



Code of **CONDUCT**

SUMMARY

| | |
|--|-----------|
| MESSAGE FROM THE BOARD OF DIRECTORS | 4 |
| 1. ABOUT THE CODE OF CONDUCT | 5 |
| 1.1. Our Culture | 6 |
| 1.2. Ethical Dilemmas | 7 |
| 1.3. Code of Conduct and its Application | 8 |
| 1.4. Ethics Line | 11 |
| 1.5. Business Ethics Committee | 14 |
| 1.6. Code Violations | 16 |
| 1.7. Disciplinary Measures | 17 |
| 1.8. Legal Measures | 18 |
| 2. EMPLOYEES AND THE WORKPLACE | 19 |
| 2.1. Relationship with Shareholders | 20 |
| 2.2. Conflict of Interest | 22 |
| 2.3. Human Rights, Diversity, Discrimination, and Harassment | 25 |
| 2.4. Health, Safety, and the Environment | 28 |
| 2.5. Use of Alcohol, Drugs and Firearms, Sale of Goods, and Inappropriate Content | 30 |

| | |
|--|-----------|
| 2.6. Information Confidentiality, Privileged and Strategic Information | 32 |
| 3. RELATIONS WITH EXTERNAL AUDIENCES | 34 |
| 3.1. Relationship with Competitors and the Antitrust Act | 35 |
| 3.2. Relationship with Business Partners | 37 |
| 3.3. Relationship with the Community | 40 |
| 3.4. Relationship with Public Entities | 42 |
| 3.5. Political Participation and Donations | 44 |
| 3.6. Relationship with Suppliers | 46 |
| 3.7. Gifts, Entertainment, and Hospitality | 48 |
| 3.8. Press and Media | 50 |
| 3.9. Image and Reputation | 52 |
| 4. USE OF COMPANY RESOURCES | 54 |
| 4.1. Company Assets | 55 |
| 4.2. Information Security and Protection of Personal Data | 57 |
| 4.3. Intellectual Property and Confidentiality | 59 |
| 5. ANTI-CORRUPTION | 61 |
| 5.1. Anti-Corruption | 62 |
| 6. TERM OF COMMITMENT | 64 |

MESSAGE FROM THE BOARD OF DIRECTORS

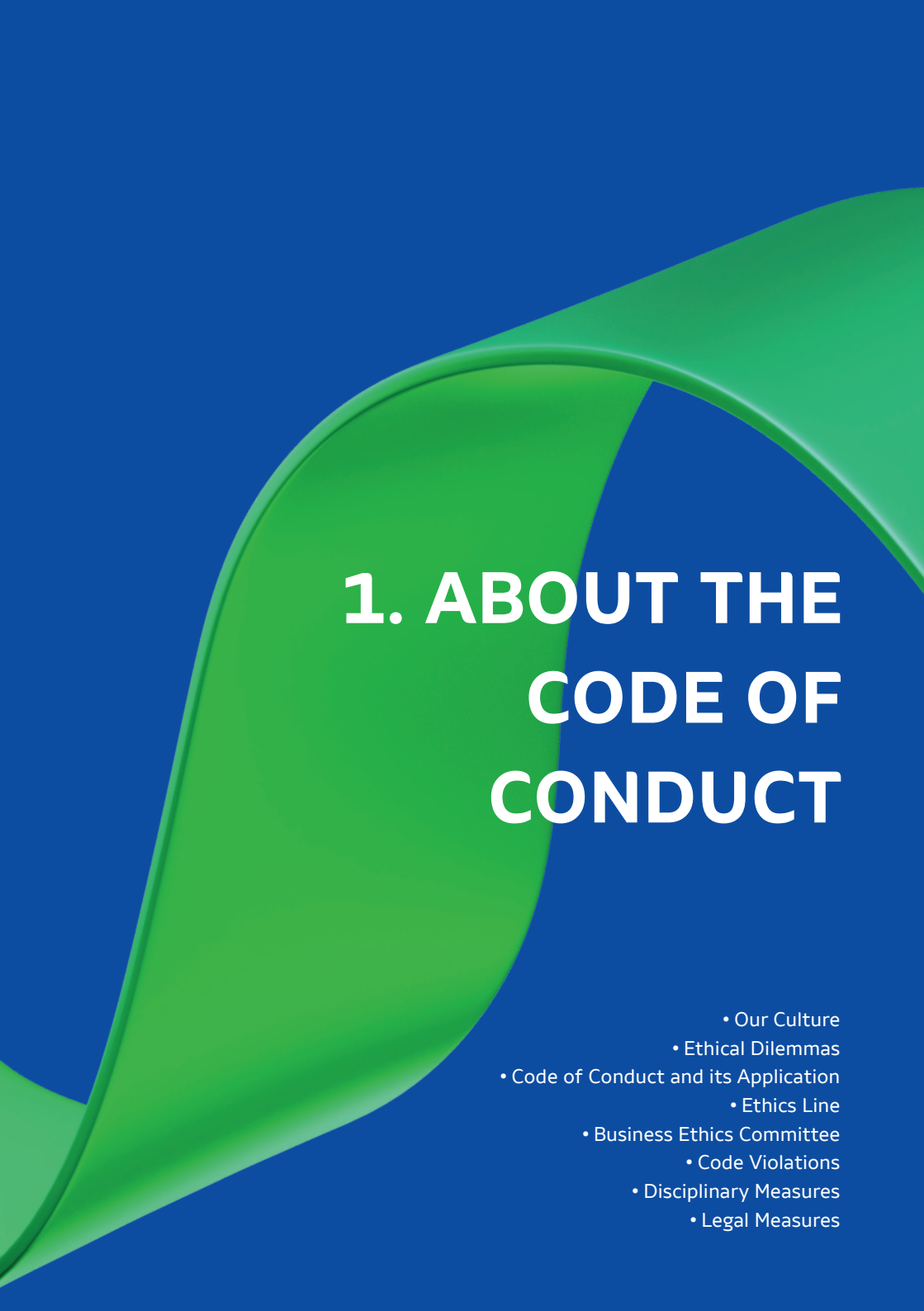
We, the Board of Directors of Votorantim Cimentos S.A. (“Votorantim Cimentos” or “VC”), highlight the importance of the Code of Conduct to be applied at Votorantim Cimentos and its subsidiaries (jointly, “Company”) (“Code of Conduct”), as well as VC’s Compliance Program, in the daily routine of maintaining a company aligned with the highest standards of ethics, integrity, and governance.

We understand that to achieve the continuity of the Company’s business, as relevant as the results achieved is the way we reach them. For this reason, this Code of Conduct reflects the Company’s commitment to the most diverse audiences with which it relates to strengthening the generation of shared value and sustainable development.

Due to it is based on ‘Our VC Way’ of being, doing, and going beyond that guide the performance of everyone at the Company, this document is essential to be read by all employees, members of the Statutory Board of Executive Officers, members of the

Board of Directors, members of the advisory committees to the Board of Directors, members of the Fiscal Council and other employees of the Company (collectively, “Employees”). Given the relevance of the matter, and understanding that as a society we always benefit from ethical principles, this document should also serve as a reference for our affiliated companies and those that we have shared control.

We hope that the content of this document will be reflected in the daily lives of each Employee through the shared responsibility of ensuring a strong and integral culture, aligned with Our VC Way that drives the Company’s performance in favor of a healthy business environment and fair society.



1. ABOUT THE CODE OF CONDUCT

- Our Culture
- Ethical Dilemmas
- Code of Conduct and its Application
 - Ethics Line
- Business Ethics Committee
 - Code Violations
- Disciplinary Measures
 - Legal Measures

1.1. Our Culture

Our VC Way is part of our DNA and composes our essence. They are the principles that manage and guide our day-to-day behaviors and help us build an even more promising future.

OUR VC WAY



1.2. Ethical Dilemmas

We all can experience one or more ethical and controversial dilemmas in our path. Whenever this occurs, ask yourself:

(i) The fact or decision is in accordance with: (a) the law, policies, and standards? (b) my personal values?; (c) Our VC Way?; (d) the standards of this Code of Conduct?

(ii) How would I feel if my decision: (a) ended up in the papers; (b) was exposed to my family; (c) harmed or put someone at risk?



1.3. Code of Conduct and its Application



Application

The Code of Conduct is mandatorily applied to all our Employees and must serve as a reference for our affiliated companies and those with that we have shared control, as well as for our commercial partners, suppliers, service providers, and customers.

The Code of Conduct should also serve as a reference for the companies that are members of the production chain and other commercial partners of the Company and represents a statement of the set of rights, duties, and responsibilities to all stakeholders, reflecting Our VC Way and our socio-environmental performance and the set of the Company's rules of conduct.

Scope and Purposes

Inspired by Our VC Way, the Code of Conduct is the basis of the Company's Compliance Program and represents our commitment to ethics and fair and honest business conduct. It is an important instrument of Governance of the Company and should serve as a basis for understanding the conduct we expect from you in the day-to-day of your activities. In addition, as a global Company, we must comply with the laws and regulations of the various countries where we are present and are committed to meeting, sustaining, and even improving in terms of international standards and practices, such as the principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights, among other best governance practices. This Code provides (i) the appropriate manner to report suspicious conduct or a clear violation of laws and regulations applicable to our business or relationships, as well as to this Code of Conduct and the other Company's internal policies, rules, and guidelines; and (ii) the possible consequences and actions to be taken in the event of a breach.

Without the intention of meeting all the possibilities inherent in the daily development of the business, it offers, however, clear, and non-negotiable guidelines. Therefore, it is very important that you fully understand all the chapters. To help you, each chapter has an examples section and a section that clarifies what we expect from you.



What we expect of you

We expect from you the same standard of ethical conduct described in this Code of Conduct, as well as the express adherence to it through signature in the field indicated in item 6.1 below. We expect you to know and apply not only the Code's guidelines, but also the policies and procedures, especially those linked to your activities. In situations where there may be cultural differences, you must follow the law or conduct that represents the highest procedure standard. We reject any form of punishment, disciplinary or retaliatory action made against anyone who exposes or helps deal with a matter relating to business conduct. If this occurs, we expect you to inform your superiors or report the fact in the Ethics Line.



Management and Modifications

The approval of this Code and its updates are the responsibility of VC's Board of Directors. Suggestions for improvements should be directed to the local the Compliance department, which is responsible for conducting the issue with the Business Ethics Committee and later to the VC's Board of Directors.

This Code of Conduct is reviewed every three years by the Company's Board of Directors. Extraordinary updates to the Code of Conduct may also take place. Every updated version of the Code of Conduct is published on the Company's website and such fact is communicated to shareholders and to the markets in which the Company holds securities.

This Code of Conduct was approved by the Board of Directors on March 1st 2023 and was made available on the Votorantim Cimentos website (<https://www.votorantimcimentos.com.br/>) on March 30th 2023, with immediate application and validity.

Continuing Education

The Company periodically promotes mandatory training of the Code of Conduct to all its Employees for qualification and awareness of the conducts, principles, concepts, and procedures provided for in this Code of Conduct. The Company also provides mandatory training on specific topics based on the risks inherent in the activities of certain areas and/or positions held. In addition, internal communications are also carried out to reinforce rules and expectations of conduct. Both training and continuous communication have shared responsibilities between the Compliance, HR & Management, Legal, and other specialist areas (e.g., HSE [Health, Safety, and Environment] for Safety issues).



Example

I have doubts about the application of the concepts in the Code, and if colleagues and managers will take seriously the issues it addresses. At the Company, we seek the highest standards of integrity, transparency, and reliability. We are always seeking to increase awareness among Employees and all those with whom we do business. We maintain a structure that is ready to deal with these challenges and we expect our Employees not to accept unethical acts, and to use this structure to influence their colleagues, or to use the appropriate channels.

In addition to the Code of Conduct, the Company defines in its policies and guidelines, for specific processes or topics, the rules, criteria, procedures, responsibilities, and controls that must be fulfilled by all its Employees. All these documents are available on the intranet of Votorantim Cimentos.

1.4. Ethics Line

To learn about, analyze and solve any question concerning the Code of Conduct, the Company maintains a channel called the 'Ethics Line', which can be accessed by internal and external audiences. Impartial and transparent, the Ethics Line is a serious and safe channel, available 24 hours a day, 7 days a week, for the sending of complaints or reporting suspected violations of this Code of Conduct and/or the laws and regulations applicable to our business or relationships, as well as for clarifying doubts about the guidelines set out in this document.

The channel can be accessed by anyone, such as Employees, suppliers, customers, communities, and other relationship audiences, and should always be used responsibly and in good faith. The service is available in several languages, especially those spoken in the countries where we have operations. When contacting the Ethics Line, you can still choose to remain anonymous. To contact the Ethics Line, you can choose one of the ways provided by the channel: by phone or through an independent portal, where you find access to make a complaint, ask questions or follow up on a report already made.

How to get in touch

(i) By portal: operated by an external and independent company:

www.votorantimcimentos.com/ethicsline

(ii) By phone:

| Country | Telephone |
|--|------------------|
| Brazil | 0800 515 0008 |
| Canada (French Language) | 1 (800) 901 0115 |
| Canada (English Language) | 1 (800) 913 0598 |
| Spain | 900 876 068 |
| United States | 1 (800) 913 0598 |
| Luxembourg (French or English Language) | 800 22873 |
| Morocco | 080-0092376 |
| Tunisia | 216 (31) 365 962 |
| Turkey | 0800 621 2404 |



Learn more

You can contact the Ethics Line, either to answer questions concerning the interpretation of the Code of Conduct, or to make complaints and report violations of the Code, as well as possible acts of corruption, or any other conduct or unethical procedure. All reports made through the Ethics Line channels are automatically received by an external company, qualified and independent, for understanding and preliminary classification. Subsequently, the reports are shared with the VC Global Business Ethics area, which proceeds with dealing with the situation reported to the appropriate internal bodies, according to the theme of the report, and with the Business Ethics Committee whenever necessary. For example, all complaints related to fraud, embezzlement (financial or material) and bribery are investigated and handled by the Forensic Investigation area. For greater success in the analysis and treatment of potential deviations, the complaints made should be complete, correct, and, whenever possible, accompanied by evidence of the facts and concrete data.



What we expect of you

Through Our VC Way of being ethical and human, we encourage our Employees to adopt a posture of frank dialogue with everyone in the organization, always valuing respect and kindness, but not avoiding difficult conversations or adopting omitted posture. Concerns regarding deviations from the Code of Conduct may be expressed to managers, managers' leaders, or responsible areas, such as HR, Legal, or Compliance, depending on the theme.

However, if it is not possible or the Employee does not feel comfortable addressing these channels, the person may use the Ethics Line, as detailed above.



Example

I worry that my immediate superior, or even my manager, will be upset, and I will suffer punishment if I contact the Ethics Line counseling service. We reject any form of retaliation made against anyone who exposes a genuine concern. All allegations of retaliation will be thoroughly investigated. Retaliation will result in disciplinary action, which may include dismissal. Thus, we hope that you seek the service and also report if you suffer any kind of retaliation.

1.5. Business Ethics Committee

The Business Ethics Committee is formed by members of the management of Votorantim Cimentos and is liable for:

Reinforce the application of this Code of Conduct, proposing actions to update, disseminate and comply with this instrument, ensuring its efficiency and effectiveness.

With impartiality, it is also necessary to establish criteria for the treatment of situations not provided for in the Code of Conduct, resolve controversial situations, address ethical dilemmas, and ensure the uniformity of the criteria used in the resolution of similar cases.

Periodically, meet with the Ombudsman area to share the main topics received and treated via Ethics Line.



Learn more

The Business Ethics Committee is globally active and composed of the Company's Global CEO and global heads of the Legal, Governance, Risk, Compliance, and Internal Audit areas, HR & Management, and, on an ad hoc basis, other boards as needed. In the case of matters involving members of the Business Ethics Committee, it is the responsibility of the Ombudsman to refer them to the Audit Committee, always ensuring independence in the process. More information about the Business Ethics Committee, its role, responsibilities, and functioning can be found in the Internal Rules of the Business Ethics Committee, available in Votorantim Cimentos' documents system.



What we expect of you

We hope you will help promote and legitimize respect, compliance, and improvement of our Code of Conduct. Knowing the mission and responsibilities of the Business Ethics Committee and the practices and postures required in this Code of Conduct, you may contribute to such practices being followed and respected. Whenever you identify a dubious posture, try to help your colleagues, and in case of identification of an inappropriate practice, talk to your immediate superior, your manager, or contact the Ethics Line.



Example

I made a report on the Ethics Line last month, but nothing happened. I also learned that there was a meeting of the Business Ethics Committee, and did not get any response. I'm really disappointed with the result. Why bother exposing issues in the future? All reports and questions exposed in the Ethics Line go through an analysis process that seeks all available data. Some cases may take longer to investigate than others, according to their complexity. For privacy reasons, we cannot keep you always up to date on the exact outcome of a raised issue. However, all reports are answered by the rapporteur at the end of the process. If after some time you find that the subject has not been addressed properly, with the protocol of your report in hand, you should contact the service again to check the progress of your issue.

1.6. Code Violations

Failure to comply with the Code is considered a misconduct, and is seen as a serious matter that must be reported and treated, and that can lead to disciplinary action. The existence of norms, policies, and procedures is essential to ensure continuity. Ensuring that the Code is followed at all times is the responsibility of each individual, having managers important role in monitoring, guiding, and preparing their teams to act accordingly. Non-compliance with VC norms and rules is not tolerated and is subject to the application of disciplinary measures, which must serve as an educating and culture-forming element.



Learn more

It is up to the leadership to inform, guide, and prepare their team for the correct application of the organization's policies and standards, and set an example to be followed.



What we expect of you

If you witness or know of a violation of the Code, we expect you to bring the issues immediately to your direct supervisor. If the violation includes him, you should seek out the manager of your unit, or the representative of the HR, Compliance, Legal, or Ethics Line, in addition to cooperating with possible investigations into this violation. Internal investigations include serious procedural aspects and, therefore, can only be performed by the appropriate staff.



Example

I see that a number of policies are not fully respected. I even discussed it with my boss, but he said some things are cultural, and so the Company doesn't follow it in practice. Is this a violation of the Code? Yes, the policies determine the roles and responsibilities of individuals in relation to the activities that are carried out. Failure to comply with a policy is a violation of the Code. If you have knowledge of a policy that is not enforced, you should report it to your manager, your manager's manager, the area responsible for the topic, or through the Ethics Line.

1.7. Disciplinary Measures

Seek to establish rules to ensure the required behavior standards, and should be applied in all situations where behavior is not in accordance with these standards.

The application will depend on the severity of the violation and other relevant circumstances and shall observe definitions provided for in a specific policy and may include but are not limited to: (i) verbal or written warning; (ii) suspension; and (iii) dismissal with or without just cause.

In certain cases, the matter may be deliberated by the Business Ethics Committee, and subject to consultation with experts, including the Legal, Compliance, and HR & Management departments.



What we expect of you

Your understanding of the Code of Conduct, the Compliance Program, VC policies, and procedures is essential for the performance of your daily activities. Therefore, you are expected to be actively informed, ask questions, participate in available training, help people who may have a mistaken understanding, and contribute to VC in the continuous improvement of our Compliance rules and environment. Ignorance of the rules is not a justification for the committing of infractions and deviations.



Example

A co-worker was fired for violating a policy but found out that another employee who did something similar only received a warning. What happened in this case? Was there a failure in the process? Violation of any policy is taken seriously at Votorantim Cimentos. The organization structures internal standards so that the same measures are applied for similar cases, but added to this, each case is handled on an individual basis, according to the available information, and considers the conduct of individuals in the past. Remember: the recurrence of unwanted behavior can lead to more drastic measures.

1.8. Legal Measures

Without prejudice to disciplinary measures applied by the Company, cases of a breach involving violations of laws and regulations applicable to our business or relationships will be referred to the competent authorities.

2. EMPLOYEES AND THE WORKPLACE

- Relationship with Shareholders
 - Conflict of Interest
 - Human Rights, Diversity, Discrimination, and Harassment
- Health, Safety, and the Environment
- Use of Alcohol, Drugs and Firearms, Sale of Goods, and Inappropriate Content
 - Information Confidentiality, Privileged and Strategic Information

2.1. Relationship with Shareholders

It must be based on effective governance, through the highest decision-making councils installed in the Company. Communication must be precise, impartial, transparent, and timely to enable them to monitor the Company's activities. When a matter involves a relationship with a shareholder, whether a commercial or operational issue, the matter should be directed for discussion and decision by the VC's Board of Directors or according to the governance provided for in the Related Parties Policy in force.



Learn more

The Company shall adopt with shareholders the same rules that it adopts in the treatment of third parties. In the case of shareholders or their companies interested in developing a commercial relationship with the Company, the same rules that apply to unrelated parties must be adopted and VC's Board of Directors must be notified.



What we expect of you

It is the duty of each to be attentive to the rules of the relationship with shareholders. Each person directly or indirectly involved in the preparation of the Company's financial reports or other public documents registered or sent to regulators shall know and comply with the disclosure requirements applicable to the Company, as well as the Company's internal disclosure procedures and controls. This will help ensure that financial reports and other public documents registered or sent to regulators comply with applicable laws and regulations in all material aspects. Any transaction with related parties must be carried out following a specific policy in force, with transparency, and consent of the management, and always under usual market conditions.



Example

We are conducting a recruitment process for hiring professional environmental consulting services, and one of the companies participating in the process has as a partner a member who has familial relationship with one of our shareholders. Can we move forward with the process? The rule for contracting any partner/service provider should also be applied in cases where companies that belong to the family of shareholders participate in the competition: the same treatment should be given to all companies that participate in the bidding, so that the process is conducted within market parameters.

2.2. Conflict of Interest

Conflict of interest may be defined as a situation in which an Employee's personal interests interfere with or have the potential to interfere with the decision to be made for the benefit or interests of the Company.

Some common conflicts include: (i) search, grant or maintain business opportunities for personal gain or for the benefit of family members or close friends; (ii) making directly or indirectly investments in assets/companies that have been contracted to conduct business with the Company and its investments; (iii) receive money, property, services or other personal financial benefits, directly or indirectly, from suppliers or third parties who are doing business or soliciting negotiations with the Company; and (iv) influencing the results of bid/competition involving supply proposals. For item (iii) above, see also chapter: "Gifts, Entertainment and Hospitality", as well as the chapter: "Anti-Corruption Act".



Learn more

In the day-to-day of your activities, you will come across a series of decisions that can configure potential, apparent, or actual conflicts of interest. They may be due to their relationship with another Employee of the Company, to a supplier, customer, or public agent, among others. In this sense, it is important to understand the situations in which you, a colleague, or a third party may be or appear to be conflicted. It is the liability of each to make impartial decisions, excluding personal and financial interests or those that may in any way affect or appear to affect their judgment. Situations may also arise in which an Employee's position or considerations, financial interests, or other personal interests affect, or have the potential to affect, or may, even, appear to affect, their judgment and independence. Regarding the kinship relationship between Employees, it is not permissible to maintain or hire relatives in functions in which there is a direct hierarchical relationship and/or who perform conflicting functions. The same prohibition is applied to affective relationships between Employees.

During the selection process of new Employees, they must be asked to

declare their relationships, to identify any possible conflicts of interest.

In small towns, where the possibility of hiring a relative is greater, the subject should be discussed in the areas of HR and Compliance.

As a non-exhaustive example:

- (i) They are **first-degree** relatives: father, mother, and children.
- (ii) They are **second-degree** relatives: brothers, sisters, grandparents, and grandchildren.
- (iii) They are **third-degree** relatives: uncles, aunts, nephews, and nieces.
- (iv) They are **fourth-degree** relatives: cousins.
- (v) They are **first-degree** relatives by affinity: father-in-law, mother-in-law, son-in-law, daughter-in-law, stepfather, stepmother, and stepchildren.
- (vi) They are **second-degree** relatives by affinity: brothers-in-law, and sisters-in-law.
- (vii) Intimate/affective relationships are considered: those marked by intimate contact or participation in private life, such as attending each other's residence, and close contact with their families, among others.

The performance of activities, whether remunerated or not, in parallel with the activities of the Company's Employees are allowed, if it occurs at a different time, without the use of the Company's resources, there is no conflict of interest with the Company's activities and/or the functions performed by the Employee in the Company, as well as there is no competition with the Company.



What we expect of you

Above all, you should be able to recognize situations that may be conflicted and refrain from influencing or making the decision. You should avoid negotiations which cause, or appear to cause, conflicts of interest always remaining absent from any decision-making process that influences, or may be perceived as influenced, your ability to make an objective decision and fulfill your responsibilities. If this occurs, provide your conflict of interest statement, and inform your direct manager of any relationships that may directly or indirectly involve you in a conflict of interest, whether this is potential, actual, or apparent. All cases of conflict of interest will be analyzed and treated according to the specific policy in force.



Example

I am the manager of the Environment department, and my wife works for a consulting firm that provides services in this area. I am not satisfied with the current advising company, and I would like the company where my wife works to be the service provider, because I think they would do something different. As the value is low and therefore, I have the authority to deliberate on this contracting without the need to go through the supply area, I understand that I can move on without taking other measures, correct? No. In our relationship with suppliers and partners, several procedures need to be performed and evaluated before you seek this exchange. In addition, hiring the company where your wife works is considered a potential conflict of interest. In this case, you must first meet with your manager, technically discuss the reasons why the current supplier does not answer, inform the manager about possible dissatisfaction, and open a procurement process via the supply area, in which you will not be able to participate in the decision since it is conflicted.

2.3. Human Rights, Diversity, Discrimination, and Harassment

Respect

We believe that a good working environment, with people who are respected, competent, valued, and engaged contributes to the formation of a more just and wholesome society. That is why the Company is committed to the protection of internationally recognized human rights. We seek a diverse and inclusive space that values individuals, as well as stimulates innovation and learning with differences. We respect everyone regardless of their color/race, gender, ethnicity, religion, sexual orientation, gender identity, age, appearance, or physical or mental disability. We provide a respectful and fair workplace with opportunities for professional growth equally to all and disprove all forms of prejudice and discrimination.

That is why the Company declares that: (i) we ensure the integrity and physical and mental health of our Employees by providing adequate and safe working conditions; (ii) we promote diversity, inclusion and offer equal and fair opportunities for professional growth for all people; and (iii) we support the right of all individuals to join trade unions and other organizations of their choice.

Remember

Harassment refers to the verbal or physical behavior of humiliation, coercion, or threat to Employees and/or third parties regardless of hierarchical level, as well as the embarrassment and violation of the sexual freedom of another person in the workplace or context, in the form of coercion, intimidation or blackmail, with the purpose of obtaining sexual advantages or favors. It also refers to the creation of a hostile workplace that interferes with individual performance or affects the working conditions of others involved. We are committed to promoting an environment with respect, non-discriminatory and equitable. Accordingly, we do not tolerate any form of harassment, such as sexual, moral, or any other nature, or situations that constitute disrespect, intimidation, or threat in relationships here in the Company, regardless of their hierarchical level.

Prejudices, discrimination, intimidation, abusive and/or aggressive practices, and sexual harassment are also attitudes that hurt respect and are therefore not tolerated in the Company.



Learn more

Stay tuned and learn below attitudes we will not tolerate: (i) child, slave, or slave-like labor in our operations or those of our business partners; (ii) public disqualification through jokes, insults, or vexatious insinuations; (iii) the treatment of subordinates with disrespect; (iv) the pursuit of employees, customers, suppliers, visitors or any other persons with whom professional relations are maintained, through explicit or disguised threats, or by an arbitrary exercise of a position of power; (v) sexual importuning or harassment, practiced through unwanted statements, unrequited affections or non-verbal manifestations of a sexual nature.



What we expect of you

We hope you treat everyone with respect and dignity, always seeking to encourage this behavior so that we have a workplace free of harassment, abuse, and discrimination. To do so, never behave in a way that is offensive, insulting, intimidating, malicious, or humiliating. Do not make jokes or comments about a person's race, gender, ethnicity, religion, sexual orientation, gender identity, age, appearance, or disability. Never distribute or display offensive material, including inappropriate photos, videos, or drawings. Never use the Company's resources to transmit offensive material internally or externally. Be aware of situations that may violate the principles set out here and do not be silent in such cases, especially leadership. Report the fact and follow up on negotiations with the HR area and, if necessary, contact through the Ethics Line.

In the context of our internal environment, you should be aware and ensure: (i) equal access to opportunities, according to the criteria of the mobility program, aiming to promote internal mobility so that Employees can face new challenges; (ii) respect in personal dealing, regardless of the position occupied; (iii) respect for Employees' functional attributions, being careful not to exceed them; (iv) the presentation of papers or ideas of colleagues conferring on them the credits; (v) encouraging people to be who they are and to see wealth in diversity; (vi) the healthy and respectful confrontation of ideas and not people.



Example

At our last department meeting, a colleague in my team asked a question, and our manager said that was the kind of meaningless question that he would expect from that colleague. This is not the first time I've seen this happen. Everyone comments on this behavior, but no one feels comfortable to take action. What should I do? Your manager's attitude not only is recurring, but it seems to make everyone uncomfortable, especially your colleague. If you think it's appropriate, ask your colleague how he felt in that situation, sharing with him what you thought was inappropriate behavior. Encourage him to talk to your manager and, if it doesn't work, with the superior above him or with the BP of the HR area. If necessary, recommend the use of one of the Ethics Line channels.

2.4. Health, Safety, and the Environment

The health, physical and mental integrity of Employees and protection of the environment. They are non-negotiable for the Company, being above economic or production issues. It is the responsibility of everyone to be familiar with the policies, procedures, and practices of health, safety, and environment and strictly comply with them. We transparently treat all health, safety, and environmental information that may have an impact on our Employees, communities, or the environment.



Learn more

As regards safety, we must always be attentive and ensure the health and physical integrity of oneself and co-workers. It is very important that each of us take responsibility for the prevention of accidents in the workplace. By taking care of the physical integrity of our facilities and technical equipment, we also avoid possible risks of accidents. We must always adopt a preventive approach to environmental challenges, seeking the constant development of practices and technologies that do not harm the environment. It is part of our culture to be aware of preservation opportunities so that we can deliver lasting environmental benefits.



What we expect of you

We expect you to identify, evaluate and take measures to control the health and safety risks associated with your work. Therefore, it is imperative that you exercise your duty of refusal and immediately stop any work that seems unsafe. Always make sure that everyone around you is wearing the necessary personal protective equipment (PPE) and that you know what to do in the event of an emergency. Immediately discontinue any work that can contribute to a significant environmental or social incident, notifying your supervisor any real or potential impact on the environment resulting from an accident or incident. We also expect you to encourage our suppliers, partners, and customers to adopt

responsible practices to minimize environmental impacts.



Example

In day-to-day activities, sometimes I see my co-workers forget their safety equipment, even for working at heights. I have already explained my concern to my immediate supervisor; however, he thinks these devices sometimes are an overkill. What should I do? All our safety procedures are necessary and should never be compromised. You should first consider exposing your concerns to your supervisor. If you feel uncomfortable doing so, or have not succeeded in the attempt, you should discuss the matter with the leader of the area or business unit, or with the BP of the HR area. If the problem remains unresolved, contact the Ethics Line.

2.5. Use of Alcohol, Drugs and Firearms, Sale of Goods, and Inappropriate Content

Prohibitions

Professional activities under the influence of alcohol, as well as the use of alcohol on the premises of the Companies, are prohibited. Thus, the use of alcohol at celebrations should be held outside the workplace, regardless if in factories or offices. The use and possession of drugs and remaining in the workplace under the influence of these substances is prohibited. They may affect the safety and performance of both the Employee and his co-workers. No weapons of any kind are allowed on the Company's premises, except for public security agents or professionals expressly authorized to do so. The sale or exchange of private goods on Company's premises, as well as the exchange, storage, or the use of obscene, pornographic, violent, discriminatory, racist, or defamatory content that disrespects any individual or entity is prohibited.

Medicines

In case of use of medications that may influence your performance, immediately notify the area of HR and Occupational Medicine, so that it can be evaluated.



Learn more

The consumption of alcoholic beverages is restricted to celebrations authorized by the director in charge, outside the workplace, always in moderation and so that their consumption does not influence any behavior that may go against the guidelines of this Code.



What we expect of you

Do not offer or consume alcohol in any workplace. Never perform work when under the influence of alcohol or drugs (including those prescribed that may interfere with your attention and cognitive ability, unless authorized by a doctor and under item 2.5.2 above). Do not consume alcohol or offer it to others while on the Company's premises. Never have by your possession, carry, use, or pass on drugs or illicit substances.



Example

At the end of the year, a series of celebrations are held among the work teams, in addition to the year-end celebration. Can I make use of alcohol during these celebrations? If after the celebration you are returning to a workplace or office, you must not consume alcohol. If you do not return to the office after the event, you can then consume alcohol, but pay attention to the fact that you arrive home safely.

2.6. Information Confidentiality, Privileged and Strategic Information

Confidentiality

The confidentiality and privacy of information of the Company, customers, suppliers, and business partners should be respected. In some cases, the use of such information may even violate national and international regulations, particularly if used for your financial benefit or other personal benefits. Privileged information is relevant data about a company that usually is not available to the general public and should be treated with appropriate rigor and confidentiality. Strategic or confidential information is what is known to the market and its disclosure, whether motivated by undue personal gain, or even out of context, for example in a comment to a colleague, may affect the Company's operations, and for that reason, should also be treated with due rigor. Examples of this information include: financial results, acquisitions and sales, industrial secrecy, investments, and related matters.



Learn more

It is not an offense to possess privileged information, however, it can become a criminal offense to buy, sell or even trade relevant assets while in possession of privileged information. It is also a criminal offense to encourage trading or disclose inside information to others, for them to profit from it.



What we expect of you

It is the Employee's duty to prevent access by anyone to such information, redoubling the care of documents and even materials left on desks or in drawers and cabinets. If you have, by virtue of your position or responsibilities, access to strategic or confidential information about the Company or associated companies, that has not been publicly disclosed, you may not pass it on to third parties or buy or sell assets or shares of these companies based on such inside information.



Example

I heard my manager talking about the possible purchase of a business that was not planned, but looks like a great opportunity. I have not heard anyone talk about it. Can I tell my friends who also work at the Company? This may be inside information about the Company that is generally not available to the public and should not be shared with your friends. If you tell your friends and they use this information to obtain any gain, financial or not, you and your friends will violate this Code of Conduct and may still suffer consequences for misuse of inside information. You should tell your manager what you have heard and ask for guidance on the confidentiality of this information.

3. RELATIONS WITH EXTERNAL AUDIENCES

- Relationship with Competitors and the Antitrust Act
- Relationship with Business Partners
 - Relationship with the Community
 - Relationship with Public Entities
- Political Participation and Donations
 - Relationship with Suppliers
- Gifts, Entertainment, and Hospitality
 - Press and Media
 - Image and Reputation

3.1. Relationship with Competitors and the Antitrust Act

The Company rejects any practice that may restrict trade or free competition, especially illegal cartel formation practices, bidding fraud, or abuses of power. We are fully committed to (i) compliance with competition laws; (ii) active involvement and cooperation with competition authorities; and (iii) compliance with competition laws against third parties acting in an anti-competitive manner. Be very careful in any contact involving competitors, especially in markets with the limited competition. If you need to make any specific contact with competitors, make a preliminary alignment with the Compliance department or with the Legal department. One of the pillars of the Compliance Program is to ensure free competition. It is the responsibility of each to know and apply the rules and measures outlined in our Competition Compliance Program, and report any questionable conduct, using the available channels.



Learn more

All market information that is legitimate and necessary for business, must be obtained through transparent and reputable practices – its acquisition by unlawful means is not allowed. You should not, under any circumstances, discuss with competitors any sensitive information, such as current and future prices, profit margins, discount policies, production capacity, processes, methods and production costs, sales territories, marketing plans, growth plans or measures to hinder or prevent the entry of other competitors.



What we expect of you

Consider the appearance and implications when interacting with a competitor, whether in a personal or business situation and avoid any action that could imply any kind of combination of prices and practices with competitors. Contact the Legal department: (i) before joining a trade association involving competitors; (ii) when inappropriate contact is initiated by a competitor; (iii) when considering any type of cooperation agreement with a competitor, such as, for example, joint production or marketing and shared logistics; and (iv) when suspecting that a third party is acting anticompetitively with the Company.



Example

I'm attending an industry conference and a competitor approached me suggesting that we exchange information about our price forecasts. Can I share this information? The exchange of sensitive information with competitors, especially information such as price forecasts, volume, areas of activity, and marketing and commercial actions, violates competition laws. Care should be taken in any discussion with competitors, in which case you should immediately stop the conversation and say that you are not comfortable continuing. If the competitor insists, stay away. Report the incident to the Company's Legal department.

3.2. Relationship with Business Partners

Are an important part of the Company's business and operations. Any misconduct by our partners may have a negative impact on our image and reputation and potentially expose us to civil or criminal liability or other penalties. Therefore, our Code should serve as a reference for our partners in the conduct of their business with the Company or on behalf of the Company, when relevant. If you deal with third parties on a day-to-day basis, make sure that they know and act in line with the principles set forth herein. Business or commercial partners are those that are directly or indirectly contracted by the Company. This includes, for example, agents, brokers, off-takers, advisors, consultants, representatives, travel agents, forwarding agents in general, customs or visa agents, tax consultants, lawyers, attorneys, accountants, and government relations consultants (persons and companies that carry out, within the law and ethics, activity organized by a group of defined and legitimate interests, with the purpose of being heard by the government).

When dealing with business partners, you must act honestly and ethically, avoiding any situation that may lead to or be based on improper advantages, manipulation, concealment, insider dealing, untrue statements, and other doubtful conduct. The same applies to community, government, and vendor relationships treated below.

The Company also does not agree with any attitude that may support and privilege money laundering and terrorist financing actions, so the Company is in a constant process of improvement to timely detect suspicious transactions, assess risks and properly investigate third parties with whom the Company engages or intends to engage in economic activities, in accordance with applicable laws and regulations.



Learn more

When selecting a business partner, it is extremely important that they know 'Our VC Way' and act in a manner compatible with the principles of this Code of Conduct. Any misconduct by business partners could damage our image and expose the Company and Employees to several penalties. See more in the chapter: "Anti-Corruption Act" and other Company policies and manuals.



What we expect of you

You must be certain that the business partner is reputable, competent, and qualified to carry out the work for which is being hired and that the remuneration requested is reasonable. To this end, based on the risk of the activity involved and specific policy on the subject, you should seek, in the exercise of your function, to conduct a thorough analysis of such partner, including a possible due diligence process before hiring, so that you can ensure that is a suitable partner, and its performance should be monitored and evaluated. Carefully check invoices and expose any suspicious or excessive charges. Remember: proper management of the supplier you hire is your responsibility.



Example

One of our units will sign a TAC (Term of Conduct Adjustment) due to an environmental incident. The environmental consultant hired to work with us in negotiating with local government officials is doing a great job, but his fees seem to be higher than I expected, and he recently asked for an advance. **What should I do?** You should be familiar with contract and ensure that the environmental consultant's fees are consonant and consistent with the terms of the contract. If you are aware of or suspect inappropriate behavior, you should ask why an advance is required and make sure that the contract has the necessary anti-corruption clauses. Reach out to Legal, Compliance, and Supplies areas to ensure that the terms of the contract are competitive and to be helped to address the issue with the environmental consultant.

3.3. Relationship with the Community

Our activities have a significant impact on the communities where we operate. Therefore, we must have adequate knowledge about all stakeholders, their needs and how we intervene, and how we change their way of life. We are committed to the economic and social development of the communities where we operate. It is everyone's commitment to act in accordance with Our VC Way and maintain open channels of dialogue with all the communities in which we are present.

All donations and sponsorships must be in line with the (i) Company's social strategy; (ii) the Compliance Program; (iii) the legislation in force; and (iv) the procedures and approvals provided for in a specific policy.



Learn more

When committing ourselves to a community development project, we should make sure that it is aligned with the Company's planning and social strategy.



What we expect of you

You must, above all, respect the cultures and several business customs of the communities and countries in which we operate, if they do not conflict with the Code of Conduct or the law. Always seek to identify and consider the interests and expectations of all stakeholders, especially those most affected by our operations, considering their opinions in decision-making. Investigate issues and complaints and report results to stakeholders. We also expect you to make sure and ensure the outcome and final destination of social investments that are under your responsibility.



Example

A member of my team suggested support for the remodeling of a local school. What should I do? Any community investment must be aligned with the Company's social and compliance guidelines. In general, these actions should seek projects that have continuity and bring development to the community more broadly. You should first consider exposing your ideas to your supervisor, the manager of your unit, or a social transformation representative.

3.4. Relationship with Public Entities

Providing information to all levels of government, including municipal, state, and federal public agencies, must always be made in writing, through the protocol, and with the due guidance of the Government Relations area. Any interaction or communication with public entities, national or international, shall be carried out transparently and in accordance with the principles and provisions outlined in this Code of Conduct, as well as the applicable legislation and regulations. Whenever a demand is filed by a Government Representative, including inspection processes, everyone must adopt a collaborative posture, helping it to obtain all the documents necessary for the supervision and evaluation of the Company, always informing, immediately, the Legal area.



Learn more

In the course of your activities, you may come into contact with public authorities. If this happens, it is very important that if you provide information to governments on behalf of the Company, you ensure that all data is correct and appropriate for your purpose. If you have to represent the Company in government affairs and before government officials, you must comply with all applicable laws and regulations and ensure that you are authorized for such representation with Government Relations. In addition, all interactions must follow the specific policy guidelines in force.



What we expect of you

Be truthful, accurate, cooperative, and courteous when dealing with Government officials. Every conversation with inspectors must be made with the participation of at least two Employees of the Company in a room suitable for the work. Every beginning of inspection should be immediately reported to the Legal department, which will provide guidance on how to proceed.



Example

I received a couple of corporate tickets to a high-level sporting event. I am waiting for approval of the extension of a major license for one of our operations and I know that a Government official involved in the approval roots for one of the teams in the sporting event. Can I invite the government official to the event? You should not receive tickets or offer them to anyone, including a Government official because, in doing so, you will create a conflict of interests with the civil servant and may violate our anti-corruption policy. The Government official must decide regarding the license and shall not be influenced or appear to have been influenced by any person associated with our Company.

3.5. Political Participation and Donations

The Company respects the Employee's individual right to engage in civic affairs and to participate in the political process. However, such participation should take place in your spare time and at your expense. In this situation, the Employee must make it clear that the manifestations are on your own, and not from Company. The Company's resources, space, and image may not be used to serve personal or partisan political interests.

Political donations: It is forbidden for the Employee to make on behalf of the Company any contribution in value, goods, or services to campaigns or political causes.

Donations to Public Officials: The Company prohibits the making of payments, by way of gratuity, or the offering of any advantage to public officials or government authorities to expedite routine services or administrative actions.



Learn more

We respect the rights and choices of our Employees, as well as their participation as individuals in the political process. However, such participation, including contributions of time and money, must be conducted entirely on behalf of the Employee, outside of his/her regular working hours, and his/her political opinions may not be presented or even appear as a political view of the Company.



What we expect of you

If you are engaged in political activity, never use, or allow any Company's goods or resources to be used for any political campaign, political party, political candidate, elected official, or any of their affiliated organizations. Never use your position in the Company to try to influence another person to make contributions or to support any politician or political party.



Example

(i) There is a political event near our unit and the organizers asked if it was possible to set up their stand in an area belonging to the Company. We will not support the event in any other way, we will only let them set up their stand on our land. Is it okay if we do this? We cannot use our assets or resources for political campaigns or activities. You must inform the party that they will need to find an alternative venue for the event.

(ii) After an official meeting, I was invited by a government official to accompany her to lunch at a restaurant. At the time of payment of the bill, the authority was willing to pay it. Can I accept? No. In such cases, the costs should be divided among the participants, each being responsible for its share. It is important to note that it is also forbidden to pay the share of a government authority.

3.6. Relationship with Suppliers

The Company's suppliers must go through hiring and evaluation processes through clear criteria and without discrimination. Every decision must have technical and economic support, and no favoritism of any nature is allowed. When choosing a supplier, you should take all necessary care and give up your participation in the decision if you are conflicted. Improper conduct by third parties may damage our image, so it is very important that our suppliers and partners undergo an evaluation, in which we can verify their suitability and greater rigor with issues related to human rights and compliance with relevant laws and regulations when carrying out activities on behalf of the Company.



Learn more

We must always seek suppliers with the same rigor and ethical integrity as the Company. In this sense, it is essential that they have lawful business practices, carried out in accordance with a high standard of business conduct. The same is expected of their management practices, which must respect the rights of all Employees, the communities where we operate, and the environment, in addition to providing a safe and healthy workplace.



What we expect of you

Before hiring a supplier or entering a contract or commitment, conduct an appropriate risks assessment and commercial analysis, including assessing the potential supplier in relation to health, safety, environment and community performance, reputation, conduct, integrity, qualifications and experience, solvency, and the ability to meet our needs and policies. Follow the appropriate procedure, obtaining all appropriate internal approvals to ensure, among other issues, the existence of all contractual clauses due. Ensure the execution of a diligence process, where applicable according to a specific policy, to attest to the suitability of the supplier. It is essential to manage the contractual obligations of the third parties contracted by you.



Example

I really like a supplier we've been using for years. They understand our business and already know our Code and our policies. Lately, their bills seem to be very expensive. Is it just inflation or do I need to take some action? Supplier charges must always be based on conditions and prices agreed in advance, either through quotations or contracts, as well as careful evaluation and proof of the services provided and/or materials delivered. The due management of suppliers is an important responsibility of each area.

3.7. Gifts, Entertainment, and Hospitality

Receipt

The receipt of gifts and presents even though it may be a legitimate way of building good business relationships, is a practice that can lead to conflicts of interest and favors. To mitigate this risk and protect the reputation of both third parties and the Company, the Company maintains clear rules on the subject, in addition to a specific policy to assist in case of doubts. In this way, the acceptance of gifts and presents must take place (i) in occasional frequency; (ii) be limited to the amount of BRL 200.00 in Brazil and 50 USD/EUR for the other regions; and (iii) cannot take by money (or equivalents such as gift cards). Even if the item is within the above criteria, it is up to the Employee to evaluate whether the receipt of a particular gift or present puts him/her in a situation of conflict of interests; may influence or appear to influence your business decision; or generate any kind of favoritism. In case of receiving gifts that exceed the characteristics described above, the courtesy must be returned. Invitations to participate in national and international courses can only be accepted upon the formal approval of the director, who has the responsibility to assess the existence of a possible conflict of interest.



Learn more

Our Employees are not expected to ask for or accept hospitality and entertainment offers of any kind from third parties. In general, you must opt out of travel offers and paid accommodations. If there is a valid purpose to participate in an event or course, the Company must pay any travel and/or accommodation expenses.



What we expect of you

We hope that you will be very careful when accepting gifts and presents and if you receive something outside the established limits that cannot, for some reason, be returned, we hope that you will thank the courtesy explaining that in the next few times, you will not be able to accept it, due to the Company's internal rules, and forward the item to the Compliance area. Be aware of the cultural aspects and, in case of questions, consult specific policies and/or look for Compliance areas.



Example

(i) I received an invitation from a supplier to watch the football game with my husband. Can I accept? No. The receipt of any form of entertainment, such as football games, is prohibited.

(ii) A long-time supplier who is currently participating in a negotiation process to expand its scope of operations here at the Company sent me a bottle of wine. The gift came after one of the technical evaluation rounds of the bids submitted by the participating suppliers, an activity for which I am responsible. I checked that the value of each bottle is within the permitted by Company rules so I can accept it, correct? No. In this situation, the receipt of a gift even if within the Company's criteria may impair or appear to impair its partiality in decision-making. We have a conflict of interest situation that prevents the acceptance of this gift.

3.8. Press and Media

Contacts with the press will be promoted only by designated spokespersons. It is forbidden for unauthorized persons to contact the press on behalf of the Company. Contact with media professionals should not be treated, under any circumstances as a business relationship, and therefore does not involve favors or payment of any kind. The Company adopts a clear position in the dissemination of the information and seeks to satisfy the interests of the parties involved. Employees should not promote the dissemination of confidential or untrue information in the press.



Learn more

The relationship with the press should prioritize the disclosure of relevant facts and the promotion of the Company's business. The highlight should be, whenever possible, directed to the activities of the Company in question.



What we expect of you

Check out the policies regarding those who can make public statements on behalf of the Company: (i) ensure that all public communications are complete, transparent, accurate, understandable, and timely; and (ii) obtain all relevant approvals before announcing material publicly.



Example

A reporter from a local newspaper asked some questions about the Company. I think I can answer those questions. Should I talk to him? You should not speak to the press on behalf of the Company, unless you have been specifically authorized to do so by the area of communication. If you receive a call from a journalist, please explain that you are not authorized to comment, write down their name and organization name, and inform your Communications department representative.

3.9. Image and Reputation

The building and strengthening of the Company's image and reputation also take place through our dialogue and behavior with the audiences with which we relate. To this end, our actions, inside and outside the Company, including on social media, must always be in line with the principles and Our VC Way. Thus, linking the Company name to personal posts on networks such as Facebook, Instagram, LinkedIn, and others is allowed, provided that this will not compromise our image and reputation and that the posts are not linked to conduct that is rejected by the Company or contain any sensitive or secret information.



Learn more

As a Company Employee, you must be careful with your conduct in public environments, whether in circumstances of your professional activity or situations of your private life, acting with prudence and zeal, not exposing the Company or your career to risk. Whether indoors or externally, as participation in training or events, using the Company's car or other situations that allow the identification of the employer, the Employee's conduct in work situations must be compatible with Our VC Way, thus contributing to the recognition of their good corporate image.



What we expect of you

In lectures and participation in seminars and other public events, the confidentiality of confidential information about the Company and its business must be strictly complied with. Both participation as an exhibitor in events and the topics to be exposed must be approved in advance by the leadership of the Employee involved.



Example

I was invited to speak at an event as a representative of the Company. I never spoke in public before. What should I do? Whenever called to represent the Company, you should inform your immediate superior and seek the Communication area to help you make sure that the message you will transmit is the most appropriate. Although in the technical aspects of your presentation, you are the best person to structure it, the Communication area will assist you in the use of the logo, image, and message that we seek to convey.

4. USE OF COMPANY RESOURCES

- Company Assets
- Information Security and Protection of Personal Data
- Intellectual Property and Confidentiality

4.1. Company Assets

The Company's assets, equipment, and facilities are intended solely for use in its operations and may not be used for private purposes, except in specific situations defined by the Company, or for obtaining personal gains. Included here are all forms of physical and intangible properties, such as facilities, inventory, information technology ("IT"), and intellectual property, as well as the Company's data and information. It is the obligation of each to protect the Company's assets and use them for the intended purposes.

Business opportunities that you become aware of in the performance of your duties or using assets or information of the Company belong to the Company and may not be the subject of individual appropriation.

In case of loss, misuse, or theft of the Company's assets or equipment are identified, the Employee must immediately inform his/her superior so that the appropriate measures are taken. Misuse will subject the content to access by other Company professionals, without prior notice, and any privacy protection. In the event of termination of the employment contract or dismissal, the superior must adopt the necessary procedures for returning the goods and equipment in accordance with the Company's policies.



Learn more

We must always be vigilant and take measures to prevent theft, misappropriation, damage, and misuse of any assets of the Company. This includes not allowing physical properties to be destroyed, disposed of, sold, lent, or donated without proper approvals. The same is true as regards intangible assets, which cannot be supplied externally without proper approvals.



What we expect of you

It is your responsibility to use and adequately protect the assets and resources of the Company, with the proper care and handlings.



Example

Our unit has a junk pile for disposal that is becoming increasingly larger, and all items will be destroyed soon. Can I sell it at a local junkyard? Even if the items are products for disposal, they are still owned by the Company and should not be removed without the necessary authorization. If you believe there is a viable option in the sale of disposal products, propose the solution and the total cost to your supervisor for further analysis.

4.2. Information Security and Protection of Personal Data

The security of information should be treated with zeal. Improper use of IT systems is forbidden and can expose us to several risks, including virus attacks and information security breaches. The use of pirated software (interface programs on electronic devices) or hardware (physical electronic equipment) as well as the sharing of passwords is prohibited. Passwords are personal and non-transferable. Users in general should not expect privacy in the use of these systems and features. Electronic systems and computer resources are available to Employees for the proper performance of their functions. Its use for personal matters is permitted if it does not contravene internal rules and guidelines or impair the progress of the work.

The Company is also committed to the protection of the personal data of Employees, candidates, and any business partners, in accordance with the laws in force of the countries in which it operates. We expect from our Employees the appropriate, strictly necessary, and secure treatment of the personal data they need to have access to in accordance with the specific policy in force.

The Company adopts security, technical and administrative measures with the aim of protecting personal data from unauthorized access and accidental or unlawful situations of destruction, loss, alteration, communication, or any form of improper or unlawful treatment.



Learn more

The Company may, at its discretion, use and monitor any information transmitted or resident in these means. This rule covers information written or stored in an electronic system and any other means associated with it. It also includes technically developed information acquired by associations, acquisition, license, purchase, or entrusted to the Company.



What we expect of you

Knowledge of our information security policies is everyone's responsibility. Any type of software and program must not be copied or installed on the Company's computers without the prior authorization of the IT area.

We hope that our Employees will be aware of possible threats to the Company's information security and take safe and preventive behavior. It is important to adopt positive habits such as always locking the computer when leaving the workplace, creating strong passwords, and changing them frequently, saving documents in appropriate locations, not clicking on suspicious or malicious links, and always reporting when witnessing any situation where information security may be compromised. The use of personal devices in the performance of functions in the Company must be in accordance with the specific policy in force.



Example

I just received an e-mail from a colleague with no reference to the subject but asking me to click on a link from a website. The e-mail seems suspicious. What should I do? If you receive a suspicious e-mail from a known person, check directly with the person before replying. Do not reply to the e-mail received, as this may enable third parties to access personal information about you. If the e-mail is a fraud, you must inform the Information Security department.

4.3. Intellectual Property and Confidentiality

Intellectual Property

It is a strategic asset for the Company. Intellectual property is understood as trademarks, patents, industrial designs, domain names, copyrights, innovations, improvements, processes or products, projects, or models, financial, commercial, or market information, ideas, knowledge, or any other non-material activity developed in the Company or by contracting it, among other items that would benefit a competitor if they were known to them. The result of the work of an intellectual nature and strategic information generated by the Company is the exclusive property of the Company. It is everyone's responsibility to treat confidentially the information about the intellectual property to which they have access because of their work, using it carefully.



Learn more

The disclosure of such information, either by our Employees or by business partners who, because of their activities, had access to this information without the express authorization of the Company's leadership is not permitted. The use of information for academic work purposes must be previously evaluated by the person responsible for the business, as well as by the Legal area. It is true when we think about third-party information. We must be aware that using intellectual property from third parties improperly may result in civil liability for the Company.



What we expect of you

(i) Always check that there are no intellectual property rights of third parties that may prevent the deployment of new technologies or processes; (ii) do not install any unlicensed software on the Company's devices; and (iii) never accept or use confidential information from another person, except where there is permission to do so. Remember: the knowledge and information acquired during your work at the Company remain the property of the Company even after your departure and, thus, should not be exposed.



Example

I would like to use the Company logo on a social media website for students that will be registered in my name. Can this be done? Our brand is an important part of our reputation and needs to be protected. If you wish to use the logo, request permission from the Communication representative.



5. ANTI-CORRUPTION

5.1. Anti-Corruption

The company repudiates any type of corruption. One of the pillars of the Compliance Program is the prevention of corruption, and for this purpose we developed the Anti-Corruption Program, which guides our efforts, detailing the depth of our actions and assisting all our Employees in understanding the types of corruption that exist, the impact on the Company's image and what must be done to avoid them. It is the responsibility of each individual to know and apply the rules and measures outlined in our Anti-Corruption Compliance Program, as report any questionable conduct, using the available channels.



Learn more

Popularly known as the intention or willingness to act dishonestly, unethically, and in violation of the law, in exchange for any advantage or personal gain, corruption harms society and causes political, economic and social damage. One of the pillars of the Company's Compliance Program is the prevention of corruption, and for this, we have developed the Anti-Corruption Compliance Program, which guides our efforts and details the depth of our actions in preventing acts of corruption. With this, we intend to help you better understand the theme and actions that should be taken to avoid it.



What we expect of you

(i) Know the Anti-Corruption Policy and act in accordance with it; (ii) assess the risks of third-party hiring, actions, and activities that may constitute a violation of the Anti-Corruption Policy and applicable legislation; (iii) if in doubt, consult the Anti-Corruption Policy, the Legal and Compliance departments and/or the Ethics Line before making any decision; and (iv) you should also encourage your colleagues to consult and enforce the Anti-Corruption Policy, act in accordance with our **“Take Responsibility”** principle and not expose you or the Company to risks.



Example

My manager and I identified that we need to build a closer working relationship with public officials and improve their understanding of our local operations. One of those public officials mentioned that he socializes with other companies and receives plane tickets, tickets to events, and dinners in restaurants. Is that appropriate? The act of gifting with flights, accommodation, and entertainment can be seen as an attempt to unduly influence employees and should not occur in such circumstances. Improving the understanding of public officials about our operations is a legitimate business purpose, which can be achieved by visiting our local operation, previously approved by the Legal department of your unit.



6. TERM OF COMMITMENT

6.1. Statement

I hereby declare that I have read and understood the Votorantim Cimentos' Code of Conduct, I agree to the principles and guidelines contained therein and I am commitment to comply with and respect it in all my activities in the Company, ensuring its application by all other persons to whom it applies. All updates disclosed in this document and approved by the Board of Directors will be followed by me.

Company/Unit:

Date:

Full Name:

Signature:



