

[Logo of Brasilata]	POLICIES AND STRATEGY	
Code of Ethics and Conduct - 2023		
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## Code of Conduct and Ethics

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## **CONDUCT AND ETHICS**

The Brasilata Group's Code of Ethics and Conduct brings together the guidelines and principles that must be observed and adopted by all companies that are part of the Group, guiding actions and relations with the (both internal and external) public.

This Code is based on the ethical principles that guide the behavior of the Brasilata Group, reflecting its cultural identity and consolidating its commitment to compliance with all laws governing its activities, promoting support mechanisms so that employees and related parties may be instructed and trained to follow the rules in force in the exercise of professional activities related to the Brasilata Group.

All duly registered employees, partners, clients, third parties, service providers, or suppliers who work in any of its business units are considered employees and related parties of the Brasilata Group.

To this end, this Code of Conduct covers all employees and other persons who act, even occasionally, as performers of activities related to the company and must be widely disclosed to the general public. Therefore, it applies to all direct and indirect employees and third parties.

This Code seeks to prevent misconduct, observing and promoting the dissemination of guidelines and educational activities issued by top management without prejudice to applying appropriate disciplinary measures when such deviations are found.

Everyone's commitment to this Code is essential for Brasilata to achieve its goals and objectives ethically and transparently, thus providing a work environment that is increasingly fair, safe, and healthy.

### **1. Good faith and diligence**

Brasilata Group is committed to developing and appreciating its employees through participative management and a relationship based on balancing duties and rights. Brasilata Group expects all its employees and related parties to commit to ethical and respectful treatment in all relations, innovation, and continuous improvement in product differentiation and process efficiency.

Ethics, trust, and consistency guide our relationships with clients and suppliers by providing products and services that meet needs and exceed expectations with quality, food safety, innovation, and sustainability, striving for differentiation, creating value for our products, and strengthening our relations.

### **2. Ethical business practices**

Top leadership defines our strategies, objectives, and goals and establishes the levels of responsibility of the people who make decisions on behalf of the organization. We have an active Governance structure that includes a Board of Directors and an Executive Board, who are committed to sustainable development, monitor the implementation of decisions to ensure that they are followed in a socially and environmentally responsible manner, enforce accountability for the results of decisions and company activities - whether positive or negative. Furthermore, it periodically analyzes and evaluates the Governance processes, adjusting them and disseminating their content throughout the Brasilata Group.

### **3. Collaboration with independent auditors**

Aligned with the applicable laws and valuing transparency and good faith in carrying out actions with the Executive Board, the Board of Directors, and its Committees, the principles of corporate governance are followed by the Economic Group, with the preparation and disclosure of financial reports under the accounting standards that apply to its corporate operation, by carrying out an independent audit and publishing its accounts publicly.

### **4. Conflicts of Interest**

Conflicts of interest occur when secondary interests - matters outside the interests of Brasilata Group and which are of a professional, personal, political, and financial nature, among others - interfere in the judgment, action or omission of people within Brasilata Group, who act based on their interests, disregarding the interests of Brasilata Group.

A conflict of interest occurs when the employee decides to be influenced by their interests, resulting in them obtaining a benefit, not necessarily financially, for themselves or their family members and friends.

Considering that in such situations, the greater interest, which is the Brasilata Group, is set aside, the employee must declare that they are prevented from deliberating on the subject and excuse themselves from the decision and/or communicate the fact to the Ethics Committee, which shall decide whether or not to impeach the employee.

The following situations will be considered as conflicts of interest:

#### **a) In cases of family or affectional bonds**

It is necessary to inform the Brasilata Group, through the area related to the subject, with a copy to the Ethics Committee, about such a bond.

Managers cannot make decisions that benefit their family members, prioritizing personal interests.

Granting a privilege to employees with affectional bonds solely because of the family bond through hiring, promotion, receiving raises, and/or other advantages is considered a conflict.

The relationship between sibling(s), child(children), parents, grandparents, aunt(s), uncle(s), cousin(s), in-law(s) or spouse is admissible within the Brasilata Group. In the event of this type of relationship and/or any other kind of conflict of interest, the employee must fill out the form on conflict of interest available on the Intranet, submit it to the appreciation of their immediate superior, Human Resources Management, Risks' and Internal Controls' Management and/or Ethics Committee, which will decide on the appropriate measures for the matter.

Therefore, each employee is responsible for analyzing their situation in the company and immediately reporting any conflict of interest (actual or imminent). However, the Ethics Committee may issue an opinion on the matter if this analysis is not conducted.

#### **b) Relations between members and shareholders**

The concepts addressed in this item of the Code of Ethics and Conduct are extended to the members and shareholders of the Brasilata Group.

#### **c) Relations with goods suppliers and service providers**

Partners will be hired based on the establishment of technical criteria, and it will be conducted within the limits provided for in the Brasilata Group's Policies that apply to the specific matter.

Employees who eventually have family members acting or intending to supply materials/services to the Brasilata Group must refrain from acting personally in hiring and managing these businesses, avoiding any acts in the sense of influencing the decisions of other employees addressing the matter.

#### **d) Relations with clients**

Brasilata Group's relations with clients shall observe the ethical principles set forth herein. Any gifts, souvenirs, tributes, or granting of cash to Brasilata Group employees by their clients shall not be accepted.

Expenses with clients related to meals, transport and accommodation are defined according to the budgets of the areas and need to be justified, with only those connected to the work being performed to be accepted.

The mere offer of any type of advantage, financial or otherwise, made by partners to any employee of the Brasilata Group, even without the employee's agreement, shall be deemed as an act of corruption or bribery.

Any sharing of values, for any reason, between any partners and employees of the Brasilata Group is also prohibited, and such acts are considered severe misconduct, giving rise to the termination of the commercial relation with cause.

Suppose gifts, souvenirs, tributes, or cash are granted to any employees of the Brasilata Group. In that case, such employees must notify their immediate manager and the Ethics Committee to deal with the matter.

Participation in promotional events that are sponsored or promoted by third parties, partners, or related parties as a representative of the Brasilata Group will be conditioned to the approval of the Marketing department, which may consult the Ethics Committee in case of doubts

Those that have a market value under two hundred reais (BRL 200) per year may be accepted as gifts, souvenirs, and tributes, or offers of stationery items, such as, but not limited to, notebooks, agendas, calendars, obligatorily personalized with the client's brand.

#### **e) Relations with the government**

Obtaining or offering advantages from/to government agents in any sphere or level will not be tolerated.

### **LABOR PRACTICES AND HUMAN RIGHTS**

#### **5. Promoting human rights**

Brasilata Group respects and promotes Human Rights practices in its activities and procedures and seeks to establish relations with those who share the same principles and values. Thus, the following are non-negotiable values:

- a) decent working conditions and compliance with labor and social security obligations;
- b) respect and appreciation for diversities;
- c) inclusion of people with disabilities in the production chain;

- d) prohibition of child labor, or working conditions analogous to slavery; and not admitting children and adolescents in its processes and/or in its production chain, except as young apprentices under the terms of the Law;
- e) illegal exploitation of immigrant or refugee labor; and
- f) forced or involuntary labor

We endorse the other rights that can be consulted in the Universal Declaration of Human Rights - UNICEF. If such situations occur, they must be immediately blocked and reported to the authorities. Any partners using such labor shall be eliminated from having a relationship with Brasilata Group.

These values extend to our suppliers and clients.

## **6. Labor as a Young Apprentice**

Brasilata Group does not accept or employ child labor directly or indirectly in its production process. It reinforces its commitment to the future of children and child development, committing itself not to admit any case of exploitation of child labor in its production chain, including its related parties.

