

# Code of Ethics and Conduct

Priner

7th edition



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When we wrote this Code of Ethics and Conduct, we put ourselves in the shoes of those who touch us: the shareholders who entrust us with their financial capital, the community that gives us its environment and its people, our employees who transform work into the energy of their family, our suppliers who also embrace our challenges and the customers who welcome us in their houses.

Let us do for others what we would like them to do for us. The difference between right and wrong is simply that we are proud of what is right and ashamed of what is wrong.

Please read and understand our work ethics guidelines and make it a link to our commitment to sustainable growth. For our part, we will comply to the letter.

## Tulio Cintra | CEO



# Pillars of the Code of Ethics and Conduct

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- Be honest, fair, and transparent in any situation.
- Act within the law and in accordance with the Priner's policies.
- Say no to any type of prejudice and/or discrimination!
- Always do the right thing. If in doubt, seek advice.
- Be committed, serving everyone adequately with quality safety, agility and effectiveness.
- Do not receive or offer any gift or present that constitutes an advantage, as well as do not act in a way that constitute corruption/fraud or even that may appear to be corruption and/or fraud.
- Always act with social and environmental responsibility, understanding and respecting the needs of the regions where it operates, ensuring the responsible use of natural resources.
- Do not disclose information that is not public knowledge or without proper authorization.
- In your relationship with other people, have a posture and attitude that you would like them to have with you.
- Make your actions something you can be proud of when you talk about them.
- Remember that achieving a good reputation is the result of collective effort and must be a daily duty.
- If you notice any irregularity listed in our Code of Ethics and Conduct, report it immediately through the Whistleblowing Channel!
- Take care of the Priner at all times, you are part of it!

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# Purpose and Scope

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The Priner strives for the highest standards of integrity, transparency and reliability for the conduct of all its business and relationships. For this reason, this Code of Ethics and Conduct (or simply “Code”) has been inspired by the Priner’s values and designed to help achieve such standards, presenting the fundamental principles of integrity and business ethics that guide its activities and relationships, strengthening its identity.

This Code applies to all audiences with which we relate, in particular: Employees, third parties, suppliers, managers, service providers and other business partners of the Priner companies (“Eligible Audience”), in all operating units.

The Code should serve as a reference for all decisions and actions in the development of our activities, and should be analyzed in conjunction with the Priner’s internal policies, as available on the Company’s website:

[www.ri.priner.com.br](http://www.ri.priner.com.br)

We emphasize that the Code of Ethics and Conduct is in line with current laws and indicates the minimum and non-negotiable standards of behavior to be followed, including the rules, beliefs and values of the Priner. However, it does not exhaust all the situations that may occur. If you have any questions about its content or application, please contact the channels informed at the end of this document.



## Our Purpose

Build and preserve industrial assets through people development, protecting lives and the environment.



## Our Vision

Expand our market through an innovative portfolio, making the Priner a choice of value and reliability for related parties.



## Our Values

Todos devem respeitar os valores da Priner:

- We do what is right
- We stay close
- We deliver with excellence

# Compliance with Laws and Similar

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The Priner's business must comply with:

- Laws in force in the territories where we operate;
- Standards (internal or external);
- Priner Policies and Guidelines;
- Voluntary or compulsory regulations and commitments;
- 'The Company's values and beliefs; and
- This Code of Ethics and Conduct.

Ignorance of a legal or normative obligation cannot be used as a defense against the possible consequences of misconduct.

Thus, it is the responsibility of the entire Eligible Audience covered by this document to act ethically and with integrity, as well as to know and ensure compliance with the laws and rules applicable to their professional activities - which includes this Code and the Priner's Policies and Guidelines.

In case of doubts, the Eligible Audience should:

- Always consult the policies, guidelines, procedures and standards of the Priner before acting.
- Align understandings with their direct managers, or consult the heads of the departments/areas of the Priner to ensure adequate performance.
- Consult the Manager Responsible for the contracting, in cases of supply, service provision or commercial partnership.

For other cases, consult the Compliance area:

**[compliance@priner.com.br](mailto:compliance@priner.com.br)**



# ESG Commitment

For the Priner, ethics and integrity represent values reflected, in a transversal way, in all our activities, as well as in our relationships with people and the Planet.

Focused on building and preserving industrial assets - and connected to its purpose of developing people, protecting lives and the environment - the Company includes sustainability as a fundamental pillar of its culture, seeking balance between the economic-financial, governance, environmental and social dimensions.

Since 2020, the year of the IPO, the Priner has been part of the Novo Mercado, a listing segment of B3 composed of organizations that maintain governance practices superior to those required by law, ensuring additional rights to minority shareholders, in addition to the wide disclosure of information about their activities and performance. In line with this commitment, this Code of Ethics and Conduct incorporates the Company's governance guidelines.

The Parent Company (Priner Serviços Industriais S.A.) has the following bodies in its Corporate Governance:

- Board of Directors;
- Audit Committee;
- People Committee;
- Executive Officers;
- Secretariat of Governance.

To learn more about the Priner's Corporate Governance bodies, visit: <https://ri.priner.com.br>



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The Priner acts responsibly to grow and prosper in harmony and respect for the environment, in the segments and regions in which it operates. In addition to ensuring legal compliance, the Company seeks to minimize the negative impacts and enhance the positive ones resulting from its operations, assuming the commitment to continuous improvement of its environmental management.

Learn about our environmental guidelines by accessing our Environmental Management Policy: <https://ri.priner.com.br>

Human development, in turn, is at the heart of the Priner's culture and strategies. In this way, the Company is committed to respecting Human Rights, creating safe and healthy working conditions, with guidelines aimed at individual and collective development, in an environment that values the respect and appreciation of each individual. In addition, in full respect for the communities in the regions where it operates, it has been dedicating efforts that contribute to collective prosperity and a fairer society.

Learn about our fundamental commitments for a sustainable journey by accessing the Sustainable Management Policy: <https://ri.priner.com.br>



# Relationship with Shareholders

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The Priner has a Policy for the Disclosure of Material Information, complying with the requirements of the Brazilian Securities and Exchange Commission (CVM). Following this concept, the communication of information seeks to be accurate and transparent, which allows monitoring the Company's activities and business.

The Company maintains dialogue channels always open with its shareholders, except in cases where the confidentiality of the information is justified.

The relationship with shareholders and investors follows compliance with current legislation and approved policies, regardless of the percentage of their interest in the capital stock.

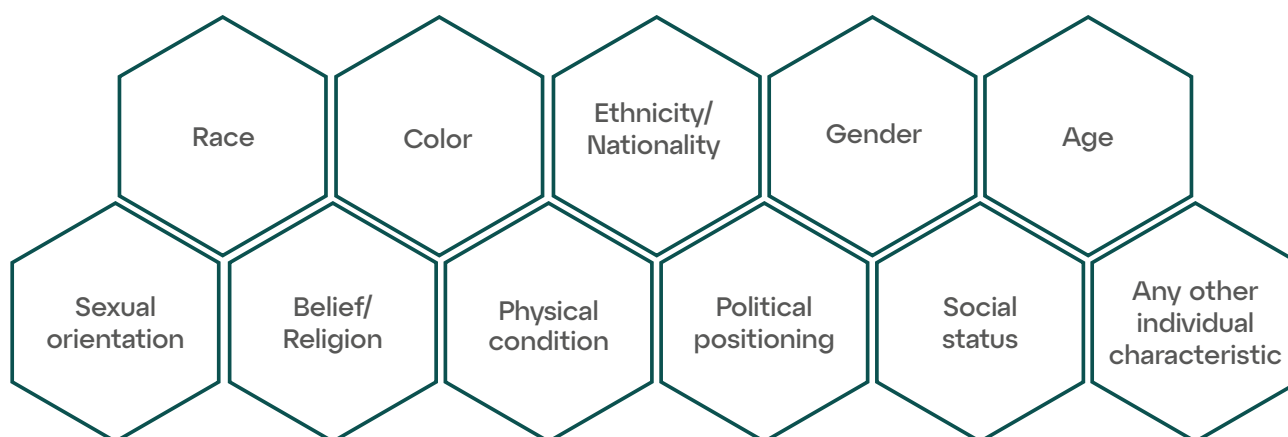
Following this concept, the Priner has opted for a corporate model in which all shares have voting rights.



# Relationship with Employees

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At Priner, regardless of role, function or position, all people must be treated with total respect and attention. Thus, the Company combats – and does not tolerate – any type of discrimination or prejudice, of any nature, such as those related to:



## Occupational Health and Safety

The Priner is committed to offering healthy and safe conditions to minimize risks to Employees, as well as to anyone who is in its facilities, in the development of its activities. In this sense, it provides clear guidelines for compliance with general health and safety standards at work, established by the Priner Priner and by current legislation, including training and the provision of personal protective equipment.



# Discrimination and Harassment

The Priner **does not tolerate** any form of prejudice, discrimination, racism, homophobia, moral and sexual harassment, as well as any situation of humiliation, intimidation, hostility or embarrassment practiced by the eligible Audiences or directed at this audience. We advise that the above situations be reported to the Whistleblowing Channel.

## Bullying

Moral Harassment is the exposure of an individual (people eligible for this Code) to humiliating and embarrassing situations with behaviors, words, acts, gestures or writings that may cause damage to personality, dignity or physical and psychological integrity, in a repetitive and prolonged way, in the exercise of their functions, and which, ultimately, destabilizes the victim's relationship with the work environment and the organization. The Priner strongly repudiates moral harassment.

Examples of attitudes that characterize bullying:

- Stipulate humiliating tasks;
- Yelling or speaking disrespectfully;
- Spreading rumors or spreading offensive rumors;
- Assigning pejorative nicknames;
- Imposing vexatious punishments (dances, gifts);
- Posting derogatory messages on social networks.

## Sexual harassment

Sexual harassment is the act of embarrassing, verbally or physically, someone with the objective of sexual favoritism, with the agent taking advantage of his superior status or influence inherent to the exercise of his work, position or function, to pressure the victim. Just like bullying, sexual harassment is not tolerated by the Priner.

Examples of attitudes that characterize sexual harassment:

- Insinuations;
- Forced physical contact;
- Invitations, comments, impertinent physical contact, conditioned or not to factors such as job maintenance, promotions and growth offers;
- Various types of threats to gain sexual advantage or that puts the individual in an unwanted sexual context.



All situations of discrimination and harassment must be reported through the Whistleblowing Channel.

**Access the website:** [www.contatoseguro.com.br/denunciaspriner](http://www.contatoseguro.com.br/denunciaspriner)

**Phone:** 0800 155 0010

# Use of Alcoholic Beverages and Other Substances

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The Priner **prohibits** the ingestion of alcoholic beverages during working hours and environments – of the Priner or of customers – as well as in the exercise of professional functions and access to the place where activities are carried out in a state of intoxication.

The use and possession of drugs are also prohibited, as well as the permanence in the work environment in an altered state due to the use of these substances, which can affect the safety and performance of both the professional and his or her co-workers.



# Carrying of Weapons

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We do not allow the carrying of any type of weapon on the company's premises, whether it is a knife (sharp or piercing artifact), fire, shock or even toys and other objects that imitate a weapon, except for professionals legally authorized to use them, supported by prerogative, due to the function and/or legislation, such as watchmen, security guards and escorts, as long as their activities require it.



# Slave and Child Labor

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The Priner prohibits, both on its premises and in its suppliers (including their subcontractors) and business partners, forced labor, slavery or in conditions similar to slavery, as well as the use of child labor.

If minors between 16 and 18 years of age are hired as young apprentices, the laws in force in the country must be followed, with the guarantee of non-interference in studies.



# Relationship with Customers

It is the responsibility of all our employees and partners to adequately serve customers, with quality, safety, agility, effectiveness, transparency and fair price, guided by social and environmental responsibility and broad respect for legislation.

Our mission is to serve the customer with high productivity, results-oriented management and firm commitment to safety.

The Priner defends the right to terminate a business relationship with a customer whenever there is prejudice to its interests or disregard of legal, social, tax, integrity, compliance and environmental and health and safety issues.

As we are a company that values transparency, information about our products and services must always be clear and objective. Technical data, in particular safety, health and environmental requirements, will be mandatorily informed to customers.

Each product must strictly follow the legal requirements of the market to which it belongs.



It is forbidden to promise, grant or acquire any type of benefits or even receive or make improper payments to any person, with the intention of facilitating the sale of Priner products or services, even at the cost of losing a business opportunity (according to the Integrity Policy Against Corruption and Bribery).

It is the responsibility of all of us, employees of the Priner, to ensure confidentiality.



# Relationship with Suppliers

The registration and contracting of suppliers will be based on technical and professional criteria, considering factors related to cost, quality, deadline, Health, Safety and Environmental requirements, and compliance, as well as compliance with legal requirements and other specifications or relevant business decisions, and must be fully understood and accepted by the suppliers.

Contracting will follow the principles of free competition and participation of bidders, and it should be prevented from doing business with suppliers that do not comply with the contracting requirements of this Code.

The relationship with suppliers will be of respectful and appropriate treatment, regardless of the position or hierarchical position of any party.

The hiring of suppliers who are related to an Employee - or equity interest in any of the companies of the Priner must comply with the Conflict of Interest chapter.

Just like the Company's Employees, suppliers, their employees and subcontractors, who carry out activities contracted by the Priner, must observe our values and principles.

It is the responsibility of suppliers and service providers to diligently and appropriately instruct their employees, agents and subcontractors regarding the guidelines of this Code, as well as with respect to the specific policies and standards of the Priner, in order to prevent misconduct.

The Priner conducts due diligence to verify the background of the companies that participate in the selection for supply and provision of services, with validation with the Procurement and Compliance areas and, with the objective of restricting the hiring of partners who do not comply with the rules of this Code, the Company's Policies or current Brazilian legislation.



# Relationship with Competitors

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The Priner conducts its business by the principle of free competition and requires its Employees, third parties, service providers, suppliers and managers to always act in accordance with current competition law, in the various locations in which it operates.

All market and competitor information, legitimate and necessary for the business, must be obtained through transparent and reputable practices. Illegal means, such as:

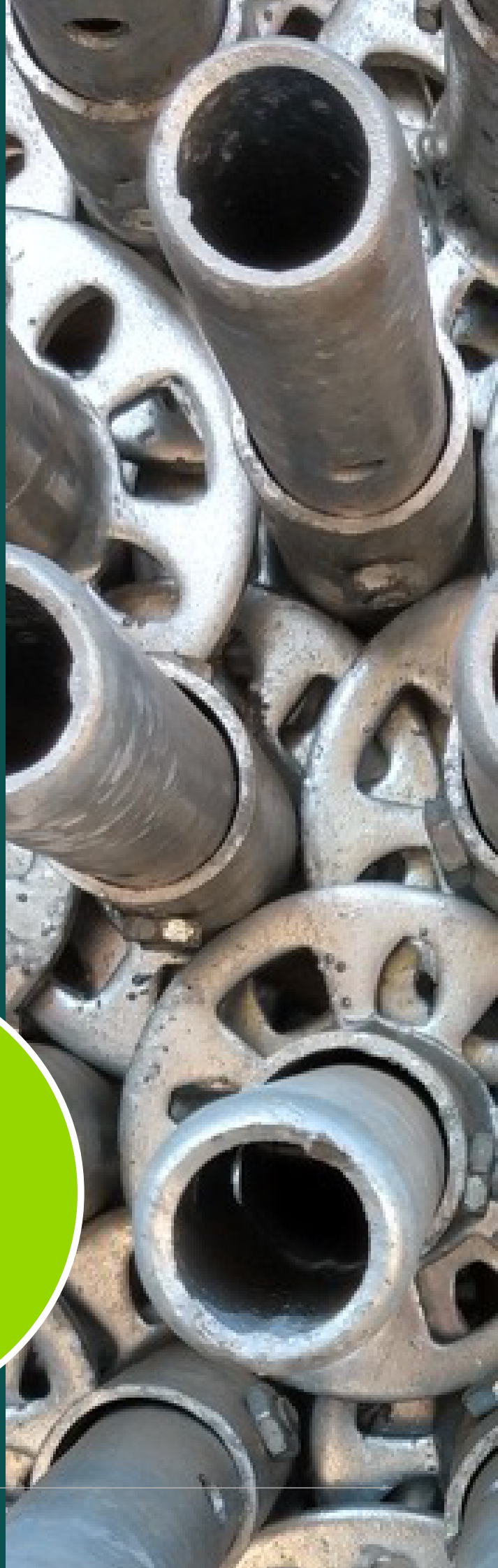
- Exchange of privileged and confidential information with competitors;
- Adoption of any attitude that discredits the image of business partners or competitors of the Priner by its Employees, as well as its managers, suppliers, service providers or those who represent it;
- Understandings with competitors aiming at abuse of economic power;
- Arbitrary commercial practices or limitation of competition, such as agreements to fix or control prices;
- Establishment of market divisions or territories of operation, among others.

# Press

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Contacts with the press will be promoted exclusively by spokespersons designated by the Priner, with guidance from the Executive Officers. Unauthorized persons are prohibited from making contact with the press on behalf of any Priner company.

Contact with press professionals should not be treated, under any circumstances, as a business relationship. Thus, it should not involve favors or payment of any kind. The relationship with the press should favor the disclosure of material facts and, whenever possible, directed to the Priner's activities.



# Priner's Assets

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The goods, equipment, facilities and other assets of the Priner are made available to its Employees for exclusive use in the Priner's operations and must not be used for private purposes.

It is everyone's responsibility to ensure the good use and conservation of the Priner's assets.

# Priner's Assets

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## Electronic Information Systems

Electronic systems and computer resources are available to Employees for the proper performance of their duties. Access to the internet and telephone, as well as the use of e-mails, software, hardware, equipment and other assets of the Priner, must be related to the exercise of professional activities.

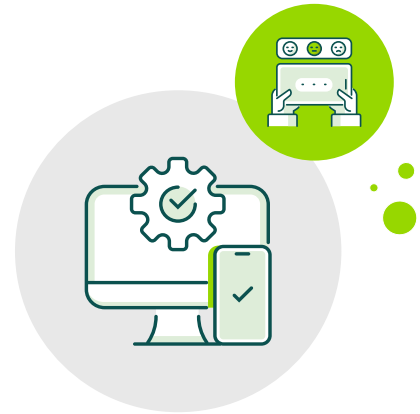
Specifically with regard to the use of the internet, its access through the computer resources connected to the Priner's network is primarily intended for purposes of interest to the Priner.

The use of the e-mail address of the companies of the Priner is intended exclusively for corporate purposes and related to the activities of Employees and managers and must be used in accordance with this Code and the Priner's policies. For further details, please refer to the Priner Information Security Policy.

The exchange, rescue, storage or use of obscene, pornographic, violent, discriminatory, racist or defamatory content that disrespects the Priner Policies, current Brazilian legislation, as well as any individual or entity and that is contrary to the policies and interests of the Priner is prohibited. Access to games, chain messages and the use of your professional email to create accounts on social networks are not allowed.

Based on these assumptions, the Company may, at its discretion, use and monitor any information transmitted or accessed on media and equipment owned by it. This monitoring covers information written or stored in an electronic system and/or any other system (such as pen drive, external disk, virtual storage, CD/DVD, desktops, laptops, cell phones, among others), including the corporate e-mail used by the Priner. This also includes technical data, acquired by associations, licenses, purchases or entrusted to the Priner.





All files and information related to professional activity created, received or stored in electronic systems are the property of the Priner and are considered commercial and legal assets.

