



# CODE OF ETHICS AND CONDUCT




**CVIX Construtora**  
Innovation, Construct, evolve

## MESSAGE FROM THE BOARD

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- ✓ CVIX's reputation is the result of a collective process, developed with work and dedication. We are all responsible for preserving and constantly improving the image, trust and credibility, achieved over the years, always with the mission of innovation, construct and evolve solidly, in order to provide a better future for employees, service providers, customers, suppliers and the communities where we operate.
- ✓ This Code of Ethics and Conduct reflects CVIX's principles and values, as well as demonstrating our commitment to the adoption of good corporate governance practices and the highest standards of ethical conduct.
- ✓ We are all examples and therefore, we must always act with integrity and ethics. We are responsible for ensuring the success of our Company, the continuity of commercial relations and the reputation of our brand.



**Cinthia Braga**  
**Partner Manager**

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# 1. OBJECTIVE

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- ✓ This Code of Ethics and Conduct has as its main objective to discipline the morals and customs of CVIX's direct employees, so that ethical principles can guide the performance of their professional activities and also of their personal conduct and more, all good practices must be extensive to colleagues, service providers, customers and CVIX suppliers, so that important values such as respect, credibility, integrity and honesty are always practiced and preserved
- ✓ Fidelity in complying with the laws that govern the society in which we live is also essential to enforce and direct decision-making, always preceded by strong responsibility.

## 2. COMMITMENT TO ETHICS AND CONDUCT

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- ✓ CVIX's Ethics and Conduct Committee is composed of Company Directors, who manage it. The Committee is responsible for disclosing and ensuring the understanding of the document, regularly evaluating its applicability, making any updates or rectifications, judging cases of non-compliance with its principles and ensuring the application of the appropriate measures.

### VIOLATION OF THE CODE OF ETHICS AND CONDUCT:

- ✓ CVIX will promptly and rigorously investigate all facts involving suspected fraud, theft, property damage, misappropriation, manipulation of information or any other crime, criminal misdemeanor or unlawful act and acts that deviate from the values, guidelines and procedures corporate, of which this code is an integral part.
- ✓ Any violation or disregard for the principles contained in this Code of Ethics and Conduct must be immediately reported to CVIX's Ethics Committee, through the following channel:
  -  [eticaeconduta@cvix.com.br](mailto:eticaeconduta@cvix.com.br)
- ✓ CVIX ensures confidentiality to all its direct employees, service providers, customers and suppliers who wish to report any act of violation of ethics and / or conduct. The actions necessary to deal with complaints will be taken in accordance with the principles practiced by CVIX and provided for in this code, duly supported by the laws in force, always sovereign.
- ✓ Failure to acknowledge possible violations by CVIX's direct employees is considered unethical conduct, as well as reporting unreal situations, with the aim of harming other people or companies for personal interests.

# 3. MISSION, PRINCIPLES & VALUES

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- ✓ Aware of the importance of customer satisfaction, CVIX's mission is to contribute in an efficient, effective and sustainable way to the development of the country, performing engineering services in accordance with the technical standards applicable to the exercise of its activities and current legislation.
- ✓ The principles that govern CVIX's actions in fulfilling its mission must be preceded by responsibility, respect, transparency, secrecy, integrity, citizenship and loyalty.
- ✓ Supported by the policies of integrated management, related to quality, safety and health at work and environment, which prevail at CVIX, we have as fundamental values ethics, integrity, humility, cooperation, respect and discipline



## 4. TOP MANAGEMENT PRINCIPLES

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- ✓ We support, protect and preserve human rights, adopting policies and practices that contribute to the eradication of child labor, slave, forced or compulsory labor and the sexual exploitation of children and adolescents. **We do not tolerate any practice that violates human rights.**
- ✓ **We do not tolerate** any child labor and, for those over 16 (sixteen) years, exclusively as a Minor Apprentice, provided that all rules and laws for this type of apprenticeship are strictly complied with and applied.
- ✓ **We do not tolerate** any kind of discrimination based on gender, race and / or religion.
- ✓ We will punish with rigor due any and all actions of intolerance.
- ✓ To ensure the integrity of the work environment and the safety of all employees, employees who are under the influence of alcohol or any other legal drugs, let alone illegal drugs, will not be allowed to remain..