It acknowledges that education is the basis for the development of children, their communities and their countries, and supports the development of young people by offering positions in the Young Apprentice program, which offers good working conditions, as well as personal and professional development, with appropriate monitoring, evaluation process and guidance for fulfilling their social role. At the end of the apprenticeship period, Brasilata Group offers effective job openings for Young Apprentices who have displayed satisfactory performance, potential and positive attitudes.

## **7. Promoting a healthy work environment**

Brasilata Group values a diverse and inclusive work environment, so we do not admit any discrimination in the selection process for job candidates. It hires and promotes qualified people for all positions based on their competence and productivity through technical evaluation criteria and equal opportunities for all its employees. Brasilata Group does not tolerate any discrimination, in line with Brazilian laws and other international Conventions on the matter, eliminating all forms of discrimination, thus conceptualized as being "any distinction, exclusion or restriction based on race, color, religious conviction, descendant, or national or ethnic origin which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise on an equal footing of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of the public life" according to Law No. 12,288, of July 20, 2010.

Employees must guarantee and promote a healthy work environment without constraints, insinuations, prejudice, or discrimination. This action extends to the partners and parties related to Brasilata Group. In addition, Brasilata Group offers its employees health, life, and dental insurance in the locations in which it operates. Health and dental insurance extend to dependents of Brasilata Group employees.

## **WHISTLEBLOWER AND NEGOTIATIONS**

### **8. Harassment-free and retaliation-free work environment**

Harassment, in general, means any invasive approach to individual freedom, impertinence, persecution, constant suggestion or pretension about someone and consists of the purpose of inducing behavior, obtaining favors of a sexual nature or otherwise, in a non-consensual manner.

Moral harassment is an attack against a person's honor, image, dignity, and privacy. It can occur through acts, insinuations, forced physical contact, and impertinent invitations that present distinct characteristics such as, among others, a condition to provide or keep a job, influence career promotions of the harassed or harm performance professional, humiliate, insult or intimidate the victim.

In the case of sexual harassment, the behavior is directed exclusively at obtaining sexual advantage or favor. In this case, in addition to reprehensible conduct, it is also a crime under the Brazilian Criminal Code. According to Article 216-A of the Brazilian Criminal Code. The crime of sexual harassment consists of an agent in a superior hierarchical position, trying to "force a person for purposes of obtaining a sexual advantage or favor, given the offender's position as hierarchical superior or dominance inherent to the job, position or duties." So, in addition to the company's internal disciplinary measures, the agent/employee may be reported to the relevant authorities.

In addition to sexual harassment, there is the crime of sexual assault (article 215-A of the Brazilian Criminal Code), which occurs when someone performs a libidinous act against and without the consent of a person for purposes of satisfying one's own lasciviousness or that of a third party:

Brasilata Group does not tolerate abuse of any nature among employees, partners and related parties, such as moral or sexual harassment or sexual assault, as well as any verbal or physical behavior of humiliation, aggression, coercion or threat to company employees, partners and related parties with the creation of a hostile, unsafe and inappropriate work environment is unacceptable.

To ensure a healthy work environment, Brasilata Group relies on its employees, partners and related parties to file reports if they witness or suffer harassment, assault or discrimination. Any occurrence in this regard must be reported immediately to the Human Resources Management or the Human Resources person of reference at the Brasilata Group unit, or also through an anonymous report, through Brasilata Group's Whistleblower and Negotiations Channel, so that the appropriate measures are taken (include link).

Reported cases will be treated with absolute secrecy, respect, ethics and professionalism, preserving the victim and seeking to share information only with strictly necessary areas.

The victim will be taken care of and guided when appropriate measures are taken from a legal standpoint.

## **9. Whistleblower channel**

The whistleblower channel can be contacted via the following link [https://psimp.com.br/denuncia\\_new.php](https://psimp.com.br/denuncia_new.php) where any type of irregularity or dissatisfaction can be reported. All reports are forwarded to the chairperson of the Board of Directors, who will then analyze and involve those responsible to assess the situation and make any pertinent decisions. It is of paramount importance that the allegations are as detailed as possible.

In cases of doubts or violations about any item described or premise set forth herein, or even in the case of omissions or other issues not covered in this document, suppliers should seek their commercial contact at Brasilata Group or, if they would instead remain anonymous, use the whistleblower channel available at the website mentioned above.

Anyone filing a claim will be assured of the following:

- Protection from retaliation for reporting sexual harassment or other unlawful forms of harassment;

- The company's commitment to investigate allegations and take appropriate action;
- Total secrecy of the whistleblower if this is in their interest;
- That the company will inform the whistleblower (when identified) of the results of the investigation and the measures taken.

Brasilata Group reinforces its ethical commitment to its employees, partners and related parties, emphasizing that all reports must be made responsibly and not as a mere channel for disseminating gossip or inappropriate comments.

## **10. Ethics Committee**

The Brasilata Ethics Committee (CEB) will judge cases violating the Code of Ethics and determine possible disciplinary measures. The CEB is made up of the Executive Committee (CDE), the Responsible for: Risks and Internal Controls, Legal and Human Resources. When assessing possible conduct violations, the manager responsible for the area where the employee works will also be in the Ethics Committee.

## **ENVIRONMENT, HEALTH AND SAFETY**

### **11. Prioritizing health and safety**

At Brasilata Group, our greatest assets are the people; as such, we are committed to acting according to regulatory standards, current laws and our internal procedures. Thus, we are committed to eliminating or mitigating hazards and risks, and consequently, the occurrence of accidents, providing employees and subcontractors with a safe work environment and satisfactory conditions.

Through the integration of Occupational Safety and periodic training, Brasilata Group promotes training to its employees, partners and all those who, directly or indirectly, have relations with the company and in all its Units. We believe that through awareness and good practices, the Group encourages safe behavior, to reduce accidents.

To continuously improve occupational health and safety management, we evaluate and monitor our indicators within our Integrated Management System, whose Policy is periodically reviewed and widely disseminated to all employees, partners and stakeholders.

### **12. Environment**

In its Integrated Policy, Brasilata Group states its commitment to preventing and minimizing the impact of its activities on the environment.

Based on monitoring the environmental aspects and impacts of processes and activities, the organization considers controls related to compliance with legal requirements, waste disposal, atmospheric emissions and consumption of natural resources, raw materials and inputs, as well as internal control of its processes through preventive maintenance and assessment of atmospheric emissions, where applicable, to be fundamental.

With a focus on continuously improving its activities, the Group seeks to improve its products and processes to encourage sustainable development, minimizing its environmental, financial and social impacts.

### **13. Relation with unions**

Brasilata Group enters into Collective-Bargaining Agreements and participates in Collective-Labor Agreements with the Category Union, according to the regions where it has a

manufacturing plant, all in compliance with labor, insurance and social security legislation. We acknowledge the presence and importance of union representation in our facilities and provide information on the rights and duties applicable to the category.

## **QUALITY**

### **14. Quality Management System**

Brasilata Group is certified by ISO 9001:2015, reflected in its internal systems and Integrated Policy, bringing agile responses and training the team to respond quickly and transparently to crises.

We strictly comply with regulations related to the health and safety of consumers, clients, information and labeling.

To encourage and promote the circular economy and reverse logistics, Brasilata Group adopts:

- Research and development for better use of steel sheets in the production process;
- Management to reduce steel sheet losses;
- Responsibility after resource consumption program coordinated by Prolata - permanent steel recycling program.

### **15. Food Safety**

Brasilata Group is committed to meeting the needs and expectations of its clients, providing safe and quality products for the food product line, which meet the company's standards, client requirements and relevant legal requirements.

It is consolidated in our Integrated Policy that we guarantee the effectiveness of the Food Safety Management System for packaging food products by applying the best manufacturing practices and focusing on continuously improving its processes, increasing profitability and operational excellence.

Through its internal and external communication channels, the Group maintains an effective communication system whereby updated matters are published and informed to all stakeholders responsibly and safely.

### **16. Appropriate use of Brasilata Group's assets and facilities**

As a commitment, Brasilata Group preaches care for the preservation of its assets, whether tangible (financial resources, inventory, machinery, equipment and buildings) or intangible (patents, licenses, copyrights, software, technology development, revenues, formulas, client portfolio, human resources and know-how, brands and image).

To this end, it disseminates the culture of appropriation and belonging, and the responsibility for effectively using the resources made available for the performance of the work to its employees, partners and related parties.

## **RELATIONS WITH RELATED PARTIES**

Brasilata Group has an active and participatory profile in social relations. It understands its impactful role in the transformation of society, through honest practices, dissemination of culture and education, as well as the promotion of innovation and technology.

Brasilata Group's relationship with its different stakeholders is based on honesty, integrity and transparency, with policies compatible with its values. By raising awareness, it trains its



employees to respect the values, knowledge and traditional practices of the communities in which it operates.

As a means of promoting the values mentioned above, it seeks to bring innovation and development in the regions where it has manufacturing plants, promoting employability, encouraging the study and training of its employees by granting scholarships and educational incentives and stimulating innovation through the submission of ideas for the "Simplification Project".

#### **17. Relationship with society**

As an entity that propagates ethical and positive ideas in the communities in which it operates, it rigorously exercises its socio-environmental responsibility.

#### **18. Ethical relationship with Government and Third Parties**

Brasilata Group interacts with public agents, private individuals and all kinds of third parties, whether or not linked to related parties, through its legal representatives and agents. Such persons, in their role as representatives of Brasilata Group, must faithfully comply with the precepts established in this Code of Ethics and Conduct, as well as observe the internal Policies and Procedures, and the entire Brazilian legal system, notably the anti-corruption and anti-money laundering laws.

Brasilata Group does not tolerate, and instead, prohibits and vehemently repudiates any practices that imply a violation of the Brazilian legal system. In addition, it demands the same rigor from its employees, partners and related parties in complying with the practices established in this Code and by the applicable laws.

##### **Anti-Corruption and Anti-Bribery Practices**

In compliance with the provisions of Federal Law No. 46,366/18, Law No. 12,846/13 and State Law No. 7,753/17, which deal with anti-corruption and anti-bribery practices, Brasilata Group provides, through its policies, for the application of punitive measures to those involved in illegal acts and of corruption.

Brasilata Group is firmly committed to rigorously complying with the laws that apply to its operations and the conduct of its business, which is a commitment shared by all.

##### **Money Laundering**

Law 12,683/12 defines money laundering as "hiding or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or values". In other words, money laundering consists of a series of operations that aim to insert unlawful money into a country's financial system, so it appears to have a legal origin.

Money laundering is a crime and represents a significant threat to the development of society, because, most of the time, there are other profoundly serious crimes behind it, such as drug and arms trafficking, tax evasion, payment of ransoms, significant thefts, piracy and crimes of corruption, among others.

Any payments must have a defined, clear and proven origin. For this reason, payments in cash, despite being lawful, must be evaluated and recorded in suitable tax documents. Monitoring commercial transactions is necessary to detect and report any behavior by the counterparty (client, related parties or partners) that may raise suspicion of money laundering. Such irregularity is a warning sign that must be clarified before continuing the commercial transaction. The case must be reported to the Council for Financial Activities Control (COAF) if the suspicion is plausible.

Therefore, if there is evidence of any practices contrary to the provisions of this document and the laws referenced here, whether practiced by employees, partners or related parties, jointly or not, for their own benefit or that of third parties and which constitute acts of corruption, bribery, favoritism, shall be subject to sanctions, including but not limited to sanctions provided for in labor, civil and criminal laws. Commission

Examples of corrupt, bribery or favoritism practices are:

- offering or demanding benefits from third parties in exchange for personal advantage, within the scope of the relations established by Brasilata Group;
- receiving benefits from third parties in exchange for personal advantages for favoring purposes, within the scope of the relations established by Brasilata Group;
- defrauding documents to alter the truth of the facts for their own benefit or that of third parties, within the scope of the relations established by Brasilata Group;

### **(Separate topic) Political activities**

We respect the right of employees, partners and related parties to participate in the political process and exercise their citizenship, however, we do not allow party-political demonstrations during work activities or outside of them, if at Brasilata Group's manufacturing facilities.

Brasilata Group does not contribute to or support the candidacy of any person or party entity in the national or international political scene.

It is lawful to participate in the political debate respectfully and healthily and respect for differences is mandatory, as well as participation through representative entities and segments of society and in a constructive manner, within the law, in the expression of their opinions on the formulation of laws and regulations. We adopt a stance of not using economic power to influence contributions from other companies, suppliers, clients and other partners.

Any financial contributions, if made by Brasilata Group, will strictly follow the legal provisions. Brasilata Group repudiates and does not tolerate hate speech under any pretext or argument from its employees, partners and related parties.

### **Compliance with the laws and regulations**

Brasilata Group follows and strictly complies with the laws that apply to its activities, in all areas for which the law determines, whether in the civil, labor, tax, environmental and social security spheres.

In addition, in strict compliance with legal provisions, Brasilata Group relies on an external audit to close its annual accounts.

### **19. Responding to requests from public agencies**

In developing its activities, Brasilata Group promotes proactive and participative conduct. This extends to fulfilling demands motivated by public agencies, with which Brasilata Group will comply, observing the applicable laws, as requested by the public agency.

The spirit of cooperation and mutual collaboration will be sought through any type of legitimate action supported by laws promoted by any public agency.

### **20. Relations with Suppliers and Service Providers**

Relationships with suppliers and service providers are guided by ethical commitment, transparency, honesty and sustainability in the relations established with Brasilata Group.

The choice and contracting of suppliers follow, in addition to technical, strategic, economic and professional criteria, ethical conduct, added to the needs of Brasilata Group, thus guaranteeing an environment aligned with the values of Brasilata Group.

To better guide the commitment of the supplier or service provider, Brasilata Group developed the Supplier Code of Conduct, which is available on its communication channels.

## **21. Relations with Clients**

The quest to satisfy and exceed client needs is based on the trust, quality and credibility developed over the years based on good practices carried out by Brasilata Group. In addition, the constant search for innovation and modern technologies stimulates the market to make the products produced by Brasilata Group attractive and competitive.

Clients are served courteously and politely and provided with all information relating to the business being conducted. All information is passed on clearly and in detail to establish objective communication with its clients.

In the quest for constant innovation, Brasilata Group adopts preventive measures to avoid complaints and grievances from its clients, anticipating potential problems. Clear communication with clients gives access to technical and after-sales support services, so the client will not be left unattended.

## **22. Donations and Sponsorships**

Brasilata Group, within the scope of its activities, promotes donations and sponsorships under the terms of the law. To better understand this, it follows the following definitions:

- Donation: an action that consists of the exercise of liberality by Brasilata Group, which consists of the transfer of values or things to third parties without consideration. Donations will be made in the manner established in the applicable legislation, and the recipient may refuse to receive the donation. - Sponsorship: it is the granting of money or service for the purposes of aid or protection, through some kind of consideration, including advertising.

Any donation or sponsorship will only be allowed if it is transparent, deductible and justifiable, at any time, as well as its reason and destination. At Brasilata Group, any donation or sponsorship must be supported by an agreement or document duly approved by the internal authorities, always following the premise of a transparent process that can be audited at any time.

Donations to the following recipients are strictly prohibited:

- Political parties;
- Candidates running for elected public office and/or representatives of an entity in which Brasilata Group has an interest;
- Religious institutions of any nature;
- Any agent or public office;
- Trade unions representing the professional categories assigned to employees;
- Any individuals or legal entities that represent a risk to the reputation of Brasilata Group.

