



Supernova
Tecnologia

Code of Ethical Conduct

1. SUMMARY

1.	SUMMARY	2
2.	INTRODUCTION	3
3.	MISSION, VISION E VALUES	3
4.	LAWS AND REGULATIONS	4
5.	TO WHOM IT APPLIES	5
6.	WORKPLACE	5
7.	SEXUAL AND MORAL HARASSMENT	5
8.	SOCIAL RESPONSIBILITY AND SUSTAINABILITY	6
9.	HEALTH AND SAFETY	6
10.	PERSONAL CONDUCT	7
11.	CLOTHING AND PERSONAL PRESENTATION	8
12.	ABSENCES AND DELAYS	8
13.	ACTIVITIES OUTSIDE SUPERNOVA TECNOLOGIA	9
14.	CONFLICT OF INTERESTS	9
15.	INSIDE INFORMATION	10
16.	PATRIMONY	11
17.	IT AND INFORMATION SECURITY	12
18.	CUSTOMERS	13
19.	COMPETITORS	14
20.	QUESTIONS AND OTHER CONSIDERATIONS	15
21.	NON-COMPLIANCE AND COMPLAINTS	15
22.	PENALTIES	16
23.	ETHICS COMMITTEE	16
24.	COMMITMENT TERM	17

2. INTRODUCTION

SUPERNOVA TECNOLOGIA is fully aware that in order to remain in the market as a solid and reliable company that seeks its results through fair, transparent and legal performance, and to maintain the unity of the organization, its Employees are required. share the same ethical principles and act on common values and goals.

This Code of Conduct and Ethics reflects the culture, values and principles of SUPERNOVA TECNOLOGIA, as well as demonstrating its commitment to the adoption of good corporate governance practices and the highest standards of ethical conduct.

3. MISSION, VISION E VALUES

MISSION:

- Acting throughout the country solving problems in the computational area of organizations, through consulting and technical and commercial advice on information technology, and developing the relationship between leading manufacturers, suppliers and professionals in the field of information technology with client companies

VISION:

- Help organizations be more productive and reliable by increasingly incorporating into their information technology environment, data security features, scalable computing performance, resource savings and IT management excellence.

VALUES:

- TRUTH: We deal with everyone on this pillar, providing a cyclical flow of credibility, transparency, honesty and empathy.;
- EXCELLENCE: Flawless execution in all our processes promoting the growth of all;
- SIMPLIFY: Solve extremely complex problems through incredibly simple solutions.

4. LAWS AND REGULATIONS

SUPERNOVA TECNOLOGIA expects from its Employees, in the performance of their duties, the adequacy to established corporate procedures, as well as the same care and diligence that any person usually employs in their personal affairs, that is, honest and dignified conduct, in accordance with laws and ethical standards of society.

All Employees shall proceed in a transparent manner and in strict compliance with applicable laws, bylaws, guidelines, rules and procedures, always striving for the zeal of this Code.

SUPERNOVA TECNOLOGIA does not encourage the commission of any kind of offense and will investigate all facts involving suspected fraud, theft, misappropriation or any other crime, misdemeanor or unlawful act, as well as acts that deviate from corporate procedures established.

All Employees are required to comply strictly with Brazilian anti-corruption laws, including the provisions of Law No. 12,846 / 2013 ("Anti-Corruption Law"), as well as Law 8,666 / 1993 ("Bidding Law"). The attitudes of our Employees must always be based on the transparency and ethical principles of this Code in their relationships with public agencies and relevant governmental authorities.

Thus, SUPERNOVA TECNOLOGIA, by itself and its Employees, at any hierarchical level, defined in item 2 of this Code, are prohibited from making payments, as a bonus, or offering any advantage to public employees or Government authorities to expedite any routine service or administrative actions.

All Employees and representatives acting on behalf of SUPERNOVA TECNOLOGIA are prohibited from offering, promising, making, authorizing or providing (directly or indirectly through any third party) any improper advantage, payments, gifts or the transfer of anything of value to anyone, whether public or not, to influence or reward any official action or decision of such person for the benefit of SUPERNOVA TECHNOLOGY.

