motiva

Motiva Integrity Program

August / 2025

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Message from top management

Our purpose at MOTIVA is to improve people's lives through mobility. We want to lead the mobility infrastructure sector, focusing on creating sustainable value. Therefore, we strengthen our culture with the non-negotiable principles of Integrity, Integration, and Impact. In Integrity, we have an unwavering commitment to the values **ethics, unconditional respect, transparency, and security**, which guide our activities and relationships with all stakeholders. **Sustainability** is also a priority, focusing on decarbonizing our operations, having a positive impact on society, and valuing people, setting ambitious goals for engagement, diversity, and the mental health of our employees.

At MOTIVA, we adopt **best corporate governance practices**, invest in **diversity programs**, and make an impact in the communities in which we operate by investing in **education, culture, health, and inclusion. Safety** comes first as we have adopted standardized guidelines for our employees and business partners to keep our work environment safe for everyone.

Our **MOTIVA INTEGRITY PROGRAM** was implemented and is developed in compliance with applicable laws and best market practices. We believe that by **maintaining integrity across all our operations,** ensuring compliance with laws, regulations and ethical standards, we strengthen the trust of employees, customers, suppliers and the society.

To contribute to a healthy, safe, and sustainable work environment, **we are all committed to knowing, enforcing, and disseminating** the guidelines contained in the INTEGRITY PROGRAM, the Code of Ethical Conduct, and other regulations.

Executive Board

I. Purpose

The purpose of **Motiva Integrity Program** is to guide all employees, shareholders, managers and third parties, at all levels, on the need to develop sustainable businesses in compliance with the legislation applicable to the Corporation, the Code of Ethical Conduct, internal policies and standards.

Motiva and its subsidiaries[1] are signatories to the UN Global Compact, particularly to the initiatives proposed by the Anti-Corruption Group. Our Integrity Program follows the principle of respecting the laws and regulations applicable to our business, and commits to ethics and integrity in all our relationships, internal and external, private and public. These principles are part of Motiva's values – the Culture of the 3 I's, Integrity, Integration and Impact, described in the Code of Ethical Conduct.

The Company also has a Clean Company, Anti-corruption and Bribery Policy, which aims to define guidelines to prevent and combat bribery and corruption in all its operations, both in its relationship with the Government and in the sphere of private relationships.

With the commitment of Top Management, Motiva continuously reinforces and improves its Integrity Program following the guidelines of the Brazilian Clean Company Law (Law No. 12.846/13), the Brazilian Bidding Law (Law No. 14.133/21), Brazilian Decree No. 11.129/22, and Brazilian Decree No. 12.304/24, among other applicable regulations.

Motiva Integrity Program meets the requirements of ABNT NBR ISO37001 - *Sistema de Gestão Antissuborno* (Anti-Bribery Management System) and ABNT NBR ISO37301 - *Sistema de Gestão de Compliance* (Compliance Management System), with a commitment to continuous improvement and the implementation of best market practices, according to the scope below:

1 Railway Platform: ViaMobilidade, ViaQuatro, Linhas 8 e 9, VLT Carioca, Metrô Bahia
Highway Platform: Autoban, SPVias, Rodoanel, RioSP, Motiva Pantanal, PRVias, Sorocabana, ViaRio, ViaLagos, ViaCosteira, ViaSul, Renovias
Airport Platform: Bloco Sul, Bloco Central, BH Airport, Aeris, CAP, and Quiport
Services: CSC
Learn more on: **www.motiva.com.br**

SCOPE

ISO 37301

Compliance Management System

E

Reporting Assurance of Greenhouse Gas Emissions, including:

1. Maintenance and Works
2. Cargo Transportation
3. Infrastructure
4. Water and Effluents
5. Vegetation Suppression
6. Power Consumption
7. Non-hazardous Waste
8. Hazardous Waste
9. Travel and Business
10. Generators
11. Seedling Planting
12. Fuel to Subcontractors
13. Personnel Transportation
14. I-RECs - Clean Energy Purchase
15. Power Generation
16. Fleets (Operational, Administrative, and Generators)

S

Fight against forced labor, slavery-like labor, or child labor – activities related to its employees, such as climate surveys, termination interviews, **occupational interviews**, in accordance with the Safety Monitoring and Performance for employees through the IOS (Safe Operation Index).

