



# **CODE OF CONDUCT OF SUPPLIERS**

**AND OTHER THIRD PARTIES**

***Dear Supplier,***

We are pleased to present Dexco's Supplier Code of Conduct ("Code"), which expressly sets forth the conduct that Dexco Group, consisting of Dexco S.A. and its subsidiaries (each, a "Company"), expects from its suppliers and service providers, and all persons and entities that may do business with the Company ("Supplier(s)"), in accordance with our Code of Conduct and Way of Being and Doing, as well as the laws and regulations of the Company.

With this Guide, the Company aims to reinforce good practices of ethics, integrity and sustainability throughout its production chain.

For the sake of our values and the continuity of our entire relationship chain, the Company encourages its Suppliers to adopt a management based on legal, social, environmental and ethical criteria.

Therefore, we ask you, Supplier, to read this Guide carefully and put it into practice. Remember that by supplying or providing services to the Company, the Supplier automatically agrees to be bound by the Commitment Agreement at the end of this Guide.



# 1. COMPLIANCE WITH LAWS AND CONTRACTS



Throughout the duration of the business relationship, the Supplier shall observe and comply with all applicable laws, the Company's internal policies and good market practices, including the requirements set forth in the anti-corruption legislation (Law No. 12.846/13 and Decree No. 11.129/2022). The Company strictly adheres to its legal obligations as reflected in its policies, internal rules and contracts, and deviations or omissions by its Suppliers are not permitted. The commercial proposal submitted by the Supplier shall include conditions to which it may be legally bound.

The Company encourages its suppliers to comply with the international treaties and conventions to which Brazil is a signatory and which are applicable to its operations, such as the United Nations (UN) Global Compact, the UN Universal Declaration of Human Rights and the laws of the International Labor Organization (ILO).

## 2. CONDUCT OF SUPPLIERS

Suppliers, their employees and subcontractors performing activities contracted with the Company, whether inside or outside the Company, must comply with the policies set forth herein and, where applicable, the requirements of our Code of Conduct, which is available on our website.

[Click here to access.](#)

### **Suppliers hired by the Company must also:**

- Act in accordance with applicable laws and comply with established standards and policies, processes and procedures;
- Apply quality criteria in hiring and retaining employees, providing them with the technical knowledge and appropriate conditions to perform their jobs properly;
- Provide clear and concise information, without misleading people or causing them harm;
- Do not use the Company's name, position or influence to obtain benefits for yourself or for relatives, friends or third parties;
- Not discriminate against people based on race, color, ethnicity, gender, political ideology, sexual orientation, religion, age or disability;
- Not adopt harmful or offensive conduct, whether verbal, physical or gestural;

- In the event of a delivery error or conduct that violates the Company's Code of Conduct, notify the appropriate Company personnel as soon as you become aware of the situation to mitigate the consequences and risks;
- Ensure the Company's facilities, resources, equipment and materials;
- Adopt the principles of conscious consumption and good sustainability practices, in addition to complying with the environmental and health and safety laws to which they are subject;
- Present its personnel in a full state of normality (without drunkenness, drug use, etc.), in addition to using, whenever necessary, the safety equipment appropriate to the role performed;
- Value the quality in the provision of services and/or products, with the diligence and commitment that the activity requires;
- Stay informed of market developments and obtain the certifications required to operate in them;
- Prevent and combat illegal or criminal activities (corruption, bribery, money laundering, fraud, etc.) in the conduct of its business. To this end, among other precautions, to know and comply with the Company's policies and practices related to the subject and applicable legislation, such as Law no. 12.846/13 and Decree no. 11.129/2022;
- Ensure decent, humane and appropriate conditions for its employees, subcontractors and anyone directly or indirectly involved in the provision of services or supplies to the Company, in compliance with applicable laws;
- Accept responsibility for defects or deficiencies in the delivery to the Company and commit to resolve these situations together with the Company.

