

## SUPPLIER CODE OF CONDUCT

AND OTHER THIRD PARTIES

#### Dear Supplier

We present to you the Supplier Code of Conduct of Dexco ("Guide"), which expressly establishes the conduct expected by the Dexco Group, composed of Dexco S.A. and its subsidiaries (each a "Company"), from their suppliers, service providers, and all individuals and entities that may interact with the Company ("Suppliers"), in accordance with our Code of Conduct and Way of Being and Doing, as well as established in the Company's legislation and rules.

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

In line with our values and the sustainability of our entire relationship chain, the Company encourages its Suppliers to adopt management based on legal, social, environmental, and ethical criteria.

Therefore, we kindly request that you, as a Supplier, carefully read this Guide and implement its principles. Please note that supplying goods or providing services to the Company implies the Supplier's automatic adherence to the Commitment Agreement at the end of this Guide.



# 1. COMPLIANCE WITH LEGISLATION AND CONTRACTS



Throughout the entire period of the business relationship, the Supplier must observe and comply with all current legislation, the Company's internal policies, and market best practices, which includes requirements stipulated in the Anti-Corruption legislation (Law No. 12,846/13 and Decree No. 11,129/2022). The Company strictly complies with its legal obligations, reflected in its policies, internal regulations, and contracts, and deviations or omissions by its Suppliers are not tolerated. The commercial proposal presented by the Supplier must encompass conditions to which they can legally bind themselves.

The Company encourages its Suppliers to align with international treaties and conventions, of which Brazil is a signatory, applicable in their field of operation, such as the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights by the UN, and the legislations of the International Labour Organization (ILO).

## 2. SUPPLIER CONDUCT



Suppliers, their employees, and subcontractors engaged in activities with the Company, whether within or outside of it, must adhere to the guidelines stated herein and comply, where applicable, with the requirements outlined in our Code of Conduct, available on our website or via the following link: https://shorturl.at/fgLW2

#### **Suppliers contracted by the Company should also:**

- Act in accordance with applicable laws and comply with established norms, policies, processes, and procedures;
- Implement quality criteria in hiring and maintaining employees, providing technical knowledge and adequate conditions for them to perform their activities properly;
- Provide clear and concise information without misleading individuals or causing them harm;
- Refrain from using the Company's name, position, or influence to gain benefits for oneself or for relatives, friends, or third parties;
- Avoid discriminating against individuals based on their race, color, ethnicity, gender, political ideologies, sexual orientation, religion, age, or disability;
- Refrain from engaging in harmful or offensive behavior, whether verbal, physical, or gestural;



- In cases of errors in the supply chain or conduct contrary to the Company's Code of Conduct, promptly inform the responsible party within the Company as soon as knowledge of the situation is acquired, mitigating the consequences and risks involved;
- Take care of the Company's facilities, resources, equipment, and materials;
- Adopt principles of conscious consumption and good sustainability practices, in addition to complying with environmental and health and safety legislations to which they are subject;
- Present personnel in a normal state (without intoxication, drug use, etc.), and always use the necessary safety equipment for the function being performed;
- Emphasize quality in the provision of services and/or products with the diligence and commitment required by the activity;
- Stay updated on advancements in their market and, whenever necessary, obtain the necessary certifications for the activity;
- Prevent and combat illegal or criminal acts (corruption, bribery, money laundering, fraud, etc.) in the execution of their activities. To do so, among other precautions, understand and comply with the Company's guidelines and practices related to the subject matter and applicable legislation, such as Law No. 12,846/13 and Decree No. 11,129/2022;
- Ensure dignified and adequate conditions for their employees, subcontractors, and any individuals directly or indirectly involved in services or supply with the Company, in compliance with applicable legislation;
- Assume responsibility to the Company for faults or defects in the supply chain, committing to resolve these situations in conjunction with the Company.

OR MILITIES.

# 3. SUPPLIER INTEGRITY AND TRANSPARENCY



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

Thus, for the continuity of supply relationships, it is essential that the Supplier:

- Be committed to transparency, respect, loyalty, collaboration, and honesty;
- Provide the Company with true and reliable information, especially regarding fiscal, economic, legal, health, safety, environmental, quality, among other aspects, reporting to the Company any deviation that impacts the business relationship;
- Act in good faith, objectivity, and decisiveness during all negotiations, without inconsistencies, delays, or omissions, aiming to promote promptness and the best negotiation outcome with the Company.



#### **Fraud and corruption**

The Company does not tolerate any form of corruption, bribery, kickbacks, personal favoritism, fraud, or other forms of illegal or criminal activities 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 legal measures.

#### In compliance with Anticorruption Law, it is prohibited:

- a. To promise, offer, or give, directly or indirectly, undue advantage to the Company's employees, public officials, or third parties;
- b. To finance, cover the costs of, sponsor, or subsidize the practice of illegal acts of corruption, including bribery, fraud, and money laundering;
- To use an intermediary, either a person or a legal entity, to engage in corrupt or fraudulent acts with the aim of concealing or disguising real interests and benefits or the identity of the Company or a person within it;

- d. Frustrate or impair procedures or contracts resulting from public tenders, impacting their competitive nature, especially by offering undue advantage to the bidder's agent while representing the Company;
- e. Fraudulently obtain advantages or benefits in contracts entered into with the Public Administration, as well as operating licenses, public authorizations, etc., in the name of the Company;
- f. Hinder or impair the activities of investigation or oversight by public bodies or entities.



The Company expects its Suppliers and other third parties within its relationship chain to comply with applicable legislation and implement corruption prevention and combat practices within their companies, such as the Integrity Program, as required by Federal Decree No. 11,129/2022.

The Company has policies and procedures that provide guidelines and precautions regarding this matter, in addition to actions taken for the prevention and combat of corruption.

To access the 'Policies' section, visit: <a href="https://ri.dex.co/en/corporate-governance/regulations-and-policies/">https://ri.dex.co/en/corporate-governance/regulations-and-policies/</a>

Furthermore, the Company's Integrity Program Guide can be accessed on the Investor Relations website via the following link: <a href="https://www.dex.co/en/esg/ethics-and-integrity/">https://www.dex.co/en/esg/ethics-and-integrity/</a>

#### Gifts and Presents

The Company does not accept the offering or receiving of gifts, courtesies, discounts on personal transactions, and/or any other gratuities in exchange for personal favors, either for oneself or for third parties, or for Dexco and/or with the purpose of influencing decisions.

If it does not involve any of the aforementioned characteristics, the offering or receiving of gifts or gratuities may be accepted, provided they meet all the conditions established in the Company's internal regulations. It should also be exercised with consideration and common sense to avoid excesses that contradict our guidelines and should not occur with unreasonable frequency.

Just like our employees, our Suppliers, and third parties representing Dexco are strictly prohibited from promising, offering, or receiving gifts and courtesies from public officials within the scope of the business relationship with the Company.



#### Conflict of Interests

Any situations involving a relationship between Suppliers and employees or administrators of the Company, such as family relationships or affinities, should be reported to the responsible manager at Dexco as soon as they are identified, to enable recording and appropriate handling, whenever relevant

Additionally, it is important for the Supplier to disclose whether its partners or even the employee representing the Company before the Public Administration (if applicable) have served, currently serve, or have had family members or partners in public/political positions in the last 5 (five) years, as members of the Executive, Legislative, and Judicial branches (politically exposed persons - PEP), such as council members, mayors, governors, ministers, judges, prosecutors, among others.

#### **Workplace and Sexual Harassment**

The Company does not tolerate any form of workplace bullying or sexual harassment, sexual misconduct, racism, discrimination, political or religious intolerance, and other abusive practices.

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

Below are definitions of some abusive behaviors not tolerated by Dexco, provided solely as examples:



- Workplace Harassment Abusive and repetitive behaviors aimed at humiliating, intimidating, embarrassing, threatening, or emotionally harming the victim in the professional environment.
- Discrimination The act of excluding or belittling someone based on prejudices against a specific category, such as race, sexuality, gender, sexual orientation, appearance, physical condition, among others.
- Sexual Harassment Coercing someone to obtain sexual advantage or favoritism, taking advantage of the agent's hierarchical position or the privilege of their position, job, or function.
- Sexual Assault- Engaging in a sexual act against someone without their consent, aiming to satisfy one's own desire or that of a third party."



#### **Unfair Competition**

The Company operates in compliance with market rules and advocates for and promotes free competition among companies, aiming to receive products and services selected through fair criteria.

Practices that prevent free competition among the Company's Suppliers are not allowed, such as fixing prices or sales conditions among competitors (cartel), abuse of market or economic power, predatory pricing practices (dumping), private corruption, tying arrangements, etc. Failure to comply may result in appropriate legal or administrative measures.

Furthermore, the Company expects its Suppliers to mutually respect the reputation and opinions of their competitors, refraining from disparaging others' products or services, ensuring conditions for healthy competition with the Company.