1. Work Permits
2. Task Cycle Check
3. Behavior Observation
4. TFCA
5. Severity Rate
6. TFSA
7. Reliability Project
8. Third-party project
9. SGI - 3 Project below
10. Actions with accident analysis and plans, when they occur
11. PDCA to correct anything needed
12. I see, I protect

G

Anti-Bribery Management System based on **anti-corruption, bribery, and frauds**
ISO 37001

All Motiva subsidiaries in Brazil are ISO37001 and ISO37301 certified.

II. Evolution of the Integrity Program

2015 initial

- Creation of the Integrity Programme
- Implementation of the Confidential Channel
- Drafting and approval of the Code of Ethical Conduct and Clean Company Policy

2018 structuring

- The Board of Directors updates and improves the company's control mechanisms and corporate governance structure

2019

- Review of advisory committees
- Implementation of governance portal
- Review of integrity program and compliance policies

2020

- The VP of Governance, Compliance, and Auditing oversees the Risk and Controls and ESG areas
- Implementation of the platform for recording compliance statements
- Conducting background checks on executives prior to their appointment

2021 maturity

- Strategic planning with an emphasis on ESG
- Implementation of the Integrity Program for national and international assets
- Creation of the Hands-On Program for small- and medium-sized outsourced companies

2022

- The Company has achieved ISO37001 certification for some of its units
- Fomento Infra + Integrity Seal issued by the Ministry of Infrastructure. (ViaCosteira and ViaSul)

advanced

2023

- Obtain ISO 37001 and ISO 37301 certifications for all subsidiaries

2024

- The Hands On program was enhanced including the ESG module
- The company sought to consolidate its values with the purpose of improving people's lives and the three I's: integrity, integration, and Impact
- The integrity program matured

III. Pillars of the Integrity Program

1. COMMITMENT FROM THE TOP MANAGEMENT

With the support of Top Management, Motiva Integrity Program was structured and is continuously improved. Through Motiva Integrity Program, we guide our Employees, shareholders, managers and third parties on the behaviors expected for the development of our activities in an ethical and sustainable manner. Motiva Board of Directors, through the Audit, Compliance and Corporate Risk Committee, monitors the Integrity Program's performance indicators and the main activities planned and developed throughout the year on a quarterly basis. The reporting and monitoring of the Integrity Program, as well as its objective and main activities, are set out in the Internal Regulations of the Board of Directors and Advisory Committees. Motiva's Top Management also receives periodic reports and updates and constantly updates the company's values through specific events and company-wide communications.

2. AUTONOMY AND STRUCTURE

The creation of the Vice Presidency of Sustainability, Risks and Compliance in 2018, reporting directly to the Board of Directors, constituted an important improvement to the Integrity Program, guaranteeing autonomy and independence for the Compliance Department. The Compliance Department has personnel and budget resources appropriate to the Company's risk level, with authority to manage the Integrity Program, thus ensuring the achievement of objectives and compliance with the requirements of the Compliance function and the Compliance and Anti-Bribery Management Systems set forth in ABNT NBR ISO37001 and ABNT NBR ISO37301 standards.

2.1 **COMPLIANCE AMBASSORS:** Motiva Integrity Program is supported by compliance representatives in all units, called Ambassadors. They are Employees from different areas and activities who stand out for their commitment, ethical behavior and collaboration, capable of acting as propagators and engagers of the Integrity Program in the areas where they work. In addition to the duties related to their positions, Ambassadors have the role of acting as multipliers of the culture of integrity in the workplace, bringing the topic into the daily lives of other Employees, in addition to supporting the consolidation of the Integrity Program in their area of activity, remaining as a point of contact to disseminate information and clarify doubts. To this end, they are trained and have direct support from the Compliance Department, which promotes campaigns, actions, training, and monthly meetings to align topics and professional development.

