

CODE OF ETHICS

NEW WAVE



WORDS FROM THE PRESIDENT

I am delighted to present New Wave's Code of Ethics, a key part of our corporate culture. This document reflects the core values that should guide our daily behavior and reinforces the commitment to integrity that is expected of everyone in the organization.

The Code acts as a moral compass, establishing clear guidelines to guide ethical decision-making and guiding working relationships between New Wave and its stakeholders, which include shareholders, suppliers, customers, public officials and employees.

Its adoption is extremely important, as it promotes a culture of integrity, guides decisions, protects the organization against legal and ethical risks and strengthens Corporate Governance, as it ensures that the company operates transparently and responsibly, respecting the rights and interests of all those involved.

The Code of Ethics is the foundation of the principles of transparency, fairness, responsibility, integrity and sustainability, the fundamental pillars of Corporate Governance. It ensures that New Wave's operations are in line with ethical and legal values, which are fundamental to the sustainable development of our organization.

By adopting this Code, we reaffirm our commitment not only to the success of New Wave, but also to the well-being of society. Together, we are dedicated to building a future marked by ethics and responsibility.

Gustavo Emina
CEO and Founder

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ANNEX I - TERM OF ADHERENCE TO NEW WAVE'S CODE OF ETHICS

I - MISSION, VISION AND VALUES

1.1. Mission

Developing and implementing innovative, competent and sustainable technological solutions anchored in ESG principles.

Creating a positive impact on the planet by supporting our customers and partners in achieving their business objectives.

1.2. Vision

To be recognized as the world's leading company in sustainable transformation. We believe that technology can be a powerful tool for generating results, promoting harmony between economic and human progress and the protection of the global ecosystem.

1.3. Values

- Creativity and Innovation
- Global Company
- People first
- Agility
- Ethics and sustainability
- Work environment
- Safety of people and the environment
- Promoting the circular economy

II - APPLICATION OF THIS CODE. ETHICAL PRINCIPLES FOR ALL OUR RELATIONSHIPS.

The guidelines of this Code of Ethics apply to all partners, managers, employees of any hierarchical level, including those of our subsidiaries, as well as to our service providers.

Regardless of the sphere of relationship in which we are included, whether in the workplace, or with customers, suppliers, shareholders, investors, unions, communities and government authorities, in order to maintain the respect and trust of the market and society in general, it is important that we respect each other's integrity and privacy, maintaining confidentiality about business and operations, complying with internal or external rules and procedures, and thus cooperating so that the company's purposes are achieved.

In accordance with the values that guide our performance and development, we are increasingly committed to guaranteeing due respect and promoting the rights of all, which are minimum obligations for all our Employees and Third Parties:

- a) Comply with applicable laws, rules, regulations and bylaws;
- b) Preserving the Company's assets and image;
- c) Act responsibly;
- d) Do not use the Company's physical resources for personal purposes;
- e) Use the information received exclusively for the performance of their duties;
- f) Not to use privileged information obtained in the course of their work for their own benefit or that of third parties;
- g) Refuse advantages intended to influence professional decisions;
- h) Maintain confidentiality about the Company's operations and strategies;
- i) Do not practice abusive attitudes (gestures and/or words) or embarrassing behavior against the moral and physical integrity of any person, regardless of whether they are characterized by legislation as sexual harassment or moral harassment, as well as intimidation or threats;
- j) Do not adopt prejudiced or discriminatory behavior in relation to race, color, nationality, religion, sex, age, marital status, sexual orientation, special needs or social position.
- k) Do not violate human rights.

2.1 Relationships in the workplace

NEW WAVE's workplace relationships are designed to disseminate our values and encourage mutual dignity and respect, as well as everyone's safety, in order to create an excellent organizational climate.

We emphasize that our attitudes should be an example. So it's our duty:

- Respect the laws in force, statutes, regulations, policies, procedures and administrative and operational rules applicable to our business.

