



june/25

# Code of Professional Ethic Conduct

Nova Transportadora do Sudeste S.A. - NTS





## The NTS' Code of Ethics

This Code of Professional Ethic Conduct ("Code of Ethics") sets forth the principles and guidelines that guide the ethic conduct of all board members, directors, officers, interns, trainees, and employees, disregarding the hyerarchical level, and temporary workers' ("Employees") of Nova Transportadora do Sudeste S.A. - NTS ("NTS" or "Company"), as well as to the Third Parties, including suppliers, service providers, partners, clients, and other publics of relationship of NTS ("Third Parties").

## Browre through the code



Follow the values of honesty, transparency, and integrity of NTS to assure ethics and compliance.

Protection of the assets, resources, and data of NTS

Protect and use the NTS' assets, data, and intellectual property with responsibility and according to the internal policies and governing legislation.

Accuracy of books, records, documents, and public disclosures

Keep accurate and complete records, assure authorized and revised contracts, and guarantee objective public disclosures in compliance with the standards.

O4 Duties with clients, shareholders, suppliers, competitors, and other people

Treat clients, shareholders, suppliers, and competitors with justice and good faith, avoiding illegal or anti-ethic conducts.

Communication and media

Use the communication tools of NTS with safety and professionalism.

Conflicts of Interest and Personal Behavior

Avoid conflicts of interest and report any suspicious situation.

Positive working environment

We fight for a safe, inclusive environment free of discrimination, violence, and harassment.

Environmental, social, and governance management ("ESG")

We look for sustainable operations to generate lasting value.

Compliance with laws, standardsm regulations, and policies

Follow laws and policies with integrity, reporting conducts that affect the company's good standing.

Reporting potential breaches of the Code of Ethics

Report breaches of the Code of Ethics on a safe basis.

Legal and disciplinary measures for breaches of the Code of Ethics

NTS will apply legal and disciplinary measures in case of breach of the Code of Ethics.

Information about the Code of Ethics

Learn more about the Code of Ethics, its updates, and how to confirm its annual compliance.

<sup>&</sup>lt;sup>1</sup> For purposes of this Code, "temporary workers" include employees, service providers, and consultants that do not work full time at our facilities.





03

04

05

07

08

10

11

**CODE OF ETHICS** 

## O1 Corporate Conduct Standards

At NTS, we value honesty, transparency, reliability, integrity, and professionalism in all activities. To keep these principles, you shall follow this Code of Ethics and the related policies and procedures, preserving our culture, and guaranteeing compliance with the legal and regulatory requirements.



#### Policies and related standards

This Code of Ethics shall be read together with:

Anti-bribery and Anti-corruption Program and Policy

Information Security Policy

Positive Working Environment Policy

Personal Data Governance Program and Standard

Standard of Responsibilities and Limits

Sustainability Policy

Standard of Giveaways, Gifts, Entertainment, Trips, and Charity Contributions

## O2 Protection off the assets, resources, and data of NTS

Assets

What are NTS' assets??

Physical assets such as office supplies, furniture, computers, and facilities.

**Intangible assets** such as intellectual property, the company's name (including elements of the mark, such as logo and letterhead) and commercial relationships.

#### How do you have to use the Company's Assets?

Exclusively for legitimate business purposes. It is your responsibility to protect such resources against theft, loss, misuse, and waste.



If you identify any problem or have any questions about the proper use of the assets, look for your superior.



02

03

05

06

08

10

11

### What happens if you use the assets for personal purposes, not to take care of them, or waste them?

In such cases, you will be violating your duties with the Company. You shall use such resources in a commensurate and responsible manner, especially upon requesting reimbursements, which shall only be made for legitimate commercial expenses.



If you have questions about the legitimacy of any expense, refer to the applicable standards and procedures, or talk to your superior.

#### Confidential Information

#### What is confidential information?

It is all data and documents in your possession while employees of NTS, and which shall be protected. Such data include information of NTS itself, of other companies, of clients, and of investors.