We comply with applicable laws and regulations. If there is no agreement, we seek legal protection and legal means to defend ourselves.

We are aware and law-abiding citizens of our country.

We have a zero-tolerance approach to any acts of corruption. We hope that everyone will remain concerned about this issue and report any concerns to the SUPERNOVA TECNOLOGIA Ethics Committee.

No employee will be penalized due to delay or loss of business resulting from their refusal to pay a bribe, or in connection with the participation of any other unlawful act.

5. TO WHOM IT APPLIES

This Code applies to all SUPERNOVA TECNOLOGIA Employees of any hierarchical, geographical and functional level, such as managers, directors, managers, employees, interns, apprentices, temporary and third parties allocated to SUPERNOVA TECNOLOGIA (“Employees”). It guides us about moral values and principles of conduct in interpersonal, professional and social relationships.

Our goal is to establish rules of conduct, organization and discipline at work, which are encouraged and respected by all our employees.

6. WORKPLACE

We provide a healthy working environment based on absolute respect among co-workers and on the principle of insertion, and any manifestation of discrimination on grounds of sexual orientation, race, nationality, religion, origin, marital or social status, physical disability is inadmissible. or mental, as well as any other kind of discrimination that may embarrass the dignity of the person.

We respect diversity! We ward off malicious comments, embarrassment, harassment, intimidation or any offense.

All SUPERNOVA TECNOLOGIA Employees, especially managers, for their dedication, experience and, above all, by example, should promote, always and at all levels of the hierarchy, relationships based on respect for the dignity of others, as well as participation, fairness and mutual collaboration in order to contribute to a respectful and pleasant working environment.

Relations between Employees must be governed by courtesy and respect. It is the duty of all to invest in creating a harmonious work environment with team spirit, solidarity and companionship in all professional relationships. Discussions with aggressive postures and / or offensive content between Employees of any hierarchical levels will not be accepted.

Managers, supervisors, and leaders are responsible for guiding their subordinates to fully comply with the standards, guidelines, and procedures contained in this Code.

7. SEXUAL AND MORAL HARASSMENT

Moral and / or sexual harassment, abuse of power, intimidation, disrespect and consideration or any other type of physical or verbal aggression will not be allowed or tolerated in the workplace. This includes verbal threats or any expression of hostility, intimidation, aggression or prank calls.

We rule out any possibility of harassment and consider harassment:

- Request for sexual favors by the hierarchical superior, with promise of differential treatment in case of acceptance and / or threats or concrete attitudes of reprisals in case of refusal. For example: loss of job or benefits;
- Exposure to humiliating and embarrassing, repetitive and prolonged situations during the workday and in the performance of their duties. They are most common in authoritarian hierarchical relationships, in which negative conduct, inhumane and unethical long-term relationships predominate, from one or more bosses to one or more subordinates, destabilizing the victim's relationship with the work environment and the organization, forcing you to quit your job.

Both forms of harassment are prohibited and punished. It is our responsibility to resist such constraints and to report the occurrence to the Ethics Committee, so that appropriate measures may be taken to determine the violation and consequent punishment of the aggressor.

8. SOCIAL RESPONSIBILITY AND SUSTAINABILITY

We seek the preservation of our environment, we are concerned with the correct disposal of waste, with our food and sustainable consumption. With this in mind, we encourage our employees to adopt ecologically correct and socially responsible behaviors, adopting practices such as:

- Sustainability: We reduce the consumption of natural resources: water, paper, plastic cups, etc. We make good use of what we have at our disposal;
- Recyclable: Paper, glass, metals, plastics, organic material and batteries are disposed of separately and consciously. We reflect: Do I really need this product? Where is the most appropriate place to dispose of it?

We are “sustainable” citizens and we make our world a better place to live.

9. HEALTH AND SAFETY

We must keep our work environment clean, organized, safe and productive.

Employees must keep their work environment, toilets, cafeteria and common areas of SUPERNOVA TECNOLOGIA in a good state of cleanliness and conservation, using the basic principles of hygiene and education.

The health, physical integrity of the Employees and the protection of the environment are priorities for SUPERNOVA TECHNOLOGY.