3. POLICIES AND PROCEDURES

Motiva publishes clear standards of conduct, policies and procedures dedicated to guiding all employees and managers, regardless of their position or role, regarding the behaviors expected in the development of their responsibilities and relationships. The Code of Ethical Conduct and Clean Company and Anti-Corruption Policy establish clear rules and guidelines on the conduct expected of its Employees in the most diverse situations.

In addition to these regulatory instruments, Motiva Integrity Program also includes the following policies and standards: Third Party Code of Ethical Conduct; Bylaws of the Commission for the Study and Application of Disciplinary Measures (CEAMD); Policy for Managing Affiliation with Trade Unions, Associations with Professional Associations and Similar Entities; Authority Policy; Social Investment Policy; Consequence Management and Non-Retaliation Policy; Risk Management Policy; M&A and New Business Policy (Tenders and PMIs); Purchasing and Contracting Policy; Compliance Management System Policy; Standards for Gifts, Presents, Business Meals, Entertainment, and Travel; Third Party Risk Assessment Standards (Due Diligence); Standards for Interaction with Public Officials; Standards for Reimbursement and Travel Expenses; Standards for Handling Confidential Channel Reports; Standards for Conduct during Election Periods; Standards for Monitoring Procedures; Standards for Conflicts of Interest.

Motiva participates in various bidding processes and provides public services as a concessionaire. Therefore, it has its own regulations that guide its Employees and Administrators during interactions with public officials, as well as within the scope of bidding processes and execution of administrative contracts. All interactions with relevant public officials that made an impact to concession contracts must be duly recorded on the Compliance platform or in the Company's official system.

As an infrastructure company with a significant role in the market in which it operates, Motiva is also concerned with having a specific regulatory instrument for assessing, monitoring and mapping risks in mergers, acquisitions and corporate restructuring processes, making its best efforts to execute lawful, sustainable business that guarantees the company's longevity.

3.1 ANNUAL STATEMENTS: Motiva has an online platform, connected to the payroll, to facilitate the registration and completion of compliance statements and forms inherent to the Group's policies and standards; Among them, the following stand out:

- Declaration of Acceptance of the Code of Ethical Conduct;
- Declaration of Acceptance of the Clean Company Policy and Combating Corruption and Bribery;
- Declaration of Acceptance of the Compliance Management System Policy;
- Declaration of Conflict of Interests.

These compliance statements must be completed when each employee is hired, annually when required, or when updates are necessary, as is the case with the Declaration of Conflicts of Interest.

As provided for in NOR 018 – Conflict of Interest Standard, Motiva Employees must report potential conflicts of interest related to family relationships with other employees, equity interests, extra-work activities, relationship with public officials or politically exposed persons. Specifically for these cases, the Compliance Department assesses the existence of a conflict of interest, the possibility of a mitigation plan for the Employee or exceptional situation and, when necessary for relevant cases, submits the report for approval by the Committee for Studies and Application of Disciplinary Measures, for resolution.

3.2. BACKGROUND CHECK OF EXECUTIVES AND EMPLOYEES: Motiva conducts background checks on its executives, including its Directors and Board Members, prior to appointments, hiring, transfers or promotions, in compliance with best market practices. The Compliance Department also carries out this procedure for certain leaders and employees in sensitive areas, such as Supplies and People. In addition to the background check, the Compliance Department conducts research related to the existence of conflicts of interest and possible reports in the Whistleblowing Channel.

4. THIRD PARTY AND BUSINESS PARTNER RISK ASSESSMENT (*Due Diligence*)

Motiva performs risk assessment and management in our business. In this scenario, hiring suppliers and establishing partnerships proves to be one of the most challenging and complex items in addressing these risks. This is because the relationship built with third parties can generate direct or indirect impacts on the legal, reputation and image spheres of the company. Therefore, when exercising the freedom to contract with whoever best suits it, Motiva assesses, in advance, any risks to which it may be exposed due to its commercial relationship with certain business partners or suppliers. This analysis aims to select suppliers and business partners that will not cause the company to experience unexpected legal incidents (tax, corporate, criminal, civil, labor), non-compliance with quality or sustainability premises, or even be associated with negative media for the business.

