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viveo

**Anti-Corruption
Policy**

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1. INTRODUCTION

The provisions contained in Viveo's Anti-Corruption Policy ("Anti-Corruption Policy"), which is known and mandatory, aims to ensure that all Viveo Employees (own or third parties) understand the guidelines of the Brazilian Anti-Corruption Law and observe its guidelines to prevent and combat situations prone to acts of corruption, bribery and fraud, both in relation to public institutions and private companies.

This Anti-Corruption Policy is complementary to Viveo's other policies and procedures in force and has been prepared in accordance with all applicable laws and regulations against bribery and corruption, including, but not limited to: Brazilian Anti-Corruption Law (Federal Law No. 12.846/13) and its Decree No. 11.129/2022; Antitrust Law (Law No. 12.529/11); Bidding and Administrative Contracts Law (Law No. 8.666/93); Administrative Misconduct Law (Law No. 8.249/92) and its regulations, US Foreign Corrupt Practices Act (FCPA); UK Bribery Law ("UKBA"); United Nations Convention against Corruption ("UNCAC"); United Nations Global Compact and other national and international laws related to bribery and corruption applicable to Viveo.

Viveo prohibits and does not tolerate any practice of corruption, bribery, payment or receipt of bribes either with the Public Administration, national or foreign, or with private companies, based on Brazilian and international anti-corruption law.

Failure to comply with this policy by Viveo employees is subject to the application of disciplinary measures and/or applicable penalties, based on Viveo's policies, labor, civil and criminal legislation, applicable national and international anti-corruption legislation, including laws to prevent and combat corruption and money laundering, as the case may be.

If Viveo Employees have doubts about the classification of a situation in relation to this Anti-Corruption Policy, that is, whether or not a certain conduct characterizes a deviation from the precepts established therein, a consultation may be made with the Compliance area through the channels indicated in this Policy.

ACCESS THE ANTI-CORRUPTION POLICY ON THE WEBSITE WWW.VIVEO.COM.BR

2. VIVEO INTEGRITY PROGRAM

2.1. WHAT IS THE INTEGRITY PROGRAM?

Viveo's Integrity Program is a specific compliance program, focusing on the adoption of ethical and anti-corruption measures aimed at the prevention, detection and remediation of harmful acts provided for in the Anti-Corruption Law and other laws in force, in addition to the occurrence of bribery and fraud against the national and/or foreign public administration.

In other words, Viveo's Integrity Program represents a set of internal mechanisms and procedures for integrity, auditing and encouraging the reporting of irregularities and the effective application of Viveo's Code of Conduct, Anti-Corruption Policy, Anti-Bribery Policy and Corporate Risk Management Policy, in addition to other internal policies and guidelines, in order to detect and remedy deviations, fraud, irregularities and unlawful acts committed against the national or foreign public and private administration.

2.2. WHAT IS COMPLIANCE?

The term compliance derives from the English verb “to comply”, which means to fulfill, execute, satisfy, or agree with something. Thus, corporate compliance is the adoption of procedures by Viveo in order to comply and ensure compliance with current legislation and internal and external regulations, by preventing and punishing deviations from illegal conduct or practices.

2.3. OBJECTIVES OF THE INTEGRITY PROGRAM

The objectives of Viveo's Integrity Program are:

- Disseminate the culture of compliance, ethics, morality and transfer among Viveo employees and business partners
- Guide employees on legal practices, policies and internal guidelines
- Observe and enforce the application of the guidelines of the Code of Conduct, Anti-Corruption Policy, Anti-Bribery Policy and Corporate Risk Management Policy, in addition to Viveo's other internal policies and guidelines
- Align with the best practices of corporate governance
- Ensure integrity, reliability and security in information
- Ensuring sustainable growth and business longevity
- Prevent, detect and remedy deviations, fraud, irregularities and unlawful acts
- Provide greater protection and value gain to Viveo's corporate image and reputation

- Encourage raising concerns (complaints) based on good faith or reasonable conviction through the use of the Viveo Ethics Channel
- Ensure that no employee or business partner will suffer any kind of retaliation or penalty resulting from raising concerns (complaints) or refusal to practice any illegal or unethical conduct

