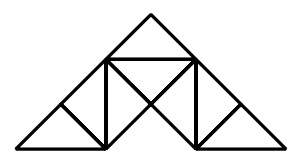


> CODE OF CONDUCT AND ETHICS >>

Our “way of working”



ALPARGATAS

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Hello!

At Alpargatas, or, as we like to call it, Alpa, our people are unique and we treat everyone, without distinction, with ethics and respect. Thus, we only relate to customers, partners and resellers who agree with and practice these same values!

This Code of Conduct and Ethics summarizes, in a simple way, our “way of working”. Furthermore, this document serves as a guide to empower each of us to make the right decision! And how do we know we are making the right decision? Simple! Just ask yourself the 5 questions below:

1 *Is it legal?*

2 *Does it comply with Alpa's rules and behaviors?*

3 *Would I like to be treated the same way?*

4 *Will it protect Alpa's reputation and my own?*

5 *Would I be comfortable discussing this action openly with my coworkers?*

If the answer is “YES” to ALL of these questions, go ahead! If you have doubts about any of them, think and rethink! Do not take actions that could affect you or Alpa. Always act according to the instructions in this Code.

Therefore, the guidelines that you will receive below must be well applied in your routine. Only this way, everyone will contribute to a fairer and ethical society.

We invite you to read this code very carefully, and, in this way, assume the commitment of following the guidelines contained herein.

Cheers,

Board of Directors

To whom this Code of Conduct and Ethics applies?

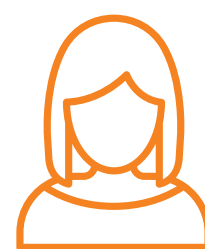
To all people who are in any way related to Alpa or its subsidiaries:



Alpa's Employees, regardless of position and function, including directors and officers.



Service providers, suppliers and customers.



Shareholders, stakeholders and subsidiaries must also fulfill the principles set out herein.



STAKEHOLDERS

Everyone who affects or is affected in any way by Alpa, and might be represented by companies, institutions, investors, groups, people etc.





Alpa's "way of working"

We act with responsibility, integrity, and ethics. We are driven by **sustainable growth, generating positive social, environmental, and economic impacts**. Our commitment is to always act with respect for people, the company, and society.

Respect for people

OUR PEOPLE

Our people are unique! Hence we **respect individuality and cultivate transparent relationships**, based on basic principles of ethics and integrity.

We do not discriminate and we do not accept any form of prejudice. We are all different, but we are part of the same team.

We support and encourage **diversity and inclusion**.

We respect all creeds and beliefs.

We do not tolerate any **harassment** or disrespect, or any practice of illegal actions in our work environment or outside it. Hence we expect this respect to be followed by our employees, partners, resellers, and shareholders.



HARASSMENT

Comprises a series of behaviors, practices or threats, repeated or not, that have as objective, result or can result in embarrassment, disturbance, violence or physical, psychological, sexual or economic damage to someone, for example, affecting their dignity or creating an intimidating environment. It can be moral or sexual and can be practiced by any means and by any person, regardless of hierarchical position.



RESPECT FOR PEOPLE

We do not admit child labor, involuntary, forced or slave labor, and we make sure that our partners act the same way.

We practice fair and safe working conditions, allowing the development of everyone at the same time. We only work with partners who also offer such conditions.

We have a light and uncomplicated way of being. When we celebrate something, the consumption of alcohol is allowed, but only at authorized parties and in moderation, and without forgetting the precautions to take when going back home.

We respect the privacy and **freedom of expression of our employees, as long as they do not affect Alpa's reputation or that of third parties.** All of us, inside and outside Alpa, must act with ethics and respect, therefore, violations of this nature may be interpreted as noncompliance with the rules of conduct of this Code, and will be subject to the penalties set out herein.

The **individual political statements** of our employees and partners are respected, since we guarantee everyone's freedom of expression. However, such statements do not represent Alpa. We do not carry out political activities and our decisions are free from political or ideological preferences. Any political activity carried out by our employees must take place outside the work environment and during working hours, without involving the name or Alpa's resources. Always keep in mind the importance of behaving ethically and with integrity, even outside Alpa.

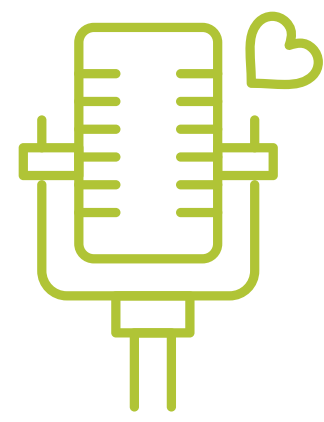
We allow love or kinship relationships between our employees, as long as there is no direct or indirect subordination or other situations that may generate **conflict of interests.** In order to maintain the independence of decisions, every employee who has this kind of relationship must refrain from giving opinions or attending meetings that might impact the professional life of the person with whom they have such relationship.



CONFLICT OF INTEREST

A conflict of interest occurs when an employee starts to act against Alpa, influenced by situations or personal or family activities, putting his or her interests above the company's. In these cases, the person's judgment and/or attitude may be distorted in favor of other interests, leading to inappropriate decisions.

OUR CLIENTS



We want to hear from you, who are at the center of everything. We welcome your suggestions and criticism to our performance, and we answer your questions with agility. Our communication channels are available to listen to you.



We deliver quality products, for very positive experiences with our brands, and are always produced in accordance with local law.



We invest in innovation to always deliver new products that meet our resellers' desires.



OUR PARTNERS AND RESELLERS

We want to be the best option for our partners and resellers.

We conduct our negotiation and contracting processes with third parties with **honesty, ethics, integrity, and impartiality**, thus contributing to the development of a sustainable chain.

Our relationship must be guided by **honesty, ethics, an adequate cost-benefit ratio**, technical and financial reliability, integrity in conducting the negotiation, always respecting the law, the environment, the social values of labor, and commercial, social, and contractual rights.

Gifts given by our partners or customers are allowed as long as they are according to our **Gifts Policy**, which is available on the corporation's website. And remember: a dinner, a trip, a concert ticket, participation in events, any other entertainment event or gift also fit into this Policy, ok?





RESPECT FOR PEOPLE

OUR SHAREHOLDERS AND INVESTORS

We are a public company listed on the Brazilian stock exchange, which increases our concern when providing more **transparency, honesty, and prudence in the information provided to the market.**

We are committed to delivering **consistent, sustainable results** with integrity.

We are held accountable in a timely and correct manner. Our reports, filings, communications and statements **reflect Alpa's reality with transparency, simplicity, accuracy and consistency.**

Our employees cannot negotiate securities, such as shares, based on relevant information that are not public, nor suggest investments to family members, friends or any interested party to obtain advantages in the securities market. If you have any questions, take a look at our Share Trading Policy.

Respect for the company

We conduct our business by stimulating **high performance**, innovation and agility, within a **meritocratic, fair and inclusive** work environment. We strongly protect our company, our brands, and our reputation, and we eliminate situations that can create conflicts of interest.

We take care of our business and treat all matters ethically and with integrity, thus maintaining the confidentiality of pertinent topics.

Everyone is free to disclose our products and actions, as long as they have already become public, in other words, we need to be careful regarding Alpa's confidential and strategic matters.



In Brazil, only the Officers are authorized to speak on behalf of Alpa. For this reason, you **must obtain prior approval to participate as a spokesperson or representative of Alpa in external actions.** Therefore, any request (for press, to participate in events - open or not to the general public -- debates, presentation of cases or any publication of articles or content) must be sent for prior authorization from your Officer and for analysis by the Corporate Communication area. Regarding our International subsidiaries, this communication must be made by the main local leader or whoever is designated for this function.

Alpa's organizational structure, as well as and its subsidiaries, is established based on the best interests of the respective companies and never on the personal interests of shareholders, officers or third parties. For that matter, we must follow and comply with our **Policy for Related Party Transactions.**

We allow our employees to work in other functions, as long as they **do not use Alpa's infrastructure or information,** do not conflict with Alpa's interests or working hours.



RELATED PARTIES

Related parties are entities, individuals or legal entities, characterized by having relevance in the management organization of a public corporation.



We will not use our position or business opportunities identified by Alpa to favor or benefit ourselves or third parties.