## **NEGOTIATIONS**

### **23. Conflict Minerals**

In order not to encourage practices contrary to Brazilian laws and the commitments undertaken by Brasilata Group, we require that suppliers and service providers provide traceability information to verify the origin of the **TIN** material in our supply chain so that it is proven that the Supply does not contribute to the promotion of illegal armed groups, human rights violations or financial irregularities, as defined in Schedule II of the Organization for Economic Cooperation and Development (OECD) Guidance.

Suppose any failures to comply with the guidelines provided for herein are identified. In that case, Brasilata Group shall immediately stop engaging with suppliers or service providers that pose a risk of supporting the conflict financed by the trade of minerals and promoting working conditions that do not comply with our code of ethics.

We use the response to the annual Responsible Minerals Assurance Process (RMAP) assessment to verify our conflict-free status and identify opportunities to improve our conflict minerals due diligence management system continually.

### **24. Practices for ethical marketing**

Brasilata Group communicates relevant data on the products produced, aspects of their quality and services and possible changes in their characteristics to the internal and external public.

Brasilata Group acts under the UN guidelines for consumer protection and we update our communication material with consumers and clients whenever relevant data changes occur.

### **25. Respect for free competition and antitrust law**

The competitiveness of Brasilata Group must be based on the differentiation and excellence of its products and services and not through the disparagement of its competitors or predatory market practices, therefore, we do not use the demonstration of defects or flaws of the competition's products to promote the products being developed.

In this sense, verbal or written statements contrary to the provisions set forth in this Code that may tarnish the image of competitors will not be recognized or made, and competitors must be treated with the same respect and reciprocity with which Brasilata Group treats the market. We comply with all applicable fair-trade practices and fair competition and antitrust laws to guide our actions in competitive environments. We also value corporate practices encouraging free competition, in line with legal principles and best antitrust market practices.

Remember that you will represent Brasilata Group. Gifts and/or giveaways may only be received during an event if they follow the abovementioned provisions. This is because invitations to entertainment events must be treated as gifts and favors and, therefore, follow the aforementioned item's provisions.

### **General Data Protection Regulation**

Brasilata Group, in compliance with the General Data Protection Regulation, produced its Privacy Policy, which can be found on its communication channels. It will be possible to find information regarding the collection and processing of personal data by Brasilata Group, adopted conducts and procedures for data processing.

Brasilata Group reinforces its commitment to digital transformation, as well as its unrestricted and unconditional support for the law and the privacy and protection of data holders, combined with transparency and regulation in data processing. If you have any questions and requests, please contact our data manager at the email address below: [encarregado.lgpd@brasilata.com.br](mailto:encarregado.lgpd@brasilata.com.br).

## **Public Opinion**

Any disclosure on behalf of Brasilata Group will only be made through official communication channels. If there is a right of reply, this must be requested by sending a message through: <https://www.brasilata.com.br/fale-conosco>.

## **Prohibition of disclosure of confidential information**

The disclosure of confidential or secret information owned by or related to Brasilata Group by any employees, partners or related parties is strictly prohibited, except under law or court order.

Suppose there is a need to comply with legal regulations or a court order. In that case, the person compelled to make the disclosure must formally notify Brasilata Group, presenting the justification for the disclosure under the terms set forth herein. Disclosures made in a manner different from that contained in this Code shall result in the application of sanctions and measures against the discloser, including, but not limited to, legal measures, compensation for damages and losses.

## **Intellectual property**

Brasilata Group owns several patents, inventions and trademarks, and their use by unauthorized persons or companies is expressly prohibited. Use without proper authorization will result in sanctions and legal measures.

## **Social Media**

Brasilata Group only communicates through its official channels. Any publication made by employees, partners and related parties on social media must be made in a way that makes it clear that they are personal and have no relation to or represent the opinion of Brasilata Group.

