

POSITIVO TECNOLOGIA S.A.

**CODE OF CONDUCT FOR
SUPPLIERS AND BUSINESS
PARTNERS OF
POSITIVO TECNOLOGIA**



POSITIVO

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1. Importance and scope of this Code

This Code of Conduct for Suppliers and Business Partners of Positivo Tecnologia (“Code of Conduct”) contemplates the most important guidelines, norms and principles of ethical conduct to guide the daily lives of all of those related to the Company and reflects our commitment to integrity and honesty. The rules of conduct set forth herein apply to all persons who do business, partnerships, provide goods or services or are involved in any other kind of contractual relationship with Positivo Tecnologia (“Suppliers and Business Partners”).

Positivo expects its Suppliers and Business Partners to share and incorporate these values and commitment to integrity in order to build a long-lasting business relationship.

2. Conduct and Commitments of Suppliers and Business Partners

2.1 Compliance with legislation and standards: Suppliers and Business Partners shall comply with applicable laws and regulations in force, in particular, but not limited to, labor, tax, anti-corruption, competition, import/export, social security, and environmental laws.

2.2 Anti-corruption, anti-bribery and anti-fraud policy: even if the relationship with Positivo Tecnologia does not involve Public Officers¹ directly, it is required of every Supplier and Business Partner to observe all the precepts brought by the Anti-Corruption Law. In this way, it is prohibited to our Suppliers and Business Partners and subject to applicable legal and contractual measures:

- Promise, offer, receive or give, directly or indirectly, to directors or employees of Positivo or to public officers, any payment, donation, or anything of value, especially for the purpose of obtaining any type of improper advantage;
- Enter into contracts or agreements with competitors or others that restrict competition, fix prices, or circumvent the public bidding procedure.

As representatives of Positivo, Suppliers and Business Partners must comply in full with the Corporate Anti-Corruption Policy available at <https://compliance.positivotecnologia.com.br>. Positivo Tecnologia respects the principles of the Brazilian public administration and does not condone any acts of corruption committed by its employees, suppliers and business partners.

2.3. Regularity before public agencies: all licenses, registrations, permits, operating authorizations and any other mandatory documents of Suppliers and Business Partners must be regular and valid, as well as any corporate changes.

¹ Are considered to be public agents any person acting temporarily or permanently, with or without remuneration, for the national or foreign public administration, which is composed of public companies, semi-public corporations, institutions, agencies, departments and bodies of property or controlled by the Brazilian or foreign State as well as other public entities (whether interest or control is total or partial, direct or indirect), diplomatic representations, and international public organizations including research institutions, universities and hospitals

2.4. Fair competition and antitrust: Positivo expects its Suppliers and Business Partners to adopt a firm position in order to compete in a respectful, ethical and transparent manner, acting in accordance with national and international competition rules as well as with Positivo Tecnologia's Competition Policy.

2.5. Conflict of interest: it is forbidden to obtain an advantage for oneself or for a third party by using one's power, influence or position within the Company, and one should avoid any conduct that may generate a conflict or appear to conflict with the interests of Positivo. Affective, family or commercial relationships of suppliers with any members of Positivo's staff or third parties related to the Company must be communicated to Compliance, immediately and formally.

2.6. Gifts and entertainment: it is prohibited to offer, grant or receive any kind of gifts, benefits, privileges, travel, favors and the like that may confer an advantage to directors, employees, third parties or family and friends related to them, acting for and/or on behalf of the Company. Suppliers may offer corporate/promotional objects of small economic value, such as calendars, notebooks, pens and flash drives to promote their brands.

2.7. Secrecy and Confidentiality: Suppliers and Business Partners commit themselves to the confidentiality of all information that they have access to because of their relationship with Positivo Tecnologia.

2.8. Use of Trademark and Trade Name: the use of the Positivo Tecnologia brand is only permitted with the express authorization of Positivo's Management and in accordance with the rules of use set out in the Trademark Usage Guidelines; otherwise it may be deemed misused.

2.9. Social Media: Suppliers and Business Partners, as well as their employees, undertake to act in social media respecting the values of this Code when mentioning Positivo Tecnologia or referring to any of its employees or third parties.