# 3. SUPPLIER SUITABILITY AND TRANSPARENCY



The practice of the Company's Values is expected, not only from its own managers and employees, but also from the members of its production chain.

**It is therefore essential for the continuity of supply relationships that the Supplier:**

- Be committed to transparency, respect, loyalty, collaboration and honesty;
- Provide the Company with truthful and reliable information, especially with respect to fiscal, economic, legal, health, safety, environmental, quality, and other matters, and report to the Company any deviation that may affect the business relationship;
- Practice good faith, objectivity and assertiveness in all negotiations, without contradictions, delays or omissions, in order to promote speed and the best business scenario with the Company.

# 4. BUSINESS INTEGRITY AND ETHICS

The Company's supplier selection and maintenance criteria are based on the ethics and conduct history of these suppliers.

## **Fraud and corruption**

The Company does not tolerate any form of corruption, bribery, kickbacks, personal favoritism, fraud or any other form of illegal or criminal activity in its production chain, which may result not only in the immediate termination of the business relationship, but also in the adoption of appropriate administrative and judicial measures.

### **In accordance with the Anti-Corruption Law, it is prohibited to**

- a. Promise, offer or give, directly or indirectly, any undue advantage to any employee of the Company, any public official or any third party;
- b. Financing, encouraging, sponsoring or subsidizing the practice of illegal acts of corruption, including bribery, fraud and money laundering;
- c. Use an intermediary, individual or legal entity, to practice acts of corruption or fraud, in order to conceal or disguise real interests and advantages or the identity of the Company or a member thereof;



- d. Frustrate or interfere with procedures or contracts resulting from public tenders that affect their competitive nature, mainly by giving undue advantage to the bidder's representative while representing the Company;
- e. Fraudulently obtaining advantages or benefits under contracts entered into with the Public Administration, as well as operating licenses, public permits, etc., on behalf of the Company;
- f. Obstruct or interfere with the investigation or inspection activities of any governmental agency or entity.





The Company expects its Suppliers and other third parties in its relationship chain to act in compliance with applicable laws and implement practices to prevent and combat corruption in their businesses, such as the Integrity Program, as required by Federal Decree No. 11.129/2022.

Specifically, the Company has policies and procedures that provide guidance and diligence on this issue, in addition to the measures taken to prevent and combat corruption.

Access the topic “Policies” within the website:

<https://ri.dex.co/governanca-corporativa/acordo-de-acionistas-estatuto/>

The Company's Integrity Program Guide can be accessed on the Investor Relations website through the link

<https://www.dex.co/esg/etica/>

## **Gifts and presents**

The Company does not accept the offer or receipt of gifts, favors, discounts on personal transactions and/or other gratuities in exchange for personal favors, for oneself or for a third party, or for Dexco and/or for the purpose of influencing decisions.

If it does not involve any of the foregoing, the offer or receipt of gifts or gratuities may be accepted, provided that they meet all of the conditions set forth in the Company's internal standard, as well as prudence and common sense to avoid excesses that violate our policies and do not occur with unreasonable frequency.

In addition to employees, our Suppliers and third parties representing Dexco are strictly prohibited from promising, offering or accepting gifts and gratuities from public officials in the course of doing business with the Company.

## **Conflict of interest**

Any situations involving relationships between Suppliers and Company employees or officers, such as kinship and affinity relationships, must be reported to the appropriate Dexco manager as soon as they are identified so that they can be recorded and addressed, as appropriate.