**Exemples:** memoranda, notes, lists, records, and other documents, whether printed or digital.

#### How to protect confidential information?

You are responsible for protecting all confidential information in your possession. Such data and documents shall be returned to the Company immediately after the end of your employment relationship or whenever requested by NTS. The protection of such information shall be kept even after the termination of your relationship with the Company.



When you need to work outside the office, assure to protect hard and digital copies of confidential information.

## How to avoid expourure of confidential information?



Share NTS' information only with whom needs access.



Avoid discussing the company's affairs in public places, such as elevators, restaurants, or public transportation, and upon using telephone or e-mail outside the office.



Do not leave confidential documents in meeting rooms or places where third parties may access them.



If you identify that confidential information of NTS or another entity was disclosed in an undue manner, contact the Legal and Compliance area of NTS.



02

04

05

06

07

08

11

12

#### Personal data

NTS uses personal data, either internal or external, to administer and manage its operations in an efficient manner and according to the data protection laws. Such data may include personal and financial information and shall only be kept while required.

#### How to protect personal data on the day-by-day?

You have to take all reasonable and required measures to ensure that the personal data remain confidential and are only accessed by those who need them to comply with his/her functions.

If you need to share personal data with third parties (for example, for service provision or procurement), assure that:



The disclosure is according to the legal and regulatory requirements.



NTS' Data Protection Commissioner has been notified before the disclosure.



The involved third party has executed a confidentiality agreement that includes, when relevant, other obligations required to meet the data protection laws of certain jurisdictions.



If you have any questions about the authorization to disclose personal data — including requests of authorities — contact the Commissioner.

#### When and how to discharge personal data?

We shall keep personal data only for the time required to comply with legal, regulatory, or operational obligations. As soon as there is no need of retention anymore, the data shall be discharged in a safe and proper manner.

#### And if it is needed to internationally transfer personal data?

Upon transferring data to outside your jurisdiction, assure to have the required permit (such as consent or a data transfer agreement) and that the data are protected according to the applicable data protection laws.

#### Compliance with the Internal Policies of Data Protection

You are responsible for understanding and following the policies of personal data protection and privacy of NTS.



Para mais informações, consulte a Norma de Governança de Dados Pessoais e os documentos do Programa de Privacidade e Proteção de Dados Pessoais da NTS. Ao concordar com este Código de Ética, você autoriza a NTS a reter e tratar seus dados pessoais conforme a legislação aplicável e as políticas internas da Empresa.

#### Intellectual Property

During the period of your employment or contractual relationship with NTS, you may be involved in the creation, development, improvement, or invention of several types of intellectual property, such as:











07

08

10

12

11

Concepts, methods, processes, inventions:





Merchandise, ideas, plans, programs, applications, and codes;



Authoring works, registered marks, service marks, and design.

Such intellectual property, including any copyright, patents, and other related rights, is exclusive property of NTS.



You will not be entitled to such intellectual properties and is responsible for collaborating with the Company, providing the required assistance so that all such rights are formally recognized as exclusive property of NTS.

#### Preservation of the Company's documents

The preservation of the commercial records is essential. Follow the guidelines of the policies of documents and meet the applicable legal and regulatory requirements.



If you are informed that any document under your responsibility is relevant to a lawsuit, investigation, or audit in progress or imminent, follow the guidelines of the Legal area for the proper retention of such documents.

#### Proper use of artificial intelligence (AI) tools

Al tools may be powerful allies that assist our business, but, if inadequately used, bring significant risks related to the protection of confidential information and to the reliability of the results generated by the AI.

#### How to guarantee the correct use of AI?



Properly classify the documents generated in NTS, avoiding their undue disclosure as a result of conversations with NTS' Al.



Never share confidential, non-public, or personal information, with artificial intelligence tools



Only use the AI tools expressly approved by the IT area for internal use, following the applicable guidelines and/or standards.



Always revise and carefully assess the results generated by the AI to assure their quality and accuracy.



If you have any questions about the use of artificial intelligence in the Company's activities, contact the IT and/or Legal and Compliance area.

#### O3 Accuracy of books, records, documents, and public disclosures

#### Complete and accurate maintenance of the records

Certify that all books and records of NTS are complete and accurate, and that all commercial transactions are duly authorized.

These records shall faithfully reflect all transactions, allowing the preparation of correct financial statements. No information shall be omitted from external audits, internal audits, Compliance, or Committee of Ethics and Integrity of NTS.



Any attempt of influencing in a fraudulent manner, inducing to error, or manipulating external audits is illegal.



#### Company's contracts and agreements

NTS' contracts and agreements govern our commercial relationships and, due to the complexity of the laws that regulate them, shall be executed with the proper level of approval.



01

02



07

08

10

11

12

Before signing any contract, assure that you have authorization and that the document was revised by a lawyer of the Company, when required by the policies.

If you are not sure if the contract or agreement requires revision, refer to the Legal area. If you have questions about the required authorization, refer to the Standard of Responsibilities and Limits.

#### Accurate and objective public disclosures

Assure that all public disclosures of NTS are complete, true, and objective. Employees involved in the preparation of public information or that provide data to such process shall guarantee that the disclosures are made with honesty, accuracy, and in compliance with the applicable legislation.

#### **Actioons tobe reportaded**

You shall be attentive and report actions that involve:



Fraud or willful mistakes in the exploration, maintenance, assessment, revision, or audit (internal or external) of financial statements or records:



Failures or non-compliances in the internal accounting controls;



Failures or deviations in the complete, true, and objective report of the company's accounting and financial information.



False representations or statements in documents of public disclosure, such as annual reports, prospects, newsletters, and press releases.



Employees that supervise financial reports, as well as their family members<sup>2</sup>, are prohibited from obtaining any fiscal service or other services before the external auditor, regardless who pays for such services.

## O4 Duties with clients, shareholders, suppliers, competitors, and other people

Treat in a fair manner and in good faith everyone NTS has a relationship with — including clients, shareholders, investors, suppliers, competitors, local communities, and governments.



To preserve the Company's good standing, do not practice any illegal or anti-ethic conduct upon making business with such parties.

<sup>&</sup>lt;sup>2</sup> Family members' include the spouse, partner, or any other member of the family that resides in the same domicile as you.



#### O5 Communication and media

#### Adequate use of the communication tools



01

03

04

05

08

11

12

Use the e-mail, Internet, telephone, and other communication tools of NTS in a professional manner. All business communications shall be exclusively conducted by the corporate e-mail system or other means approved by the Company.

Although the limited personal use is allowed, it shall not interfere in your work or in your co-workers' work.

#### Restrictions of non-approved tools

Business subjects may not be discussed through electronic communication systems that have not been specifically approved for such activities, such as e-mail accounts and personal messaging applications, or social media.



The Employees shall not send e-mail with business information of the Company to their personal accounts, nor save business data of the Company in personal devices.

#### Information security and monitoring

Upon using tools such as computers and cell phones provided by the Company, do not expect full privacy. The activities may be monitored and stored to guarantee proper use or to comply with regulations. It is essential that all Employees follow NTS' information security policies.

- What cares shall be taken with cybernetic security?

Attention to suspicious e-mail: Avoid opening e-mail from unknown or suspect sources, since they may contain virus or "Trojan horses".



If you have questions about the security of an e-mail or of a communication, or suspect that your equipment has been infected, contact the IT area.

- Use outside the working environment: Be especially careful upon using devices outside the office and follow all precautions required to avoid compromising the NTS' systems.
- Protection of confidential data: The Company's systems contain confidential information subject to the data protection acts. Process such information with extreme care, in compliance with the General Data Protection Regulation and the internal policies.



02

03

04





07

O8

10

11

12

#### Use of social media

Unless it is expressly authorized, it is **forbidden** to comment, publish, or discuss subjects of the Company, its clients or business in Social Media, such as social networks, chat rooms, blogs, and forums.



For further details, refer to the Information Security Policy.



Remember that you are a representative of the Company and shall assure that your behavior is appropriate and consistent with the Company's values.

#### Who may make public representations on behalf of NTS?

Only the official spokespeople. To guarantee a timely, true communication to the public in compliance with the legal and regulatory requirements, address any request of external information (of media, shareholders, or third parties) to your superior or to the communication area or area of relationships with investors.

#### Ob Conflicts of Interest and Personal Behavior

Personal behavior

#### How does your personal behavior impact the Company's image?

Your behavior, either inside or outside work, shall reinforce a positive image of yours, of the Company, or of its business activities. Use and good sense in all your personal and business relationships, avoiding activities that may hinder your reputation, NTS' good standing, or the trust relationship between you and the Company or between the Company and its clients.



Inadequate actions may result in disciplinary measures, including dismissal for cause.

#### External activities and required permit

To participate in business activities outside the scope of your function, even if they are non-profit activities, obtain permit from NTS. Although the Company encourages the community involvement, such activities shall not prevent you from complying with your functions nor conflict NTS' interests.



In any external activity, do not speak or act on behalf of the Company, regardless the cause or positioning.

#### What are Other Business Activities (OAC)?

"OAC" refers to business activities outside your function at the Company, such as acting as officer, board member, or partner in other organizations. It is required the approval of the Code of Ethics and Integrity of NTS before accepting an OAC.

**Exception:** It is not needed an approval to act in boards of charity institutions or small family companies with no relationship with the Company.



If you have any question if you need to obtain a permit, refer to the Legal and Compliance area.



Conflict of interest

01

02

03

05

06

08

11

12

#### How to identify a conflict of interest?

A conflict of interest takes place when a personal interest may interfere, or seem to interfere, on the decisions or performance of your functions at the Company. It means that any situation where your judgment may be influenced by personal interests shall be carefully assessed.

#### To assess if the is conflict

Ask yourself: could a person reasonably informed think that may interest in this subject would influence my objectivity or performance at work?

#### What is the conduct we expect from you?

In any business situation, attempt to align your decisions with NTS' interests, always considering the obligations we have with our clients and partners. Assess each case with objectivity and transparency, guaranteeing that your actions and choices reflect NTS' commitment to ethics and integrity.

#### What to do if you identify a potential conflict?

If you identify a potential conflict, it is important to inform your immediate superior and the Legal and Compliance area. NTS' Ethics and Integrity committee will assess such cases. If you get aware of a conflict involving another Employee, also refer to the Legal and Compliance area.

#### Close personal relationships

Close personal relationships<sup>3</sup> with other employees may create the appearance of conflict of interest.



Report such relationships to the People and Management area to guarantee a proper management.

#### **Utilization of the Company's opportunities**

It is forbidden to use in own benefit property, assets, business or investments discovered through your work at the Company.



Always promote the NTS' interests when an opportunity appears.

<sup>&</sup>lt;sup>3</sup> A "close personal relationship" includes, but is not limited to, relationships with relatives or equivalent, such as foster father, cousin, close friend, spouse, fiancé(e), partner of common-law marriage, or any other person you are or were in an intimate or romantic relationship with.



#### O7 Positive working environment

#### Commitment to a positive working environment free of discrimination, violence, and harassment

We value the diversity and look for keeping a respectful, safe, inclusive, and productive working environment, where all feel respected. NTS does not tolerate discrimination, violence, or harassment in the workplace. All Employees shall contribute to an environment that values equality, justice, and dignity.



01

03

05

06

08

11

12

For further detail, refer to POL-013-Positive Working Environment Policy.

#### What does constitute discrimination, violence, and harassment?

- Discrimination: Different treatment of person or group based on characteristics protected by law, such as race, color, gender, sexual orientation, marital status, nationality, religion, age, or disability. The effect of the behavior is what matters, regardless intention.
- Violence: Any act (oral, written, or physical) that may cause physical injury or be interpreted as a threat to safety. It includes use of physical force, attempt of use of force, or threats of damage. It also comprehends the potential impact of domestic violence in the working environment.
- Harassment: A series of offensive oral or physical conducts, intentional or not, including sexual harassment, which negatively affect the working environment or the individual professional performance. It may include undesired sexual approaches, offensive jokes, bullying, and other actions that create a hostile working environment.

#### How to report discrimination violence, or harassment?

If you feel discriminated, victim of violence, or harassed, or is aware of such incidents, you have the duty of reporting. NTS investigates all reports in a serious manner and may apply disciplinary measures, including dismissal, against any Employee that practices or tolerates such conducts. Reports in good faith are protected against retaliation, although accusations intentionally false may lead to disciplinary measures.



Report according to the section Reporting potential breaches of the Code of Ethics and/or POL-013-Positive Working Environment Policy.

#### Commitment to health and safety

Everybody is entitled to a safe and healthy working environment. To guarantee that, each one shall:



Not carry, distribute, or be under the influence of illegal substances in the Company's premises or conducting their businesses;



activities with the Company.

cluding acts or threats of violence;



Not carry guns or flammable materials in the Company's premises or premises in service thereof, unless if expressly authorized due to your



Observe all laws and internal procedures of occu-

Not adopting hazardous or illegal behaviors, in-

pational health and safety.





03

04

O5 O6

07





10

12

11

0

If you or someone you know is at immediate risk, call the police and inform the incident according to the section **Reporting potential breaches of the Code of Ethics** and/or POL-013-Positive Working Environment Policy.

#### O8 Environmental, rocial, and governance management ("ESG")

Our ESG principles are fundamental and are integrated in all operations of the Company. They aim to build resilient businesses and generate long-term value to our investors and other stakeholders.



For further information, refer to Pol-003-Sustainability Policy.

#### Human rights and eradication of contemporary slavery

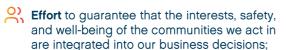
We are committed to make business in an ethic and responsible manner, including conduct our activities respecting and supporting the protection of the human rights, comprehending:



**Conducting** operations with health and safety practices;







**Eradicating** harassment and abuse in the workplace.

We integrate such standards in our business activities, including training courses, communications, contracts, Third Parties' risk assessment processes (due diligence), and analysis from the perspective of health and safety, as appropriate, to suppliers and commercial partners.

#### 09 Compliance with laws, standards, regulations, and policies

#### Why is the compliance essential?

NTS operates in a sector highly regulated and is committed to comply with all applicable laws, rules, regulations, and policies. It is each Employee's responsibility to know and follow such regulations, which may be subject to changes.

#### Awareness and responsibility

The non-awareness of the laws, standards, and regulations does not justify any breach. We expect that everyone makes the possible to get familiar with the rules that affect their activities and strictly comply with them.



In case of questions about the enforceability or interpretation of standards, refer to the Company's Legal and Compliance area.



#### What to do in case of conflict between local standards and the Code of Ethics?

If local laws, habits, or practices conflict this Code of Ethics, follow the strictest standard.



01

03

06

07

08

09

11

12

If you identify a Company's practice that may be illegal, you have the duty to communicate such fact.

#### Commitment to honesty and the Anti-corruption Policy

NTS adopts zero tolerance to bribery and other corruption acts, in compliance with the Brazilian Anti-corruption Act (Law no. 12,846/2013) and international standards. It is forbidden to negotiate, promise, offer, enable, pay, receive, or authorize briberies, directly or indirectly, authorizing that third parties do so on behalf of NTS.

"Bribery" — is anything of value that is offered, promised, given, or received to unduly influence a decision or to obtain undue or unfair advantage for effect of promotion, valuation, obtainment, or retention of business.

"Facilitating payments" — small payments made to speed up or guarantee routine actions — are also considered a form of bribery and, therefore, prohibited. Employees are not authorized to make any facilitating payment, and shall assure that third parties, including agents and other consultants, do not make such payments on behalf of NTS.



For further information, refer to the Program and POL-002 Anti-bribery and Anti-corruption Policy of the Company.

#### Standard for giveaways, gifts, and entertainment

Gifts and entertainment offered or received from people with business relationships with NTS are allowed provided that they have modest value, are appropriate, and do not create the appearance of conflict of interest. It is forbidden to give or receive money or equivalents, such as checks or gift vouchers, as well as to offer gifts to public servants. The non-compliance may result in obligations of reimbursement.



For further details, refer to NOR-002 Standard of Giveaways, Gifts, Entertainment, Trips, and Charity Contributions.

#### Restrictions to political donations

In Brazil, legal entities are prohibited from making donations to political candidates or political parties. Donations made on personal behalf shall be in compliance with the local laws.

#### Prevention against money laundering and other criminal activities

NTS is strongly committed to prevent the use of its operations for illegal activities, such as money laundering, financing to terrorism, or any criminal activity. We have zero tolerance to such practices, in alignment with the Brazilian and international anti-money laundering laws.

CODE OF ETHIC AND PROFESSIONAL CONDUCT

13



02

03

05

06

O7 O8

09

11

12

#### Attention to deal with third parties

Certain jurisdictions publish lists of individuals and organizations the Company is forbidden to do business with, in compliance with the anti-money laundering laws. Upon dealing with third parties, you shall exercise reasonable care to assure that such parties are not involved in illegal or restrictive activities

#### For such you shall:

- Check if third parties you have a relationship with comply with practices of money laundering prevention and are not subject to legal restrictions.
- **O2** Request that third parties, including agents and consultants, to present statements of compliance with anti-money laundering practices.
- You may request the Legal area that provides the proper language to include such statements in contractual documents.



If you have questions or suspects about the legitimacy of a transaction or about the compliance of a third party, contact the Legal and Compliance area to obtain guideline.

#### Rights and obligations to provide information to authorities

In case of contact by governmental authorities searching for confidential information, during or after your contractual relationship with NTS, it is recommended that you look for legal advice before answering, to your own protection. The Legal area may assist in this process. However, nothing in this Code of Ethics prevents you from providing information to the authorities according to the applicable regulations.

#### Obligations of reporting convictions or relevant conducts

Our reputation depends on the reputation of the individuals acting as our Employees. Our selection process at NTS is careful, observing integrity criteria that are checked through specific tools. From the time you join NTS, we expect that you continue adhering to the principles of sincerity, honesty, and transparency.

If you are convicted for a crime or misdemeanor or are involved in a conduct relevant to your reputation, it is your responsibility to inform the fact to the Legal area and to your superior, so that it may be property documented and assessed in relation to the Company's policies.

This transparency helps the Company to protect its image and to assure the reliability of its partners and clients, reflecting our commitment to ethics and integrity in all activities.



02

03

04

06

07

08

10

11

12

#### 10 Reporting potential breaches of the Code of Ethics

#### Why is it important to report breaches?

Internally reporting any breaches of the Code of Ethics or anti-ethic behaviors is essential to the Company's success and reflects the conduct expected from all Employees. You have the duty to report, in good faith, any breach or suspect of breach of the Code of Ethics, illegal behavior, anti-ethic behavior, or misconduct you get aware of.



Including specific details and supporting documents whenever possible is essential to an adequate investigation, since vague or non-specific allegations make the process difficult.

The Internal Audit and Compliance areas are autonomous to access information and documents required to perform your activities with independence.

#### How to report a breach?

You shall report misconduct or breaches or potential breaches to the Code of Ethics to your immediate superior, since he/she generally is in a position to solve the question. Alternatively, you may contact the People and Management area, the Legal and Compliance area, or register a report in the Confidential Channel, so that the subject is addressed to the Ethics and Integrity Committee of NTS.

#### What is the confidential channel?



The Confidential Channel is managed by an outsourced company independent on NTS, guaranteeing full confidentiality and, if desired, anonymity in the reports about anti-ethic, illegal, or inadequate behaviors. This channel works 24 hours a day, 7 days a week, and is available to all Employees and Third Parties that need to report suspects or breaches.

Upon selecting to make an anonymous report, NTS commits to preserve your anonymity as much as possible, respecting the applicable legislation.

You may access the Confidential Channel through the following means:



PHONE **0800 721 5955** 



canalconfidencial.com.br/nt/

#### **Directors' reports**

Directors shall report breaches directly to the Chairman of the Board of Directors of NTS and, where applicable, to the person in charge of the Internal Audit.



If you have any questions about the policy of reporting of irregularities of the Company, contact the Legal and Compliance area to obtain further guideline.

#### Confidentiality and treatment of the reports

All reports will be addressed in a secret and proper manner. The Company commits to keep secrecy of the reports as much as possible, compatible with the needs of conducting a strict assessment, and according to the applicable legislation. To facilitate the investigation, we recommend that the whistle blower identifies him/herself. However, you have the option of anonymously making the report through the available channels.



#### Process of registration and reference of the reports

The person that receives the report shall register the receipt, document the actions taken, and inform, in writing, the person in charge of the Internal Audit of NTS. The Internal Audit area is in charge of keeping these records and reporting all illegal and anti-ethic conducts in breach of the Code of Ethics to the Ethics and Integrity Committee of NTS, to the Audit Committee of NTS (if any), to the Chairman of the Board of Directors of NTS and, where required, to external authorities, in compliance with the applicable laws.

The Internal Audit area is responsible for managing and guaranteeing the proper operation of the Confidential Channel, in addition to conduct and document internal investigations of potential breaches of the integrity standards, or recommend the contracting of independent investigation. The Internal Audit area may also count on the assistance of other areas, as applicable, such as the Legal and Compliance, and People & Management areas.

To assure the reasonableness of the actions and decisions of the report assessment process, if an informed allegation represents a potential breach by an Employee integrating the management process of the Confidential Channel, in no circumstance, he/she, his/her team, or also his/her manager, will have access to the registrations of the allegation. In such event, the assessment activities, and resolutions will be designated to other teams. In specific cases, the Company may also designate the assessment to external partners in order to guarantee the conduct of an impartial and independent investigation.

#### **Protection against retaliation**

No reprisal or retaliation will be carried out against whom makes a report in good faith, with reasonable belief that there was, there is being, or there may be a breach of the Code of Ethics, laws, or regulations. However, it does not exempt the whistle blower if he/she is involved in the reported situation.



01

03

05

06

07

08

If you believe that you are going through reprisals after a report, inform the fact to your immediate superior, to the Legal and Compliance area, or register a new report through the Confidential Channel itself. The Company may apply disciplinary measures if someone makes a report with information intentionally false.

## 11 Legal and disciplinary measures for breaches of the Code of Ethics

NTS may adopt legal and disciplinary measures in case of breach of this Code of Ethics. Depending on the situation, it may include the immediate dismissal for cause, in addition to the possibility of taking legal actions, if required.

If Third Parties are involved in breaches, the Company may also apply contractual measures, such as terminating the professional relationship, and searching for legal measures against the responsible ones, if required.





#### 12 Information about the Code

#### **Annual Statement of Compliance**

Upon joining NTS, each Employee will receive a copy of this Code of Ethics, as well as the standards mentioned therein. It will be requested that each Employee reads and states the receipt of the document through the Annual Statement of Compliance. Additionally, every year, the Employees shall confirm that they are in compliance with this Code of Ethics, the policies, and the standards of the Company.



The annual signature of the Statement of Compliance with the Code of Ethics is a condition for the continuity of the employment relationship or relationship with the Company.

#### Changes

01

03

05

06

07

08

09

10

11

12

The Board of Directors revises and approves this Code of Ethics at least once a year, being the final responsible for guaranteeing the compliance with this Code of Ethics.

#### Right of change or interpretation

NTS may change, interpret, suspend, or revoke this Code of Ethics, its policies, procedures, and programs at any time, as required. Any changes will be informed according to the law.

#### **Conflict with Collective Bargaining**

If there is conflict between this Code of Ethics and a union agreement or collective bargaining on salaries and working conditions, the union agreement or collective bargaining prevails. When the agreement or bargaining are omitted, the Code of Ethics shall be followed.

#### Nature of the Code of Ethics

This Code of Ethics and policies associated therewith do not grant rights, privileges, or specific benefits to the Employees, nor guarantee the continuity of the employment relationship with the Company. It also does not establish employment conditions, nor creates, expressly or implicitly, any type of employment relationship. Additionally, this Code does not change the employment relationship already existing between the Employees and the Companies.

#### **Current version**

The most updated version of the Code is at the website and/or intranet, which prevails on hard versions.

Any questions?



E-MAIL

compliance@nt/bra/il.com