Alpa's interests come first. Personal interests shall never affect or influence business decisions. Read our Conflict of Interests Policy to get to know more about this theme.

Situations in which personal interests may conflict, or appear to conflict, with those of Alpa or our subsidiaries must be avoided. **When a conflict of interest happens, the case must be evaluated by the Ethics and Compliance Committee,** which will recommend how such conflict should be addressed. If the conflict involves any member of this Committee, he/she cannot vote to resolve the conflict.

In the event of being invited to join the Board or Committee of any company, **such invitation must be promptly communicated to your manager,** who will forward the subject for prior approval by the Alpa's Ethics and Compliance Committee. In case of non-approval, the Ethics and Compliance Committee will present its decision in a reasoned manner.

Any supply and/or provision of services to Alpa by a company owned by the employee or his or her **relative**, even if a minority stakeholder, or by a company of which the employee or his or her relative is a manager, is strictly forbidden. If it happens, it must be immediately reported to the Ethics and Compliance Committee in order to evaluate the existing conflict of interest, and the possibility of eliminating such prohibition by the majority vote of its members.

Our employees, as well as their relatives, cannot be owners or responsible for the administration of any franchises of our brands. You must share this restriction with them.

We care for and protect Alpa's assets from both physical and virtual threats. They must be used and preserved in an appropriate manner. We guarantee their protection against misuse, loss, theft or waste.



RELATIVES

We consider all ascendants, descendants, or collaterals of a family up to the 3rd degree, for example, parents, grandparents, uncles/aunts, siblings, sons/daughters, nephews/nieces and cousins, grandchildren, parents-in-law, siblings-in-law, stepparents and stepchildren.

We respect intellectual property, our own and that of third parties, as well as the security and privacy of personal data.

The use of email, internet, telephones and other means of communication **must be carried out in a professional and polite manner**. While we understand the need to use these tools for personal purposes, they must not be used excessively or in ways that interfere with or hinder our work.

In investigative processes of non-compliance with the Code of Conduct and Ethics, corporate emails and the content of any equipment owned by Alpa (desktops, notebooks, cell phones, etc.) may be monitored to make sure they are being used in an appropriate way, without exposing Alpa to any risk and according to applicable law.

We must always negotiate. Our commitment is to deliver the result. We only do not negotiate ethics and integrity!

It is never too much to remind that everyone who has access to privileged information, that is, information that is not public and belongs to Alpa, must keep it confidential, even in the event of leaving our team. **The use of privileged information, that is, data that belongs to Alpa, for personal benefit or for the benefit of third parties is a crime** and is subject to labor, civil and criminal sanctions.

We guarantee the independence of our risk management, compliance and auditing processes in the preservation of Alpa's interests.



Respect for the society

We comply with the local applicable law, and we believe that the continuous living of values and ethical principles that inspire our policies and practices impregnates Alpa's performance as a whole. Therefore, we must always follow its internal policies and rules, which can be consulted at <https://www.alpargatas.com.br/#/principios-de-conduta>

In no way we offend the competence or other characteristics of our competitors. We are in favor of free competition and work to improve ourselves, day after day.

We do not accept, condone or authorize any form of **corruption**, favoritism, extortion, undue advantage or **bribery**.

We relate with authorities and public agents, and in these relations we maintain our **ethics, professionalism, and transparency**. Any pressure or request that does not correspond to these values must be immediately refused and reported to the Compliance Department. **Take a look at our Policy of Relationship with Public Agents** if you have any questions in this matter.



BRIBERY X CORRUPTION

Corruption is the act of promising, offering or giving, directly or indirectly, an advantage to a public agent, or to a third person related to him (it does not necessarily have to be money) in exchange for something, which is not always money either. This is a criminal activity, even when the person is an accomplice or authorizes acts of corruption. Bribery involves acts that are very similar to corruption, but may involve private individuals and, even though in some countries it is not considered a criminal practice, it will not be tolerated at Alpa!

We are always attentive and in compliance with the **communities in which our units are installed**, respecting people, their traditions, their principles and the environment.

We adopt practices aimed at **mitigating the environmental impacts** of our business and operations.