2.10. Environment: caring for our planet is one of our premises. Positivo Tecnologia sees the environmental quality of its activities, products and services as a fundamental factor for the sustainability of its business and works to keep in line with the current environmental legislation. As part of this commitment, all Positivo Suppliers and Business Partners must comply with all environmental laws and regulations applicable to their activities in addition to obtaining, maintaining and updating all mandatory environmental authorizations and registrations.

2.11. Workplace Relationships: Positivo expects its Suppliers and Business Partners to share its commitment to human rights and equal opportunities at work and to guarantee their employees compliance with existing labor, social security and insurance legislation, among other obligations established by agreement and/or collective bargaining agreement, including:

2.11.1 Combating discrimination: discriminatory or prejudicial practices in any type of relationship are unacceptable and Positivo reserves the right not to connect with companies that engage in discriminatory acts of any nature.

2.11.2 Respect for Diversity: all Suppliers and Business Partners shall respect and value differences between gender, origin, ethnicity, sexual orientation, belief, religious practices, political and ideological convictions, social class, disability status, marital status or age.

2.11.3 Combating moral and sexual harassment: no commercial relations will be sustained with companies that engage in acts of moral and/or sexual harassments in their activities under any circumstance or pretext

2.11.4 Occupational Health and Safety: our Suppliers and Business Partners are required to integrate good health and safety management practices into all aspects of their business and to work towards preventing occupational accidents and diseases. Suppliers and Business Partners shall comply with the Safety and Occupational Health Legislation and provide adequate and sufficient protection equipment, presenting PCMSO, ASOs, PPRA, PPP, and other related documents when requested by Positivo.

2.11.5 Prohibition of child, slave or degrading labor and trafficking of persons: the relationship with companies that tolerate, permit or condone these types of labor and/or disrespect human rights in their activities is forbidden.

2.11.6 Wages: the compensation paid to workers must comply with all applicable wages laws, including those relating to minimum wages, overtime and legally required benefits and must ensure an adequate standard of living. Suppliers are expected to offer their employees fair and competitive wages and benefits.

3. Audit, Diligence and Visits to Facilities

Invoices, licenses, certificates, permits, accounting and operational records, social contracts, on-site audit, as well as any other document proving the certification of the company, material or service, shall be provided to Positivo upon request, as well as the completion of a Third Party Compliance Questionnaire as provided for in the Corporate Anti-Corruption Policy.

4. Canal Aberto Complaints Channel

Violation of the legislation, the Code of Conduct, the Policies, Manuals and Norms of Positivo Tecnologia or even the mere suspicion of unlawful acts must be reported to and received with complete confidentiality, secrecy and anonymity, if desired, by the Complaints Channel, which can be contacted by phone 0800 727 7016 or website www.positivotecnologia.com.br/canalaberto.

5. Responsibilities

Suppliers and Business Partners are responsible for their employees (with or without employment relationship), holders of power of attorney, and partners. Therefore, Suppliers and Business Partners must ensure that the Code of Conduct for Suppliers and Business Partners, the Anti-Corruption Policy of Positivo Tecnologia and the Brazilian Anti-Corruption Law (among other laws and normative acts) are widely known and duly complied with, and undertake to implement internal mechanisms and procedures for integrity, auditing and incentive to the reporting of irregularities .

6. Penalties

Cases of noncompliance with this Code shall be analyzed individually. The following penalties may be formally applied in isolation or cumulatively: a) written warning; b) suspension of participation in price quotation and/or commercialization process with Positivo Tecnologia, for a specific term to be determined as the case may be; c) contract termination; d) permanent exclusion from the qualified suppliers list; e) application of fine as provided for in the contract.

7. How to get Help

In case of doubt, e-mail the Compliance Committee at compliance@positivotecnologia.com.br

STATEMENT OF LIABILITY AND COMMITMENT TO THE CODE OF CONDUCT ALIGNMENT OF POSITIVO TECNOLOGIA

I hereby confirm that I have received, read and understood the entire contents of the Code of Conduct for Suppliers and Business Partners of Positivo Tecnologia and agree to comply with all terms and conditions presented.

I commit to:

- a) comply with the provisions of the Code;
- b) report infractions that contradict the conduct and norms laid out in the documents through the complaints channel (www.canalabertopositivo.com.br) and (compliance@positivotecnologia.com.br);
- c) contribute to the investigation of possible infractions.

Company: _____

Name: _____

Registry: _____ Positivo: _____

Area: _____ Place: _____

Date: _____ Signature: _____



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