- Respect, disseminate and monitor occupational health and safety actions and precautions.
- Protecting the Company's intellectual property, preserving its industrial secrets, patents and inventions, against disclosures not expressly authorized by the Board of Directors.
- Ensure the privacy of our operations and restricted access to our industrial plants by our employees, unless authorized by the Board of Directors or the Manager of the respective Production Unit.
- Not to use privileged information obtained in the course of their work for their own benefit or that of third parties.
- To preserve the Company's confidential information, and only disclose or share it with other employees or third parties who need it exclusively for the performance of their activities at NEW WAVE, contacting the manager in case of doubt.
- Do not share passwords. Not to share personal information of any employees, except for professional purposes and within the limits of the law.
- Exercise caution when holding meetings or making comments in public places (airports, cafés, elevators, restaurants, etc.).
- To take care of the company's operational or administrative assets, exclusively for professional purposes, which are made available for the performance of our activities, using them correctly so that there is no damage, improper handling, loss or misplacement.
- Refuse advantages intended to influence professional decisions.
- Do not campaign religiously or politically for any party, candidate, union or professional council, in the workplace or using any New Wave resources.
- Not to consume or be under the influence, during working hours or on company premises, of alcoholic beverages, illicit drugs or any substance that could affect safety at work.
- No gambling in the workplace.

2.2 Moral harassment

Bullying in the workplace is characterized by the exposure of individuals to humiliating and embarrassing situations during the performance of their duties on an ongoing basis.

New Wave does not accept, in any context whatsoever, the practice of acts that characterize moral harassment, such as:

- Deterioration of the working environment;
- Requests to carry out tasks that are incompatible with the employee's technical skills and role;
- Use of derogatory nicknames;
- Use of obscene or degrading terms and gestures;
- Discrimination of any kind;
- Spreading rumors;
- Employee isolation in the workplace;
- Refusal to communicate.

2.3 Sexual harassment

Sexual harassment, according to the Federal General Controller (*“Controladoria Geral da União”*), is characterized by "conduct of a sexual nature, manifested physically, by words, gestures or other means, proposed or imposed on people against their will, causing them embarrassment and violating their sexual freedom". Sexual harassment is a crime and is not accepted by New Wave.

Acts that can be considered sexual harassment:

- Sexual innuendo without the victim's consent;
- Sexual requests and favors;
- Intimidation or threatening employment, as well as offering benefits to the victim.

2.4 Diversity and Inclusion

New Wave offers a safe and diverse work environment, offering the same opportunities and remuneration, free from any kind of discrimination or embarrassment, whether based on color, race, religion, sexual orientation, gender or any other characteristic.

All employees or third parties working for New Wave have a responsibility to ensure that they are treated appropriately, whether on or off the job, with respect and dignity, regardless of any individual characteristics or hierarchical position.

- Seek help from the People and Culture area or its representative in the Production Units if you need further clarification on these issues.

Under no circumstances does NEW WAVE allow service providers in its establishments:

- Hiring child labor and working with children under the age of 14, except through the Young Apprentices Program (Law 10.097/2000, extended by Federal Decree 5.598/2005).
- Exploitation of slave labor (or labor analogous to slavery) and/or forced labor.

2.5 Internal opportunities

We develop talent at home! We encourage the professional growth of all our employees, who defend our flag, show commitment and are aligned with our principles.

We offer equal professional development, according to the value and contribution of each employee. Decisions regarding employees' professional careers that are based solely on personal relationships are not permitted.

2.6 Relations with clients and strategic partners

The customer is our *raison d'être*. You can't win over and retain customers without adopting ethics at all times in this relationship.

We have therefore established the following premises:

- Commitment to customer satisfaction
- Sharing results
- Transparency in operations
- Confidentiality of information received

2.7 Relations with suppliers

Our suppliers are contracted by adopting criteria of impartiality, transparency and sustainability, based on ethical standards aligned with our own, observing excellence in services and best practices, in professional relationships free of any favoritism and based on respect for human rights.

- We allow equal opportunities for everyone, so that all suppliers have access to the same information base during the quotation and purchasing process.
- Suppliers are selected and contracted solely on the basis of technical, commercial, reputational, sustainability and ethical criteria.
- We encourage the adoption of management practices that respect human dignity, worker health and safety, ethics and the preservation of the environment.
- If child and/or slave labor is found to have been hired, the supplier will be subject to termination of the contract and will be held legally responsible for their actions.
- Confidentiality and secrecy of data and information accessed by any means or form is essential.

It is forbidden for our employees:

- Receiving gifts, presents and invitations to events other than those described in the gifts and presents chapter of this document;
- Accepting or offering favors, loans, special services, payments or any benefits that generate the feeling or duty to repay the offeror.

Any situations listed above should be reported immediately to your manager.

2.8 Relations with shareholders and investors

NEW WAVE follows the best Corporate Governance practices, with transparency and fair treatment of shareholders and investors, observing criteria even higher than those required by law.

- The company's relationship with its shareholders is free of favoritism, regardless of the number of shares.
- Any and all shareholder requests made directly to employees must be directed and submitted to the Board of Directors for approval.
- All of the Company's transactions with Related Parties should be avoided. They may be accepted, exceptionally, provided that they comply with market parameters and are submitted to the Board of Directors.

- We guarantee the absolute confidentiality of information, activities, business and results that are not yet public knowledge.

2.9 Relations with trade unions

We recognize the important role of trade unions, we respect their initiatives and we are always willing to engage in dialogue in any situation, seeking solutions that suit everyone involved, based on the principle of a relationship that is always based on legality, credibility, transparency and mutual respect.

We consider it very important to interact directly with our employees when dealing with matters involving labor relations, with the aim of resolving any impasses and, above all, providing the necessary clarifications to maintain a relationship of total transparency between the company and the employee.

2.10 Political, Trade Union and Religious Activities

We respect our employees' right to participate in political, trade union and religious activities. However, such activities must be conducted outside working hours and in their own name, and Employees may not use their positions or company resources to promote political, religious or trade union campaigns of any kind.

New Wave maintains a neutral position with regard to ideologies and political party affiliations, and expressly forbids associating its commercial activities with political party manifestations, both in its physical places of business and in its online presences. The granting of favors or the imposition of penalties based on party political criteria is not permitted.

Employees who run for public office must take unpaid leave from their duties in order to avoid possible conflicts of interest between their professional responsibilities and political campaigning. If elected, they must terminate their relationship with the Company.

2.11 Relations with government and regulatory bodies

We encourage good, transparent, ethical and respectful relations between our employees and representatives of government and regulatory bodies. We respect any and all laws, rules and regulations to which we are legally subject. When public officials visit our facilities for inspections and/or surveys, they must be respected and provided with all the clarifications requested. The Legal & Sustainability and People & Culture areas must be notified in advance of such visits.

2.12 Corruption Prevention

Acts of corruption occur when there is a promise, offer or even delivery by any person, natural or legal, of an undue advantage to a public official or agent, directly or otherwise, with the intention of influencing an action or omission, with a view to receiving an advantage or benefit for themselves or for the company.

New Wave guarantees adherence to anti-corruption legislation, in particular the Brazilian Anti-Corruption Law No. 12,846/2013, and does not admit acts of corruption in the conduct of its business, whether in the private sphere or in its relationship with the Public Authorities. We are committed to integrity, always seeking to comply with the laws and regulations that govern our business.

All New Wave employees are obliged to comply with the provisions of the Brazilian Anti-Corruption Law, as well as to observe any policies on the subject published by New Wave.

