

	Integrity Policy Against Corruption and Bribery	Code:	POL.CPL.0001
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Integrity Policy Against Corruption and Bribery

Prepared by:	Verified by:	Approved by:
Internal Control and Compliance Department	Legal Department, Executive Officers appointed by virtue of the Articles of Incorporation and Audit Committee	Board of Directors

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1.0 – PURPOSE:

This Integrity Policy Against Corruption and Bribery aims to establish criteria for the prohibition of bribery and corruption practices in the conduct of business by Priner Serviços Industriais S.A. and its subsidiaries.

2.0 – GENERAL CONSIDERATIONS:

The policy is applicable to all Managers (Officers appointed by virtue of the Articles of Incorporation and members of the Board of Directors), members of the Advisory Committees, Employees and Third Parties who maintain relations with Priner Serviços Industriais S.A. and its subsidiaries, with reference to money laundering crimes and the Anti-Corruption Laws in force, to prevent, identify and combat acts of corruption and fraud.

3.0 – TERMS AND DEFINITIONS:

Managers: Officers appointed by virtue of the Articles of Incorporation and members of the Company's Board of Directors.

Government Official: A government official, national or foreign, is considered to be any and all persons who are part of the structure of any of the three branches of government who, whether temporarily or without compensation, exercise public functions, hold a position or work in: (i) a public position, job or public function directly in the Government or even in a quasi-governmental entity or in legal entities controlled, directly or indirectly, by the Government or a foreign State; (ii) a service provider company contracted or hired to perform a typical activity of the public administration; (iii) position in commission or in a management or advisory function of a direct administration body, government-controlled company, public company or foundation established by the government; (iv) agent of international public or non-governmental organizations (World Bank, United Nations, International Monetary Fund, etc.); and (v) candidates for political public office and affiliated with political parties.

Whistleblowing Channel: The Company's third-party channel that can receive reports of suspected or proven situations of non-compliance with the Company's policies, guidelines, standards and procedures, the Code of Ethics and Conduct, Anti-Corruption Laws and/or other laws or standards in force.

Employees: All employees, including the Company's officers not appointed by virtue of the Articles of Incorporation.

Advisory Committees: Non-statutory bodies that provide support to Priner's Board of Directors.

Corruption: The act of promising, offering or giving, directly or indirectly, or even requesting, receiving or accepting, an undue advantage to a Government Official, Private Agent, or a Third Party appointed by them, to influence them to do something that is dishonest or illegal, causing a breach with the legal order for the benefit of someone, to obtain, maintain or provide relevant business or benefits, or to demonstrably finance, fund, sponsor or in any way subsidize such practices. The following are forms of corruption: (a) Bribe-Paying: it is the act of offering or promising an Undue Advantage to a Government Official, to determine them to practice, omit or delay an act of office; and (b) Bribe-Taking: is the act of soliciting or receiving, for oneself or for others, directly or indirectly, even outside the function or before assuming it, but by reason of it, Undue Advantage, or accepting a promise of such advantage.

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Due Diligence: Procedure for carrying out a detailed survey of information about a person or company in order to assess risk conditions.

Compliance Team: Employees of the Internal Controls and Compliance department who are responsible for implementing and managing Compliance processes.

Fraud: Unlawful or bad faith act aimed at obtaining undue or increased advantages, for oneself or for Third Parties, usually by committing crimes or omissions, untruth, abuse of power, breach of trust, circumvention of rules, among others.

Internal Control and Compliance Manager: Employee responsible for monitoring and ensuring that all the Company's procedures and all activities performed by its employees are in compliance with the legislation and regulations in force. Ensuring corporate governance and that the organization's compliance policies are followed.

Malfeasance: An illegal act or an act contrary to the basic principles of public administration, committed by a Government Official during the exercise of public function or resulting from it, under the terms described in the Anti-Corruption Laws.