To ensure the integrity of the work environment and safety of all Employees, the employee who is under the influence of alcohol, illicit drugs or carrying any type of weapon shall not be allowed to remain.

Each of SUPERNOVA TECNOLOGIA's Employees is responsible for reporting unsafe conditions, violations of safety rules or situations that could endanger the life of anyone.

10. PERSONAL CONDUCT

We are proud of what we do and the team we make. We convey this pride in our daily lives, in our actions, whether with colleagues, business partners, internal or external customers.

We are honest and trustworthy. We always act honestly, impartially, conscientiously and transparently.

It is our responsibility to inform the Ethics Committee of any unlawful acts or actions of any employee that may harm our image and integrity.

SUPERNOVA TECHNOLOGIA expects from its employees an action based on this Code and the following examples:

- Active posture and questioning of guidelines that hurt the values of SUPERNOVA TECNOLOGIA
- Cooperation attitude, where there is a relationship of responsibility and solidarity between the Employees, so that each SUPERNOVA TECNOLOGIA professional feels the moral obligation to support others;
- Recognition of their own mistakes and communication of what happened to the hierarchical superior;
- Presentation of criticisms and suggestions that seek to improve the quality of the products and services provided and workplace.

Duties of all SUPERNOVA TECNOLOGIA Employees:

- Respect and zeal for SUPERNOVA TECNOLOGIA brands and products;
- Observe internal rules and administrative practices;
- Be lawful. It is understood as illicit: voluntary action or omission, negligence or imprudence, violate right and cause harm to others, even if exclusively moral;
- Immediately report to the leadership any conduct that violates or is likely to violate the provisions of this Code or the law;
- Maintain and maintain in perfect organization all elements and documents related to our professional activities;
- Ensure, in the exercise of professional activity, the minimization of risks;
- Promote cooperation and mutual respect between people;
- Properly use work tools: headset, telephone, computer, mobile phone, car, among others;
- Not solicit, accept or even offer to third parties any offers or goods, in cash or in kind, that may compromise impartiality and loyalty to SUPERNOVA TECNOLOGIA;
- Refrain from using hierarchical position to gain any advantage for yourself, your family or any third party;
- Not accept any power of attorney or personal mandate, except as expressly authorized by the legal department;
- Communicate to HR any changes regarding their marital status, family expenses or housing, providing, upon request, a readable copy of the documents;
- Be clear and truthful.

11. CLOTHING AND PERSONAL PRESENTATION

We take care of our image - hair, beard, nails, uniforms (where applicable), clothing, accessories, etc. Our dress and personal presentation are the professional image of our company, so we ensure that it is full, comfortable, appropriate and safe to our daily lives.

Some of our areas are our company's 'business card' and have uniforms, but the other areas also look after our image and follow some guidelines. As following:

- We use common sense to determine the appropriate attire to the work environment, thus avoiding demonstrating excessive casualty, that is restricting the use of shorts, shorts, miniskirts, overly transparent and / or low-cut clothing;
- We never use messages of our personal preference, whether they are team or cheerleading shirts, political parties, religions or any other groups of which we are part;
- Our clothing is always in a good state of repair, free of holes and tears, clean and ironed;
- Clothing with logos of our brands, suppliers and customers are accepted except with respect to service providers;
- Uniforms cannot be altered or customized;
- We ensure our safety and health in choosing the right clothing and shoes for the job.

12. ABSENCES AND DELAYS

We always report to our immediate superior, preferably in advance, absences or delays. In addition, we present a certificate or statement justifying our absence within 48 hours after the absence or delay, so that we do not have payroll discounts.

The attestations or statements are presented on letterhead and contain: full name physician's stamp and CRM, date, time and reason for care (CID - with patient / collaborator consent), full address of the clinical or hospital establishment. In cases of non-medical absences, the certificate or statement shall also be issued on letterhead and shall state the reason for the absence / absence.

We know that at any time and without prior notice the certificate or statement may be investigated to confirm its veracity, as SUPERNOVA TECNOLOGIA considers the falsification of statements or certificates as serious misconduct.