2.13 Preventing "Private Corruption"

Within New Wave, we extend the concept of corruption and prohibit any business practices between the Company and Third Parties of a private nature that seek to favor themselves through bribes, promises, facilitated payments, favors in private tenders, manipulation or exchange of information that characterize acts of unfair competition or any other act that violates the ethical and normative principles defined in this Code.

2.14 Money Laundering Prevention

Money laundering is the act of concealing or disguising the illicit origin of goods or values that are the fruit of illegal acts.

We guarantee compliance with the applicable legislation (Law No. 9.613/98) and we expect our Employees to prevent any action that could lead to the Company's involvement in criminal activities or the concealment of funds.

It is worth emphasizing that it is the duty of Employees to report all suspicions of money laundering to the Whistleblowing Channel or the Ethics Committee, as far as possible, in accordance with all applicable domestic and foreign laws.

2.15 Relationship with the community and the environment

New Wave is passionate about creating solutions that drive progress while preserving the environment for future generations, exemplified by the circular economy that the world-first technology for processing discarded tailings and marginal ores developed represents, reducing liabilities and optimizing development. Reconciling economic development, environmental preservation, caring for people and shared value reflects one of our main values, sustainability, which is a premise in our relationship with all our stakeholders and in our search for suppliers and partners.

New Wave's growth is also supported by its global social responsibility and harmonious coexistence with the entire community, especially the surrounding communities, with the aim of building a legacy.

That's why:

- We constantly invest significant amounts and have set up an autonomous business unit with its own budget, specifically for the purpose of researching, creating, developing, perfecting and implementing technologies aimed exclusively at sustainability, with maximum reuse of natural resources.
- We ensure the sustainability of projects, disseminate the rational use of natural resources and the eco-efficiency of operations, in line with the best socio-environmental management practices, controlling and monitoring risks, adapting process safety to the best global practices and minimizing the adverse impacts inherent in the activities carried out.
- We develop and promote sustainability actions that spread values and good environmental, social and governance practices to our employees, suppliers and other stakeholders.

2.16 Relationship with the market and competitors

Society in general benefits from a free, fair and open market.

We respect our competitors, ensure the protection of intellectual property and market information and seek to promote fair and equal competition, based on ethical principles and in accordance with applicable rules and legislation.

Our employees do not engage in anti-competitive conduct, nor do they make knowingly misleading statements about our competitors' products and services.

2.17 Relations with the international community

With its unprecedented global technology, NEW WAVE is present in different markets with different business practices and standards.

We encourage respect for and integration with different peoples. We respect the culture of each country and region, always based on this Code of Ethics, which must be universally and faithfully complied with by all leaders and employees.

2.18 Relations with associations and trade associations

Regularly constituted associations and trade associations are recognized as important according to the principles of NEW WAVE, which is always willing to engage in dialogue in any situation involving the company, with a view to the common interest of integrating its employees into these communities.

2.19 Relations with the press and external media

The corporate image is invaluable and the press is the greatest disseminator of this asset. In this way, we maintain an open channel with the press and provide all the information necessary to clarify and publicize our actions.

To this end, our employees must follow certain rules:

- No employee is authorized to speak on behalf of NEW WAVE without authorization from the Board of Directors and/or in disagreement with internal policies
- If you are approached by a journalist, you should inform the Board of Directors, who will guide you in these situations.
- We must ensure the safety of journalists on our premises.

2.20 Use of social networks

The use of social networks should be guided as follows:

- In order to guarantee the confidentiality of our information and strategies, it is not permitted to post photos on social networks of your workplace, especially where it may contain confidential information, unless expressly authorized by the responsible management;

- Whenever incorrect news or information that could affect New Wave's image is identified, the Institutional Relations area should be informed immediately;
- When commenting on New Wave social media posts, be careful when mentioning the Company. If you have any questions, please contact the People & Culture team;
- Be careful with comments on your private social networks. The practice of discrimination, harassment and abuse on social networks or instant messaging applications, even when not related to work or the company, affects New Wave's image and goes against the principles of the company's internal culture and this Code.

