

CODE OF CONDUCT FOR SUPPLIERS



Mission

Be a leader in our business, offering trust and strong ties to customers and employees, a sustainable approach to the environment and the return to shareholders.

Vision

Learn to listen, develop and deliver:
there is always a clear need.

A leading Company presents solutions.

Values

Committed and unblemished conduct;

Adaptability;

Total focus on customer demands.



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1. Purpose

Innova is committed to building a sustainable business model and contributing to a more just, environmentally balanced and economically prosperous society. For this, we need to act and positively and proactively influence each partner and others involved in our production chain.

The Code of Conduct for Suppliers has the purpose of clarifying what the Company understands by ethical conduct in commercial relations with companies that provide services and products. Therefore, we expect our Suppliers to understand these criteria throughout their entire value chain, including their customers, partners, raw material Suppliers and service providers, directly or indirectly, linked to the company's activities.



2. Scope

This code covers all Innova's Suppliers, as well as its affiliated and controlled companies.



3. Guidelines

Ethical and socio-environmental guidelines were established for all Suppliers based on Innova's Code of Conduct. In the development and selection of Suppliers, service providers and integrated partners, the Company impartially considers objective, technical, professional and ethical criteria and compliance with legal, labor and environmental requirements. Preference is given to those who are socially responsible and committed to the causes of social and community transformation defended by Innova.

We therefore expect commitments and practices consistent with the following topics.



3.1 Laws and Regulations

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate and in full compliance with this Code.



3.2 Anti-bribery and anti-corruption

Innova has a zero tolerance policy for bribery and corruption of any kind and in any form. Offering, authorizing, promising, giving, accepting, soliciting or receiving, directly or indirectly, anything of value to improperly influence someone or obtain an improper or illegal advantage is considered bribery and is prohibited by law. This prohibition extends to public officials and commercial relationships. Even the appearance of an inadequate condition must be avoided at all times and under all circumstances. Suppliers must act with the utmost integrity, honesty and transparency and comply with all anti-bribery and anti-corruption legislation.



3.3 Gifts and entertainment

In accordance with the Gifts, Presents and Entertainment Policy, offering or receiving gifts, presents and entertainment, made by or to a Public or Private Entity, do not require pre-approval from the Compliance Area when the value is less than USD 100.00 or the respective equivalent value in foreign currency.

They require pre-approval from the Compliance area, all offers or receipts of gifts, presents and entertainment made by or to a Public or Private Entity, whose value exceeds USD 100.00, or the respective equivalent value in foreign currency, or, also, when it occurs for the second time in a year by or from the same Entity.



3.4 Child and/or Labor Analogous to Slavery

Child labor is characterized when performed by children and adolescents below the minimum legal age, compromising their physical, moral and psychosocial integrity. The hiring of minors is accepted only as a Young Apprentice (14 to 24 years old), in accordance with current legislation. Suppliers must respect the hiring of workers with the legal minimum age (16 years old).

Unhealthy and dangerous activities are restricted to those over 18 years of age, provided the legal precepts of health and safety are complied with.



Not restricting the worker's freedom by withholding documents, exhausting working hours and degrading working and housing conditions - which can be characterized as forced and/or slave labor.

All Suppliers must provide decent working conditions for their employees. The workload, remuneration and benefits, and health and safety requirements, must comply with labor legislation.



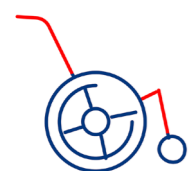
3.5 Freedom of association

Suppliers must recognize and respect any workers' rights to exercise their legal rights to freely associate, including whether or not to join any association.



3.6 Harassment

Suppliers must treat all workers with respect and dignity. No worker shall be subjected to physical punishment or to physical, sexual, moral, racial, religious, political, psychological or verbal abuse or harassment. Innova does not condone coercive commercial practices to gain advantage or any type of harassment.



3.7 Diversity

All Suppliers must respect and value differences between gender, origin, ethnicity, sexual orientation, belief, religious practices, political conviction, ideology, social class, disability status, marital status or age.



3.8 Health and safety

Suppliers shall provide workers with a clean, safe and healthy work environment that complies with all legally mandated standards for workplace health and safety.



3.9 Conflict of interests

Any type of private relationship, on a regular basis, between Suppliers and Innova employees must be communicated, such as, for example, family relationships between the supplier and its employees with Innova employees.



3.10 Unfair competition

Corporate and/or industrial espionage acts, as well as any other practice other than fair competition, will not be accepted.



3.11 Environment

Suppliers must comply with all local environmental laws applicable to the workplace, the products manufactured and the manufacturing methods. They must not use materials considered harmful to the environment, but must encourage the use of processes and materials that support and encourage sustainability and circular economy.



4. Failure to comply with this Code of Conduct for Suppliers

To maintain the Company's ethical standards and monitor commercial relations with third parties, as well as assist in the prevention and detection of all forms of corruption, Innova supports and encourages the reporting of any practices that may represent a violation or potential violation of this Policy, to the Code of Conduct, or that are in disagreement with the applicable national and foreign legislation.

Complaints must be made to the Whistleblower Channel through the following means of communication:



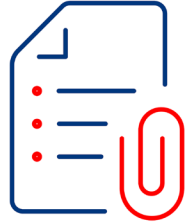
0800 810 8166



<https://www.contatoseguro.com.br/innova>

Barueri/SP, December 1st, 2022





Term of acknowledgment and agreement

Company name: _____, company
duly constituted in accordance with the laws of the country, _____
headquartered in _____, hereby duly represented by
_____, declares:

- (a) that I know and accept the principles contained in the Innova Supplier Code of Conduct, the full text of which was delivered to me on this date;
- (b) that I will seek to comply, as of this date, with the terms and conditions transcribed in this Code and that I will seek to remain in compliance with it, develop it and integrate it into my management processes;
- (c) that I will seek to share with Innova and with my respective network of Suppliers the efforts, difficulties and achievements in incorporating the proposed practices aimed at the sustainability of the company's business;
- (d) that I am aware that the signing of this Term of Commitment does not require Innova to establish any commercial relationship with the signatory company.

_____, _____ 20__.

(signature)

