

CODE OF CONDUCT

Approved by the Board of Directors
on July 28, 2021





Our vision is to be
**Brazil's best highway
infrastructure** manager
in a sustainable manner.





JOINT MESSAGE FROM THE BOARD OF DIRECTORS AND THE BOARD OF EXECUTIVE OFFICERS

In 1997, EcoRodovias was born with the aim of directing its efforts to be an innovative infrastructure company, which resulted in the generation of countless jobs and concessions that we are proud to be part of.

More than twenty years have been dedicated to the commitment to sustainable development, ethics, collaboration, focus on results and initiative that allowed EcoRodovias to become a valuable asset for its shareholders and employees.

EcoRodovias' history would not be the same without the support of our employees and shareholders, as well as the partnership with our third parties. Together we built an increasingly better and longer-lasting path for all of us, grounded on a culture of ethics and integrity.

Our **Ethics Program – Integrity System (PE-SI)** was initially implemented in 2008 and has since undergone a few changes and improvements, adding value to all the business developed by EcoRodovias and offering our shareholders and stakeholders greater trust and transparency.

As the cornerstone of our Program, we are pleased to share **this new version of our Code of Conduct**, which brings our values and, especially, our commitment to ethics, transparency and integrity in all our activities. Compliance with applicable laws and regulation is a serious and non-negotiable commitment undertaken by EcoRodovias and by all of its employees and third parties.

Thus, we encourage all EcoRodovias' employees, third parties and stakeholders to read and understand this Code of Conduct, using it as a guiding instrument for the professional conduct of each one of us in relation to EcoRodovias' business.

We take this opportunity to emphasize the importance of reporting to EcoRodovias, through its Ethics Channel or the Compliance area, any suspected or actual violations of laws, the Code of Conduct and other internal rules of the Company.

We count on the support, commitment and dedication of all to ensure that the guidelines of this Code of Conduct are followed and disseminated in our daily lives.

Warm regards,



Marco Antônio Cassou
Chairman of the Board
of Directors



Nicolo Caffo
Executive Officer
Highway Business



Marcello Guidotti
Chief Financial and
Investor Relations Officer



Marcelo Lucon
Chief Legal Officer

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1. INTRODUCTION

We are one of Brazil's largest highway infrastructure companies. Over the past 20 years, have expanded our footprint across the country's import and export highway corridors, as well as important tourist regions.

We seek to develop a quality and sustainable infrastructure to support the country's economic and social development

We currently manage highway concessions totaling more than 3,000 km across eight states in the Southern, Southeastern, Midwestern and Northeastern regions of Brazil. We also manage two logistics assets - a regulatory yard and a port terminal – which serve the Port of Santos, the Brazil's largest port.

Our mission is to create value by undertaking infrastructure assets in a sustainable, synergistic, ethical and innovative manner

We believe in the sustainable development and growth of our business, based on high ethical standards and strict compliance with all applicable laws and regulations, especially the anti-corruption legislation (Federal Law 12846/13), but also observing the following guidelines:

- UN Global Compact.
- Business Pact Against Sexual Exploitation of Children and Teens on Brazilian Highways.
- Standards related to Management Systems - ISO 9001 (Quality Management System), ISO 14001 (Environmental Management System), ISO 39001 (Road Traffic Safety Management System), ISO 45001 (Occupational Health and Safety Management System), ISO 26000 (Guidance on Social Responsibility), ISO 37001 (Anti-Bribery Management System).

We are committed to promote the fight against corruption and bribery in all our activities

It is part of our mission the dissemination of a culture of ethics and integrity within our organization by promoting a fair, honest and reliable working environment for our employees and stakeholders.

This Code of Conduct (“Code”) consolidates the mission, values and principles that guide the business of the EcoRodovias Group (“EcoRodovias”), serving as an instrument to guide the conduct of all employees, third parties and stakeholders.



This Code reunite the mission, values and principles that we consider essential and non-negotiable in our operations

All employees are responsible for promoting a culture of ethics and integrity and acting in accordance with this Code, in order to avoid breaching the terms contained herein.

Our managers are responsible for promoting an environment, in which our employees feel confident and comfortable to ask questions, as well as listening carefully to their concerns and taking all the appropriate measures to respond to them.

As such, this Code acts as a consultation tool to instruct and clarify our employees if they have doubts about how to act in certain situations, offering adequate mechanisms to provide advice in such situations and how to communicate their concerns.

This Code is part of the Ethics Program - Integrity System (PE-SI) of EcoRodovias, mainly based on the parameters defined by the Decree 8,420/15, in the Manual "Integrity Program - Guidelines for Private Companies" issued by the Federal Comptroller's Officer (CGU) and the guidelines set by the ISO 37001 (Anti-Bribery Management System).

Read this Code carefully and make sure it is followed by all.





2. OUR VALUES, OUR WAY OF THINKING AND ACTING

In our activities we share the following values:

Ethics

Integrity, transparency and fairness in conducting our business, being plural and diverse.

Collaboration

Synergy and cooperation among people and teams in building solutions.

Initiative

Protagonism, innovation and creativity to achieve outstanding results that add value.

Sustainability

Attitudes that seek long-term economic growth, respect to the environment and contribution for the development of employees and the society.

Focus on results

Excellence, planning, commitment, efficiency and synergistic business model in the pursuit of sustainable results.





3. WHO MUST FOLLOW THIS CODE

This Code applies to all EcoRodovias' units and its apprentices, interns, employees, executive officers and directors of EcoRodovias.

The provisions in this Code cover diverse aspects of our work and hence compliance with them is an integral part of the obligations of all our employees.

This Code must also be followed by third parties that interact or do business with EcoRodovias, such as temporary employees, suppliers and business partners.

We expect our employees and stakeholders to:

- Fully comply with this Code and all the policies of the Ethics Program – Integrity System.
- Report any violations of this Code to their managers or the Compliance area.
- Obtain information and clear all their doubts about how to act appropriately in specific situations.





4. OUR PRINCIPLES

In conducting our business and in the daily activities of our employees, we are guided by the following principles:

Equality

Egalitarian and non-discriminatory treatment of all employees, users of our services, business partners, third parties and other stakeholders of EcoRodovias.

Responsibility

Responsible conduct in all our operations and all our relations.

Transparency

Disclosure of true and accurate information in accordance with law.





5. HOW WE CONDUCT OUR BUSINESS

We conduct our business with ethics and integrity and we are committed to fight corruption and bribery in all its forms

Corruption and bribery can take several forms, mainly the offering or receipt of undue benefits, which can include anything of value, such as cash, gifts, meals or payments for travel expenses in violation of the applicable laws.

We do not tolerate any form of corruption and bribery in our business. As such, the following are strictly prohibited:

- Promising, offering or giving, directly or indirectly, any undue benefit to a public official or a related third party.
- Financing, funding, sponsoring or otherwise encouraging the unlawful actions mentioned in Federal Law 12,846/13 (Anti-Corruption Law).
- Using an individual or a legal entity as an intermediary to conceal or disguise the real interests or identity of the beneficiaries of the actions taken.
- Obstructing the investigation or inspection by public agencies, entities or officials, or interfering in their functions, including within the scope of regulatory agencies and inspection agencies of Brazil's financial system.
- With regard to public bids and contracts:
 1. Thwarting or defrauding, through adjustments, collusion or any other arrangement, the competitive nature of public bids.
 2. Preventing, disrupting or defrauding any public bid process.
 3. Removing or trying to remove a bidder through fraudulent means or by offering any undue benefit.
 4. Defrauding a public bid or the resulting contract.
 5. Creating, fraudulently or irregularly, a legal entity to participate in public bids or sign administrative contracts;
 6. Obtaining undue advantages or benefits fraudulently, from amendments or extensions of contracts entered into with public entities, without any authorization by law, during invitations for bids or in the respective contracts.
 7. Manipulating or defrauding the economic and financial balance of contracts signed with public entities.

Our employees are instructed and trained to neither offer nor receive any form of undue benefits involving public or private officials.

We assure our employees that they will not face retaliation, discrimination or disciplinary action for refusing to participate in corruption or bribery even if such refusal could result in the loss of business for EcoRodovias.

Our Ethics Program - Integrity System (PE-SI) has implemented measures and controls related to the corruption and bribery risks that EcoRodovias and its subsidiaries are subject to, in order to prevent, detect and remedy actions that violate this Code, internal policies and applicable laws.

For more information about the anti-corruption and anti-bribery measures taken by EcoRodovias, see the Anti-Corruption and Anti-Bribery Policy on our website.



Donations and Sponsorships

We do not make donations or sponsorships to fund illegal activities

Our donations and sponsorships must always be made transparently and in accordance with this Code, internal policies and applicable laws. Donations and sponsorships must be approved in advance and properly booked in the accounting records of EcoRodovias.

We do not make political donations to candidates or political parties and our employees are instructed to not use EcoRodovias resources, such as equipment, materials or vehicles to support candidates or political campaigns. We consider irregular any reimbursement of expenses for employees who have made political contributions.

We respect the right of our employees to run for political office, but we prohibit political campaigns within EcoRodovias premises and during working hours.

For more information, see our Policy on Donations and Sponsorships.

Gifts and Presents

We have clear and objective rules about offering and receiving gifts and presents

We do not tolerate offering and/or receiving gifts to influence business decisions or to facilitate improper payments and we take all measures to ensure that our employees comply with these rules.

We consider as promotional gifts, items that generally have no relevant commercial value and are generally distributed as business courtesy or publicity and which contain the logo of the company that offers them (e.g. pens, caps, diaries, calendars, key chains, etc.). All employees are authorized to give or receive gifts and need not declare them in the Ethics Portal, provided the maximum value of R\$100.00 is observed.

We consider as presents, items of commercial value or hospitality, including invitations to leisure events (e.g. concerts, sporting and similar events, business meals and travel expenses). In some cases, offering and/or receiving present could give the impression of favoritism or influence our capacity to work ethically and with integrity, even if unconsciously.

Generally, presents may be offered or received, provided they are done transparently, limited to R\$300.00, but never in cash, vouchers or gift certificates, and must be exclusively with institutional purpose. All the presents must be registered in the Ethics Portal.

Before receiving or offering presents or hospitality, our employees must ensure this practice does not violate applicable laws or internal policies of the third party involved.



Refuse gifts or hospitalities if you understand that it is against applicable laws or our Compliance rules

Our employees must never accept or offer presents if they are unsure about the regularity of the practice or the possibility of the action being interpreted as improper or illegal. If it is inconvenient or inappropriate to refuse or return a present, contact the Compliance area for further guidance. Presents that are perishable and which do not contain alcohol can be placed in a common area for other employees.



Presents to public officials

Offering presents to public officials is prohibited, except for meals, provided these are limited to R\$ 300.00 per public official and respect the specific rules of the public agency to which the official is linked.

Our employees must observe the company rules on reimbursement of expenses.

For more information, see our Policy on Gifts and Presents.



Avoiding conflicts of interest

Do not take any decision if you have a personal interest and do not use your position to obtain gains for yourself or for your family and friends

Our employees must prevent personal interests from interfering with their capacity to take decisions impartially and solely in the best interests of EcoRodovias. We are committed to identifying potential conflicts of interest and addressing them appropriately in order to safeguard the interests, image and reputation of EcoRodovias.

Our employees and third parties must promptly disclose any conflict of interest to the Compliance area. This includes members of the Board of Directors, who must refrain from taking decisions on matters in which they have potential conflict of interests.

For more information, see our Policy on Conflicts of Interests.

Image and Reputation

We are all responsible for safeguarding our image and reputation

Our image and reputation are among our most important assets and hence our employees must always act with moderation and respect in their interactions with external stakeholders.

No employee is allowed to speak on behalf of EcoRodovias when not qualified or expressly authorized, much less disclose any information that is not yet public or which should be addressed by our official channels.

Publications on social networks

We expect our employees to pay utmost attention in the statements made on the Internet, ensuring that all posts and comments on social networks reflect only their personal opinions, without any connection to EcoRodovias.

All necessary care must be taken regarding content about EcoRodovias shared with external stakeholders. Dissemination of fake news is strictly prohibited.





Use of EcoRodovias systems and equipment

Our employees must take care of and ensure the efficient use of equipment entrusted to them by EcoRodovias, such as computers, cell phones, vehicles, etc. In case of loss, damage or theft of cell phones and computers, our employees must report the same to their managers and immediately notify the Facilities and Information Technology areas, respectively.

EcoRodovias equipment must be used primarily for matters related to our operations. Occasional use for other issues is permitted.

Use of EcoRodovias' communication systems or channels to access, store or disseminate rumors, pornography, political propaganda, discriminatory content or that is against our principles and values is prohibited

Electronic systems, including corporate email account, communication apps and files on the cloud, as well as electronic equipment, such as notebooks and cell phones, are the property of EcoRodovias and are available to employees as work tools.

Hence, these devices are monitored by EcoRodovias and shall be used in accordance with the internal procedures established by the Information Security Policy and labor laws.

Suspected hacking attempts of these devices must be immediately reported to the Information Security area.

We protect and respect intellectual property

Our intellectual property is a valuable asset that drives our operations and creates trust among our stakeholders. Materials and documents produced by our employees, pursuant to their employment agreement and applicable laws, are the intellectual property of EcoRodovias and must be treated with due care and attention.

Handling confidential or insider information

Discretion is essential to ensure the confidentiality of sensitive information that our employees and certain stakeholders have access to as a result of our business, such as financial results, potential investments, market strategies, etc.

This information is not always publicly known to the market and hence cannot be used or disclosed without express authorization from EcoRodovias, especially when it results in benefits for oneself or for third parties. In some cases, sharing of confidential information must be preceded by the signing of a non-confidentiality agreement between the parties involved.



Never disclose confidential or insider information to third parties without first checking with your manager

In our operations, the following are prohibited:

- Buying and/or selling - or advising about the same - shares in EcoRodovias based on information that is not known to the market.
- Disclosing insider information that could affect the value of EcoRodovias shares, for the benefit of oneself or third parties.
- Using for personal purposes or transferring to third parties: technologies, methodologies, know-how or information owned by EcoRodovias without prior authorization.

Our employees are trained and instructed to contact their managers and the Compliance area if they have any doubts whether the information they have access to is considered confidential or insider information.

Following are a few attitudes that are essential for protecting our information:

- Be an example for other employees.
- Be careful what we say and pay attention to those around us and what they can see and hear.
- Protect EcoRodovias equipment.





How we protect our data

We comply with the General Data Protection Law (GDPL) and, consequently, protect the personal data and information of our stakeholders and we take adequate preventive security, technical and administrative measures to avoid the risk of destruction, loss or unauthorized access.

We guarantee that personal data are treated lawfully and respect the rights of the holders of such data. We reiterate that only data that are necessary for the stated and legitimate purposes are collected and are stored only for the time necessary for exercising the rights or complying with legal obligations.

6. CONDUCT TOWARDS EMPLOYEES

We treat everyone with dignity and respect

We strongly advocate that our conduct respects human rights, labor laws and social aspects of our employees and stakeholders. Our conduct is aligned with recognized international labor standards and we reject child labor, forced labor and any form of exploitation.

We strive to ensure that everyone can identify and report human rights violations.

We are committed to promoting a safe and healthy working environment for our employees

In our employee selection and termination processes, we observe and value diversity and privacy. Our decisions are always based on objective - not subjective and/or discriminatory - criteria and we always follow human resources best practices.

We respect the right of our employees to join unions and encourage collective bargaining for their rights, while ensuring that no reprisals occur.

We understand that no policy, procedure or any action of EcoRodovias shall restrict or limit the right of our employees to speak freely about their working conditions.





Diversity and Inclusion

We do not tolerate any type of discrimination based on sex, age, origin, nationality, religion, sexual orientation, disability, political beliefs or union activity, among others

We believe that an environment of diversity and inclusion encourages the generation of ideas and the positive coexistence of different views. The Caminho para Todos Program (“A path for everyone”) has set up Diversity and Inclusion Committees at our units to raise awareness and increasingly promote a diverse, inclusive and respectful environment. Moreover, we have joined the UN Free & Equal initiative on diversity.

For more information, see our Policy on Diversity and Inclusion.



Occupational Health and Safety

We are committed to protecting the health and safety of our employees and stakeholders

We have taken measures to comply with best practices related to occupational health and safety and ensure that all our operations comply with applicable laws of the regions where we operate.

We have implemented health and preventive medicine programs to improve the quality of life of our employees and their dependents.

In terms of occupational safety, we support and encourage the activities of the Internal Accident Prevention Commissions (CIPA) and roll out special actions during the Internal Work Accident Prevention Weeks (SIPAT). Safety Committees have also been set up at the units with the involvement of leadership to discuss and disseminate important information about the safety of our employees.

We have detailed internal regulations on occupational health and safety, which are disseminated to all our employees.



Moral and Sexual Harassment

We reject all forms of moral and sexual harassment in our activities

We are dedicated to promoting a work environment that is free from bullying, sexual harassment or discrimination of any kind.

We consider as moral harassment the exposure of someone to humiliating and/or embarrassing situations in the performance of their functions.

We consider as sexual harassment embarrassing someone to obtain sexual favors through requests, insinuations or any other behavior in this regard.

If any employee or stakeholder has suffered any kind of harassment or has witnessed any discriminatory behavior, we advise to submit an alert to the Human Resources area or our Ethics Channel.

Use of alcohol and drugs

Alcohol and drug abuse can pose serious risks to the health and safety of our employees, besides impairing their capacity to do their job. No employee is authorized to consume these substances or be under their influence at the workplace or wherever they are performing their functions, during they work hours.

The consumption of alcohol on specific occasions is tolerated, such as, for example, end-of-year events, business lunches or similar, as long as in places and times previously authorized and shall not, in any circumstances, affect the employee's professional performance.

EcoRodovias provides information about the dangers and damages caused by the use of these substances and guarantees support for employees who are addicted to such substances.

Participation in lectures

All lectures, seminars or academic work about EcoRodovias or topics that involve the areas of expertise of our employees require prior approval from the respective manager and must be informed to the Communication area.





If such participation is approved, the employee must not request or accept any form of compensation from the organization that requested their participation, but can accept reimbursement of expenses incurred.

Payment of expenses related to the participation of public officials in events organized or sponsored by EcoRodovias, such as travel, accommodation and meals, is allowed provided the specific rules of the public agency to which the official is linked are respected and that the expenses incurred are reasonable and properly booked in our accounting records, the invitation is not extended to family members or people close to the public official and such expenses are approved by the Compliance area in advance.

7. OUR RULES OF CONDUCT ACCORDING TO STAKEHOLDER GROUPS

Users of our services

We are committed to the quality of our services and the safety of all users of our highways.

Ensuring the quality of services provided, with the focus on road safety and user satisfaction, is vital for the reputation of our business.

Our service is focused on respect, courtesy and efficiency, and we always strive to provide clear and accurate information to our users. In this regard, we have provided permanent communication channels to meet their demands, with the focus on improving our services.