Anti-Corruption Laws: The Brazilian Anti-Corruption Law (Law No. 12,846/2013), Federal Decree No. 8,420/2015, the Penal Code (Decree-Law No. 2848/1940), the Malfeasance Law (Law No. 8,429/1992), the Bidding Law (Law No. 8,666/1993), the Money Laundering Law (Law No. 9,613/1998), the Antitrust Law (Law No. 12,529/2011), the Law of the Differentiated Regime of Public Procurement – RDC (Law No. 12,462/2011), the Conflicts of Interest Law (Law No. 12,813/2013), and other laws of a similar nature that are applicable.

Politically Exposed Persons (PEP): Government Officials who perform or have performed, in the previous five years, in Brazil or in foreign countries, territories and dependencies/organizations, positions, jobs or relevant public functions, as well as their representatives, family members and close employees.

Eligible People: Managers, members of the Company's Advisory Committees, Employees and Attorneys-in-Fact.

Priner and its Subsidiaries: It consists of the group of companies formed by Priner Serviços Industriais S.A. ("Priner") and the subsidiary companies of which Priner holds corporate control.

Third Party: Suppliers, service providers, customers, intermediary agents, attorneys and associates, among others.

Undue Advantage: Any property, tangible or intangible, including money and valuables, offered, promised or delivered for the purpose of influencing or rewarding any act or decision of a Government Official, PEP, or private agent. This includes gifts, entertainment, airline tickets, accommodation, donations, sponsorships or any other thing of value used for this purpose.

4.0 – GUIDELINES:

It is everyone's duty to conduct business with integrity, through ethical, transparent, honest and legitimate conduct. Thus, the Managers, members of the Advisory Committees, Employees and Third Parties are prohibited from offering and/or granting to any Government Official or Private Agent any undue advantage, monetary or not, or engaging in influence peddling with the objective of influencing decisions that affect the

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Company's business or obtaining a personal gain that may cause any impact on the Company's business interests.

In particular, the Company and its Managers, members of the Advisory Committees and Employees must observe and demand strict compliance with the Anti-Corruption Laws.

Relationships with Government Officials and Private Agents must always be based on ethics, transparency and professionalism and always conducted in accordance with applicable laws and the Code of Ethics and Conduct, this policy and other policies and guidelines of the Company.

4.1 – Corruption Prevention:

The Company may be held liable for the conduct of its Managers, members of the Advisory Committees, Employees and Third Parties, and it is therefore necessary to avoid ties with individuals or legal entities capable of causing damage to the Company's operations and image.

The hiring of Third Parties and Employees, including counterparties in corporate transactions carried out by the Company, will be submitted to prior analysis through the "Third Party Due Diligence Process", where information that may demonstrate evidence of misconduct will be investigated, or risks to the performance of the contract, which will be considered a *risk analysis*. Whenever evidence of this nature is identified, the Compliance team must be notified to analyze the situation and give its recommendation on whether or not to hire or even on the permanence of the relationship, leaving it up to the Procurement and People and Management areas to make the final and justified decision about hiring.

All agreements carried out by the Company must specifically contain an anti-corruption clause, which must be expressed as to its alignment with the applicable legislation, the Code of Ethics and Conduct and the Company's Integrity Policy Against Corruption and Bribery, except for specific exceptions authorized by the Executive Officers.

4.2 – Money Laundering:

Money laundering is the practice that aims to "clean" resources obtained through crime, masking their criminal origin by reintroducing them into the economy through apparently lawful operations.

The Company prevents and combats money laundering, and it is expressly forbidden for any Manager, member of the Advisory Committee and/or Employee to engage or facilitate acts that constitute a crime of money laundering. Thus, the Company shall not conduct business with fictitious or shell companies or with a Third Party that has dubious commercial activity.

