

GRUPO

Sotreq

A close-up photograph of a person's hand holding a pen over a document on a desk. The document has the word 'AGREEMENT' visible at the top. The background is softly blurred, showing a wooden desk and a window with light coming through. A yellow graphic overlay is on the right side of the image.

CODE OF ETHICAL CONDUCT FOR THIRD PARTIES

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INTRODUCTION

The Sotreq Group, with over 75 years of history, has always valued ethics and integrity. Reaffirming our commitment, we released the Code of Ethical Conduct for Third Parties, which brings together the main guidelines for conducting business with the Sotreq Group.

Establishing partnerships with seriousness and trust is fundamental for the success of our business and the sustainable development of the locations where we operate. This document reflects the ethical and moral standards that underpin the construction of a healthy, transparent, and lasting relationship, and the Group and all partners are responsible for complying with this code.

We reaffirm our commitment to the best corporate governance practices, ensuring channels to report suspected violations, preserving anonymity and confidentiality.

Cordially,
Marcelo Orberg

01



COMMITMENT TO INTEGRITY

We are committed to integrity and transparency to ensure compliance with standards, codes, laws, and procedures, in addition to combating deviations and fraud. It is crucial that our ethical conduct, integrity and transparency is also practiced by third parties with whom the Sotreq Group has relationships.

This Code of Ethical Conduct intends to present, in a clear way, the behaviors expected from each third party, who are also responsible for selecting and contracting their commercial partners and suppliers, in accordance with all applicable legislation and this Code.

02



WORK ENVIRONMENT

The Sotreq Group wishes that its third parties encourage diversity with the aim of promoting the inclusion of all segments of society, treating everyone with respect and treating everyone equally, and any manifestation or kind of abuse of power, threat, intimidation, violence, moral or sexual harassment being forbidden.

Acts of prejudice and/or discrimination will not be tolerated in the performance of activities, whether due to race, ideology, sex, religion, nationality, gender, age, sexual orientation, disease, addiction, appearance, disabled people, pregnant women, union participation, party affiliation, or political conviction.

The Sotreq Group requires that its business practices are based on principles of social responsibility with respect to labor analogous to slavery, child labor and sexual exploitation.

03

Business must be conducted consistently and in defense of the principles of free competition, prohibiting undue restrictions and preserving fair competition among competitors.



FAIR COMPETITION

04



CORRUPTION AND FRAUD

The Sotreq Group expects its Third Parties to operate ethically and with integrity in the course of their relationship with the market, including Public Agents, Politically Exposed Persons and/or Third Parties.

Thus, any practice or form of corruption and fraud is expressly forbidden. Third parties must not offer, promise, grant, or authorize any illegal, improper, or questionable payment.

It is also not allowed the granting of benefits to employees of the Sotreq Group, government officials or any individual who is directly or indirectly linked to the company.

05



CONFLICT OF INTERESTS

Any type of private relationship, of a habitual or occasional nature, between third parties and Sotreq Group employees must be communicated.

We seek business relationships based on trust, transparency, and mutual accountability, and it is important to prevent conflicts of interest.

06



GIVEAWAYS AND GIFTS

Any giveaways and gifts must be based on corporate policy for being given or received, and they may not be perceived as bribes, improper payments, or attempts to exert influence.

Employees are only allowed to receive promotional giveaways without commercial value (with the logo of the supplier company, customer, or its representative), as long as they do not exceed R\$250.00 (two hundred and fifty reais).

07



HEALTH, SAFETY AND ENVIRONMENT

Legislation related to safety, the environment, and occupational health must be fully and unrestrictedly complied with.

In addition, it is necessary to make a commitment for oneself and for all those related to it by providing a safe and healthy work environment, seeking to prevent accidents and control occupational hazards and risks, protecting the environment through sustainable consumption, reducing greenhouse gas emissions, and decreasing waste generation.

08

It is a duty to care for the custody, conservation, and maintenance of the Group's assets that are under their responsibility, and it is forbidden to use them for one's own benefit or for the benefit of others.



ASSET PROTECTION

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CONFIDENTIAL INFORMATION

The disclosure and/or use of confidential or proprietary information of the Sotreq Group can only occur with the express authorization of the Executive Board. This obligation must be maintained even after the termination of the business relationship. Third parties must take care of information pertaining to our company.

All matters dealing with or concerning the Group must be conducted with secrecy and confidentiality. The access to information should be limited to individuals who have a need to receive it and should only use it for the specific purpose of providing or delivering the service

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IMAGE AND REPUTATION

The Values of the Sotreq Group and this Code must be respected, when mentioning or referring to the company, as well as preserving and caring for the image and reputation, refraining from performing any act that may put them at risk, as well as adopting the necessary measures, if they become aware of irregularities practiced by individuals who may compromise the name or interests of the Group.

Third parties are forbidden to make contact with the press on behalf of the Sotreq Group companies or about them. The relationship with any means of communication is the sole responsibility of the Marketing area or authorized by it, in the same way that the use of the brands that make up the Sotreq Group must be in accordance with the company's brand manual and previously authorized by the Marketing Area.

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The third party is obliged to comply with all laws, rules, regulations and treaties, including - without limitation - laws relating to anti-corruption, competition, business conduct, the environment, occupational safety and health, privacy and data protection, labor and employment, as well as any other laws applicable to the products and/or services provided.

The Group reserves the right to perform due diligence, at any stage of the relationship with the third party, and may adopt corrective measures.



COMPLIANCE WITH LAWS AND REGULATIONS

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AUDITED CHANNEL

It is important that the Sotreq Group knows the questions and possible violations related to this Code, so that we can guide and correct deviations. Any suspicion of acts practiced in disagreement with the information herein or with the legislation must be reported through our Audit Channel. This can be accessed through the following communication channels:

Sotreq Group Website:

www.gruposotreq.com.br

Phone: (21) 2107-2184

E-mail: auditoria@sotreq.com.br

Correspondence to:

Ayrton Senna, 2200 / 1º floor Bloco 1 - Barra da Tijuca - Rio de Janeiro - RJ - Postal Code [CEP] 22.775-003

A/C Audit & Processes.

The contact is completely confidential and is available all year round. We guarantee the anonymity and confidentiality of information.

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COMPLIANCE

This Code is mandatory. Therefore, it is important that everyone knows that contrary conducts can lead to the application of penalties, without prejudice to the applicable legal responsibilities.