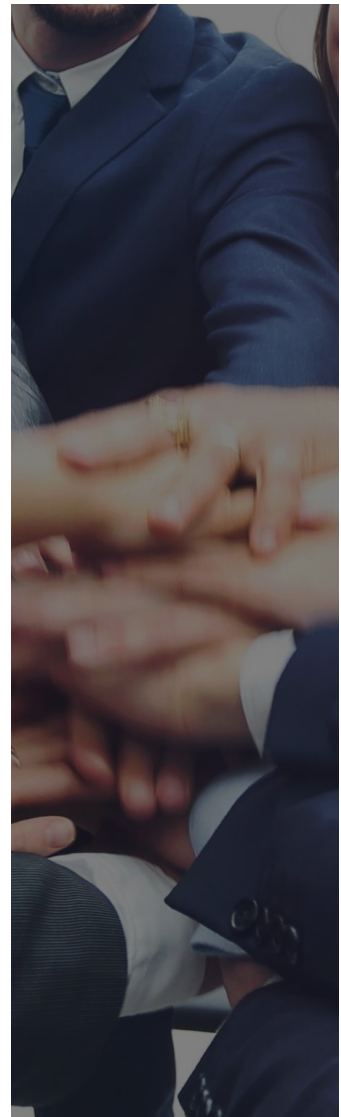
It is also important for the Supplier to declare whether its partners or even the employee who will represent the company before the Public Administration (if applicable) holds or has held, or has a family member or partner who holds or has held in the last 5 (years) years, public/political positions as members of the Executive, Legislative and Judicial branches (PEP condition), such as councilors, mayors, governors, ministers, judges, prosecutors, among others.

## **Bullying and sexual harassment**

The Company does not tolerate the practice of any form of moral or sexual harassment, sexual harassment, racism, discrimination, political or religious intolerance, or other abusive practices.

The Company expects its Suppliers and other third parties to also reject the practice of these acts and to conduct their activities in an ethical and respectful manner toward other parties and to promote a safe and healthy work environment for their employees.

**Below are definitions of some abusive behaviors that are not tolerated by Dexco and are provided by way of example only:**



- **Bullying** - Abusive and repetitive behavior designed to humiliate, intimidate, embarrass, threaten, or emotionally harm the victim in a professional setting.
- **Discrimination** - Act of excluding or degrading due to prejudice against a particular category, such as race, sexuality, gender, sexual orientation, appearance, physical condition, etc.
- **Sexual Harassment** - Embarrassing someone to gain advantage or sexual favoritism, taking advantage of the agent's position as hierarchical superior or privilege of the position, job or function.
- **Sexual Misconduct** - Practicing a sexual act against someone and without their consent libidinous act with the objective of satisfying one's own desire or that of a third party.



### **Anti-competitive behavior**

The Company operates in accordance with the rules of the market and defends and promotes free competition between companies, with the aim of obtaining products and services selected on the basis of fair criteria.

Practices that impede free competition among the Company's Suppliers, such as the fixing of prices or terms of sale among competitors (cartels), abuse of market or economic power, predatory pricing (dumping), private corruption, tie in sales, etc., are prohibited and subject to appropriate judicial or administrative action.

In addition, the Company expects its Suppliers to show mutual respect for the reputation and opinion of its competitors, without devaluing other products or services, thus ensuring the conditions for healthy competition with the Company.

## Use of name, image, trademarks and patents

The Supplier, as well as its employees, subcontractors or third parties, must act in a manner consistent with the Company's values and all of the policies described in this Guide when publishing in public media, including social networking sites.

Any reference by the Supplier to the Company's name, image, trademark, patent or other intellectual property must be approved in writing by the Company.

Suppliers are not authorized to speak on behalf of the Company, especially in public and on social networking sites, unless they have been hired to do so.



# 5. DATA PROTECTION AND INFORMATION CONFIDENTIALITY



Without limiting the list below, confidential and/or strategic information of the Company will be considered if it has not been previously disclosed to the public:

- Technical and commercial data;
- Business and marketing objectives, tactics and strategies;
- Personal data and sensitive personal data;
- Quotations;
- Short- and long-term planning;
- Purchasing conditions;
- Results;
- Statistical, financial, accounting and operational data;
- Commercial information entered into between the Company and the Supplier.

All confidential and/or strategic information of the Company remains the property of the Company and its use for private purposes or its disclosure by the Supplier without prior express authorization is prohibited. The use of this and other confidential information by the Supplier shall be strictly limited to the specific, formalized authorization.