2.4. WHAT IS THE ROLE OF THE LIVING EMPLOYEE IN THE INTEGRITY PROGRAM

The role of the Viveo employee in the Integrity Program is:

- ✓ Know and strictly follow Viveo's Code of Conduct, Anti-Corruption Policy, Anti-Bribery Policy and Corporate Risk Management Policy
- ✓ Participate in all mandatory training of the Integrity Program, practice learning in your work routine and solve your possible doubts
- ✓ Have ethical conduct, posture and professionalism in activities performed on a daily basis and in relationships with any business partner
- ✓ Raise concerns (complaints) based on good faith or reasonable conviction through the use of the Viveo Ethics Channel when witnessing acts or conduct that is in disagreement with the integrity program
- ✓ Act as guardians of the Anti-Corruption Policy and be responsible for the application of the guidelines contained herein in all professional relations

Viveo reinforces that the participation and active performance of Employees is essential to ensure the effectiveness of the implementation of the Integrity Program.

2.5. ZERO TOLERANCE TO CORRUPTION

Viveo's policy is zero tolerance for acts of corruption. The exercise of professional activities and commercial affairs must always respect the laws and regulations in force, as well as the internal rules and policies of Viveo companies.

In order to guarantee professional fairness in the execution of their activities, Viveo Employees will receive periodic training to prevent the practice of any conduct inconsistent with the guidelines of this Anti-Corruption Policy. Any act in disagreement with Viveo's Anti-Corruption Policy will be subject to the sanctions applicable by the Company's internal policies and related legislation, and its non-compliance will be subject to Viveo liability.

3. INTEGRITY PROGRAM IN PRACTICE

3.1. RELATIONSHIP WITH PUBLIC AUTHORITIES

Viveo reaffirms its full and transparent stance in its relationship with the Government and prohibits any acts of corruption and bribery, directly or indirectly, in its relationship with a Public Agent or a related third party, whether national or transnational.

All Viveo Employees acting on behalf of Viveo are prohibited from offering, promising, authorizing or receiving (directly or indirectly) any undue advantage (payments, gifts or the transfer of anything of value) to Public Agents, in order to influence, facilitate or reward any official action or decision for the benefit of Viveo or itself.

It is expressly prohibited that there is any manipulation or adulteration of documents, authorizations, fulfillment of commitments, purchase orders, or any other documents used for participation in bids and other purchasing systems of the entities of the Government. In order to prevent any defects and illegalities, any discrepancies in information identified during the validation of the documents necessary to formalize Viveo's participation in a bidding process must be reported to the Compliance area.

No Viveo Employee, third party or partner will suffer any kind of retaliation or penalty due to delay or loss of business resulting from their refusal to pay or receive bribes and/or to practice any illegal or unethical conduct.

The deepening of the guidelines and other information on commercial relations with the public sector are available in the "Bidding and Relationship with Public Agents Policy".

3.2. RELATIONSHIP WITH SUPPLIERS, PARTNERS AND THIRD PARTIES

All suppliers, service providers, intermediaries and other partners conducting business with Viveo, by Viveo or on behalf of Viveo, must act with the highest level of integrity.

Thus, Viveo reserves the right to carry out a compliance risk assessment through an integrity due diligence procedure, which aims to know and evaluate the integrity risks to which it may be exposed, in its relationships with third parties, based on the evaluation of the profile, the history of involvement in cases of corruption, reputation and anti-corruption practices, among other compliance criteria.

Any risk situation identified in the integrity due diligence must be treated with the support of the Compliance area of Viveo. In accordance with the Anti-Corruption Law, Viveo may be held liable for the actions of suppliers, service providers, intermediary agents and other business partners if acts of bribery or corruption that aim to benefit Viveo participate, regardless of the fact that Viveo is aware of the alleged improper conduct practiced.

Therefore, Viveo Employees should never ask a third party intermediary to engage or tolerate any conduct that the employee himself is prohibited, according to the terms of this Anti-Corruption Policy.

Viveo also undertakes to compete fairly in the markets, boosting free competition for the benefit of consumers and users, always ensuring compliance with the legal rules in force.

Viveo Employees will not perform misleading advertising of the activity of their business and will avoid any conduct that constitutes or may constitute an abuse or unlawful restriction of competition (price agreement, cartel formation, restriction of competition, etc.), and any anti-competitive practice provided for in Law No. 12.529/11 is prohibited.

If any third party conduct represents a suspicion of committing an act of corruption and/or the practice of any other illegal act, whether of any kind, the Viveo Employee involved must strongly and immediately reject the proposal, reporting the occurrence to their leadership and/or the Compliance area, so that the appropriate measures are adopted, including in the criminal sphere.

3.3. IMPROPER ADVANTAGE FACILITATION PAYMENT

Viveo Employees are strictly prohibited from directly or indirectly, promising, offering or giving an Improper Advantage, regardless of value, to a Public Agent or to third parties related to it, and it is forbidden to ask, request, agree to receive or accept bribes, kickbacks, payments of illegal influences or any kind of favor or special treatment.

Viveo prohibits and does not tolerate the offer or payment of facilitation to accelerate or favor the analysis and obtaining of licenses, authorizations and permissions to be performed by its employees, suppliers or intermediary agents.

3.4. CONFLICT OF INTERESTS

All Viveo Employees must act in order to prevent and remedy situations that may cause or suggest a conflict of interest in the relations between employees, suppliers, competitors and public agencies

and that, if not disclosed, may undermine the trust and credibility of employees and Viveo, as established in the Code of Conduct.

Employees shall not engage in any activity or situation that conflicts with or interferes with the performance of their duties to Viveo, that is, they shall not compete with or allow personal or family interests to exert a direct or indirect influence on Viveo's business, nor shall they make a business decision motivated by a personal interest that may influence the ability to act in Viveo's best interest, or when the assessment of a circumstance may or may appear to be affected by the possibility of a personal benefit.

3.5. FRAUD OR DIVERSION OF FINANCIAL VALUES AND ASSETS

Fraud is considered to be any misleading conduct, in bad faith, with the intention of causing damage, deceiving someone or not fulfilling a duty. Fraudulent and, therefore, criminal activities are: forgery, embezzlement, misappropriation, theft, active and passive corruption, payments and receipts of doubtful origin, among others.

In this sense, Viveo Employees undertake to respect all the provisions contained in Viveo's various internal regulations, such as rules on the use of corporate debit and credit cards, use of vehicles, reimbursement of expenses, approval of contracts and any other rules presented to them.

Cases identified as fraudulent will be considered very serious faults and those responsible will be subject to the penalties provided for in this Anti-Corruption Policy and referral to the competent authorities. Upon becoming aware of cases of fraud or any unlawfulness, Viveo Employees must immediately notify the Compliance area or use Viveo's Ethics Channel to make the report.

3.6. GIFTS, GIVEAWAYS, ENTERTAINMENT, MEALS AND TRAVEL EXPENSES

Viveo Employees are prohibited from offering, requesting or accepting from persons who negotiate and/or seek to negotiate with Viveo, Presents, Gifts and Entertainment, which includes, but is not limited to, discounts, loans, cash, vouchers, vouchers, guarantees, favors, advantages, sponsorships, travel, meals, expenses or other commercial courtesies, which exceed the amount of R\$150.00 (one hundred and fifty reais), for their own benefit and/or that of third parties and/or in situations that may result in a feeling or expectation of obligation to Viveo Employees in relation to the formalization of said business, except for the item below.

Subject to the conditions described below, only the Compliance area will be authorized to offer Gifts, Giveaways and Entertainment to public agencies or Agents that:

- Are intended for legitimate and appropriate purposes, linked to Viveo's core activities.
- Are not bound by any intended consideration or consideration linked to Viveo;
- They are limited and reasonable in value, type and quantity, such as pens, diaries, calendars and institutional gifts;
- Are permitted by the internal rules of the receiving party's organization;
- Are delivered openly to the receiver (and not in a hidden manner)
- Do not embarrass Viveo if publicly disclosed;
- Are not made available to a single person repeatedly, thus understood as no more than twice a year;
- Do not contravene or violate the Anti-Corruption Law and the other rules and procedures established in this Anti-Corruption Policy

Wherever possible, Viveo Gifts should be engraved with your name and/or logo and no Gifts, Gifts or Entertainment should be given in cash or cash equivalents.

Gifts and Gifts offered to Viveo and that exceed the amount of R\$150.00 (one hundred and fifty reais) must be immediately communicated to the Compliance area so that the appropriate measures are taken with respect to acceptance or refusal (if it fits the hypothesis provided for in the item above).

Likewise, Viveo Employees are prohibited from offering, on behalf of Viveo, Presents and Gifts that exceed the amount of R\$150.00 (one hundred and fifty reais), to third parties with whom Viveo maintains a relationship.

Viveo Employees are also prohibited from offering to a Public Agent, their relatives or aggregates, as well as to third parties, money, advance of expenses, gift, facilitations, improper payments, gifts and/or travel for the purpose of influencing their decision. Improper payments include anything other than a symbolic value delivered to anyone for targeted treatment to obtain advantages for Viveo or Viveo Employees.

Exceptions to the rules imposed herein will be analyzed by the Compliance area. In all the above situations, it is necessary to ensure that the records of expenses associated with meals, travel, favors, Presents, Gifts and Entertainment received and offered by Viveo Employees are accurate and clearly reflect the reason for the expenses, and must keep the corresponding documentary and accounting records.

Reimbursements of these expenses will only be made after proof of compliance with the rules of this Anti-Corruption Policy and confirmation of the correlation of expenses to the information presented.

3.7. ENTERTAINMENT

Events are legitimate means for Viveo to promote and give visibility to its business and brands, either through its own events or through sponsorships of third-party events. In this context, Viveo may offer Entertainment, such as tickets to events held or sponsored by the company, to promote and give visibility of its practices and its business to third parties.

Notwithstanding the foregoing, Viveo Employees are prohibited from promising, offering or giving any entertainment to a public agency or Public Agent without prior approval from the Compliance area

Entertainment may only be offered or given to a Public Agent if the above is observed, and when the Public Agent is exercising institutional representation in said event, it is advisable that at least one Viveo Employee is present in any entertainment offered by Viveo.

The provision of Entertainment by Viveo to companions or guests of a Public Agent is not allowed, nor will the provision of entertainment be approved if there is a potential negative exposure to Viveo.

Any exception to the rules established herein must be approved in advance by the Compliance area.

3.8. MEAL EXPENSES

In the context of business accomplishments, meals may occur with third parties related to Viveo's activities.

Meals may only be offered or paid to Public Officials when the matter to be dealt with is related to the institutional functions of said Public Official, and at least one Viveo Employee is present.

The maximum value of a meal to be offered to a Public Agent will be determined by the Compliance area, and may not involve items considered luxury (such as excessively expensive beverages and food). Payment of meals by Viveo is not allowed for companions or guests of Public Agents.

Meals that exceed the determined limit must be previously authorized by the Compliance Committee, even if the amount actually spent on the meal is updated later.

3.9. TRAVEL EXPENSES

Viveo Employees are prohibited from promising, offering or paying any travel expense to or on behalf of a Public Agent, including transportation, food and lodging, without prior approval from the Compliance Committee.

Payments of travel expenses to Public Agents will be approved if the event that gave rise to the trip, such as seminars, congresses, visits and technical meetings, is directly related to the promotion of Viveo products and/or initiatives, and provided that said event has a correlation with the duties of the position, job or function of the Public Agent.

The invitation to participate in the events dealt with herein shall be sent to the highest authority of the body or entity, or to another body or authority designated by it, which shall indicate, in case of acceptance, the appropriate representative, in view of the nature and matters to be dealt with in the event.

TRAVEL EXPENSES WILL BE PAID ONLY IF:

- The trip has a legitimate commercial purpose;
- The cost is reasonable and in accordance with Viveo's policies;
- No guest and/or member of the Public Agent's family is traveling at Viveo's expense;
- The trip is in accordance with the rules to which the Public Official is subject; and
- There are no planned stops that are not directly linked to the business purpose of the trip, unless the additional expenses resulting from this stop are borne by the Public Agent and not by Viveo.

Expenses above what would be deemed reasonably necessary for the business purpose, including extravagant accommodations or expenses related to companions, or that are not in accordance with Viveo's internal policies, will not be approved.