In the event of dismissal of an Employee, the information kept in the Priner's electronic system will be forwarded to the immediate leadership, and may be archived or discarded.

The password to access the systems is for exclusive and personal use, and it is not allowed to be granted to third parties, even a co-worker.

Any type of software and program must not be copied or installed on the computers of the companies of the Priner, unless previously authorized by the information technology area and immediate manager.

To the extent permitted by applicable local laws, the Priner may review, search, image, process, duplicate, copy, collect, export and transfer any data (including personal information), stored in the Company's corporate email accounts or on any other equipment owned by it.



# Information Protection / Confidentiality

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All Employees are committed to protecting the confidentiality of any private information of the Priner, that is, that is not in the public domain. In this sense, all personal and sensitive data of Employees, shareholders, customers, suppliers and other business partners, must also respect the intellectual property rights of third parties, and their misuse may result in the application of legal provisions.

Information is essential for the operation of the Priner's activities and, like its assets, must be properly managed and protected by all Employees.

Here are some examples of confidential and/or proprietary information:

## Engineering

- a) Research and development data;
- b) Calculation memorial;
- c) Engineering projects.

## Financial

- a) Budget forecasts;
- b) Bank fees;
- c) Costs.

## Operation

- a) Methods, techniques for performing services;
- b) Standard operating procedures;
- c) Work instructions.



## People & Management

- a) Personal data of Employees;
- b) Personal files of Employees;
- c) Employees' salary data;
- d) Employees' medical records.

## Commercial/ Supplies

- a) List of customers and suppliers;
- b) Information related to customers and suppliers;
- c) Marketing strategies;
- d) Prices;
- e) Quality data.

## Strategic

- a) Business plans;
- b) Information on the acquisition of new equipment;
- c) Information on acquisitions of companies;
- d) Strategic plans.

It is the duty of every Employee to report to the directors any irregular disclosure or leakage of confidential information, as well as any unauthorized access or suspected access that they become aware of.

Confidential information necessary for the work of all Employees shall be used by them only for this purpose. The information in question should only be shared with other Employees who need it for their professional activities and who have access authorization.

If there is a need to share confidential information with third parties (due to the force and consequence of the business, such as financial institutions - banks), aiming at the interests of the Priner, the sharing must be done based on confidentiality agreements or provided for in applicable rules/legislation (except in cases arising from a court order that do not allow confidentiality).

Confidential information must be treated as such even after the Employee ceases to work for the Priner.

# Use of Insider Trading

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The Priner periodically discloses information to its shareholders, in accordance with the rules set forth in the CVM – Brazilian Securities and Exchange Commission, enabling them to make decisions regarding their investment strategies.

In the same sense, in order to avoid the trading of securities using privileged information, not yet disclosed to the market, the public eligible for this Code must act in accordance with the guidelines of the Securities Trading Policy of Priner Serviços Industriais S.A. available at [ri.priner.com.br](https://ri.priner.com.br).

## Relevant Information

Relevant information, according to the concept adopted by the Brazilian Securities and Exchange Commission (CVM), corresponds to any act or event of a political, administrative, technical, business, economic or financial nature occurring or related to the business of a publicly-held company that may influence:

- a) The quotation (price) of the shares of the publicly-held company, traded on the stock exchange;
- b) The investors' decision to buy, sell or hold shares of the publicly-held company; or
- c) The investors' decision to exercise any rights inherent to the condition of holder of shares of the publicly-held company.

## Confidential Information

Information is considered confidential when it is not public knowledge. Its improper use may result in losses to the Company, including legal liabilities and economic losses.

The dissemination of confidential information to specific agents, in an irregular manner, can be classified as insider trading (improper use of privileged information for one's own benefit or that of third parties), divided into two modalities:

- The use, by the holder himself or herself, of privileged information in order to obtain advantages in the trading of shares issued by a publicly-held company;
- The provision of privileged information to third parties - even if unintentionally - so that they obtain advantages in the trading of shares issued by a publicly-held company.

In these cases, both the person who disclosed the privileged information and the third party who made use of it can be classified as insiders for the purposes of regulation and accountability.

The Company's direct or indirect controlling shareholders, officers, members of the Board of Directors, Committees and Employees may have access to undisclosed Material Information, so that other elements that configure the practice of insider trading must be analyzed.

# Data Protection

The Priner is committed to protecting the Personal Data of the entire eligible audience, based on the applicable Personal Data protection regulations in force in the regions where it operates.

According to the General Data Protection Law (LGPD), the following are considered **Personal Data**:

- Information capable of identifying the data subject;
- Specific elements of the physical, psychological, physiological, economic, social or cultural identity of the data subject;
- Name, age, address and personal documents.



Also, **Sensitive Data** is considered to be those related to:

- Racial or ethnic origin;
- Religious conviction;
- Political opinion;
- Membership in a union or organization of a religious, philosophical or political nature;
- Health or sex life; and
- Genetic or biometric data.

All systems, software and other databases of the Priner companies must be managed considering the care in the processing of personal data required by the LGPD and the determinations contained in the Priner's other policies.