13. ACTIVITIES OUTSIDE SUPERNOVA TECNOLOGIA

During working hours, the employee must devote his or her full time to the activities inherent to his / her position, and it is not accepted to perform private activities such as commercialization of any kind of personal product or service on the company's premises.

SUPERNOVA TECNOLOGIA Employees shall not engage in activities or engage in organizations that compromise their dedication to the company, engage in behavior that generates a conflict of interest with their responsibilities and duties, or act in any other segment whose duties may in any way compromise the integrity, confidentiality and security of the company.

Employees who have parallel professional activities, such as business ventures, academic teaching and research, consulting, etc., are encouraged to report their status to their manager, who will assess potential conflicts of interest and possible situations of competition with the employee. work schedule.

The connection, affiliation or collaboration with political parties or other entities, institutions or associations for political or religious purposes, as well as contributions or services to them, shall be carried out in a manner that evidences their personal character and avoids any involvement of SUPERNOVA. TECNOLOGIA.

14. CONFLICT OF INTERESTS

With each passing day our professional and personal lives are more intertwined and we are always looking for conflicts of interest not to arise, that is, we move away from activities or matters of personal interest that are contrary to those of the company. What are these acts?

Conflict of interest occurs when an employee influences or may influence a SUPERNOVA TECNOLOGIA decision that results in or may result in some direct or indirect personal gain for themselves, family members or friends.

The use of the position, function or information about business and affairs of SUPERNOVA TECNOLOGIA to influence decisions that may favor the interests of third parties or others is not permitted.

For illustrative purposes only, below are some situations that characterize conflict of interest.:

- Hire children, spouse or relatives;
- old, directly or indirectly (through spouse, children and first-degree relatives) interests and / or interests in any institution that may benefit from your business knowledge, such as risk manager, authorized service desk, dealer, competitors, among others;
- Provide services of any nature to other organizations, directly or indirectly remunerated, that conflict with the interests of SUPERNOVA TECNOLOGIA, safeguarding the cases of prior authorization;
- Gain privileged financial advantage, directly or indirectly, in institutions that maintain business relations with us;

- Accepting, directly or indirectly, objects of any value from any person or entity that has or is interested in creating or maintaining business relationships with us. Remembering that money under no circumstances should be accepted;
- Provide competitors or third parties with any customer information, pricing policy, business, economic and financial plans;
- Improperly transfer to third parties' benefits offered to employees;
- Use company resources for personal or third-party benefit;
- Intentionally failing to clarify, externally or internally, relevant points when hiring a service or purchasing a SUPERNOVA TECNOLOGIA solution by customers, such as costs or obligations of the parties, terms and conditions of business or delivery, and technical or operational prerequisites.

Participation in charitable, philanthropic, civic, religious, political, social or cultural organizations, if they do not compete with the work schedule / activities developed and do not consume company resources, are welcome.

Any invitation, gift or gift which, by reason of its customary nature, characteristics or circumstances, may be construed as being intended to affect the recipient's impartial judgment, shall be refused and brought to the attention of the immediate superior and / or the Appeals Department. Humans.

Cash gifts cannot be accepted or offered under any circumstances.

15. INSIDE INFORMATION

In order to ensure the maintenance of our brands, any contact with the press or any other type of disclosure related to commercial, technical, financial matters, etc. must be previously authorized / reviewed by the management of our company. As following:

- Revenues
- General corporate operations (merger, acquisition, incorporation, etc.)
- New products
- Letters received from government agencies
- Change of control or administration
- Bankruptcies
- Litigation
- Customers
- Providers
- Service providers

It is forbidden to use, for private purposes or to pass on to third parties, technologies, methodologies, strategies, know-how and other information acquired through the work developed in SUPERNOVA TECNOLOGIA. All disclosable information is available on our website, therefore it is not allowed to pass on any information or internal document without prior and formal (written) authorization from the Board.