The payment of daily expenses (defined as fixed payments to an individual intended to cover expenses on a given day, regardless of the nature and extent of the expenses actually incurred on that day) is prohibited, unless required by applicable law or previously agreed in writing with the Public Agent's organization. The payment of remuneration to the Public Agent for participation in the event is prohibited.

To avoid risks of deviations, where possible expenses should be paid directly by Viveo (e.g. airfare should be directly to the travel agency or airline).

3.10. DONATIONS TO NON-PROFIT INSTITUTIONS

Contributions from donations and sponsorships will be made with the highest standard of transparency, impersonality, integrity and legality.

Donations to non-profit institutions or associations must follow the Donations and Tax Incentives Policy, previously approved by the Donations Committee, and the institution receiving the donation must expressly agree to comply with this Anti-Corruption Policy.

Donations are prohibited from being offered, promised or granted for the purpose of obtaining an inadequate advantage or influencing the action of any person, whether public agent, supplier, third party, among others, regardless of the suitability of the organization to be favored.

As a rule, requests for donations made by public agents will not be accepted. However, as an exception, Viveo will be able to evaluate the social needs of public agencies, thus being able to decide to offer donations in response to the lack of society dependent on public agencies. The donation process to public agencies will go through all diligence evaluation supported by the donation and tax incentive committee, as well as prior validation of the Company's CEO.

The deepening of the guidelines and other information on donations are available in the "Donations and Tax Incentives Policy".

3.11. CONTRIBUTIONS TO POLITICAL PARTIES AND ELECTION CAMPAIGNS

Viveo does not engage in political party activities and does not make political contributions, whether to candidates, political parties, party representatives or similar campaigns, and donations to election campaigns, by Viveo or by individuals on behalf of Viveo, directly or indirectly, including monetary contributions, sponsorships, payment for fundraising events or the like, whether before or after the end of such campaigns, are prohibited.

Viveo respects the participation of Viveo Employees in political activities, provided that donations and/or contributions to political parties and election campaigns are always carried out in a strictly personal manner, outside the working hours and in compliance with the guidelines of the Code of Conduct, being certain that the party and political support of Viveo Employees does not reflect Viveo's choice.

If a Viveo Employee engages in any type of political activity, they must do so independently, without requesting help, support, participation, financing or any type of involvement of Viveo and other Viveo Employees.

4. ACCOUNTING RECORDS

Viveo Employees shall at all times act to ensure that Viveo's financial statements, books and records accurately, clearly, completely and in adequate detail represent all Viveo's business and operations.

All transactions must be recorded and managed in accordance with Viveo's accounting policy, including those related to the budget, as follows:

- Clearly and accurately reflect Viveo's operations;
- Be recorded in a manner that allows the preparation of Financial Statements in accordance with applicable accounting standards;
- Comply with applicable tax legislation; and
- Maintain accountability of assets.

All supporting documentation must be maintained in compliance with applicable record retention requirements (i.e. invoices, receipts, expense vouchers, etc.).

No fund or asset not recorded in Viveo's financial statements may be established or maintained for any purpose.

No Viveo Employee shall engage in the falsification of any accounting or other business record, and all Viveo Employees shall fully and correctly answer any inquiries made to them by internal or external auditors of the group or regulatory authority auditors.

4.1. *MERGERS AND ACQUISITIONS*

Viveo seeks to form new businesses or partnerships through mergers and acquisition processes of potential companies or assets that are in line with the objectives of our ecosystem and this process must be guided by an adequate, reasonable and robust due diligence analysis, which includes an anti-corruption analysis and evaluation of compliance with the rules and guidelines of this Anti-Corruption Policy, in order to prevent any risks that Viveo may face when conducting the business, as well as point out the measures that must be taken to minimize or eliminate the risk of bribery or corruption that that that relationship may represent.

For cases of mergers and acquisitions, Viveo may choose to hire external firms with the necessary expertise to conduct the due diligence process. Legal instruments and purchase and sale agreements must contain anti-corruption clauses, as well as consider other options available to avoid the succession of liabilities for violation of anti-corruption laws practiced prior to operations.

4.2. *ANTI-CORRUPTION CLAUSE*

The inclusion of the anti-corruption clause is mandatory for all contracts signed by Viveo, under the terms developed by the Compliance area.