4.3 – Examples of Prohibited Conduct:

It is strictly forbidden to:

- Give, offer, promise or authorize the offering of undue advantage to Government Officials and Private Agents or to a third person related to them, directly or indirectly, by another person or company acting on behalf of the Company.
- Authorize Third Parties to bribe Government Officials or Private Agents or to make payments to Third Parties, knowing that those Third Parties are likely to use such funds to bribe Government Officials or

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Private Agents or otherwise allow Third Parties to bribe Government Officials or Private Agents on behalf of the Company.

- c) Finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in this policy and in current legislation.
- d) Use an intermediary individual or legal entity to hide or disguise their real interests or the identity of the beneficiaries of the acts performed.
- e) Hinder the investigation or inspection activity of bodies, entities or Government Officials, or intervene in their performance, including within the scope of regulatory agencies and inspection bodies of the national financial system.
- f) Manipulate or defraud the economic and financial balance of contracts entered into with the Public Administration.
- g) Frustrate or defraud, by means of adjustment, combination or any other initiative, the competitive nature of a public bidding procedure.
- h) Give offer, promise or authorize the making of "facilitation payments" to a Government Official, with the objective of encouraging the initiation or acceleration of a process or procedure that is the responsibility of the Government Official to perform or conduct.
- i) Prevent, disturb or defraud the performance of any act of public bidding procedure.
- j) Remove or seek to remove another bidder, through fraud or offering an advantage of any kind.
- k) Receive, for oneself or for another person, money, movable or immovable property, or any other economic advantage, directly or indirectly, by way of commission, percentage, gratuity or gift from anyone who has an interest, direct or indirect, that may be affected or supported by action or omission arising from the duties of the Government Official.
- l) Receive an economic advantage of any kind, directly or indirectly, to tolerate the exploitation or practice of gambling, pimping, drug trafficking, smuggling, usury or any other illicit activity, or accept the promise of such advantage.
- m) Receive economic advantage of any nature, directly or indirectly, to make a false statement about measurement or evaluation in public works or any other service, or about the quantity, weight, measure, quality or characteristics of goods or products supplied to any Government Official and/or Private Agent.
- n) Offer employment, commission or carry out consulting or advisory activities to an individual or legal entity that has an interest likely to be affected or supported by action or omission arising from the duties of the Government Official, during the activity.
- o) Receive an economic advantage to intermediate the release or application of public funds of any nature.
- p) Receive an economic advantage of any nature, directly or indirectly, to omit an official act, measure or declaration to which he/she is obliged.
- q) Incorporate, in any way, to its equity any property, incomes, funds or values that are part of the assets of Government Officials.

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4.4 – Interaction with Government Officials:

The rules of interaction with Government Officials must be strictly observed by all Managers, members of the Advisory Committees and/or Employees, under penalty of disciplinary measures and even the interruption and/or termination of agreements and contracts with Third Parties in case of violation of this Policy.

The Company's Employees are expected to behave with integrity and transparency in all interactions with Government Officials, including during any inspections carried out at the Company's facilities or during obtaining licenses and authorizations from the Government.

Employees must communicate accurately and completely, as well as keep all communications made with Government Officials recorded and documented.

Communications with Government Officials must occur exclusively through official channels, such as the Government Official's functional electronic address, telephone number of public offices and official letters with the letterhead and numbering of the Government.

Meetings with Government Officials, both virtual and face-to-face, must have the participation of at least two (2) Company Employees and the existence of a prior agenda must be observed, indicating the scheduling of the meeting, the issues that will be dealt with and the Employees and Government Officials who will participate.

Within 5 business days after the meeting, the Employees who interacted with such Officials must forward the meeting agenda to the Compliance area, containing the topics discussed during the virtual or face -to-face meeting, indicating the date, time, place, participants, procedure adopted to schedule the meeting and with the signature of the Employees present during the meeting.

If any Employee receives any request for payment or receipt of undue advantages, the request must be immediately rejected and reported to their immediate manager and to the Compliance Officer, directly or through the Whistleblowing Channel.

Likewise, if any Employee knows or believes that any undue advantage has been or may be materialized within the scope of the Company, he or she must report such information directly to the Internal Control and Compliance Manager or through the Whistleblowing Channel indicated in the Company's Code of Ethics and Conduct.

4.5 – Public Bids:

The Company participates in Public Bids, the procedure of which requires the interaction of the Company with the Government. For this reason, all Employees involved in Public Bids must comply with the rules set forth in this Policy, especially those described below.

The areas responsible for conducting the bidding processes, in the public bidding processes, must follow the appropriate policies and procedures approved by the Company's Board of Directors and Executive Officers (appointed or not by virtue of the Articles of Incorporation), as well as the Company's jurisdictional rules. In addition, other measures must be observed by Employees who act in public bids for the Company, such as:

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- a) They must treat the matters discussed with absolute confidentiality, and it is forbidden to share information with people not involved in the bidding process, including about the Company's participation or not in the bidding process.
- b) They must act independently in the decision to participate or not in the bidding, in the analysis of the public notice, in the determination of the value of the proposal, in the challenge or filing of an appeal. Any alignment with third parties, especially competitors, is strictly prohibited.
- c) They must refrain from contacting, by any means, the bidding or competing Government to obtain information not available in a public source or unavailable in the market.
- d) Any conduct that may inhibit the competitive character of the competitions is prohibited.
- e) Contacts with Government Officials can only occur through formal communication to those involved in the event and to the Executive Officers. If the contact is by phone, as soon as it is closed, a written report of the main points discussed must be sent to the Compliance team. In the event of an exchange of e-mails, those involved and at least one member of the Executive Officers must be in copy in all communications.
- f) In case of a face-to-face public event or any meeting with a Government Official, at least two (2) Employees must be present, observing the rules set forth in item 4.4 of this Policy.
- g) All actions and communications related to the public tender must be registered and filed for a period of up to five (5) years.

The same precautions during interaction with Government Officials must be observed in interactions with private parties during and after the closing of the bidding process.

4.6 – Hiring of Government Officials or Former Government Officials:

The hiring of Government Officials or former Government Officials, as well as PEP (Politically Exposed Persons), may expose the Company to integrity risks. Such contracts can only occur based exclusively on the contractor's technical knowledge and/or to offer technical assistance to the Company's decisions. Under no circumstances will the contracting be allowed to facilitate the Company's access to the Government or to obtain Privileged Information.

Special attention must be given to the period of impediment to the hiring of former Government Officials, thus complying with the legal provision in force.

In addition, attention should also be paid to hiring family members or relatives, or partners of Government Officials, since this modality can be used as a way to hide illegal activities, in addition to generating conflicts of interest described in the Company's Code of Ethics and Conduct.

All the cases described above, which are part of item 4.6, must be evaluated individually and the hiring of individuals subject to such provisions must be analyzed by the Compliance area, which may request the support of the Internal Ethics Committee for approval, if necessary, as well as apply any mitigating measures. After any approval by the Compliance area and the Internal Ethics Committee, when it is involved, the hiring may be concluded with the participation of two (2) officers, at least one (1) of which appointed by virtue of the Articles of Incorporation.

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4.7 – Hiring of Third Parties:

The Company prioritizes respect for integrity in the hiring process of its Third Parties, therefore, any act of corruption in the relations of such Third Parties with the Company is prohibited.

In this context, even if the hiring of Third Parties does not have the immediate objective of intermediating the relationship with the public administration, this fact may occur during the performance of the contract, generating a risk to integrity.