Business Partners and Third Parties

Our relations with business partners and third parties are based on legal, ethical and fair practices. The processes for choosing and contracting business partners and third parties are always based on technical and objective criteria, subject to our internal policies and applicable laws, especially the anti-corruption law.

We do not admit fraud in contracting processes of business partners and third parties

We prioritize commercial relations with business partners and third parties who enjoy good reputation in the market and, as such, we seek to strengthen our relations with business partners and third parties who are not involved in:

- Child labor, slave labor or any form of human rights violations, including the sexual exploitation of children and teenagers.
- Discrimination in all its forms.
- Fraud and manipulation of bid procedures or contracts with the government.
- Acts harmful to public administration.

We have a Third Parties Code of Conduct, which lays down EcoRodovias' guidelines and expectations regarding the actions of our business partners

We encourage our business partners and third parties to promptly raise their concerns about possible violations of the Code, internal policies and/or applicable laws.

Related parties

We have established criteria and procedures for contracts between companies belonging to EcoRodovias and related parties. These contracts must observe the corporate governance rules in force, the guidelines of Concession Authorities and the interests of EcoRodovias. They must also be approved by the Board of Directors of the contracting unit to ensure the adoption of best governance practices and market conditions.



Communities where we operate

Since we are present in different regions across the country, healthy relations with the communities where we operate is essential for our business. We carefully identify any adverse impact that may be caused by our operations in these locations, for which we have permanent channels for dialogue with these communities, which include indigenous peoples and quilombolas, while always fully respecting their rights.

We strive to contribute to the economic and social development of the regions where we operate.

We seek to employ people from these communities, thereby contributing to local development and reducing social inequalities. We also participate in specific social programs through actions that are aligned with our business.



Public Administration

Due to the nature of our business, we are in permanent contact with municipal, state and federal governments. Relations of this nature are and must be based on transparency and integrity, always in compliance with anti-corruption laws and internal policies, including the Policy on Interaction with Public Officials.

We consider unacceptable any practice that violates anti-corruption and anti-bribery laws

We take all the necessary measures to ensure that reports, working papers, information or records that we disclose to the government are true and accurate.



Shareholders, Investors and Regulatory Agencies

We manage our business with the aim of preserving and growing shareholders' equity in a sustainable manner

The rights of both controlling and minority shareholders, as well as of investors are protected by law and by the policies of EcoRodovias.

Our relations with shareholders, investors, financial analysts, risk agencies and regulatory agencies is based exclusively on professional management, as well as the accurate and transparent communication of information.

These relations are maintained exclusively by duly authorized employees, in compliance with law, the regulations of the B3 stock exchange and the internal provisions of EcoRodovias.

We assure the accuracy and transparency of our accounting records and communications with the market

Exceptionally, if the controlling shareholders and managers understand that the disclosure of certain information could put at risk the legitimate interests of EcoRodovias, we may not disclose it, though always in compliance with applicable laws.

Our employees must collaborate with internal and external auditors. No employee or third party acting on behalf of EcoRodovias may influence auditors or force them to take certain measures, manipulate them or induce them to commit errors.





Our relations with Competitors

Our conduct is aimed at maintaining a competitive environment through compliance with antitrust laws.

Actions that violate antitrust laws are strictly prohibited

We do not exchange confidential information with our competitors through illegal means, including payment of undue benefits.

The Antitrust Policy lays down specific guidelines regarding relations with our competitors, sharing of confidential information, abuse of power and use of language. Our employees must be familiar with these concepts so that they can report violations.

Associations

We understand the importance of joining associations to establish the mechanisms for mutual cooperation and to discuss a common public agenda for addressing the challenges related to infrastructure and mobility.

As a rule, association meetings are authorized to discuss issues that affect the business sector of EcoRodovias, provided these comply with the charter of said associations, such as the discussion of bills and regulations, and the interpretation of legal issues, all in order to achieve common business goals and permitted by the laws in force.