**All CVIX superiors must be examples of ethical conduct during their professional activities and therefore, it is up to these:**

- ✓ Be examples of leadership, so that your team will act with integrity in all negotiations and situations; - Never ignore or hide problems of an ethical nature. Leaders must deal with the situation quickly and impartially and fairly, seeking direction and support, if necessary



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- ✓ Bring the ethical issues brought up by their team members to the attention of the other Directors, so that the best option to resolve the issue is discussed and decided;
  - ✓ Do not reprimand or pressure employees who have raised an ethical issue or helped in an investigation by the Board;
  - ✓ Gather your teams periodically to review knowledge about the Code of Ethics and Conduct, ensuring that everyone is aware of the guidelines described here.

# 5. PRINCIPLES OF DIRECTS EMPLOYEES

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- ✓ This Code of Ethics and Conduct applies to all CVIX direct employees and expresses the concern to promote the practice of good conduct in relationships with co-workers, customers, suppliers, competing companies, public agents and society in general. It is everyone's obligation to know and comply with the rules of this Code of Ethics and Conduct and CVIX's Ethics Committee is responsible for disseminating and monitoring the corresponding practice.

All direct employees who perform external work or who are traveling must also comply with the Company's policies and standards.

- ✓ In relation to this Code of Ethics and Conduct, it is important that all :
  - Understand its content in order to apply it in your daily work and in society;
  - Communicate to your leader or through the reporting channel situations that characterize a violation of this Code;
  - Cooperate and maintain confidentiality on any investigation regarding violations of this Code or any other CVIX rule;
  - Take responsibility and promise anyone just what can be effectively accomplished and which is within the law, whether for customers, colleagues, suppliers or public institutions, ensuring CVIX's credibility;
  - Be aware that in case of conflict, the laws in force in the country are sovereign to this Code.

# 6. CONDUCT

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- ✓ Top management and direct employees, as representatives of the company, must always be guided by the principles, policies and values of the Company, which together with ethical conduct underlie CVIX's actions and practices.

- ✓ **RESPECT FOR PEOPLE:**

CVIX expects from all its direct employees absolute respect for co-workers, and any manifestation of discrimination due to sex or sexual orientation, race, nationality, religion, origin, marital status, professional category, social status, disability is inadmissible physical or mental, or any other type of distinction that may constrain the dignity of the person, regardless of the laws in force.

It is essential to maintain a good working environment. Thus, moral and or sexual harassment, abuse of power, intimidation, verbal threats, lack of respect, hostility, prank calls or any other type of physical or verbal aggression will not be accepted or tolerated in the workplace. Any and all type of moral or sexual constraint must be disapproved and immediately reported, directly to the Board or through the channel made available for such purpose.

- ✓ **PERSONAL PRESENTATION**

The personal presentation of our employees must consider the use of appropriate clothing for the work environment and the type of function they perform, in order to avoid unnecessary exposure. Where uniform use is required, it must be worn throughout the working hours.

When all employees and service providers are on the company's premises, they must wear a badge, visibly.



## ✓ **DISCIPLINARY MEASURES**

Violation of this Code, our corporate policies or any law may result in the adoption of disciplinary measures, including termination of employment, depending on the nature and severity of the violation.

In the event of violation of any law, civil and / or criminal penalties may be imposed by a government agency or a court.

## ✓ **OPPORTUNITIES**

CVIX is favorable to the meritocracy criterion and provides all its direct employees with equal opportunities and professional growth, based on dedication and competence, demonstrated in the exercise of their functions.

## ✓ **COOPERATION**

CVIX values cooperation between its employees from all units and the sharing of knowledge as a way of learning and disseminating best practices, safeguarding confidentiality criteria.

## ✓ **HEALTH AND SAFETY**

The health and safety of its direct employees is a constant concern of CVIX's Management and therefore, it is necessary that everyone effectively understand and comply with the relevant policies, rules and regulations, especially when related to the role performed.