Suppliers, service providers and their subcontractors must be aware of, respect and comply with the provisions of the Brazilian Personal Data Protection General Law (LGPD) and, whenever applicable, adopt the necessary precautions for the suitable processing of personal data, including those called sensitive, carried out on behalf of Dexco.

**Important:** If the supplier becomes aware of any attempt, occurrence or suspicion of any unauthorized, inappropriate, incompatible with Applicable Legislation and/or with the terms of its contractual relationship with Dexco processing of personal data and/or sensitive personal data, accidental or intentionally, you must notify Dexco immediately, in writing and by the DPO email ([dpo@dex.co](mailto:dpo@dex.co)), within a maximum period of 1 (one) business day, about such incident, presenting all known and available information on the date of notification, as well as carrying out all procedures that may be expressly requested by Dexco, to resolve the incident or provide information to third parties.

At the end of the business relationship, unless otherwise specified, the Supplier shall destroy or return all confidential information provided by the Company, as specified.



# 6. HUMAN RIGHTS

The Company is a signatory to the United Nations Global Compact and is committed to its ten principles, including supporting and respecting the protection of internationally recognized human rights and not engaging in practices that violate these rights.

The Company is committed to respecting and promoting human rights in its supply chain and in the communities in which it operates, including its Suppliers, subcontractors and other third parties.

## **The following conduct is encouraged by the Company:**

- Not tolerate any form of illegal or degrading labor (slave, forced, child labor, etc.) in its value chain, or non-compliance with labor laws;
- Do not allow excessive working hours, with overtime to be performed within the limits of the law and agreed upon by the parties;
- Remunerate employees appropriately, with equal pay for men and women, according to the minimum criteria established by law or by union category, with timely payments, in addition to other legal benefits;
- Maintain an environment that guarantees the basic conditions for the health and safety of the worker, as well as training and preventive measures against accidents and diseases, providing individual safety and physical protection equipment;
- Prohibit, reject and combat the exploitation of children and adolescents for sexual purposes;
- Collect payroll fees, social security contributions and taxes;
- Ensure the right of employees to join trade associations and unions and organize collectively in entities of their choice;
- Respect the hiring of employees with a minimum legal age of 16 (sixteen) years. The hiring of minors is accepted only as a young apprentice, according to current legislation. Unhealthy and dangerous activities are restricted to those over the age of 18 (eighteen), subject to legal health and safety requirements;
- Comply with the quota requirements determined by law;
- Respect differences in social class, gender, marital status, age, ethnicity, origin, sexual orientation, religious beliefs and practices, political or ideological positions.

*The Company will take all necessary legal, contractual, administrative and/or judicial measures against any supplier that tolerates any of the above illegal practices.*



# 7. HEALTH AND SAFETY

In any situation of risk, the physical integrity of the human person must be maintained. The Company has specific work safety standards that are mandatory for its employees, all visitors and Suppliers who are on the Company's premises. Failure to comply with these rules may result in the removal of individuals from the premises, which may affect the agreed upon service.