If the supplier, service provider or partner is found to be in breach of the anti-corruption clause, the contract may be suspended or even terminated, without prejudice to other appropriate measures, in order to safeguard the integrity of Viveo.

Exceptions to the inclusion of the standard anti-corruption clause must be previously evaluated with the Legal Department and Viveo's Compliance area.

5. COMPLIANCE COMMITTEE

Viveo maintains an active Compliance Committee, which is responsible for identifying, controlling, informing, instructing and mitigating, through the appropriate procedures, the risks that Viveo may suffer due to non-compliance with the laws, rules, internal guidelines and/or this Anti-Corruption Policy, in addition to inspecting and punishing any and all violations of its terms.

Viveo and all Viveo Employees must act in order to always assist the acts of the Compliance Committee and ensure its autonomy, independence, impartiality, for its material, human and financial resources necessary for the full functioning of the body.

The Compliance Committee is formed by members that are internal and external to Viveo, with technical knowledge in the area, elected under the terms of Viveo's Internal Rules.

It is the responsibility of the Compliance Committee to ensure the effectiveness of Viveo's policies, keep them updated and in line with market needs and current legislation.

Whenever there are changes or insertions of new information, the Compliance Committee will publish and disclose the new version to Viveo employees.

6. COMMUNICATION AND WHISTLEBLOWING CHANNELS

It is essential that any person immediately reports any acts or suspicions of non-compliance with this Anti-Corruption Policy, preventing acts of corruption and preserving Viveo's image in the market and in front of its stakeholders.

If any Viveo Employee and/or any third party has any concern or believes that any internal legislation or policy is being violated, Viveo provides the following access channels for questions, queries, anonymous complaints and other communications, which will be received and handled by the Compliance area:

- **Email:** eticaviveo@deloitte.com.br;
- **Telephone:** 0800 721 9152 - service from Monday to Friday, from 7 am to 8 pm, and, outside these hours, via answering machine;
- **Mailing Address:** Avenida Luiz Maggioni, nº 2727, Distrito Empresarial Luiz Roberto Jábali, CEP 14.072-055, Ribeirão Preto/SP (A/C Compliance Area);
- **Contact:** direct with members of the Compliance area.

In order to guarantee the privacy of Viveo Employees, and in order to facilitate compliance and effectiveness of this Anti-Corruption Policy, complaints made through the above channels may be made anonymously or identified, which will be operated and treated confidentially by the company contracted for this purpose and, subsequently, by the Compliance Committee, ensuring even more confidentiality and security.

In the case of sending complaints, for better analysis by the company contracted for this purpose, it is desirable to inform, in addition to what the whistleblower deems convenient, the date and place of the facts; name of the accused or, at least, surname; and description of the illegality allegedly practiced.

All complaints will be evaluated with confidentiality, impartiality, objectivity, reasonableness, integrity and speed, with the company contracted for this purpose and, subsequently, the Compliance Committee committed to presenting a reasoned response to the complaint promptly. In the case of an anonymous complaint, the person making the complaint may provide an e-mail and/or phone number so that the company contracted for this purpose can send a reply at the end of the investigation.

Viveo reinforces that the participation of Viveo Employees to ensure the effectiveness of this Anti-Corruption Policy is essential. Thus, Viveo will provide all the necessary instruments for the full security of the identified whistleblower against any kind of retaliation. If the whistleblower finds any conduct that may be characterized as reprisal, the occurrence must also be reported to the company contracted for this purpose, through the channels provided by Viveo, so that the appropriate measures are taken.

7. VIOLATIONS AND PENALTIES

It is the obligation of all Viveo Employees to know and understand the content of this Anti-Corruption Policy, as well as to obey all the rules set forth herein.

Viveo is committed to the faithful compliance with the standards established in this Anti-Corruption Policy and will promote the constant monitoring of its business activity and any and all conduct of Viveo Employees. No Viveo Employee has the authority to request or take any action that violates this Anti-Corruption Policy.

Any violation of the rules and/or guidelines of this Anti-Corruption Policy and the legislation will result in the application of appropriate disciplinary measures, which may even lead to the application of warnings, dismissal of the employee for just cause and/or immediate contractual termination, without prejudice to appropriate legal measures, such as communication to the police and supervisory bodies, and taking judicial and administrative measures to hold the agent liable and compensation for any and all damages that may be caused.