#### Use of Name, Image, Brand and Patents

The Supplier, along with its employees, subcontractors, or third parties, must act in public publications, including social media, respecting the values of the Company and all guidelines described in this Guide

Any reference by the Supplier to the name, image, trademark, patent, or any other intellectual property of the Company must be previously authorized in writing by the Company.

Suppliers are not authorized to speak on behalf of the Company, especially in the public domain and on social media, unless they have been specifically contracted for that purpose.



# **5.** DATA PROTECTION AND CONFIDENTIALITY OF INFORMATION



Without limitation to the list below, the following are considered confidential and/or strategic information of the Company, provided they have not been previously made available to the public:

- Technical and commercial data:
- Business objectives, tactics, and strategies;
- Budgets;
- Short and long-term plans;
- Purchase 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 shall remain its property, and its use for private purposes or transfer by the Supplier without prior express authorization is strictly prohibited. The use of this and other confidential information by the Supplier will be absolutely restricted to specific formalized authorization.

Suppliers, their subcontractors, and other third parties must be aware of and adhere to the guidelines of the General Data Protection Law (LGPD), and whenever applicable, take necessary precautions for the collection, storage, and handling of personal data.

At the conclusion of the business relationship, unless otherwise stipulated, the Supplier must destroy or return all confidential information provided by the Company, as instructed.



## 6. HUMAN RIGHTS

The Company is a signatory to the United Nations Global Compact – UN, and is committed to its ten principles, which include the support and respect for protecting internationally recognized human rights and the avoidance of any participation in violations of these rights.

Thus, the Company aims to preserve and promote human rights within its production chain and the communities in which it operates, including Suppliers, their subcontractors, and other third parties.

#### Conducts encouraged by the Company include:

- Do not tolerate any form of illegal or degrading labor (slave, forced, child, etc.) in its value chain, or any non-compliance with labor legislation;
- Do not allow excessive working hours, with overtime working limited to that provided for in the law and agreed between the parties, ensuring employees receive paid weekly rest;
- Compensate workers adequately, in accordance with the minimum criteria established by law or by the union category, with the payments made in a timely fashion, together with other legal benefits, and without salary deduction attributed to disciplinary issues;
- Maintain an environment that ensures basic health and safety conditions for workers, while carrying out training and other measures that prevent accidents and disease, and providing appropriate personal protective equipment;
- Prohibit, repudiate and combat the exploitation of children and adolescents for sexual purposes.
- Collect worker's benefits, social security contributions and taxes related to payroll;
- Guarantee the right of employees to join trade associations and unions and to organize collectively as part of the entities of their choice, without reprisal;
- Respect the hiring of workers of the minimum legal age (16 years). The hiring of
  minors is accepted only in the case of young apprentices, in keeping with current
  legislation. Unhealthy and dangerous activities are restricted to people over 18
  years of age, provided that the legal health and safety precepts are complied with;
- Promote the hiring of people with disabilities, in keeping with the terms, conditions and quotas specified under the law;
- Respect differences between social class, gender, marital status, age, ethnic origin, sexual orientation, religious beliefs and practices, and political or ideological position.

The Company will take all necessary legal, contractual, administrative, and/or judicial measures against the Supplier who may tolerate any of the illegal practices listed above.



## **7.** WORKPLACE SAFETY

Preserving the physical integrity of individuals is paramount in any situation of risk. The Company has specific workplace safety regulations that are mandatory for its employees, visitors, and Suppliers present on its premises. Failure to comply with these regulations may result in individuals being removed from the premises, potentially impacting the agreed-upon supply.

Therefore, the Supplier must instruct its personnel to comply with the Company's safety regulations. It is highly recommended that Suppliers commit to implementing health and safety standards within their own work environments



Access the 'Policies' section within the website: <a href="https://ri.dex.co/en/corporate-governance/regulations-and-policies/">https://ri.dex.co/en/corporate-governance/regulations-and-policies/</a> (Policies topic), which provides guidelines and adopted precautions on the subject.

### 8. Environment



Suppliers need to be aware of the potential environmental aspects and impacts resulting from their activities and the supply to the Company and be prepared for their mitigation and control.

Whenever there is any type of environmental hazard or risk in the supply and/or service provision, Suppliers should provide the necessary explanations to the Company, seeking to mitigate such risks.