In any case, Brasilata Group recommends that its employees, partners and related parties adopt cordial postures, not promoting hateful, prejudiced and discriminatory speech.

Noting the Marketing department must be contacted over any publication that discredits or contains inaccurate information about Brasilata Group so that the appropriate measures may be taken.

Never respond to any information, including information that may be inaccurate, about Brasilata. Never publish documents, parts of documents, images, video or audio recordings made on the premises of Brasilata Group's manufacturing plants, or that contain products, services or involve people of Brasilata Group carrying out activities, or at events, without the due authorization of all those involved.

In addition, the language you use on social media matters. All employees, when representing Brasilata Group or making publications using any element that may be linked to the name and/or image of the Group, must behave in a manner compatible with representing the Group and comply with the rules set forth in this Code.

When using professional networking websites, you must follow the same standards of professionalism and integrity described herein and follow the social media guidelines described above. Employees, executives and officers must use common sense when publishing information about themselves or Brasilata Group in any of these services. What you publish about Brasilata Group or yourself will reflect on all of us.

## **Appropriate use of email and internet**

All employees must use the technological resources provided exclusively for professional use appropriately and efficiently. Employees may use these resources during office hours for personal purposes, as long as they do not violate any internal rules and their productivity is not adversely affected.

Accessing sites containing pornography, promoting gambling, pedophilia, racism, discrimination, partisan political propaganda or terrorism and posting defamatory or offensive material is strictly prohibited. All information shared on the provided work devices, such as mobile phones, computers, tablets or others, is subject to verification and control by Brasilata Group's Information Technology area, even when personal access passwords have been provided. The information exchanged using work devices can be verified at any time by Brasilata Group and at its sole discretion, not constituting personal information for all purposes, whenever it deems necessary.

Other rules relating to the use of technological resources can be found in the Information Security Policy, available on Brasilata Group's communication channels.

## **26. Violations: Disciplinary Conducts and Procedures**

It is up to each employee, without exception, to communicate to their immediate superior or through the Whistleblower and Negotiations Channel, whenever they become aware of a possible violation of this Code and/or current legislation.

Any violation of this Code and/or current laws shall be subject to disciplinary measures and/or penalties based on labor laws within the scope of Brasilata Group. Sanctions may vary for each case (definition of the degree of disciplinary measures), and may not follow a logical enforcement order.

The applicable sanctions are:

- Verbal warning;
- Written warning;
- Temporary suspension of activities (without compensation);
- Termination of the employment agreement (dismissal with or without cause).

The enforcement of the sanctions provided herein does not exclude the application of measures in other spheres, such as civil and criminal.

Any reports received will be treated with absolute confidentiality. Even information that the Group is legally required to report to the authorities will be treated with due caution, always protecting the whistleblower and those involved in the ongoing stage of the investigations.

It should be pointed out that anyone who detects a possible violation of the rules should not investigate it, but communicate it to the responsible departments, as provided for in this Code. By carrying out investigations themselves, employees may compromise the evidence, violate labor laws, privacy, or get involved in the case.

Anyone who communicates a violation of this Code and/or current laws honestly and in good faith will be protected against any internal retaliation. If any individual attempts any form of retaliation, they will be subject to disciplinary action. Whistleblowers acting in bad faith, to intentionally harm other employees, suppliers or partners of Brasilata Group, will be treated in the same manner.

Reports of violations of this code can be made by employees, third parties, clients or stakeholders, through communication channels such as:

- Employee's immediate supervisor;
- Risks' and Internal Controls' Management;
- Human Resources Management, or
- Employees who choose not to identify themselves may file a report directly on Brasilata Group's Whistleblower and Negotiations Channel.

Anyone accused of violating this Code of Conduct will be assured, in the respective investigation process, the right to the adversary proceeding and the opportunity to be heard.

#### Doubts and Omissions

Doubts and omissions regarding the topics in this Code of Ethics and Conduct should be sent to the Ethics Committee for clarification and resolution.

Expiration Date: 05/30/2024