The decision regarding the definition of the penalty to be applied and the treatment to the specific case will be issued by the Compliance Committee, at its sole discretion, taking into account the severity of the fault, the extent of the damage caused to Viveo and the employee's professional and disciplinary history.

Any assignment of personal responsibility of the employee will not restrict the right of return that is reserved to Viveo in case of any damage caused to the company.

8. FINAL PROVISIONS

All Viveo Employees are responsible for the application of the provisions contained in this Anti-Corruption Policy in all professional relationships. Therefore, everyone must sign a formal adhesion to the Anti-Corruption Policy and renew it when a new edition is published.

Viveo Employees must act as guardians of the Anti-Corruption Policy, reporting through the available channels any and all situations that may indicate non-compliance with the provisions defined herein.

This Anti-Corruption Policy, although it seeks to exemplify prohibited conduct, does not present an exhaustive list of actions or omissions of such nature. Therefore, it is recommended that in all situations where Viveo Employees may be confronted with ethical issues, there is prior consultation with the Compliance Committee in case of doubt.

This Anti-Corruption Policy takes effect on the date of publication in Viveo's communication channels and revokes any rules and procedures to the contrary.

9. GLOSSARY

PUBLIC ADMINISTRATION

Set of agencies, services, autarchies and agents of the State, as well as other public legal entities, at the Federal, State and Municipal levels and Executive, Legislative and Judicial powers for the provision of public services, for the management of public goods and community interests, including departments of education and public universities.

PUBLIC AGENT

Any person representing the public power, national or foreign, who is providing public service even if temporarily or without remuneration, by election, appointment, designation, hiring or any form of investiture or bond, mandate, position, employment or public function. It is equivalent to a public agent who works for a service provider contracted or contracted for the execution of a typical activity of the Public Administration.

SOUVENIR GIFT

Item that does not have commercial value distributed as a courtesy, advertisement or usual disclosure; that contains the logo of the legal entity that granted the gift; and that is of a general nature and, therefore, is not intended to exclusively grace a certain person.

VIVEO EMPLOYEES

any individual, in Brazil or abroad, who has an employment or statutory relationship with Viveo, even if on a temporary basis and (ii) any individual or legal entity, in Brazil or abroad, who provides services through a contract signed with an interposed company (outsourced service provider).

CONFLICT OF INTEREST

Any situation in which someone is not neutral in relation to the subject under discussion and, therefore, can influence or make decisions motivated by interests conflicting with Viveo's interests.

ENTERTAINMENT

These are activities or events whose main purpose is to provide leisure to their participants, such as parties, concerts, sporting events or commemorative meals.

FACILITATION PAYMENTS

Known as "facilitation payments", payments made to both public and private sector Agents, as a personal benefit, to secure or expedite the performance of routine acts to which the company is entitled.

GOVERNMENT

Any governmental body, authority or entity.

GIFTS

Anything that does not fall within the definition of Souvenir Gifts, including, but not limited to other types of souvenir gifts, presents, prizes, pecuniary values or any other benefits of any nature, which are not related to the image of Viveo, with the identification of brand and logos, or rights exploited by them.

BRIBERY OR KICKBACKS

It is the means by which corruption is practiced, consisting in the act of promising, offering or paying to an authority, ruler, public agent or private party any amount of money or any other advantages so that the person in question ceases to behave ethically with his professional duties.

THIRD PARTIES

Service providers, including individuals or legal entities, whether personified or not, regardless of the form of organization or corporate model adopted, as well as any foundations, associations of entities or persons, or foreign companies, which have their headquarters, branch or representation in the Brazilian territory, constituted in fact or in law, even if temporarily, contractors or subcontractors, suppliers in general and consultants hired through a formal contract, or not, who act on behalf of Viveo or associated companies for any purpose, including those who provide services and interact with the government or others on behalf of Viveo for the achievement of the contracted business.

IMPROPER ADVANTAGE

It consists of any benefit, even if not economic, such as presents, gifts, travel, meals, lodging, entertainment and job opportunities.

10. APPROVALS

Preparation	Revision	Approval
Compliance	July/2022	Audit Committee, Risk Management , Compliance and Human Resources; Board of Directors.