



Supplier Code of Conduct

Effective as of July 04th, 2026

Message from Leadership

NAVVIK's values shape how we do business, guiding us toward sustainable development and ethical conduct. Suppliers are essential partners in delivering value to our stakeholders, and we work to build relationships with those who share our commitment to responsible business practices.

This Code sets out the minimum standards we expect suppliers to follow, in accordance with the UN Universal Declaration of Human Rights, the International Labour Organization (ILO), core labour conventions, the UN Guiding Principles on Business and Human Rights, and relevant ISO standards on health, safety, and environment. We ask suppliers to commit to these principles, extend them through their own supply chains, and strive to go beyond compliance toward higher standards of sustainability.

Introduction & Implementation

As a global company, NAVVIK takes active responsibility for the societies and environments in which it operates. This Code applies to all suppliers, sub-contractors, agents, consultants, and their affiliates providing goods or services to NAVVIK. Where local laws are less stringent than this Code, the stricter standard applies; where a genuine conflict arises, suppliers are encouraged to work with NAVVIK to find the most appropriate course of action.

- Suppliers must acknowledge and commit to this Code.
- Compliance is assessed through audits, self-assessments, and documentation reviews.
- Suppliers should address gaps with a time-bound improvement plan developed in consultation with NAVVIK.
- Suppliers must implement these principles, or equivalent recognized standards, throughout their own supply chains and communicate this Code to their own suppliers.
- Violations may lead to corrective action, up to and including contract termination of the business relationship and ineligibility for future supplier qualification at Navvik.

Speaking Up: Confidentiality and Non-Retaliation

Suppliers must maintain a grievance mechanism by means of which their personnel have the possibility of raising concerns anonymously and without fear of retaliation. All grievances must be investigated fairly and promptly, with appropriate remedy provided. Anyone — inside or outside NAVVIK — may report suspected violations through the NAVVIK Whistleblower Channel, a confidential, independently administered channel available 24/7 in Navvik's website (www.navvik.com.br).

Reports may be submitted anonymously, if desired, and Navvik guarantees confidentiality throughout the investigation process, to the extent permitted by applicable law.

Retaliation against those who submit reports in good faith or participate in investigations is not tolerated. Non-retaliation is a fundamental principle that supports the integrity and credibility of the Whistleblowing Channel.

Health, Safety & Security

Suppliers are expected to provide a safe, healthy, and secure workplace at all times.

- Suppliers shall promptly report any work-related incidents, injuries, illnesses, environmental releases, security events, property damage, and near misses associated with work performed on behalf of NAVVIK and cooperate in investigations and corrective actions.
- Comply with applicable health and safety laws and regulations.
- Develop effective safety management systems with worker participation.
- Identify, measure, and continually reduce health and safety risks. It is necessary to conduct documented risk assessments and implement appropriate controls.
- Provide appropriate personal protective equipment and training. Ensure that personnel are competent, appropriately trained, medically fit where required, and authorized to perform assigned tasks.
- Empower workers to report unsafe practices without fear of reprisal.
- Maintain clear emergency response procedures, including evacuation plans, first aid, and fire safety equipment.
- Suppliers shall communicate these requirements to their subcontractors and maintain appropriate oversight to ensure compliance throughout their supply chain.
- Implement appropriate security measures to protect personnel, facilities, assets, information, and operations from unauthorized access, theft, violence, sabotage, or other security threats.

Labour Rights

Suppliers must foster a workplace where workers are treated with dignity, respect, and fairness.

Child Labour

- No employment of children below the local minimum working age, compulsory education age, or ILO minimum (whichever is higher).
- Workers under 18 must not perform nightshift, overtime, or hazardous work.

Freely Chosen Employment

- No forced, bonded, indentured, or trafficked labour.
- No recruitment or hiring fees charged to workers.
- Personal identity and travel documents must remain in workers' possession.

Employment Contracts

- Clear written terms and payment conditions in a language the worker understands, provided before work begins.

Compensation

- Compliance with minimum wage, overtime, and legally mandated benefit laws.
- Fair remuneration meeting basic needs where no statutory minimum exists.
- Fair, non-punitive deductions and written pay slips.

Working Hours

- Compliance with legal limits on hours, breaks, and rest periods.
- Overtime must be voluntary, compensated, and non-systematic.
- Adherence to sickness, annual, and parental leave legislation.

Freedom of Association

- Workers may freely join or decline to join trade unions.
- Workplace issues addressed through open dialogue, free from intimidation or reprisal.

Anti- Bullying, Discrimination & Harassment

- Equal opportunity regardless of age, gender, ethnicity, religion, disability, or other protected characteristics.
- Special attention to vulnerable and migrant workers.
- Zero tolerance for bullying, intimidation, or harassment of any kind.

