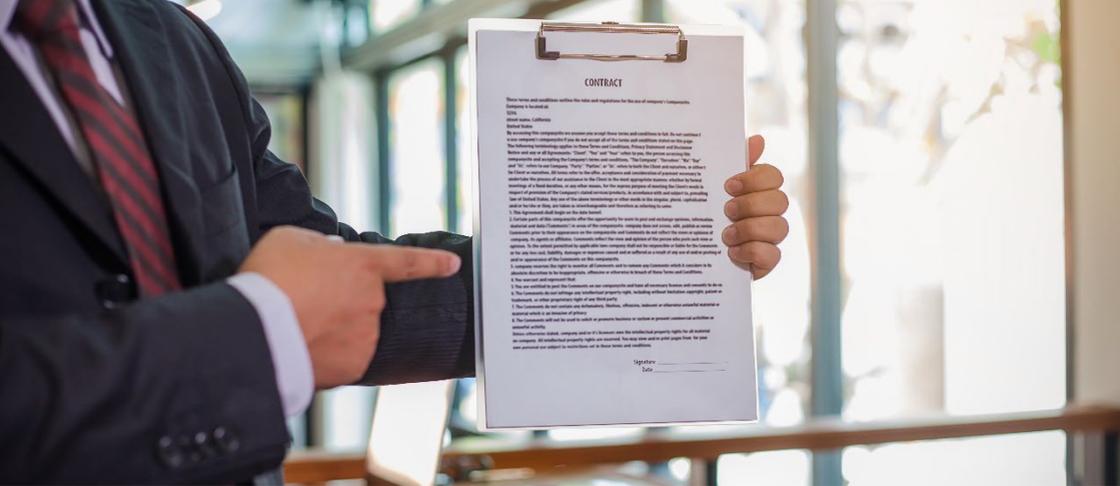
Bolivia: 0800 100 146

Peru: 0800 555 89

**E-mail:** [comite.conduta@solvi.com](mailto:comite.conduta@solvi.com)

**Mail:** Addressed to Solví – Conduct Committee: Caixa Postal 31.256 – São Paulo – SP

All reports of violations of this Code shall be handled in an impartial, clear, and objective manner by the Conduct Committee, which has the duty to review and recommend the applicable disciplinary action, if necessary.



## 16. Commitment Statement

Every member of the Management Board, member of Committees, member of the Executive Board, Director of a subsidiary, Employee, supplier, and service provider of Solví Group is responsible for knowing, accepting, complying with, and disseminating this Code of Conduct, in addition to ensuring compliance with the conditions hereof. They must also remain vigilant in the prevention and detection of conduct not compatible with this document, reporting any violations to the Conduct Committee, through the Conduct Hotline.

Once signed, the Commitment Statement (Exhibit I) will be filed with the Employee's dossier, and refresher training on the topic shall be provided every year. The relevant terms can be found at the end of this document.

## 17. Final Considerations

The adoption of this Code of Conduct is based on the mutual trust, cooperation, and solidarity relationship that exists between customers, Employees, shareholders, creditors, investors, suppliers, service providers, and other stakeholders, so that they act in an integrated, consistent, and ethical manner, conducting their dealings and business with the different interest groups and ensure the articulation for common success.

# 18. Exhibit I – Receipt and Commitment Statement

I, \_\_\_\_\_,  
position \_\_\_\_\_, hereby declare that I became aware of and understood the provisions contained in Solví Code of Conduct, revised as of May/2020, embedding the provisions of the current regulations – Act No. 12,846/13, whose copy was delivered to me hereunder, and I undertake to comply with all terms, conditions and ethical principles thereof when carrying out my duties.

I further declare that as a Manager, I am aware of my responsibilities and diligence for the dissemination of the Code among the teams, making everyone aware of the good practices.

Finally, I inform you that I commit myself to take the training and re-training at the required frequency.

Check according to your position.

Manager       Employee

\_\_\_\_\_  
(City, Date)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company

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Check according to your position.

Manager       Employee

\_\_\_\_\_  
(City, Date)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Company

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**Sustainable**  
Integrity Program

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