Therefore, we are concerned with analyzing our Third Parties and Business Partners from various angles, not only those of the commercial proposal (documentary/technical qualification, price/term), but also their economic stability, regulatory and environmental aspects, operational performance, internal management practices and policies, specialization, potential conflicts of interest, as well as a reputation and legal analysis, focused on hiring qualified, efficient third parties that add value.

The set of information obtained from the supplier or business partner generates a perception of the degree of risk of that contract or partnership, which serves as the basis for decision-making, culminating in the selection of the one that presents the best scenario, ensuring longevity and security for the Company. This adjustment to risk appetite directly affects, in addition to decision security, the costs the Company incurs in monitoring suppliers or partners and the obligation to monitor and evaluate how they act on its behalf.

Motiva's Compliance Department has internalized the entire process of executing third-party risk analyses, developing its platform to perform all analyses. This process, called "Counterparty Management," allowed Motiva to customize and calibrate its assessments of the risks to which it is exposed, producing more assertive and qualitative Compliance opinions, indicating conditions for contracting, when necessary, to mitigate risks.

Furthermore, according to NOR 004 - Third Party Risk Assessment Standard, it is mandatory that all third parties with whom Motiva may interact are evaluated by the Compliance Department, prior to being registered in the supplier system.

Each Third Party Risk Assessment has its own validity, depending on the risk that this Third Party may generate, considering criteria such as the object of the contract and contractual conditions:

- Risk Other than Low (N2) = 1 year. Supplier opinions with relevant or critical points may have terms of less than 1 year, at the discretion of the Compliance area.
- Low Risk (N1): 3 years.

In cases of Third Parties N2, opinions may have the following classifications:

A: Supplier without relevant points, approved without conditions

B: Supplier with relevant points, approved with conditions

C: Supplier with critical and mitigated points, approved with conditions

D: Supplier with critical points, approved with conditions and partial blocking

E: Not approved

For suppliers with relevant or critical points, there are conditions included in the contracts, containing obligations, for example: reporting relevant progress of administrative or judicial processes, carrying out Compliance training offered by Motiva, such as Hands On ESG & Integridade, implementing an integrity program in accordance with applicable legislation, carrying out independent audits of the program, obtaining ISO 37001 certification and joining the Brazil Compact for Business Integrity, an initiative of the Brazilian Office of the Federal Controller General.