Security Guards

- Security personnel must operate in line with recognized human rights standards on the use of force.

Our commitment to human rights requires awareness and proactive measures to identify and assess the risk of human rights violations, as well as the implementation of mechanisms to promote:

- The eradication of child labor.
- The eradication of forced or compulsory labor.
- The prevention of discrimination in all its forms.
- The promotion of diversity.
- The prevention of workplace harassment and sexual harassment.
- Decent working conditions and respect for freedom of association and the right to Collective Bargaining.

Working with Integrity

Anti-Corruption & Anti-Money Laundering

- Zero tolerance for bribery, extortion, or corruption; compliance with UN/OECD anti-corruption conventions.
- Written anti-bribery policies and worker awareness training.
- Transparency on links to government bodies or officials.
- Gifts and invitations to NAVVIK employees must be modest and consistent with local business custom.
- All bribery offers or requests must be reported and refused.
- Compliance with anti-corruption and anti-money-laundering laws, a set of national and international laws, decrees, regulations and instructions aimed at preventing and combating improper practices, such as fraud, bribery, corruption and other unlawful acts, including, in particular, the Brazilian Anti-Corruption Law (Federal Law No. 12,846/2013), Federal Decree No. 11,129/2022, the Brazilian Penal Code; the Administrative Misconduct Law (Federal Law No. 8,429/1992); the Anti-Money Laundering Law (Federal Law No. 9,613/1998); the Public Procurement Law (Federal Law No. 8,666/1993 and Federal Law No. 14,133/2021); the Electoral Code (Federal Law No. 9,504/1997); the Law on the Prevention and Suppression of Violations Against the Economic Order (Federal Law No. 8,884/1994 and Federal Law No. 12,529/2011); the U.S. Foreign Corrupt Practices Act (FCPA) and Foreign Extortion Prevention Act (FEPA); and the United Kingdom Bribery Act (UKBA).

Data Ethics & Cybersecurity

- Responsible, purpose-limited use of data entrusted by NAVVIK and its customers.
- Compliance with data protection and information security laws.
- Safeguarding of systems against unauthorized access and prompt breach notification.

Antitrust Law

- Independent competition on pricing and terms; no price-fixing, market division, or bid-rigging.
- No unlawful exchange of competitively sensitive information.

Sanctions & Export Controls

- Compliance with UN, US, EU, and UK sanctions and export control laws.
- No dealings with sanctioned parties or restricted goods/services connected to NAVVIK.
- Due diligence on suppliers' own vendors for sanctions compliance.

Conflict of Interest

- Decisions must be based on objective criteria, free from personal or business conflicts.
- Any actual or perceived conflict must be disclosed to NAVVIK immediately.

Environment

Suppliers are expected to minimize environmental impact and, where material, contribute positively to shared environmental and climate goals.

Compliance, Monitoring & Hazardous Substances

- Policies aligned with local, national, and international environmental laws.
- Licensed personnel for regulated environmental work, with proper records maintained.
- Safe identification, labeling, and disposal of hazardous substances, with Material Safety Data Sheets displayed and worker training provided.

Waste, Wastewater & Air Emissions

- Proper segregation, treatment, and monitoring of waste and wastewater.
- Immediate notification of spills or hazardous releases.
- Monitoring and control of air emissions per applicable standards.

Resource Use & Biodiversity

- Efficient, responsible use of energy, materials, and water; commercially reasonable recycling and reuse.
- Protection of biodiversity and ecosystems, minimizing presence in sensitive or protected areas.

Climate Change

- Suppliers are encouraged to measure and monitor greenhouse gas emissions, establish reduction initiatives, and where practical, set science-based reduction targets aligned with international climate objectives

Quality

Suppliers are expected to deliver products and services that consistently meet contractual, regulatory, and customer requirements.

Quality Management

- Comply with applicable quality-related laws, regulations, standards, and contractual requirements.
- Maintain processes to ensure the quality, reliability, and conformity of products and services supplied to NAVVIK.

- Implement appropriate controls for inspection, testing, verification, and release of products and services, where applicable.

Competence & Continuous Improvement

- Ensure personnel are competent, trained, and qualified for the activities they perform.
- Investigate quality deviations, implement corrective actions, and take measures to prevent recurrence.
- Promote continuous improvement of processes, products, and services.

Non-Conforming Products & Services

- Promptly notify NAVVIK of any actual or suspected non-conformance affecting delivered products or services.
- Maintain processes for identification, segregation, correction, and disposition of non-conforming products or services.

Document & Change Control

- Maintain relevant records demonstrating compliance with quality requirements.
- Communicate significant changes to products, services, manufacturing processes, materials, or key personnel that may affect quality or performance.