We know that interactions within associations are considered sensitive in nature since they bring together competitors who could use the opportunity to discuss inappropriate topics or share confidential information. Therefore, we emphasize that in these interactions, our employees must adopt the same level of caution as with regard to sharing confidential information.





Press

We maintain an independent and respectful attitude in our relations with the press and opinion makers, disclosing information that is consistent and aligned with the principles and policies of EcoRodovias.

These relations are always guided by professionalism and ethics, subject to the guidelines in this Code. Only authorized spokespersons and in previously approved circumstances can represent EcoRodovias in the media and/or among opinion makers.



8. COMMITMENT TO PROTECTING THE ENVIRONMENT

We conduct our operations fully respecting the environment and complying with applicable environmental laws. Through our actions and the commitment of our employees, we take measures to comply with all applicable environmental laws and regulations.

We highlight our advances in the environmental, social and governance (ESG) agenda through our public commitment to the UN Global Compact and the Sustainable Development Goals (SDGs). We also strive to mitigate the impacts of our operations on the environment, such as through the voluntary offset of greenhouse gas emissions, recycling materials in our operations and using renewable energy sources.

We regularly implement sustainability actions among our stakeholders through private and incentivized projects.

For more information about our commitments, read our Policy on Sustainability Guidelines.



9. HOW TO REPORT OUR CONCERNS

Violations or suspected violations of the Code of Conduct must be reported immediately

We are committed to promoting an environment in which our employees and/or stakeholders can voice their opinions and raise their concerns about behavior that is in violation of this Code, internal policies and applicable laws.

Their reports are very important for us to detect such situations and take all the necessary measures to ensure the correct application of our Code.

To report a violation or suspected violation, our employees and/or stakeholders can contact our 24x7 Ethics Channel, available in Portuguese and English.

| | |
|---|--|
| WEBSITE https://www.canaldeetica.com.br/ecorodovias/# | TELEPHONE 0800 025 8841 |
| EMAIL grupocompliance@ecorodovias.com.br | ADDRESS EcoRodovias Concessões e Serviços, Rodovias dos Imigrantes, km 28,5 s/n, cep 09845-000, São Bernardo do Campo/SP |

You can report your concern orally or in writing, identifying yourself or anonymously.

Reports are sent and managed by a third party to preserve confidentiality and transparency, and are shared only with those responsible for the investigation.

We guarantee that there will be no retaliation for those reporting to the Ethics Channel in good faith

We assure protection for those who appropriately and in good faith raise questions and concerns, and we do not retaliate against anyone who raises any concern or assists in investigating suspected violations. Retaliation could take diverse forms, such as harassment, exclusion from meetings, performance appraisals, etc. If any of our employees believes that they have suffered reprisals for reporting a problem, they must immediately report it to the Compliance area.

We also encourage our employees and stakeholders to seek clarifications whenever this Code cannot provide clear answers to concrete situations involving ethics and integrity issues.

For more information on how to report violations, see the Guide on the Ethics Channel available on our website.



10. CONSEQUENCES OF BREACH OF CODE OF CONDUCT

Violation of this Code constitutes a violation of the duties in the employment agreement, resulting in an investigation of irregularities and employees may be subject to disciplinary measures. Investigation of cases is the responsibility of the Compliance area, which will submit the investigation report to the Ethics Committee, which will determine the application of disciplinary measures based on the relevance of facts and the seriousness of the violation.

11. ADMINISTRATION OF THE CODE OF CONDUCT

This Code and revisions to it are approved by the Board of Directors.

This Code comes into force on this date and will be valid for three (3) years, when it will be updated once again.

All employees shall undergo training on the Code and certify that they have read, understood and are committed to the provisions of this Code.

São Paulo, July 28, 2021.





PROGRAMA DE
ÉTICA
SISTEMA DE
INTEGRIDADE



ecorodovias

www.ecorodovias.com.br