In order to reduce the risks that its Managers, members of the Advisory Committees and/or Employees may be involved or have their names in any way associated with acts of corruption or fraud, due to the performance of Third Parties (public or private), the Company adopts the following measures for the hiring and supervision of Third Parties:

- a) Conduct business only with Third Parties who have an unblemished reputation and integrity and who are technically qualified.
- b) Analyze technically and qualitatively certain suppliers and service providers before they are hired.
- c) Conduct due diligence of the Third Party considered eligible at the company's discretion, through the collection of independent information, under the Company's responsibility in terms of what is considered relevant for the hiring, in addition to filling out the appropriate form, without prejudice to the request for additional information or other documents that are considered relevant in each case.
- d) It is not allowed, under any circumstances, that any Third Party, acting on behalf of the Company, exerts any type of improper influence on any person, whether or not a Government Official.
- e) The hiring of a Third Party who has been indicated or recommended, even informally, by Government Officials is not allowed.
- f) Contracting must be carried out in a transparent manner and based on technical criteria (price, quality, history, etc.).
- g) During the bidding process or after contracting, the Third Party may not receive or offer any type of gift or entertainment, from or to any person, individual or legal entity, whether a Government Official or not, that may improperly influence or compensate an act or decision, as actual or intended compensation for any benefit of the company and its partners.
- h) The hiring process must be documented and formalized by signing a contract.
- i) The Third Party will be required to be aware of and declare its adherence to the Code of Ethics and Conduct and this Policy, through anti-corruption clauses and awareness of the policy present in the contracts signed.
- j) A fine, suspension or interruption of activities, termination of the contract will be imposed, without prejudice to other applicable measures, if the Third Party violates the Code of Ethics and Conduct, this Policy or the Anti-Corruption Laws.

4.8 – Due diligence process:

The due diligence process of service providers and suppliers will be analyzed and carried out by the Compliance team and/or the Company's Procurement team and/or contracting sector. If any sensitive

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information related to corruption is identified, it must be reported immediately to the Internal Ethics Committee.

The due diligence process is done through a web technological platform for third-party risk assessment through consultations with various public and private databases, such as the transparency portal, the Internal Revenue Service, among others.

4.9 – Political Participation:

Employees, Managers, members of the Advisory Committees, representatives, suppliers or service providers are prohibited from making, on behalf of the Company, any contribution in value, goods or services to campaigns or political causes.

The Company respects the involvement of all Employees in civic affairs and participation in political processes. However, such participation must occur in the professional's free time, at their own expense and in compliance with the guidelines of this Policy, as well as the Code of Ethics and Conduct. On such occasions, the person involved must make it clear that manifestations, positions and opinions are his/her own and do not portray those of the Company.

The Company's resources, space and image may not be used to serve personal or partisan political interests, and the Company does not make political contributions, whether to candidates, political parties, party representatives or similar campaigns, as prohibited by law.

4.10 – Corporate Transactions – M&A:

The Company may be held liable for unlawful acts practiced by partners or companies in which it has any interest resulting from partnerships, joint ventures or mergers, acquisitions and other corporate restructuring. In order to avoid such situations, the Company undertake to observe the following procedure:

- a) Review the target company's compliance history, including previous investigations, fines, penalties, and any litigation.
- b) Checking regulatory registrations and licenses to ensure that the target company is compliant with all legal requirements.
- c) Evaluate the existence and effectiveness of the target company's compliance policies and procedures.
- d) Evaluate the corporate governance structure of the target company, including the composition of the board of directors and audit committees, when applicable.
- e) Review internal controls and audit systems aiming at the financial and operational integrity of the target company.
- f) Evaluate the organizational culture of the target company in relation to ethics and compliance.
- g) Check for compliance and ethics training programs for employees.
- h) Plan the integration of compliance policies with the acquiring company.
- i) Seek partners or target companies that have the same commitment to the ethical values adopted by the Company in its Code of Ethics and Conduct and in this Policy.

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- j) Carry out a careful due diligence process that encompasses tax, accounting, financial and legal analysis, as well as include in the respective contracts anti-corruption clauses appropriate to the intended purpose, in addition to indemnity clauses for any liability that may be attributed to the target company.
- k) Request adherence to the Code of Ethics and Conduct and this Policy.
- l) The Company will make its best efforts so that, after the closing of the partnership or acquisition, the respective company implements the same Compliance rules adopted by it, such as a whistleblowing channel, gift policy and hiring of third parties, among others.

4.11 – Donations, Sponsorships and/or Philanthropic Contributions:

Donations, Sponsorships and/or Philanthropic Contributions must be conducted with impartiality, transparency and ethics, and must go through the analysis processes of the Compliance team, which is responsible for verifying adherence to current legislation and our Code of Ethics and Conduct. Donations to Government Officials are prohibited.

4.12 – Gifts and Similar:

- a) It is strictly forbidden to offer or receive gifts and the like in the form of money, regardless of their value.
- b) A gift or similar should not be offered or received as an improper means to exert influence or even in the face of the possibility of being interpreted as a bribe.
- c) No gift or similar may be offered or received with the purpose of influencing or altering a decision that may benefit any of the Managers, members of the Advisory Committees, and/or employees.
- d) The total value of gifts and similar allowed for annual receipt per employee must be up to R\$400.00 (four hundred reais).
- e) Gifts or similar with a commercial value greater than R\$200.00 (two hundred reais) must be expressly and jointly approved by the immediate manager and the director of the area, as well as the Compliance team, through the email compliance@priner.com.br.
- f) Any payment through which an action, service or government act can be expedited or aimed at ensuring the performance of an action or service in relation to its normal conditions is prohibited.

SUMMARY TABLE	
	The granting of gifts should be done in a generalized way, without individualizing those who receive them.
	The value of gifts or similar granted or received may not exceed R\$200.00 (two hundred reais) for each Employee. Annually, limit of R\$400.00 (four hundred reais). Above R\$200.00 (two hundred reais), they must have the express and joint approval of the immediate manager and the director of the area, as well as the Compliance team.
	Above this amount, acceptance must be preceded by authorization from the immediate manager, department leader and area board, as well as analysis by the Compliance team.

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It is forbidden to accept or offer gifts, hospitality and entertainment during the process of quoting, contracting or renewing a contract.

In case of doubts as to whether or not to accept a gift, gift, among others, the Compliance area should be consulted, through the e-mail compliance@priner.com.br.

4.13 – Records and Accounting:

The Company is required by law to maintain accounting and financial records that accurately, timely and fairly reflect all transactions, its competence and assets in detail. This record keeping applies to all transactions regardless of amount, not just those that may be considered material to the financial statements and regulatory filings.

The requirement includes recording obligations and assets under the accounting accrual regime and the adequate maintenance of all documents, respecting all current accounting rules and principles.

All Employees must adequately inform the responsible areas about any transactions and payments so that they are duly verified, justified and recorded in the accounting records.

All supporting documentation for transactions must be kept for at least five (5) years, unless a longer period is required by specific legislation.

It is expressly forbidden to falsify or mischaracterize transactions in the Company's financial records.

The Company is audited by an independent external auditing firm registered with the Brazilian Securities and Exchange Commission, which reports to the Audit Committee, a Management body that advises the Board of Directors.

The Company does not accept and does not support any initiatives related to processes made to conceal or legitimize illicit financial resources, such as: "slush funds", unusual forms or complex patterns of payment, unusual transfers to/from countries unrelated to the transaction, tax evasion, money laundering or transactions involving places previously associated with "money laundering" or tax evasion.

Any indications of occurrences related to the above or similar topics must be immediately communicated to the direct manager and the Compliance team.

4.14 – Whistleblowing Channel:

Whenever any actual or suspected violation of this Policy is observed, as well as any other policy and/or guideline of the Company or the Anti-Corruption Laws, committed by Employees, Third Parties, Managers or members of the Advisory Committees, when in the exercise of their professional activities, the fact or suspicion must be immediately reported to the Internal Control and Compliance Manager, directly or through the Whistleblowing Channel, so that the appropriate measures can be taken, thus preserving the business, its image and reputation of the Company and its Employees.

The Whistleblowing Channel receives anonymous or identified reports and can be used by both internal and external audiences. Every report received will be treated with impartiality, transparency and confidentiality. No retaliation against the whistleblower will be allowed when carried out in good faith.

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The prohibition of retaliation provided for herein will not prevent the adoption of appropriate disciplinary measures if the internal investigation concludes that the complaint is false and/or was made in bad faith.

All complaints must be accurate and contain all possible circumstantial elements to allow for an adequate assessment to be carried out by the Internal Ethics Committee on the matter, in addition to being accompanied, whenever possible, by evidence.

The confidentiality of any complaints received will be guaranteed.

The Whistleblower Channel can be accessed via the website <https://www.contatoseguro.com.br/denunciasgrupopriner> or by telephone at 0800 155 0010.

4.15 – Disciplinary Measures:

Violation of the Anti-Corruption Laws may result in civil and administrative liability of the Company, as well as criminal, civil and administrative liability for the individuals involved, for relevant action or mission, in unlawful facts. Such penalties can be imposed by Brazilian and foreign government entities, even if the offense occurred only in one country.

Employees who may be in violation will be subject to the disciplinary sanctions provided for in any policy in force and in the Code of Ethics and Conduct, in which case the Company will be entitled to take the appropriate administrative, civil and criminal measures, as the case may be.

Third parties who may be in breach will be subject to the applicable contractual commercial sanctions, including immediate contractual termination, with the application of the penalties resulting from the termination, without prejudice to an action for damages and other applicable legal measures.

Disciplinary measures will be determined based on the nature and severity of the infraction committed, after due investigation conducted by the Compliance team and deliberated by the Internal Ethics Committee.

4.16 – Reporting and Questions:

It is the responsibility of all Employees and Third Parties to ensure compliance with this Policy. Indications of non-compliance or questions regarding compliance with this Policy, the Code of Ethics and Conduct and the Anti-Corruption Laws, must be reported to the Compliance team and/or to the Whistleblowing Channel.

The Company does not tolerate retaliation of any kind against any person, internal or external, who reports in good faith a violation or suspected violation of this Policy or its Code of Ethics and Conduct, and confidentiality is guaranteed about the identity of any person who reports any violation or suspected violation. The practice of retaliation is subject to disciplinary measures that may result, including the dismissal of the Employee or termination of contract, as the case may be.

5.0 – REFERENCE DOCUMENTS:

- Code of Ethics and Conduct
- Brazilian Penal Code
- Law No. 8,137/1990 ("Law of Crimes against the Economic Order")

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Internal Control and Compliance Department	Legal Department, Executive Officers appointed by virtue of the Articles of Incorporation and Audit Committee	Board of Directors

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- Law No. 8,429/1992 ("Administrative Improbity Law")
- Law No. 8,666/1993 ("Bidding Law")
- Law No. 12,813/2013 ("Conflict of Interest Law")
- Law No. 12,846/2013, regulated by Decree No. 8,420/2015 ("Brazilian Anti-Corruption Law")

6.0 – ROLES AND RESPONSIBILITIES:

6.1 – Board of Directors:

- Approve the Policy.
- Ensure the efficiency of the Company's Compliance Program autonomously.

6.2 – Internal Ethics Committee:

- Ensure compliance with the Code of Ethics and Conduct.
- Ensure that disciplinary action is taken when compliance failures are identified.
- Resolve on disciplinary measures to be applied in cases of well-founded complaints.

6.3 – Executive Officers

- Ensure the efficiency of the Company's Compliance Program autonomously.
- Implement the Policy guidelines.
- Monitor the Policy guidelines with the Internal Controls and Compliance Department.

6.4 – Employees:

- Observe and ensure compliance with this program, being able to contact, when necessary, the Compliance team for questions, using the e-mail compliance@priner.com.br.
- Participate in compliance training and actions and/or events.
- Immediately report any irregularities, violations and potential violations of the Company's policies, guidelines, procedures and standards and applicable legislation.

6.5 – Managers:

- Disseminate the Compliance Program.
- Stay informed, ensuring that employees understand the applicable laws and the Company's Policies and guidelines.
- Set an example, acting in accordance with the Company's standards of ethics, integrity and transparency.
- Maintain an open and transparent relationship with other employees.
- Sponsor and participate in compliance training and actions and/or events.

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- f) Report to the Compliance team events that may bring the Company's compliance risks, through the e-mail compliance@priner.com.br.

6.6 – Internal Control and Compliance Manager:

- a) Manage the Company's compliance activities.
- b) Analyze compliance issues and make recommendations.
- c) Manage and conduct Compliance training, with disclosure of the Company's policies and Code of Ethics and Conduct.
- d) Ensure the integration of the obligations of the Compliance area into the Company's existing policies, guidelines, procedures and processes.
- e) Support and monitor the performance of the Compliance and Internal Control teams.
- f) To ensure and disseminate the Company's culture of compliance.

6.7 – Compliance Team:

- a) Provide training on the Code of Ethics and Conduct and other topics related to the Compliance Program, as well as follow/monitor training, promoting all necessary resources.
- b) Carry out due diligence processes with Third Parties that have a relationship with the Company, whether by commercial partnership, service/supply contracting process, corporate transactions, as well as background checks of the Managers and members of the Advisory Committees.
- c) Actively act in the whistleblowing channel.

6.8 – Internal Control Team:

- a) Perform a critical evaluation of policies, guidelines and/or processes regarding internal and external rules.
- b) Monitor an outsourced auditing company and/or perform internal audits.

7.0 – ANNEXES:

Not applicable.

8.0 – APPROVAL AND VALIDITY:

This Policy must be approved by the Board of Directors of Priner Serviços Industriais S.A.

This Policy will remain in force indefinitely.

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9.0 – REVISION CONTROL:

REVISION	DATE	DESCRIPTION OF THE CHANGE
3	11/23/2022	1. Inclusion of the document classification; 2. Inclusion of reference documents; 3. Inclusion of the Revision Control; 4. Change in the formatting of the document; 5. Amendment to item 2.3 – Gifts and similar; 6. Inclusion of Business Partners in item 2.4.1; 7. Change in the item Donations and Sponsorships; 8. Amendment to item 2.9 – Training and Monitoring; 9. Inclusion of the Whistleblowing Channel in item 2.10; 10. Amendment to item 2.12 – Declaration of commitment; 11. Inclusion of terms and definitions in item 3.0.; and 12. General drafting changes.
4	3/29/2023	1. Amendment to item 2.6 – Donations and Sponsorships
5	12/20/2024	1. Amendment and inclusion of terms and definitions in 3.0 – TERMS AND DEFINITIONS. 2. Amendment to item 4.0 – GUIDELINES. 3. Inclusion of item 4.1 – Corruption Prevention. 4. Inclusion of item 4.2 – Money Laundering. 5. Amendment to item 4.3 – Examples of Prohibited Conduct. 6. Inclusion of item 4.4 – Interaction with Government Officials. 7. Inclusion of item 4.5 – Public Bids. 8. Amendment to item 4.8 – Due diligence process. 9. Amendment to item 4.11 – Donations, Sponsorships and/or Philanthropic Contributions. 10. Inclusion of the Summary Table in item 4.12 – Gifts and Similar. 11. Change of the link to the Whistleblowing Channel in item 4.14 – Whistleblowing Channel. 12. Amendment to item 4.15 – Disciplinary Measures. 13. Inclusion of item 4.16 – Reporting and Questions. 14. Inclusion of item 5.0 – ROLES AND RESPONSIBILITIES. Amendment to item 7.0 – REFERENCE DOCUMENTS.

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