The Company has an Environmental Policy available on the Investor Relations website or under the 'Policies' section within the website <a href="https://ri.dex.co/en/corporate-governance/regulations-and-policies/">https://ri.dex.co/en/corporate-governance/regulations-and-policies/</a>, covering guidelines related to compliance with legislation, risk prevention, pollution prevention, continuous improvement, in line with the rational and efficient use of natural resources

#### Thus, Suppliers will be required, among other obligations:

- To possess environmental licensing and other licenses when applicable (IBAMA, Civil Police, Federal Police, Army, etc.);
- To maintain water consumption within limits established by law, as well as proper effluent disposal;
- To ensure that all waste generated by their activities is properly managed (identified, segregated, and disposed of);
- To control their atmospheric emissions (particulate matter, greenhouse gases, and others) in accordance with applicable legislation.

## **9.** WHISTLEBLOWER CHANNEL



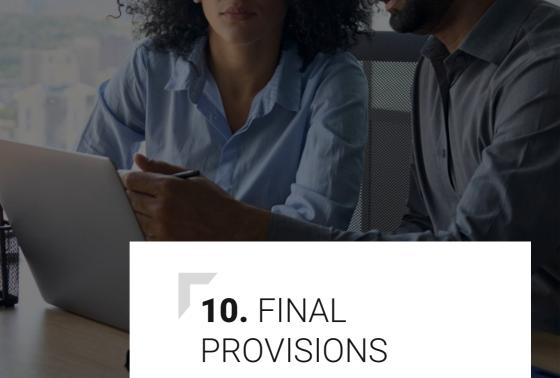
A public Whistleblower Channel is available for reporting situations that are not in line with the Code of Conduct and other policies, ethical deviations, and/or non-compliance with laws and criminal practices.

When contacting the Channel, the whistleblower can choose to identify themselves or make an anonymous report. Confidentiality and secrecy are guaranteed, and information will only be shared with those responsible for the investigation. It is emphasized that the good-faith whistleblower will be protected against retaliation.

The Company's Whistleblower Channel can be accessed via phone at 0800 55 75 77 or through the website <a href="https://www.canalconfidencial.com.br/dexco/">https://www.canalconfidencial.com.br/dexco/</a> (Service Channels >>

For inquiries, suggestions, or complaints about Company products and services, please contact: Dexco Customer Service: 0800 011 7073 or atendimento.sac@dex.co

Whistleblower Channel).



The Supplier's failure to comply with the provisions of this Guide may result in the suspension or termination of the commercial relationship and the application of judicial and/or administrative measures, as applicable, without prejudice to any losses and damages incurred by the Company. The adoption of the conditions outlined herein is a prerequisite for continuing the relationship with the Supplier.

Suppliers may be invited to attend lectures and training sessions organized by the Company on the topics covered in this Guide, and participation is strongly encouraged.

This Guide is an integral and inseparable part of the contract and/or the respective agreed-upon conditions and terms, as the case may be. Noncompliance with this Code of Ethics Commitment may lead to the suspension or termination of our commercial relationship.

## **11.** GEOGRAPHICAL SCOPE

This Guide applies to all Suppliers of the companies within the Company, including its subsidiaries, controlled or affiliated entities, in all countries where the Company operates.



### COMMITMENT AGREEMENT

I declare that I am aware of the content outlined in the Dexco Code of Conduct and commit myself to operate and conduct professional activities in accordance with the established ethical standards and quidelines herein.

Additionally, I commit to adhering to the following practices:

- Adherence to current legislation and transparent conduct, free from influences and exchanges of favors, fostering an organizational culture that values ethics and integrity;
- Avoidance of involvement in acts of corruption, bribery, money laundering, fraud, and other criminal practices, involving both private and public entities;
- Steering clear of conflicts of interest and promptly disclosing any conflicts that may arise in the course of business dealings with Dexco;
- Establishment and maintenance of a safe and healthy work environment, in compliance with human rights and applicable regulations;
- Maintenance of confidentiality regarding Dexco-related information obtained during the performance of duties, with strict prohibition against its misuse, sharing, or unauthorized disclosure:
- Refraining from engaging in any form of moral or sexual harassment, discrimination, or practices that compromise the well-being and dignity of employees and other third parties with whom I engage;
- Abstention from any suspicious activity or involvement in corrupt acts on behalf of the Company, or in any other capacity during the course of my relationship with the Company;

<ul> <li>If a manager or representative of the Suppli</li> </ul>	er, disseminating the content of this
Guide to employees involved in or working for	Dexco.

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 Full Name:	
Job Title:	



### Dexco

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