# 7. POLITICAL ACTIVITY

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- ✓ CVIX respects the right of its direct employees to participate in the country's political life. However, any and all manifestations of party political activity in the work environment, whether internal or external, are prohibited. The employee may not use his position or the name of CVIX in any personal activity.
- ✓ No direct employee has the right to use CVIX resources to make donations to political parties, political campaigns and / or candidates for public office.
- ✓ If any employee is interested in running for any public office; be part of public management, through administrative position, or assist public agent, whatever the task, he must request immediate dismissal from CVIX, before the start of any activity.

# 8. NEGOCIATIONS & COMMERCIAL RELATIONS

- ✓ CVIX negotiates fairly with third parties (customers, suppliers, service providers and competitors), in accordance with its principles and policies, establishing the highest standards of ethics in complying with and respecting both Brazilian and /or foreign laws, when it´s the case.
- ✓ All direct employees are responsible and are committed to knowing the laws and regulations in force applicable to their activities, as well as CVIX's internal policies and procedures.
- ✓ **It is strictly prohibited:**
  - The collection or receipt of any type of payment or advantage from any employees, executives or administrators of companies or entities with which we relate for the purpose of any undue favoritism;
  - The delivery, promise or offer of any type of payment, commission, gift or remuneration to any employees, executives or administrators of companies or entities, whether they are made directly to them or indirectly, through persons or companies related to them, for the purpose obtaining undue advantages.



# 9. GIFTS

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- ✓ No direct CVIX employee can receive gifts, invitations, loans, dinners, trips or any other benefit that may affect his judgment or encourage different treatments in the performance of his duties;
- ✓ The receipt of gratuities, gifts, payments and hospitality (meals, travel, accommodation and airline tickets) by CVIX's direct employees, when offered by agencies, companies or people that do not represent conflicts of interest are acceptable up to the limit value of R \$ 100 ,00 (one hundred barzilian money);
- ✓ Invitations made by customers, suppliers, service providers and other external agents, such as visits to its commercial and manufacturing facilities, fairs, training, workshops related to CVIX's commercial practices can only be accepted, with the express authorization of its immediate manager;
- ✓ CVIX's direct employee must communicate to his immediate manager about offers of any items by agencies, companies or people who are part of the Company's business environment.
- ✓ It is the responsibility of all CVIX employees to inform suppliers, service providers, customers and other external agents, in due course, about the premises for receiving gifts or giveaways.
- ✓ **It is strictly forbidden** to offer any gifts, invitations, loans, dinners, trips or other benefits to public agents.
- ✓ The receipt of cash or equivalents, such as financial securities, purchase vouchers, prepaid cards, among others, is strictly prohibited, and CVIX employees must immediately refuse the offer.

# 10. CONFLICTS OF INTEREST & EXCLUSIVITY

- ✓ CVIX ensures that there are no direct or indirect conflicts of interest. The conflict of interest occurs in any situation of personal gain of the direct employee or of a relative, friend or acquaintance to the detriment of the principles, values, interests and image of the Company;
- ✓ It is unacceptable for any direct employee to take advantage of his position or assets and information that have been obtained due to his professional relationship with CVIX to compete with the company;
- ✓ It is inadmissible for any direct employee to carry out parallel professional activity with companies that have or do not have a direct or indirect relationship with companies competing with CVIX;
- ✓ It is unacceptable for any direct employee to engage in an activity that could compromise their professional integrity and / or CVIX's reputation;
- ✓ During formalized working hours, CVIX direct employees must dedicate their time exclusively to the activities inherent to their position, and private activities such as the marketing of any type of product or personal service are not accepted;
- ✗ Direct employees who have parallel professional activities, such as commercial ventures, academic activities, consultancy services, among others, must report this condition to their immediate superior, who will assess possible conflicts of interest, to be judged punctually, with CVIX as a priority.

# 11. PROPERTY SECURITY

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- ✓ CVIX's assets and resources are made available exclusively for professional use and therefore must be well looked after and used correctly by all of its direct employees. In case of doubts, before use or handling, the immediate manager should be informed.
- ✓ All employees must treat CVIX's assets with respect and responsibility, whether these monetary values or in the form of computers, mobile printers, equipment, facilities, vehicles, uniforms, tools, systems, records, information and everything else that will produce wealth, which should be used exclusively for the benefit of the company.
- ✓ It is prohibited to remove equipment or documents from the workplace without the prior authorization of your immediate manager. Any and all material movements, whether transfer, sale or acquisition, must be informed to the asset manager of your unit.
- ✓ The use of cell phones, radios, notebooks or any other CVIX equipment outside the work environment must follow exactly the same protocols as if used in the work environment.
- ✓ It is not allowed to receive personal correspondence and / or goods;

## **It is strictly prohibited :**

- ✓ The transport of weapons of any kind;
- ✓ The transportation of third party cargo and animals;
- ✓ Record or take images of employees (direct and indirect), work facilities, computer screens, reports or any other situation that is not for use in the interests of CVIX.



# 12. INFORMATION SECURITY

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- ✓ CVIX's business must be treated as confidential and therefore must be kept confidential by all employees. When necessary to disclose information about the Company to the press, government entities, customers, among others, it must be previously authorized by the Corporate Board.
- ✓ The use of personal equipment to store, access or transport information about CVIX is prohibited.
- ✓ It is prohibited to use the means of communication provided by the company, such as e-mail, telephone, voicemail, etc. to send or receive consciously jokes, chains, pornographic material, photos and videos with private content. The sending of digital files to third parties must exclusively meet CVIX's business objectives.
- ✓ Any change in the configuration of CVIX computers and / or notebooks is prohibited, as well as storing private content on such equipment; download programs from the web without prior authorization, as well as install games and music.
- ✓ The resources and equipment used in the professional activity are the property of CVIX and must be used for the exclusive use of your interest. Therefore, CVIX has the right to access, record or monitor any of its electronic media, without being considered a violation of the rights of its employees.

# 13. SOCIAL NETWORKS & PERSONAL SITES

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- ✓ The behavior of its employees is responsible for CVIX's reputation. Thus, it is necessary to understand that the employment relationship with the company automatically establishes a relationship with the content that is generated in digital environments and therefore, exposure on social networks cannot compromise, let alone put at risk the values and principles that CVIX practices and preserves.
- ✓ Employees can identify in their profiles their professional relationship with CVIX, however it is recommended not to take sides on issues that may bring some risk to the Company's reputation and business;
- ✓ Criticism or any kind of offense against CVIX direct employees, service providers, suppliers or customers on public websites and social networks is not tolerated.
- ✓ It is strictly forbidden to share any professional information, be it comments, decisions, business prospects and other CVIX internal matters on public or private networks.

# 14. CUSTOMERS RELATIONSHIP

- ✓ CVIX is proud to have a reliable relationship with its customers and in order to continue this important credibility, we continuously seek to act with professionalism, responsibility, efficiency and effectiveness, so that the commitments made are fully fulfilled.

## **PRINCIPLES AND CONDUCT WITH CUSTOMERS:**

- ✓ CVIX does not discriminate against customers, whether by origin, economic size or location. However, it reserves the right to terminate any commercial relationship whenever its interests are not being served or even when the relationship represents risks to which the company does not wish to be exposed.
- ✓ Information about our services must always be clear and truthful. Technical data, especially safety, health and environmental requirements, will be mandatorily informed to customers.
- ✓ It is unacceptable for any direct CVIX employee to superimpose personal interests on the interests of customers or even to privilege some over others, especially if they use subterfuge to circumvent legal provisions or internal regulations in order to benefit certain customers.
- ✓ CVIX does not tolerate or condone illegal or unfair practices performed by its customers.



# 15. COMPETITORS RELATIONSHIP

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- ✓ Competition and antitrust laws are observed and respected by CVIX, and thus, its direct employees, guided by ethics and loyalty, cannot discuss prices, costs, business plans, business strategies or other business information with their competitors.

## PRINCIPLES AND CONDUCT WITH COMPETITORS

- ✓ CVIX is not allowed to obtain market information about its competitors through illegitimate procedures.
- ✓ To ensure ethical and healthy competition, the reputation of competitors must be respected, and therefore, all direct employees must refrain from making statements that could affect such an image.
- ✓ Direct employees are not permitted to provide information of any kind about CVIX to their competitors.
- ✓ Any employee who is related to another employee of direct competitors must immediately report the fact to his immediate manager, who together with the Executive Board will assess the possibility of a conflict of interest.

# 16. SUPPLIERS RELATIONSHIP

- ✓ The selection and negotiation of suppliers will always be practiced by CVIX lawfully, without privileges or discrimination of any nature, regardless of the value of the business. Once the business relationship is established, business management should also be conducted impartially and exempt.

## **PRINCIPLES AND CONDUCT WITH SUPPLIERS :**

- ✓ All contracts and commitments must be respected, monitored and fulfilled regarding the obligations assumed.
- ✓ CVIX repudiates and rejects doing business with suppliers that use child labor or in conditions similar to slavery, as well as in disagreement with current labor laws.
- ✓ CVIX safety rules must be strictly followed by its suppliers. Access to areas reserved for services will only be allowed if suppliers are duly authorized.
- ✓ In negotiations with suppliers, personal gain or any type of advantage, direct or indirect, is not allowed.
- ✓ CVIX will not accept relationships with suppliers that offer bribes or any kind of subterfuge to obtain an undue advantage.
- ✓ Any employee who has the power to influence a purchase or contract negotiation must declare himself prevented if there is a close relationship with someone from the supplier, to avoid possible conflicts of interest.
- ✓ Unjustified delays in the payment of our commitments to suppliers will not be allowed.
- ✓ Doing business with companies owned or managed by former employees must be previously evaluated by the Executive Board.

# 17. PRESS RELATIONSHIP

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- ✓ Only previously authorized employees can give interviews and / or provide clarifications to any type of media on behalf of CVIX.
- ✓ The relationship with the press or the media; interviews; statements or any form of providing information about CVIX can only be made by persons duly authorized by the Executive Board.
- ✓ The content to be disclosed must be previously reviewed and approved, before disclosure, in order to ensure the solidity of past information.
- ✓ CVIX representatives, when authorized to speak, may express only and exclusively the Company's institutional point of view. Any personal opinion provided does not represent the interests of the Company and therefore has no endorsement.



# 18. PUBLIC AGENT RELATIONSHIP

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- ✓ It is part of CVIX's policy to conduct its business with honesty and integrity. Maintaining this reputation is vital in our business and that is why we have a zero tolerance approach to any acts of corruption. Therefore, everyone is expected to remain concerned with this issue and report any concerns to the channel made available for that purpose.

## PRINCIPLES AND CONDUCT WITH PUBLIC AGENT

- ✓ For the purposes of defining these standards of conduct, CVIX considers a “Public Agent” to be any person who holds a public office, job or function or in a Parastatal Entity, including: 1) Federal, State and Municipal civil servants, of the three branches (Executive, Legislative and Judiciary); 2) employees/servers of companies controlled by the government, such as state sanitation companies, Petrobrás, Eletrobrás, Banco do Brasil, Caixa Econômica Federal, BNDES, etc.); 3) one who works in a service provider company, hired to perform a typical Public Administration activity; 4) diplomatic representations of a foreign country or state bodies and entities; 5) legal entities controlled by the government of a foreign country; 6) international public organizations; 7) or whoever, even if temporarily or without remuneration, holds office, employment or public function in organs, state entities or diplomatic representations of a foreign country.
- ✓ All employees and representatives acting on behalf of CVIX are prohibited from offering, promising, making, authorizing or providing (directly or indirectly through third parties) any improper advantage, payments, gifts or the transfer of anything of value to anyone, whether public agent or not, to influence or reward any official action or decision of a certain person for the benefit of the company.

- ✓ The institutional relationship with the Public Administration should occur with the highest level of formalization, transparency and internal documentation of conversations, communications and meetings.

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- ✓ Any employee can only contact public agents on behalf of CVIX when duly authorized by senior management. When there are inspections, the service must be carried out in accordance with the management, quality, health and safety and environment policies, practiced, remembering that the current laws, including the Anti-Corruption Law No. 12.846 / 13 are always sovereign.
- ✓ Face-to-face meetings with public officials can only be held in the presence of at least two CVIX employees and, if impossible, the meeting can only be held with the approval of Senior Management.
- ✓ Any official document of a legal nature addressed by public authorities must be immediately forwarded to CVIX's Corporate Board, which will inform the legal sector.
- ✓ In moments of inspection by the public authorities, CVIX will provide the requested information in a complete, objective and timely manner.
- ✓ All CVIX employees, suppliers, customers and representatives must follow the principles set out in Anti-Corruption Law No. 12,846 / 13 against the practice of bribery and any other illegal act.
- ✓ Payments to facilitate or speed up actions by public officials are a crime of corruption and, therefore, CVIX does not tolerate facilitating practices, of any kind.
- ✓ It is strictly forbidden to promise, offer or give, directly or indirectly to public agents or the third person related to him (wife, husband, children, uncles, partners, etc.) any kind of improper advantage (money, entertainment, travel, gifts, donations) or something of value).

- ✓ Anti-Corruption Law 12.846 / 13 and other relevant laws apply not only to individuals who pay bribes, but also to individuals who act in ways that encourage payment, that is, they apply to any individual who:
  - ✓ **Approve the payment of bribes;**
  - ✓ **Provide or accept false invoices;**
  - ✓ **Relay instructions for paying bribes;**
  - ✓ **Cover up the payment of bribes, or**
  - ✓ **Consciously cooperate in paying bribes.**
- ✓ No CVIX employee will be penalized for the delay or loss of business resulting from their refusal to pay bribes.
- ✓ Contributions are not tolerated in exchange for favors with any public agent, even if the recipient is a genuine charity. Donations made to institutions where the Public Agent or the member of his family has a public function, or at the behest of a Public Agent must be formally approved by the CVIX Ethics Committee.



# 19. CLASS ENTITIES RELATIONSHIP

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- ✓ CVIX maintains a relationship with professional representative entities, such as Unions, Professional Councils, Associations, Industry Federation, etc., in order to promote the debate on issues that may have a direct or indirect impact on the company's interests.
- ✓ CVIX employees are allowed to participate in Class Entities, such as Chambers of Commerce, Unions, Professional and Sector Entities. The employee must request prior authorization from his immediate superior, in the case of representing the company in any class entity.
- ✓ Any and all contributions or donations made to Unions, members of Unions or an entity controlled by a Union must follow the strictest legal and ethical standards, and must necessarily comply with the requirements and limits established by applicable law

# 20. PARTNERS & INVESTORS RELATIONSHIP.

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- ✓ The relationship with CVIX's partners and, perhaps investors, is based on the management policies practiced and on the precise, transparent and timely communication of information that allows us to monitor the Company's performance.
- ✓ CVIX is proactive in providing information to the market and seeks to minimize rumors and speculation. Exceptionally, we may stop disclosing information, if the partners and directors understand that its disclosure will jeopardize the legitimate interests of the Company, in compliance with current legislation;
- ✓ We manage the business with independence, good techniques and internal controls, aiming to preserve and expand the partners' assets in a sustainable way;
- ✓ We reject any action that directly or indirectly has a fraudulent, coercive, manipulative or deceptive influence on the independent auditors with the purpose of generating misleading economic and financial statements of the Company;
- ✓ We strictly comply with the requirements of the relevant laws and regulations, respecting the rights of our shareholders, both controlling and minority.

# 21. ACCOUNTING & FINANCIAL RECORDS

- ✓ Transparency of CVIX's accounting is paramount, with strictly respected legislation, rules and accounting principles, so that records and reports are consistent and, when necessary, can be disclosed in order to preserve the Company's credibility.

## STANDARDS FOR ACCOUNTING

- ✓ CVIX records must clearly express all of their transactions in order to allow the preparation of accurate financial statements in accordance with accepted accounting principles and applicable law.
- ✓ All transactions must be properly authorized, duly registered and supported by accurate and reasonably detailed documentation.
- ✓ No information can be omitted from external auditors, senior management and investors.
- ✓ It is strictly prohibited to fraudulently influence, coerce, manipulate or mislead anyone who is auditing our financial statements.
- ✓ We are transparent in our policies, in the distribution of dividends and in the statements of the economic and financial situation of the Company, so that we ensure accuracy in the books and accounting records, being agile and reliable in providing information to partners;



# 22. SOCIAL ACTIONS

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- ✓ CVIX's Mission is sustainable growth and constantly evaluates the possible social and environmental impacts of its actions and decisions.

## COMMITMENT TO THE ENVIRONMENT

- ✓ All CVIX employees, direct and indirect, must conduct their activities through practices that preserve the environment and promote sustainable development.
- ✓ Strictly comply with the parameters and requirements required by environmental and labor legislation;
- ✓ Priority in hiring suppliers that have good social and environmental conduct and that encourage the adoption of good practices in these matters.

## DONATIONS AND / OR CONTRIBUTIONS TO CHARITIES AND SOCIAL PROGRAMS

- ✓ Donations and other forms of contributions to charities and social programs must obey a legitimate interest and must always be geared towards meeting the real needs of the assisted community or society.
- ✓ Donations and contributions must always be supported by a written document containing, at least, a clear specification of the amount, date, purpose and charges that may exist.
- ✓ Donations must be made only in response to requests formally directed to CVIX and must comply with current laws. Payments must be made directly to the institutions, which must be independent of any business partners of the Company.

# 23. FINAL CONSIDERATIONS

- ✓ The Code of Ethics and Conduct is an instrument to guide CVIX's direct and indirect employees, customers and suppliers in their daily actions. However, there may be situations in the day-to-day work that require answers that are not necessarily suggested in this document, but that must be subordinated to the respective Laws, then in force.
- ✓ If you feel insecure, reflect on the following questions and answering them consciously and honestly will help you maintain your personal position of integrity.

## SUGGESTED QUESTIONS :

1. This action is complete and legal?
  2. The decision to be taken preserves CVIX's reputation or mine?
  3. I can be proud of these actions when I tell my family?
- ✓ If you answer “no” to one of these questions or if you are unsure, stop, express your opinion and seek guidance. Rest assured that CVIX Senior Management is on hand to assist you.

# 24. RECEIPT & KNOWLEDGE DECLARATION OF THE CODE OF ETHICS AND CONDUCT

- ✓ I declare that I have received CVIX's Code of Ethics and Conduct and that I am aware of its content, which will be applied in the exercise of my duties and that I will be subject to administrative, civil, labor and criminal responsibilities, due to its non-compliance.

Furthermore, I hereby **DECLARE**:

- ✓ To hold, directly or indirectly (for example: a spouse or relative), interests and / or interests of any nature in companies, companies or organizations that have a commercial relationship with CVIX.

(    ) NO

(    ) YES

In affirmative case, please provide the name of the legal company in question, the ownership percentage of participation and the name, position and family relationship with employees or partners of the company (when applicable):

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# 25. CONFLICT OF INTEREST TERM

- ✓ Kinship (spouse, parents, children, brother and / or grandparents) with CVIX employees :

(     ) NÃO

(     ) SIM

In affirmative case, please inform the degree of kinship, the name and position held by the spouse or relative of CVIX.

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Furthermore, I accept, whenever requested, to meet and comply with additional precepts disclosed by CVIX that come to integrate this Code of Ethics and Conduct, without the need to sign a new Term.

Full Name : \_\_\_\_\_

Office : \_\_\_\_\_

Registration Number : \_\_\_\_\_

CPF subscription : \_\_\_\_\_

Date : \_\_\_\_\_

Signature : \_\_\_\_\_



**CVIX Company**

*Innovation, Construct, Evolve*