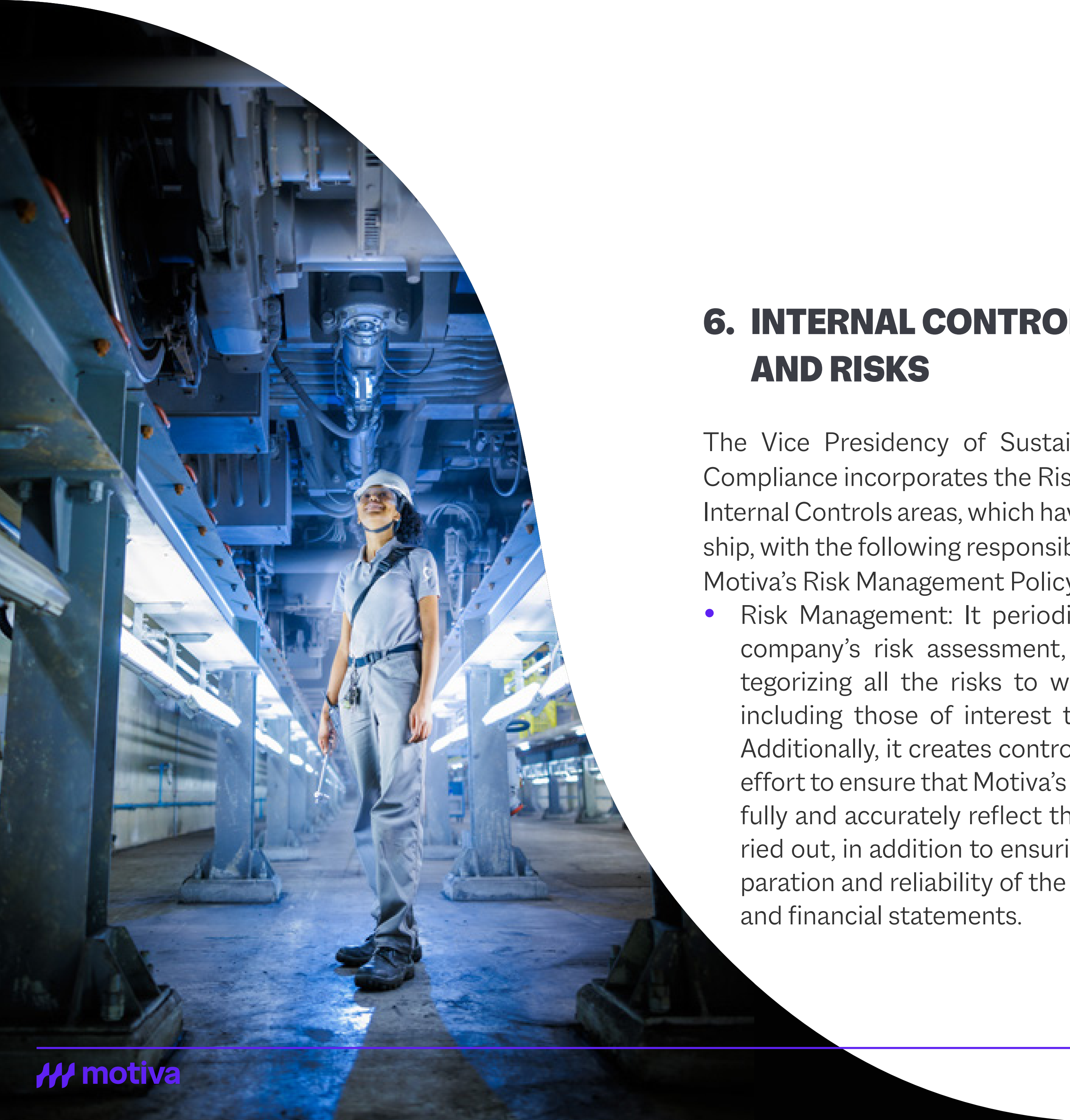
4.1. THIRD PARTY CODE OF ETHICS AND ANTI-BRIBERY AND ANTI-CORRUPTION CLAUSE: Motiva Third Party Code of Ethics aims to establish the main guidelines and best practices that should guide relationships with any individual or legal entity, in the public or private sector. The ethical conduct standards applicable to Employees are extended to Third Parties with whom Motiva has relationships, ensuring that they are aligned with the company's core values. In this sense, in order to ensure the commitment of its Third Parties, Motiva implements in all its contracts and general terms of employment a standard anti-bribery and anti-corruption clause, with a fine penalty for any deviations in conduct and/or practice of illegal acts, or even immediate termination. Furthermore, the Compliance Department is aligned with Motiva's Legal Department, to act whenever required.

4.2. HANDS ON INTEGRIDADE & ESG: Concerned with the development and alignment of the Supplier chain with its Integrity and Sustainability guidelines, Motiva developed a specific qualification for strategic partners, called Hands on Integridade & ESG, in partnership with Fundação Dom Cabral. The initiative is 100% sponsored by Motiva and aims to train supplier executives in governance, risk, compliance, and sustainability so they can implement processes, controls, and best practices in their own companies, thus reducing reputation, financial, and legal risks for Motiva.

5. COMMUNICATION AND TRAINING

Motiva's Compliance Training aims to engage and develop Employees' knowledge of Motiva's Policies and Procedures, especially issues related to integrity, ethics, risks of bribery and corruption, as well as discrimination, sexual and moral harassment at work, including the prevention, detection and reporting of possible circumstances. Training sessions are held at least annually, either in person or via an online platform, with content specifically developed for each topic and specific target audience, thus ensuring the continued dissemination of Motiva's Compliance culture and the ethical and transparent conduct of our business. The execution of the Training Plan is approved annually by Motiva's Senior Management, through the Audit, Compliance and Corporate Risk Committee. Training can be online, for administrative and operational staff, or in-person for leaders, usually conducted during unit visits.

Motiva's annual Compliance Communication Plan aims to disseminate ethics and integrity content throughout the year, promoting the dissemination of Compliance practices, engaging and familiarizing all Employees with Motiva's Policies, Standards and Procedures. The Compliance Department, together with the internal communications team, issues monthly or on-demand communications on a wide range of topics involving the Integrity Program and related topics. All material is designed and customized according to the primary message you want to communicate, and can be sent by the Compliance Department, Motiva's Corporate Communications team, leaders, or via communication chat, making everyone's engagement with the Integrity Program clear.



6. INTERNAL CONTROLS AND RISKS

The Vice Presidency of Sustainability, Risks and Compliance incorporates the Risk Management and Internal Controls areas, which have their own leadership, with the following responsibilities, according to Motiva's Risk Management Policy:

- Risk Management: It periodically performs the company's risk assessment, analyzing and categorizing all the risks to which it is exposed, including those of interest to the Compliance. Additionally, it creates controls and makes every effort to ensure that Motiva's accounting records fully and accurately reflect the transactions carried out, in addition to ensuring the prompt preparation and reliability of the Company's reports and financial statements.
- Internal Controls: The person responsible for managing internal controls, including their identification, assessment, and periodic verification, aims to provide reasonable assurance that the Organization's objectives will be achieved; acts as an advisor to the owners of controls, assisting them in defining the treatment of risks inherent to the related processes; supports the development and provides the methodologies, tools, systems, infrastructure, and governance necessary to support the management of internal controls; ensures, together with the respective managers, the efficiency of operations, the reliability of financial reports, and compliance with applicable laws and regulations; works to minimize the likelihood of occurrence or potential impact of inherent risks related to operations, information disclosure, and compliance; reports the results of the internal control analyses of the processes to the Board of Directors, with prior review by the Audit and Compliance Committee.

7. WHISTLEBLOWING CHANNEL AND DISCIPLINARY MEASURES

Motiva has a Whistleblowing Channel, the main tool of the Compliance Program to detect and address risk situations and violations of our Code of Conduct and Ethics. The Channel is open to employees, third parties, customers and interested parties to receive reports of suspected irregularities, violations of laws, policies and procedures, and unethical behavior, such as discrimination and sexual and moral harassment at work. Reporters are encouraged to report facts, acts or omissions that appear to be incorrect and that may have violated or are on the verge of violating Motiva's rules and/or policies, as well as any laws of the country, and must always act in good faith.

The Confidential Channel is widely publicized in all Motiva policies and procedures, website and intranet, and is available to employees and administrators, third parties, customers and anyone related to the Company's business.

Motiva has specific rules regarding the Confidential Channel, which provide for the handling of reports, the application of sanctions and the prohibition of retaliation against good faith reporters, namely, POL 010 - Consequence Management and Non-Retaliation Policy and NOR 014 - Whistleblowing Channel Report Handling Standard.

In this sense, Motiva has as a principle zero tolerance for acts of retaliation, directly or indirectly, by leadership, or any other person, against good faith whistleblowers, regardless of their position or the result of the investigation.

Motiva' Whistleblowing Channel can be accessed on the following contacts:

Website	https://canalconfidencial.com.br/canalconfidencialmotiva/
Phone Number	**0800 721 0759**

The Confidential Channel is managed by an independent third-party company and operates 7 days a week, 24 hours a day. The website is available in Portuguese (BR), English, and Spanish.

The outsourced company receives the report and performs initial screening, classifying the level of impact and defining the flow of treatment, depending on the parties involved and the content of the allegations.

Motiva's Compliance Department is responsible for handling and investigating all reports, as well as submitting relevant cases for deliberation by Committee for the Study and Application of Disciplinary Measures (CEAMD), with the exception of those registered with the Executive Board, the Board of Directors or areas of the Vice-Presidency of Sustainability, Risks and Compliance, which are directed to a special treatment flow.

The figure below details the steps for receiving and investigating reports from the Confidential Channel, for suspected violations of Motiva's laws and policies, such as fraud, corruption, bribery, discrimination, and sexual and moral harassment in the workplace:

1º Receipt and screening of the report by outsourced company

Carrying out initial screening.

Proper destination of the protocol – normal and special flow.