We also collaborate through the **Alpargatas Institute**, which uses its own funds and those of third parties, in educational, social and cultural projects to assist children, teenagers and young adults. Furthermore, we support and carry out professionalization and apprenticeship programs for young people to **reduce social inequalities**.



We contribute, by means of sponsorships, donations, among other initiatives, always by the Alpargatas Institute, to Non-Governmental Organizations (NGOs), Civil Society Organizations of Public Interest (OSCIPs), philanthropic and assistance entities and other similar associations. This contribution only occurs if it complies with the applicable legislation and is in line with our guidelines and our “way of working”.



Alpa is a member of the **United Nations Global Compact** and its ten principles associated with the protection of human rights, labor, the environment and anti-corruption are reflected in the conduct guidelines of this Code.

PRINCIPLES OF THE UN GLOBAL COMPACT:

- 1** Businesses should support and respect the protection of internationally recognized human rights.
- 2** Ensure that they do not participate in violations of these rights.
- 3** Businesses should support freedom of association and the effective recognition of the right to collective bargaining.
- 4** The elimination of all manners of forced or compulsory labor.
- 5** The effective abolition of child labor.
- 6** The elimination of discrimination in employment.
- 7** Businesses should support a precautionary approach to environmental challenges.
- 8** Develop initiatives to promote greater environmental responsibility.
- 9** Encourage the development and diffusion of environmentally friendly technologies.
- 10** Businesses should combat corruption in all its forms, including extortion and bribery.

Sanctions for violations of the Alpa's Code of Conduct and Ethics

Violations of the Alpa's Code of Conduct and Ethics and its policies can have serious consequences for the company and for us. Therefore, all misconducts will be analyzed and the sanctions for an employee **may vary from a verbal or written warning to dismissal**, with or without justified grounds, depending on the seriousness of the situation and on the local law.

In the case of third parties with whom Alpa has a relationship, such as franchisees and their teams, suppliers, service providers, customers, consumers, among others, such violations will be considered **contractual breaches**, and will be subject to termination of the respective agreement. Thus, all sanctions will depend on the type of violation, according to the local law and with the objective of sharing our commitment with the respect, ethics, and integrity of the relationships.





Communication and Reporting

Each one of us, employees, officers, partners, customers, resellers, shareholders, or whoever is in any way related to Alpa, has the obligation to **ensure compliance with this Code of Conduct and Ethics.**

If you have any questions about the interpretation of this Code, or of any other Alpa's policy or guideline, **you have some options:**



Contact your unit's Compliance team or Compliance Ambassador;



Talk to your manager or the People team;