It is the duty of all Employees to ensure the image and reputation of SUPERNOVA TECHNOLOGY. In this sense, only previously authorized Employees may give interviews and / or clarify any type of media on behalf of SUPERNOVA TECNOLOGIA. Relations with the press or media should be done by formally authorized professionals. SUPERNOVA TECNOLOGIA's spokespersons may express, solely and exclusively, the institutional point of view, and should not provide personal opinions on the matters dealt with on behalf of SUPERNOVA TECNOLOGIA.

We also advise that no information regarding SUPERNOVA TECNOLOGIA be disclosed, especially through social networks.

SUPERNOVA TECNOLOGIA expects, from all its employees, the adoption of an ethical position with social networks, as all are responsible for the published / generated content. All principles, guidelines and conduct set forth in this Code are applicable to your participation in social networks. Therefore, the following guidelines are established:

- The creation, affiliation, participation or interaction, by the Employees, in social networks, forums, blogs on the Internet or in any written or virtual communication means, the opinions or manifestations issued must be strictly personal;
- Criticisms aimed at denigrating the image of SUPERNOVA TECNOLOGIA, suppliers or customers, with unfounded comments, on public websites and social networks are not acceptable;
- It is prohibited to share confidential information of SUPERNOVA TECNOLOGIA in public or private networks, as well as comments on internal and professional matters dealt with in meetings or conversations with co-workers;
- The execution of cyber-crimes by Employees and partners of SUPERNOVA TECNOLOGIA will not be tolerated;
- Employees will not be able to access social networks through computers and notebooks provided by SUPERNOVA TECNOLOGIA to perform professional activities, unless previously authorized.

16. PATRIMONY

We must all protect the group's assets by ensuring that the assets are used effectively and never for personal purposes. By group assets we mean: information and intellectual property rights (products of your work); know how; Technical Data; accounting information; financial results; business opportunities; projects; researches; products; brands; patents, inventions, improvements; emblems and abbreviations; advertising expressions; literary, artistic or scientific creations; systems; originating or derived computer programs; any other intellectual creation; time at work; equipments; vehicles; computers; software; information; company and stock dependencies.

ASSETS

Employees shall ensure the preservation of company assets, such as facilities, equipment, furniture, vehicles, computer resources, valuables and others. The use of SUPERNOVA TECNOLOGIA assets must be restricted to the employee's professional activities inside and outside the company, and their use for private purposes is not allowed.

The use of cell phones, radios, notebooks, or any other SUPERNOVA TECHNOLOGY equipment outside the work environment must follow the exact same rigor as those used in the work environment.

In the case of the company's vehicles, SERIOUS INFRINGEMENT is a loan to a third party, such as a husband, wife, general family or friend, as well as other unauthorized employees. In addition, we ask Employees to use parking (either during the day or at night / weekends), minimizing theft risks.

Serious damage to, destruction, assignment, unauthorized lending, embezzlement, or loss of Company resources such as tools, computing equipment, installation media, license keys, digital information, and files stored in the Company's computing environment, resources in clouds, be that caused by intent (deflect) or guilt (lack of zeal in the form of control).

INTELLECTUAL PROPERTY

In general, Employees shall maintain professional confidentiality of data and non-public information that they gain knowledge in the exercise of their professional activity. Without prejudice to the general rule, they shall comply with the following rules:

Everything that is produced, created or developed by the Employees in the exercise of their professional activities is the property of the Company, even after termination of employment or contract, and it is not allowed to delete, destroy or make available to others or even store and / or it. use it on personal devices and equipment. SUPERNOVA TECNOLOGIA will belong to all discoveries and developments that may generate industrial patents, made by professionals in the exercise of their paid activity by the company.

Employees must respect the intellectual property and right of use of SUPERNOVA TECNOLOGIA in relation to courses, projects, programs and information systems; equipment, manuals and videos; knowledge, processes, technology, know-how and, in general, other works and works developed or created, either as a consequence of their professional activity or of third parties, therefore, their use should be made only for the exercise of their professional activity.

The employee is obliged to maintain confidentiality, in perpetual character, including after the termination of the Employment Contract, of all confidential information related to business secrets to which he has access due to his performance in SUPERNOVA TECNOLOGIA, being obliged not to disclose, exploit or use confidential data, under penalty of characterizing the crime of unfair competition, as provided for in Article 195, item XI of Law 9279/96.