Process carried out to avoid conflicts of interest and ensure independence in the investigation.

2º Submitting the report to Compliance, CAC Coordinator or CA President

If the report involves the VP of Compliance, DE or CEO, it is sent to the CAC Coordinator.

If the report involves CAC members, it is sent to the Board President.

All other reports are handled by the Compliance team.

3º Carrying out the verification process

All reports are handled by:

- People flow
- Internal investigation
- External consulting

People Flow: behavioral reports of medium or low criticality are handled by the People team.

4º Proper reports are deliberated by CEAMD

Substantiated reports are deliberated upon by CEAMD for the application of disciplinary measures.

Disciplinary measures can be:

- Verbal warning
- Written warning (with or without decreasing profit sharing)
- Suspension
- Dismissal with or without cause

CONFIDENTIAL CHANNEL FLOW

In addition to the Whistleblowing Channel system, the Compliance Department can receive information and reports directly via email from its Compliance Ambassadors, via the Legal Department regarding Labor Claims and other actions, and from the Human Resources team regarding termination interviews, discussion groups, and other processes.

The Compliance Department periodically presents Confidential Channel indicators to the team of people on each Holding and CSC platform, as well as to the platform leadership, via formal reports. Such presentations allow the mapping of specific and exceptional problems in each operation, based on the reports received and the direction of appropriate treatment.

7.1 PRINCIPLE OF NON-RETALIATION, DISCIPLINARY MEASURES AND OTHER CONSEQUENCES: Motiva has the POL 010 - Consequence Management and Non-Retaliation Policy, which addresses issues related to disciplinary measures and consequences applicable in the event of non-compliance with any internal policies and procedures, as well as the country's laws. In addition to oral and written warnings, employees, administrators or third parties who fail to comply with Motiva rules, whether by violating the Company's ethical standards or by failing to comply with laws or regulations, may receive training, a reduction in variable remuneration to be received, suspension, dismissal or termination of contracts. Motiva has a principle of zero tolerance for acts of retaliation, directly or indirectly, by leadership, or any other person, against good faith whistleblowers, even if the occurrence is unfounded. Any Employee who attempts to punish, retaliate against, or subject a good faith whistleblower to any type of unfair treatment may be subject to disciplinary action. Improper use of the Whistleblowing Channel, on the other hand, when used in bad faith to make false or malicious accusations, may result in disciplinary action against the whistleblower.

7.2. COMMITTEE FOR STUDIES AND APPLICATION OF DISCIPLINARY MEASURES (CEAMD): AThe CEAMD is governed by its Bylaws and applicable legislation and aims to promote a culture of Integrity at Motiva, by deliberating on the application of disciplinary measures in relevant cases of non-compliance with laws, the Code of Ethical Conduct, the Clean Company Policy, or any other unethical behavior, as well as evaluating the improvement of internal controls with a view to mitigating and remediating identified damages and risks.

The CEAMD is part of the set of procedures that ensure the prompt interruption of detected irregularities or infractions and the timely remediation of the damage generated that reach the Confidential Channel, and is composed of three (3) members of the Executive Board, with voting power: (i) Vice President of Sustainability, Risk and Compliance; (ii) Vice President of People and Organizational Development; and (iii) Vice President of Legal, Governance and Government Relations.

CEAMD meets monthly, in ordinary sessions, duly recorded with agenda and minutes, in Motiva's own governance system. When necessary, there are extraordinary meetings.

8. ONGOING COMPLIANCE MONITORING

Motiva has a specific standard that addresses the Process Monitoring Procedures of the Integrity Program. The objective of the Annual Compliance Monitoring Plan is to perform transactional tests to determine the adherence of Motiva's activities and processes to the Company's policies and standards, in all its operations. This allows the Compliance Department to identify potential vulnerabilities or opportunities for improvement, aiming to enhance the Integrity Program in preventing, detecting and remediating irregularities.

The Compliance Department conducts this Monitoring focused on tests and verifications carried out on *site* or *online*, in an automated and monthly manner. Every quarter, the Compliance Department submits the Compliance Monitoring report for evaluation by the Audit, Compliance and Corporate Risk Committee, including findings on non-compliance, recommendations for corrective action plans and process improvements.

IV. Normative references

In the preparation, implementation and monitoring of its Integrity Program, the Company complies with the strictest international standards and legal provisions on anti-bribery and anti-corruption in force in Brazil and worldwide, in particular:

1. Law 12.846/2013 – Provides for the civil and administrative liabilities of entities for tort against the national or foreign public administration, and other provisions.
2. Decree 11.129/2022 – Enacts the Brazilian Federal Law no. 12.846/2013, which provides for the civil and administrative liabilities of entities for tort against the national or foreign public administration, and other provisions.
3. FCPA (USA): Foreign Corrupt Practices Act, United States regulation on acts of corruption practiced abroad.
4. Law No. 14.133/21: Brazilian Tender and Administrative Contract Regulation
5. Decree No. 12.304/2024: Regulates the Tender Law, regarding the evaluation of Integrity Programs.
6. ABNT ISO 37001:2017: Anti-bribery Management System.
7. ABNT ISO 37301:2021: Compliance Management System.
8. Motiva Code of Ethical Conduct
9. POL 001 - Clean Company and Anti-Corruption Policy
10. POL 017 - Compliance Management System Policy
11. POL 010 - Consequence Management and Non-Retaliation Policy
12. POL 011 - Risk Management Policy
13. NOR 011 - Standard for Handling Whistleblowing Channel Reports
14. NOR 006 – Standard for Interaction with Public Officials
15. NOR 011 - Standard for Handling Whistleblowing Channel Reports
16. NOR 004 - Third-party Risk Assessment Standard (*Due Diligence*)

V. Responsibilities

Motiva has a Compliance Department responsible for managing, monitoring and updating the INTEGRITY PROGRAM, which acts in a segregated and independent manner in conducting and executing its compliance and integrity activities and functions, supporting the company's business areas. It also includes defining policies, procedures and internal controls, providing training on ethics and integrity, conducting reputation analyses and investigating reports involving ethical and behavioral deviations, with the aim of preventing, detecting and remedying irregularities, such as corruption, fraud and other illicit practices.

VI. Applicability and slope

The guidelines and scope of Motiva's Integrity Program apply to the holding company, its subsidiaries and affiliates, as well as to their respective Managers, Audit Committee Members and Employees, and serve as premises for companies under shared control with other partners, which have specific approved policies and controls, following the companies' Governance.

All leaders and managers are responsible for complying with the Compliance and Anti-Bribery Management System, related to the scope of the Integrity Program in their respective areas and functions at Motiva.

VII. Final remarks

In short, Motiva's **INTEGRITY PROGRAM** aims to promote an ethical and transparent organizational culture, focused on preventing fraud and corruption, and ensuring compliance with standards and laws.

The success of the program depends on the commitment of Senior Management and all Employees and partners who work on behalf of Motiva, in addition to continuous improvement and adaptation to identified changes and risks.

If you have any questions regarding the Integrity Program or wish to report any non-compliance with the guidelines of this program or other violations of applicable laws, speak to your leader or contact the Compliance Department.

VIII. Version control and history

Date	Version	Table of Contents
December/2019	**Initial Version**	Integrity Program
August/2021	**1**	Revised Integrity Program (year 2020/2021)
June/2022	**2**	Revised Integrity Program (year 2021/2022)
July/2022	**3**	Revised Integrity Program (ISO 37001)
August/2022	**4**	Current Version - Revised Integrity Program (ISO 37001)
September/2022	**5**	Revised to add ON TRILHOS in item III - APPLICABILITY AND SCOPE
August/2023	**6**	Revised Integrity Program (ISO 37301)
November/2023	**7**	Updated item 1 and item 3
September/2024	**8**	Updated organizational chart for the Vice Presidency of Sustainability, Risks, and Compliance and the Compliance Department Updated item 3, as per Third Party Risk Assessment Standard Updated Communication Plan
July/25	**9**	Document restructuring: • Updated Motiva brand • Added Evolution of the Integrity Program • Added Scope and Responsibility • Normative References

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Elaboration: Marilia Zulin

motiva

Design by pslobo