The Priner will only process personal data that has been obtained lawfully, for legitimate, non-abusive purposes, and known to its holders (natural persons to whom the data refers).

Employees will be trained to be aware of all rules and policies related to the protection of personal and sensitive data applied by the Priner, in particular the Privacy and Data Protection Policy of the Priner and the LGPD.

# Data Protection

## Internal Personal Data

The Priner undertakes to archive the personal data of its partners, employees and investors (individuals) in order to comply with legal requirements and current policies.

It is the Company's commitment to adopt strict procedures for data security, ensuring limited access to it:

- Only to professionals who need them to conduct their activities responsibly.
- Under the condition of withholding only data that deals with mandatory information and within the deadlines determined by legislation.

## Personal Data of Suppliers and Partners

In every due diligence/auditing process carried out in the pre-contracting phase of suppliers and partners, access to the personal data of individuals related to them, such as partners and managers, may be required.

It is the company's commitment to protect such data and only retain it during the evaluation period, disposing of it safely, also in accordance with the applicable legal provisions.

## Customers' Personal Data

The procedure for processing customer data is defined in the Privacy and Personal Data Protection Policy of the Priner, available at:

[ri.priner.com.br](https://ri.priner.com.br)



# Corruption Prevention Policy



The Priner is committed to complying with the Brazilian Anti-Corruption Law, acting to combat bribery and corruption practices.

Our Employees, third parties, managers, members of management bodies, suppliers, business partners, Employees and service providers, must conduct their duties in compliance with ethical standards and in good faith, and may not:



- Promise, offer, authorize, induce and/or grant any financial, commercial or personal advantage that characterizes bribery to representatives of government organizations, government agents, customers, consultants, suppliers or any other person, who may influence decisions, even if favorable to the business of the Priner.
- Receive any gift or gift that constitutes direct or indirect personal advantage.

For the avoidance of doubt, the Priner **prohibits** any payment requested by public officials, their intermediaries, service providers, in order to speed up or ensure the performance of any government procedure.

Likewise, no direct or indirect employee of the Priner, its third parties, as well as administrators, suppliers and service providers should accept any type of benefit or advantage that may corrupt, compromise or influence their decisions regarding the Company's business.

The Eligible Audience covered by this document must comply with the laws, rules and procedures of the Priner, relating to the subject of "corruption" in the locations in which they operate.

## Donations and Sponsorships

Donations for social responsibility purposes and sponsorships are allowed in limited circumstances, respecting local legislation and the Integrity Policy Against Corruption and Bribery.

It is not permitted to make any contribution to campaigns or parties on behalf of the Priner. It is forbidden to carry out political campaigns - wearing clothes or carrying materials of candidates for elective positions - in the places of the Company's operations.

Employees must also ensure that their activities are conducted in accordance with the rules in force, with the purpose and values of the Priner, making their decisions in an appropriate and diligent manner, in order to avoid the occurrence (or appearance) of unethical and immoral practices.

In this sense, to make any type of donation or sponsorship, the Employee must access the Integrity Policy against Corruption and Bribery, available on our website <https://ri.priner.com.br>, and contact the Priner's Compliance area ([compliance@priner.com.br](mailto:compliance@priner.com.br)).

# Conflict of Interest

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The Priner prohibits any activity or situation that is characterized as a conflict of interest.

## What is considered a Conflict of Interest?

Conflict of interest occurs when someone acts for their own benefit and/or to benefit family members, close people, shareholders, suppliers, public officials, regardless of whether the Priner benefits or harms them.

In this sense, the Priner repudiates any action, influence or decision motivated by illicit interests.

Conflicts of interest can arise in many situations, such as:

- When you or a member of your family has an interest or link (individual or family) in the business, management, administration, equity interest with suppliers, service providers, competitors, customers of the Priner or a member of a public body;
- When you, as an employee, make a decision motivated by personal interest.
- Receiving personal benefit from a supplier, service provider, customer, competitor or gifts in violation of the Integrity Policy Against Corruption and Bribery in force;
- Employees who have a personal or family relationship with Government Officials, whose function is related to the activities carried out by the Company.

### Who is considered a family member or relative:

Spouse, partner, siblings, parents, children, stepchildren, grandparents, grandchildren, sons-in-law, daughters-in-law, parents-in-law, nephews, brothers-in-law and cousins.

### Government Officials:

Exercise public function, temporarily or permanently, with or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment or public function. A government official is equivalent to anyone who works for a service provider company hired to perform a typical activity of the Public Administration.

## Activity among employees, managers, executives, and members of the administrative bodies and conflicting persons:

Employees of the Priner may not carry out external activities (providing consultancy, service, executive positions, management positions, intermediation, etc.) in organizations with conflicting interests or doing business with the Priner.

The Company also does not accept that employees, as well as their managers, executives and members of the management bodies, have corporate ties, their own or through their spouse or family members, with suppliers, service providers or competitors of the Priner.

Employees who hold positions (paid or unpaid) in external entities - or have family members who work in the Priner or in competitors, suppliers, customers, government agencies or non-profit institutions that are related to the Priner - must communicate the fact in writing, as soon as possible, to its immediate leadership, which will assess any conflicts of interest.

## Hiring family members or relatives of employees

The organization does not allow the hiring of family members or relatives of employees in the following cases:

- There is a hierarchical relationship (immediate superior/immediate subordinate);
- Being part of the same team as the employee, directly or indirectly, except if it is for the same function;

## Impediment Statement:

Actual or potential cases of Conflict of Interest must always be reported by Employees in a transparent, timely and formal manner to the People & Management and/or Compliance area and/or immediate Manager, through the Conflict of Interest Impediment Statement.

## Whistleblowing Channel

In cases of violation of the rules set forth in this chapter, the report must be made through the Priner's Whistleblowing Channel.



# Whistleblowing Policy

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In order to preserve business, image and reputation, the Priner has an outsourced Whistleblowing Channel, an automated, exclusive tool managed by an independent company.

Thus, whenever there is a non-compliance with the Code and Policies in force, whether by Employees, third parties, service providers, business partners, suppliers or managers, the fact must be reported to the Whistleblowing Channel, so that the appropriate measures can be taken.

Any complaint received through this Channel will be treated with the following premises:

- a) Impartiality;
- b) Transparency;
- c) Confidentiality;
- d) Anonymity, for those who so wish;

For the correct investigation, all complaints must be **accurate and correct**, in addition to being accompanied, whenever possible, by **evidence, facts and concrete data**. When they are insufficient, those responsible for the investigation will request additional information from the whistleblower. Communications without substantiation or elements that enable their investigation will be disregarded.

The confidentiality of any complaints received will be guaranteed. It is strictly forbidden to adopt any measure that represents reprisal or any type of negative consequence against the whistleblower due to his or her complaint.

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

# Priner's Whistleblowing Channel and Ombudsman Channel

## Complaints:

Violation or suspected violation of the topics addressed in the Code of Ethics and Conduct.



Access the website:  
[www.contatoseguro.com.br/denunciasgrupopriner](http://www.contatoseguro.com.br/denunciasgrupopriner)  
 Phone: 0800 155 0010

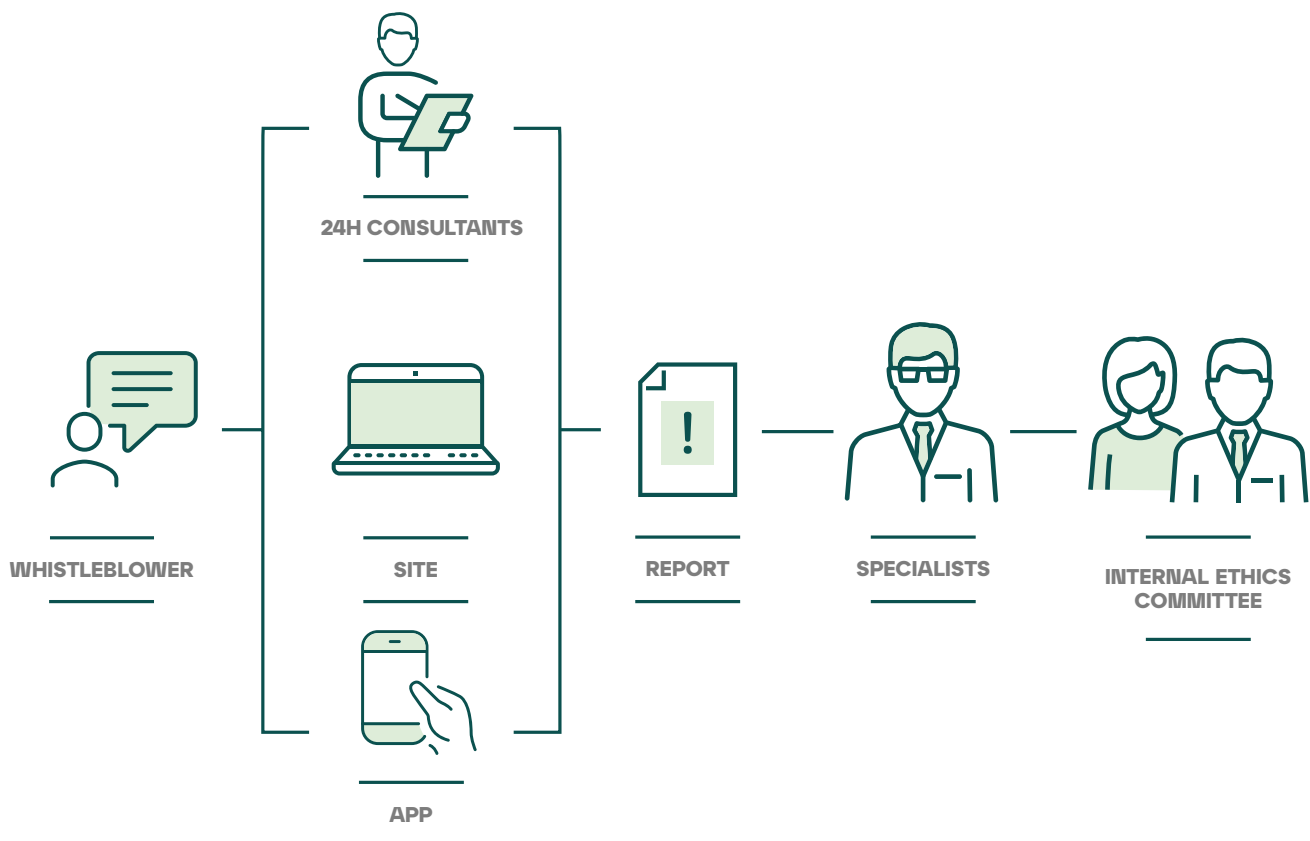
## Ombudsman:

Inappropriate behavior, quality of service, organizational environment and process failure.



Access the website:  
[www.contatoseguro.com.br/ouvidoriapriner](http://www.contatoseguro.com.br/ouvidoriapriner)  
 Phone: 0800 810 8142

## Reporting Flow





# Disciplinary Measures

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Failure to comply with this Code and the policies and rules of the Priner, committed by its Employees, third parties, managers, suppliers or service providers, will have disciplinary consequences, such as:

- Verbal warning;
- Written warning;
- Suspension;
- Dismissal without cause;
- Dismissal for cause;
- Notification and/or termination of contract for legal entities;
- Appropriate legal measures.

The application of disciplinary measures should be done, as far as possible, immediately after the fault committed. A longer period of time is allowed for the application of a penalty when the fault requires the investigation of facts and the due responsibilities.

Penalties must be fair, reasonable and proportionate to the fault committed. Similar faults should receive similar sanctions. The sanctions will be defined by the Internal Ethics Committee and the People & Management Executive Officers and may be applied:

- I. By the offender's hierarchical superior;
- II. By any of the Officers;
- III. By an attorney.

# Internal Ethics Committee

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The Priner's Internal Ethics Committee is made up of the following positions:

- Compliance Officer;
- Chief Financial and Investor Relations Officer;
- Chief People and Management Officer;
- Chief Operations Officer;
- Chief Executive Officer;

The Internal Ethics Committee has the following duties:

- Ensure compliance with the Code and clarify doubts regarding its content;
- Resolve on misconduct and conflicts of an ethical nature, together with the Board of Directors, according to criteria that must be defined by the Company;
- Encourage the adaptation of practices, policies and procedures to the Code;
- Ensure the privacy and protection of topics and people involved in ethical issues;
- Approve and ensure the relevance of the Code, proposing the improvement of the document;
- Report the indicators of conduct complaints to the Board of Directors, in order to maintain an updated diagnosis on the most vulnerable topics, areas and functions in the Priner; and
- Assess and decide on the application of disciplinary measures in relation to the Eligible Public of this Code.



# Approval

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Priner's Board of Directors is solely responsible for approving any amendment to this Code.

The Internal Controls and Compliance Manager is responsible for implementing the Code and enforcing compliance with its provisions by the Employees.

This Code shall be effective as of the date of its approval by Priner's Board of Directors and shall remain in effect indefinitely.

# Final Considerations

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If faced with any context not provided for in this document, the professional should not hesitate to consult the Compliance area.

Suggestions about this Code can be sent to the email [compliance@priner.com.br](mailto:compliance@priner.com.br).



# Declaration of Commitment

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The Eligible Audience accepts the contents of this Code of Ethics and Conduct and all Priner Policies. After reading and understanding its contents, you agree with the rules contained in this document and undertake to follow such guidelines, under penalty of disciplinary action.

The eligible Audience declares that, at this time, it is not in any situation that violates the Code of Ethics and Conduct and all the Priner Policies and that it does not know of any circumstances that could generate any conflict, also the eligible Public must transmit these rules to its Employees and subcontractors.



## Revision Control

Revision	Date	Changes
6th Edition	3/29/2023	<ol style="list-style-type: none"><li>1. Annual revision with layout;</li><li>2. Inclusion of the President's message;</li><li>3. Inclusion of the pillars of the Code of Ethics and Conduct;</li><li>4. Alteration of Values and inclusion of Purpose and Vision;</li><li>5. Inclusion of the ESG Commitment;</li><li>6. Change in the item Relationship with Shareholders;</li><li>7. Changes in the item Data Protection;</li><li>8. Changes to the Conflict of Interest item, and inclusion of the definition of family member and relatives and government officials;</li><li>9. Change in the item Donations and sponsorships;</li><li>10. Change in the reporting electronic address of the Whistleblowing Channel/Ombudsman; and</li><li>11. Change in the composition of the Internal Ethics Committee.</li></ol>
7th Edition	6/7/2024	<ol style="list-style-type: none"><li>1. Separation of the Whistleblowing and Ombudsman Channels;</li><li>2. Change of the person responsible for the implementation and supervision of the Code;</li><li>3. Change in the composition of the Ethics Committee;</li></ol>





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