

# Anti-Bribery and Compliance Policy

## INTRODUCTION

At Nuvoil, we are committed to a Code of Ethics and Conduct in demonstration of our organizational values, which requires us to conduct business with integrity. This commitment involves avoiding any act of bribery and corruption and complying with all established compliance obligations.

We are committed to periodically reviewing the Anti-Bribery and Compliance Management System to maintain continuous improvement and ensure compliance with anti-bribery and compliance objectives.

- Maintain the effectiveness of the Anti-Bribery and Compliance Management System.
- Maintain an anti-bribery and compliance culture.

## APPLICATION

This Policy reflects our zero-tolerance stance against any act of bribery and corruption, and our commitment to compliance applies to all stakeholders and processes established within Nuvoil's Integrated Management System.

Accordingly, and in accordance with the current Code of Ethics and Conduct, Chapter 8, it is strictly prohibited for any person acting directly or indirectly on behalf of our companies to make or receive any type of improper payment. This includes giving or receiving bribes, or offering, promising, or providing money, valuables, and/or travel or hospitality to third parties, including public officials, with the intent to improperly influence any act or decision of a person

or to gain an undue benefit for themselves or the company. It also includes business-related activities that may result in breaches of trust, deceit, economic losses, and in general harm to the corporate image and reputation of the company.

## FACILITATION PAYMENTS

Facilitation payments are small, unofficial payments made to public officials to expedite or ensure the performance of routine procedures or services that should, in theory, be provided without any additional payment.

Examples of situations where facilitation payments are not permitted (including but not limited to):

- Expediting urban or construction permits
- Vehicle registration or processing
- Release of goods or services
- Assistance to expedite the issuance of documents (such as driver's licenses, work visas, or work orders)
- Release of work permits with clients
- Obtaining services such as telephone, electricity, water, internet, etc.
- Provision of police protection

## COMPLIANCE

Nuvoil ensures that all personnel fully comply with the provisions of this Policy, which is an essential condition for maintaining any employment or partnership relationship.



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Any alleged non-compliance will be investigated in accordance with our Internal Work Regulations and through the Ethics Committee, under General Management. Depending on the severity of the offense, sanctions may range from a warning to the immediate dismissal of the offender.

## COMPLIANCE OFFICER

Within Nuvoil, Compliance Officers are appointed who possess the appropriate competence, authority, and independence to perform the functions of overseeing the design and implementation of the Anti-Bribery and Compliance Management System.

Compliance Officers have direct access to senior management and the governing body to communicate relevant information regarding anti-bribery and compliance matters.

The main responsibilities of the Compliance Officer include:

- Ensuring that the Anti-Bribery and Compliance Management System complies with the requirements of ISO 37001 and ISO 37301, respectively;
- Supervise the design and implementation of the Anti-Bribery and Compliance Management System by the organization, to identify any need for corrective action;
- Ensuring that the Anti-Bribery and Compliance Management System is reviewed at planned intervals;
- Establishing a system to raise concerns and ensuring such concerns are addressed in a timely manner

- Providing advice and guidance to personnel regarding the Anti-Bribery and Compliance Management System;
- Ensuring that personnel at all levels have access to information related to the Anti-Bribery and Compliance Management System;
- Reporting on the performance of the Anti-Bribery and Compliance Management System to the governing body and senior management.

Any employee or third party who has information regarding non-compliance with this Policy, the Code of Ethics and Conduct, or related controls—or who believes they are being asked to pay or receive a bribe or engage in any act that directly affects compliance with the organization's obligations, policies, processes, or procedures—must report the situation without fear of retaliation using the established mechanisms or through:

- Email: **denuncia@nuvoil.com**
- Nuvoil Help Line.
- Directly with the Human Capital Manager or a Compliance Officer.
- Via website: **<https://nuvoil.com/form-etica/>**

If a report is made in good faith, Grupo Empresarial Nuvoil ensures the integrity of its personnel and guarantees that no retaliation or measures will be taken that may harm their physical or mental well-being.

## SANCTIONS

Complaints help prevent or detect compliance and anti-bribery risks and are therefore essential for the proper functioning of our Management Systems.



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Complaints or reports received through Nuvoil's various reporting channels will be reviewed independently, safeguarding the anonymity and confidentiality of the whistleblower's identity as well as that of other individuals involved.

Likewise, the provisions of the current General Law on the Protection of Personal Data Held by Private Parties will be applied.

Internally, sanctions resulting from proven misconduct will adhere to the provisions set forth in the Internal Work Regulations and the Code of Ethics and Conduct of Nuvoil.

Externally, sanctions will be applied according to the relevant Anti-Corruption Law and as established in the Federal Labor Law.

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Nuvoil Business Group