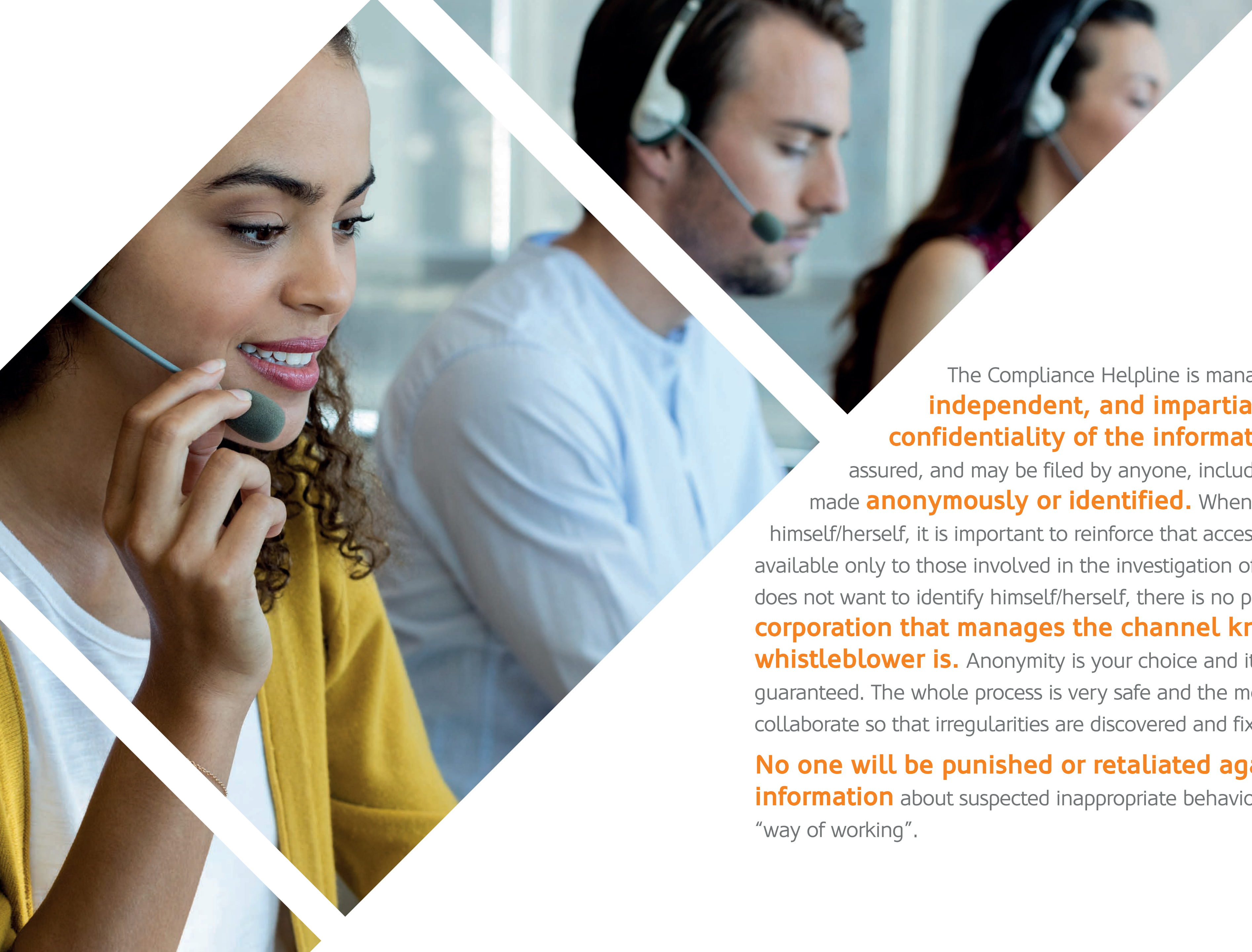
Send your question to compliance@alpargatas.com.

Don't hesitate to ask!

Keeping an open and safe communication channel is part of our “way of working”.

If you get to know or suspect a violation of any of the themes laid out in this Code of Conduct and Ethics, we have a specific channel for receiving reports. Report it! The **Compliance Helpline** can be accessed at **0800 770 7791** (Brazil only) or via website, at **www.compliancehelplinealpargatas.com**





The Compliance Helpline is managed by an internationally renowned, **independent, and impartial service provider, and the confidentiality of the information** and of the reports received is assured, and may be filed by anyone, including third parties. Such reports can be made **anonymously or identified**. When the whistleblower wants to identify himself/herself, it is important to reinforce that access to his/her identity is restricted and available only to those involved in the investigation of the facts. When the whistleblower does not want to identify himself/herself, there is no problem. **Neither Alpa nor the corporation that manages the channel know who the anonymous whistleblower is.** Anonymity is your choice and it will be fully protected and guaranteed. The whole process is very safe and the most important thing is that we collaborate so that irregularities are discovered and fixed.

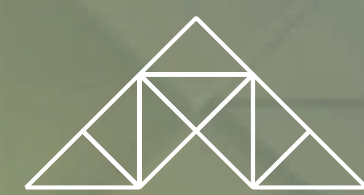
No one will be punished or retaliated against for good faith information about suspected inappropriate behavior or behavior that is contrary to our “way of working”.

Commitment

All those who relate to Alpa are committed to **complying with, disseminating and guaranteeing the application of this Code of Conduct and Ethics.**

All officers, directors, and employees upon joining the Corporation declare that they are aware of and agree with this Code of Conduct and Ethics.

This Alpa's Code of Conduct and Ethics was prepared by the Compliance Department, with the support and suggestions from the Ethics and Compliance Committee and the Audit Committee, and was approved by the Board of Directors on December 3rd 2021.



ALPARGATAS