2.21 Conflict of interest

Occasionally, some situations may arise in day-to-day corporate life that may characterize a conflict of interest between employees and NEW WAVE, and that may go against the principles expressed in this Code of Ethics. It is therefore important to prevent such conflicts of interest, which can influence or appear to influence professional matters.

The referral of new professionals by Employees and Third Parties for open opportunities is permitted, as is the referral of new suppliers, business partners and other third parties.

However, all nominees will be assessed on the basis of the same criteria that apply to other candidates during the selection process.

Those Employees and/or Third Parties who make nominations will not participate in the stages of the selection process or the hiring of the candidates or third parties who have been nominated, as well as in the management of the contract, to ensure that the approval and management processes are conducted impartially, without any form of favoritism.

2.22 Hiring Public Agents and PEP

The hiring of Public Agents and PEPs will only take place, if there is no legal provision preventing it, with the prior approval of the Ethics Committee.

All agreements entered into with Public Agents and PEPs must have a legitimate business purpose, with a clear definition of scope and adequate formalization in writing.

In cases of recruitment and selection carried out by the Human Resources area, the selection of the candidate must be based on the expertise and experience of the professional hired, without there being any kind of favoring or advantage for those who are Public Agents or PEPs over others.

2.23 Exercise of position or function

Employees must not use their position, function or Company information to benefit themselves or third parties outside the Company's interests.

2.24 Private interests

A number of acts are considered to be in private interests and often conflict with the company's interests.

- Therefore, New Wave advises employees to: Not maintain their own businesses or activities that conflict with NEW WAVE's business.
- Not to engage in other professional or personal activities that would affect the time spent working for NEW WAVE, unless expressly authorized by the Board of Directors.
- Not to request, accept or grant loans or any guarantees, directly or indirectly, from people or companies that do business with NEW WAVE.
- Do not participate in, or exert influence on, negotiation processes with suppliers and clients, the outcome of which is of interest in some way to people closely related to them, such as parents, children, siblings, spouses and other close family members.
- Do not create or maintain a direct or indirect leadership/subordination relationship with an employee with whom you have an emotional or loving relationship, such as parents, children, siblings, spouses and other close family members, unless expressly authorized by the Executive Board.

2.25 Salary information

Employees are forbidden to disclose information regarding salaries (their own or those of third parties), variable remuneration or any other type of payment adopted by the company, unless expressly authorized by the Board of Directors.

2.26 Confidential Information

Employees must preserve the confidentiality of any information relating to the Company, clients, shareholders, suppliers, partners, service providers and collaborators obtained in the course of their personal or professional activities, even after their relationship with the Company has ended. Failure to observe confidentiality will subject the Employee to liability in the civil and criminal spheres for any damage caused to the Company or third parties.

Disclosure of this information to government authorities or by virtue of judicial, arbitration or administrative decisions must be communicated in advance and in a timely manner to the Ethics Committee, so that it can decide on the most appropriate form for such disclosure.

In addition, the use of New Wave logos in external materials is not permitted without the express authorization of the respective manager.

2.27 Security and Information Technology

Computer resources must be used exclusively for the benefit of the Company and not according to personal interests. Failure to comply with this standard makes the company's internal security vulnerable, as it facilitates undue access (hackers), and also has negative repercussions on the performance of corporate systems.

IT Management - Information Technology has full autonomy to audit NEW WAVE's equipment and may also, without prior notice, define restricted profiles, install monitoring software and remove any program harmful to the integrity of the network.

The employee must observe the following guidelines:

- **Email:** the use of Outlook is restricted to strictly professional messages.
- **Intranet:** The Intranet is available to complement professional activities. Access to news addresses, searches related to the Company's interests, internet banking and the like is permitted, provided that it is occasional and rational. Access to sites with inappropriate content, such as pornographic, discriminatory, terrorist, partisan, gaming, chain letters, etc. is not permitted.
- **Software:** The downloading of files, programs and games, as well as their execution, which are not authorized by the Company, is forbidden.
- Access to **the network:** the access password allows entry to corporate systems and will only be released by IT after authorization from the area manager. It is forbidden to share passwords and each user is responsible for safeguarding them. The manager of each unit is responsible for informing the termination and transfer of employees and the use of their user/password.

Employees who violate any of the above guidelines are subject to the penalties provided for by law, in addition to having their e-mail box canceled and immediately notifying their immediate manager, the corresponding directorate and the president's office.

Contact for the Information Technology Department:

e-mail: TI@newwavetech.com.br

2.28 Personal Data Protection

For New Wave, the protection of any information that is personal and/or confidential is extremely important.

Our commitment to guaranteeing due protection and confidentiality has gained even more strength since the General Data Protection Act ("*LGPD*") came into force, and for this reason, in respect for our Employees and Third Parties, New Wave undertakes to process data in accordance with the premises established by the legislation.

All those who have access to Personal Data due to their function must act with care and prudence in the conservation, maintenance and protection of the data, ensuring that the Company fully complies with the requirements established by law.

The transmission, sharing, deletion, alteration and other forms of data processing provided for by law are prohibited, except with the express prior authorization of New Wave's DPO.

In the event of incidents or any situation that appears to be a breach of data protection or a compromise of confidential information, immediately notify New Wave's DPO at dpo@newwavetech.com.br so that the appropriate measures can be taken.

2.29 Use of company assets

We use and protect the Company's tangible and intangible, intellectual, electronic and investment assets in a safe and responsible manner.

The following conduct on the part of Company employees is not acceptable, except with the approval of management:

- Removing internal NEW WAVE material, including information related to the Company's operations, even if the employee has participated in their development.
- Making paper copies or any other means of documents that may contain NEW WAVE's confidential information, including data on intellectual property, business secrets, patents, inventions, collaborators, clients, suppliers or other matters relating to activities in their area.

- Give lectures, seminars or academic papers on NEW WAVE or subjects that include their area of activity within the Company.

2.30 Accounting books and records

We ensure that our accounting records and books are always accurate and complete. It is the responsibility of all our employees to ensure the necessary accuracy and completeness of documents and records. The accuracy of these records is a direct reflection of the company's reputation and credibility, and is essential for complying with all legal obligations, both for the company and its business partners.

If you become aware of any omission, falsification, inaccuracy in accounting and financial records, in the information that supports them, or in other communications, as well as any violation of internal controls, it is necessary for any member of the team to immediately report it to their management or use our Ethics Channel.

2.31 Gifts, presents and favors

In order to inhibit any expectation of retribution or favoritism, we do not encourage the receipt, solicitation or offering of gifts, presents, invitations or favors, whether from suppliers, customers, resellers, shareholders or others.

Exceptionally, we tolerate the following:

- Employees may only receive corporate gifts or gifts that are compatible with good business practices and have a symbolic value of up to R\$100.00.
- If any employee receives a gift, i.e. an item with a value greater than that described above, we advise that the offer be politely refused and that the gift be returned immediately to the sender. If it is not possible to return the gift, for reasons of logistics or the possible creation of embarrassing scenarios, it should be sent to the People and Culture department so that it can be raffled off among the Employees, if its nature allows, or donated to a charity to be chosen by the Communications/Marketing department.

2.32 Participation in events

Within New Wave, we encourage our employees to participate in events that may be organized by third parties for professional and/or academic purposes.

In the event of an invitation to events that are not intended for a specific position, the area manager must decide, with impartiality and moderation, which employee will take part in the event. If the invitation is addressed to a specific professional, the employee's manager must decide, based on New Wave's principles, values and guidelines, whether or not the employee can participate.

2.33 Donations and Sponsorship

New Wave allows charitable donations and sponsorships to third parties, as long as they are made in accordance with the provisions of specific legislation. In any case, the beneficiary institution must be subject to due diligence and subsequent approval by the Compliance Area, momentarily combined with the Legal Area.

III - ETHICS MANAGEMENT

Applying the guidelines of this Code and maintaining an environment with high standards of ethical conduct is a commitment of all employees.

3.1 Ethics Committee

This Code does not cover all possible ethical issues related to NEW WAVE's working relationship. Therefore, it does not restrict the Company in applying disciplinary measures, always guided by the law, in respect of conduct not provided for herein.

The Ethics Committee was set up, made up of the CEO, the Legal Director and the People and Culture Director.

Your main responsibilities are:

- Analyze situations not provided for in the Code and define how to proceed;
- Clarify doubts about the interpretation of the Code of Ethics guidelines;
- Evaluate situations of non-compliance with the Code in order to decide on the action(s) to be taken;
- Supporting managers in the decision to be taken in situations of violations of the Code of Ethics;
- Review the Code of Ethics and update it whenever necessary.

- Promote the training related to this Code of Ethics.

The committee will meet every two months or whenever the need arises. Other professionals may be invited, depending on the topic and/or area involved.

3.2 Communication Channels

Questions channel

If Employees have any doubts about the way this Code is interpreted or suggestions for improvement, New Wave recommends that this be formalized as follows:

- a) Contact the immediate leadership personally in order to clarify doubts and/or interpretations; or
- b) Send an e-mail to compliance@newwavetech.com.br.

Ethics Channel

The Company has set up an independent Ethics Channel, which consists of an effective communication channel for reporting irregularities related to violations of this Code and acts of fraud, corruption and other illegal acts.

The Ethics Channel can be accessed by Employees and Third Parties 24 (twenty-four) hours a day via:

the website www.contatoseguro.com.br/newwave, via computer, smartphone or tablet; or the telephone number 0800 602 6916.

The principle of the Ethics Channel is to preserve the anonymity of the whistleblower. We assure you that the identity of the author of any type of communication will be kept confidential, if you so wish, and that any type of punishment or retaliation against people who report behavior that does not comply with the Code will not be accepted.

It is important to emphasize that communication channels must be used responsibly and that communications must be based on facts and evidence, so that this resource really does what it sets out to do.

3.3 Sanctions and penalties

This Code is mandatory.

Violation of the Code, the Company's policies and procedures and any deviation in behavior are subject to disciplinary action, regardless of hierarchical level, based on labor, civil or criminal legislation, as the case may be.

3.4 Approval and validity

This Code of Ethics was approved by New Wave's Board of Directors at a meeting held on 03/07/2024, and came into force as of its publication.

3.5 Disclosure

The document must be widely disseminated to all employees, suppliers and business partners. The latter two will acknowledge this in the signed contracts, while each employee will sign a term of responsibility.

ANNEX I - TERM OF ADHERENCE TO NEW WAVE'S CODE OF ETHICS

I, _____, registered with the CPF under no. _____, in the capacity of

() Shareholder () Employee () Third party () Supplier () Customer

of New Wave ("Company"):

In the case of a legal entity, identify the name of the legal entity:

I hereby certify that:

I - I have received a copy of the Company's Code of Ethics;

II - I am aware of the obligations to which I am subject, including those relating to insider trading, the duty of confidentiality and the obligations and responsibilities relating to the protection of Personal Data;

III - I am aware that the use of the Company's information and information systems is monitored and that the records thus obtained may be used to detect violations of the Code of Ethics and, as the case may be, serve as evidence in administrative and/or legal proceedings;

IV - I agree with the entire Code of Ethics.

I declare that I have read and fully accepted the terms and rules of the Code of Ethics, expressing full agreement and unrestricted adherence to said terms and rules, about which I declare that I have no doubts.

Place and date: _____, _____ / _____ / _____

Signature