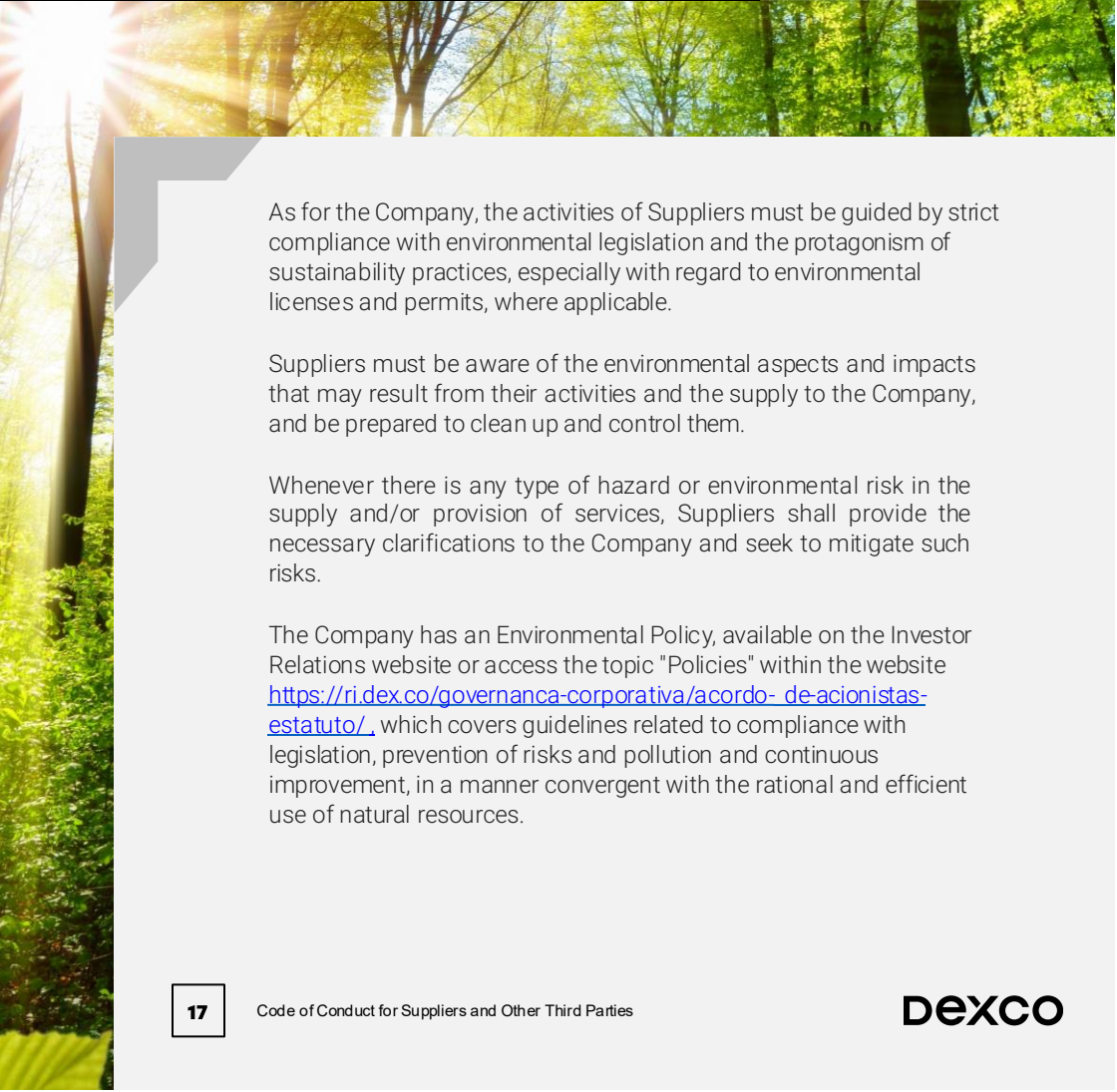
Therefore, the Supplier must instruct its personnel on the obligation to comply with the Company's safety standards, and Suppliers are hereby recommended to assume the obligation to apply health and safety standards in their own work environment.



Access the topic "Policies" on the website: [https://ri.dex.co/governanca-corporativa/acordo-de-acionistas-estatuto/\(Policies topic\)](https://ri.dex.co/governanca-corporativa/acordo-de-acionistas-estatuto/(Policies%20topic)), which includes guidelines and precautions adopted on the subject.



## 8. ENVIRONMENT



As for the Company, the activities of Suppliers must be guided by strict compliance with environmental legislation and the protagonism of sustainability practices, especially with regard to environmental licenses and permits, where applicable.

Suppliers must be aware of the environmental aspects and impacts that may result from their activities and the supply to the Company, and be prepared to clean up and control them.

Whenever there is any type of hazard or environmental risk in the supply and/or provision of services, Suppliers shall provide the necessary clarifications to the Company and seek to mitigate such risks.

The Company has an Environmental Policy, available on the Investor Relations website or access the topic "Policies" within the website <https://ri.dex.co/governanca-corporativa/acordo-de-acionistas-estatuto/>, which covers guidelines related to compliance with legislation, prevention of risks and pollution and continuous improvement, in a manner convergent with the rational and efficient use of natural resources.

**Thus, Suppliers will be required, among other obligations, to:**

- Have environmental licensing and other licenses When applicable (IBAMA, Civil Police, Federal Police, Army, etc.);
- Maintain water consumption within the limits established by law, as well as the disposal of effluents;
- Ensure that all waste generated by its activities is properly managed (identified, segregated and disposed of);
- Control their atmospheric emissions (particulate matter, greenhouse gases, and others) in accordance with applicable legislation as well as manage energy consumption.

## 9. REPORTING CHANNEL



The Company has a Reporting Channel available to the public to report situations that are inconsistent with the Code of Conduct and other policies, ethical deviations and/or non-compliance with criminal laws and practices.

When contacting the Channel, the person making the report may choose to identify themselves or make an anonymous report. Secrecy and confidentiality are guaranteed, and information is shared only with those responsible for the investigation. It should be noted that the person reporting making a report in good faith will be protected from retaliation.

**The Company's Reporting Channel can be accessed through the telephone 0800 55 75 77 or the [website https://www.canalconfidencial.com.br/dexco/](https://www.canalconfidencial.com.br/dexco/) (Service Channels Complaints >> Channel).**

For clarifications, suggestions, complaints about the Company's products and services, please contact Dexco Customer Service: 0800 011 7073 or [atendimento.sac@dex.co](mailto:atendimento.sac@dex.co)



## 10. FINAL PROVISIONS

Failure by the Supplier to comply with the provisions of this Guide may result in the suspension or termination of the business relationship and the application of judicial and/or administrative measures, as appropriate, without prejudice to the losses and damages incurred by the Company, and the acceptance of the conditions set forth herein is a prerequisite for the continuity of the relationship with the Supplier.

Suppliers may be invited to participate in lectures and training promoted by the Company on the topics covered in this Guide, whose participation is strongly encouraged.

This Guide is an integral and inseparable part of the Agreement and/or the applicable terms and conditions, as the case may be. Failure to comply with this Ethics Commitment Agreement may result in suspension or termination of our business relationship.

# 11. TERRITORIAL SCOPE

This Guide applies to all Suppliers to the Company's member companies, including their subsidiaries, controlled companies or affiliates, in all countries in which the Company operates.





# COMMITMENT AGREEMENT

I declare that I am aware of the contents of Dexco's Code of Conduct and agree to act and conduct my professional activities in accordance with the policies and ethical standards set forth herein.

In addition, I undertake to act in accordance with the following practices:

- Comply with applicable laws and regulations and act transparently, without influence or favor, promoting a corporate culture that values ethics and integrity;
- Not engage in acts of corruption, bribery, money laundering, fraud or other criminal activity involving private or public entities;
- Avoid conflicts of interest and promptly disclose any conflicts that may arise in the course of your business with Dexco;
- Establish and maintain a safe and healthy work environment, respecting human rights and applicable regulations;
- Maintain the confidentiality of information related to Dexco to which I have access in the course of performing my job, and prohibit the misuse, sharing or unauthorized disclosure of such information;
- Not engage in any form of moral or sexual harassment, discrimination or practices that may compromise the well-being and dignity of employees and other third parties with whom you work;
- Not engage in any suspected act of unlawful corruption on behalf of the Company or otherwise in the course of their relationship with the Company;
- If the Supplier's manager or representative, multiply the content of this Guide to employees who work with or for Dexco.

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**Full Name**

**Position held:**

**Dexco**

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