17. IT AND INFORMATION SECURITY

The use of unauthorized (pirated) software on computers, notebooks and mobile phones provided by the company as work tools is strictly prohibited.

IT resources should not be used to download, copy, store or even create, transmit or distribute any pornographic, offensive, defamatory, obscene, discriminatory, content that is inappropriate or unrelated

to the employee's professional activities. SUPERNOVA TECNOLOGIA technology should not be used to download, copy, store, create, transmit or distribute materials that may violate copyright, license restrictions or other intellectual property rights. If the employee receives this type of material from another company employee, he / she should report the matter to his / her Director or the Human Resources Department.

Internet and telephone access, as well as the use of SUPERNOVA TECNOLOGIA's e-mails, software, hardware, equipment and other assets must be restricted to the employee's professional activity, in compliance with the other provisions set forth in company policies, regulations or guidelines. .

We do not, under any circumstances, grant unauthorized access to company systems.

When using corporate e-mail, the employee must ensure the image and security of the organization, being forbidden its improper, abusive or private use, preventing confidential information from being disclosed or becoming vulnerable to the reach of third parties with unauthorized access.

Sharing passwords for access to internal systems with co-workers is prohibited, as the password is personal and non-transferable. All transactions made in the system are recorded and associated with the password of the user logged in to the terminal, in order to make him responsible in case of irregularities.

The Employee must be careful not to register passwords that are easy to discover, such as: date of birth, parent's name, registration number, sequential numbers, among others. If you are absent from your workplace, you should lock your computer or terminal, preventing others from using it instead. When you need to connect to another terminal, disconnect it when you complete the transaction.

The resources and equipment used in the professional activity are the property of SUPERNOVA TECNOLOGIA and must be used for the exclusive use of your interest. Accordingly, under the law, SUPERNOVA TECNOLOGIA reserves the right to store, review, audit, intercept, access, monitor, initiate and disclose communications, including messages created, received or sent through electronic systems, either on the Employee's own device. or any other device in the computing environment of SUPERNOVA TECNOLOGIA, whether local or cloud, without notice to the Employee. The Employee should not expect privacy regarding these matters. Any actions taken to prevent SUPERNOVA TECNOLOGIA's access to such information are prohibited.

18. CUSTOMERS

Our customers are our greatest asset, that is, our relationships are based on meeting their needs, ensuring their well-being and success. We rely on:

- Truth;
- Respect;
- Transparency;
- Excellence;
- Mutuality;

- Loyalty;
- Efficiency;
- Speed;
- Justice sense;
- Description and Confidentiality;
- and zeal for the other;

SUPERNOVA TECNOLOGIA expects its Employees to conduct business relations in compliance with laws, legal market practices and, in particular, national and international norms regarding economic order and competition protection.

It is expressly forbidden for all SUPERNOVA TECNOLOGIA Employees to make any illegal payments or to favor, through the granting of improper benefits or outside the usual practices of commerce, clients and suppliers, to the detriment of others, as well as to make payments or grant privileges or advantages to public officials. or equivalent, either directly or by third parties.

SUPERNOVA TECHNOLOGY's basic principle is to serve the Customer with an emphasis on excellence, quality, productivity and innovation, with social, community and environmental responsibility, and with full respect for laws and regulations.

Clients must be served with the utmost courtesy, courtesy and efficiency, and are provided with clear, accurate and transparent information. The customer should get answers to their requests, even if negative, but appropriate, cordial and within the expected time.

Accordingly, all customer-related processes should be handled with the utmost attention to:

- The commercialization conditions, according to policies established by the responsible departments;
- The clarity and truthfulness of the information provided to customers;
- Taking care to present products that meet customer expectations and attention to deadlines and punctual deliveries. Customer requirements and expectations must be considered, and all those agreed upon must be strictly adhered to;
- Treating solutions and services honestly and respectfully;
- Prompt service in solving technical problems requested by customers.

The use of trademarks, patents, identification marks owned by our customers will only be used and / or cited by SUPERNOVA TECNOLOGIA in its promotional materials, marketing campaigns and institutional presentation, with the prior written consent of customers. All our employees are responsible for maintaining the confidentiality of information received from customers.

19. COMPETITORS

Competition in the market for products manufactured and / or marketed by SUPERNOVA TECNOLOGIA must be exercised based on free and fair competition.

SUPERNOVA TECNOLOGIA does not allow verbal or written statements that may affect competitors' image or contribute to the spread of rumors about them, and the competitor should be treated with respect, just as SUPERNOVA TECNOLOGIA expects to be treated.

It is expressly prohibited to provide strategic, confidential or otherwise harmful information to SUPERNOVA TECNOLOGIA's business to any third party, including, but not limited to, competitors.

It is forbidden for any employee to maintain understandings with the competitors of SUPERNOVA TECNOLOGIA aiming at fixing prices and / or conditions of sale, adopting or influencing the adoption of a uniform or pre-agreed commercial conduct, dividing markets and subordinating the sale of a product to other.

The Employee who is related to another Employee of direct competitors should immediately report this fact to his / her immediate superior, who will report this situation to the Ethics Committee to assess whether there is a conflict of interest.

20. QUESTIONS AND OTHER CONSIDERATIONS

Due to the breadth of possible situations in the various areas of SUPERNOVA TECNOLOGIA, this Code is not intended to address all practices or principles of conduct, but to provide clarification on frequently asked questions and to serve as a basis for understanding what they are considered. ethical conduct.

Whenever questions or situations arise that pose us in ethical dilemmas, we seek our manager (mediate or immediate), share our doubts and seek guidance. We do not accept them and let them pass, we are always looking for answers, solutions.

Therefore, if in doubt regarding any situation or procedure, the Employee should seek guidance from his / her superior.

21. NON-COMPLIANCE AND COMPLAINTS

Any violation or disrespect for the principles contained in this Code should be reported to the Ethics Committee at: etica@supernova1.com.br.

The initiative to confess violations of ethical conduct is encouraged and will be considered when determining appropriate disciplinary action to be taken.

Failure to acknowledge possible violations by third parties will also be considered unethical conduct.

The Ethics Committee will ensure the confidentiality of reports received. Retaliation against a Contributor who in good faith reports a potential violation of the Code will not be permitted. Employees who believe

they have been exposed to retaliation after addressing ethical issues should refer this matter to the Ethics Committee.

The prohibition on reprisals set forth above will not prevent the adoption of appropriate disciplinary measures when the internal investigation finds that the allegation is false and made in bad faith.

22. PENALTIES

In case of violation of any established rule, the appropriate disciplinary measures will be adopted, always guaranteeing the full right of defense and argumentation of the involved parties.

The purpose of applying a disciplinary sanction is to correct inappropriate behavior and not simply to punish.

Violation of this Code, our policies, or any Law may result in:

- Disciplinary actions, including termination of employment, depending on the nature and severity of the violation. Disciplinary measures related to each type of violation will be established based on the analysis of the impact and recurrence of unethical conduct;
- In the event of a violation of the law, civil and / or criminal penalties may be imposed by a government agency or court.

23. ETHICS COMMITTEE

The Ethics Committee is composed of at least three representatives from different areas of SUPERNOVA TECNOLOGIA, who manage this Code. The Ethics Committee is responsible for disclosing and ensuring the understanding of the document, regularly evaluating its applicability, making any updates or rectifications, judging cases of non-compliance with its principles and ensuring the application of appropriate measures.

24. COMMITMENT TERM

I, having received the “Code of Conduct and Ethics”, after thorough reading, understanding and agreeing to the points set out therein, take responsibility for keeping it always alive and in use.

I understand that this statement of agreement and science will be filed in my medical records and failure to comply may lead to disciplinary action or even to my termination of business.

If you have any questions, I will immediately contact my immediate or immediate manager to discuss them.

I take for myself the values of this Code, I know that it is an integral part of my Employment Contract and I agree to meet and comply with additional precepts disclosed by SUPERNOVA TECNOLOGIA that will integrate this Code, without the need to sign a new Term.

Date:

____ / ____ / ____

Signature:

Full Name:
