

CODE OF CONDUCT

FOR SUPPLIERS, SERVICE
PROVIDERS AND BUSINESS
PARTNERS



RODOLIDER
transportes

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1. INTRODUCTION AND PURPOSE

This Code of Conduct sets forth the values, principles, and standards of conduct that Rodolider Transportes expects from all its suppliers, service providers, subcontractors, and business partners (hereinafter referred to simply as "Partner Suppliers").

We are committed to conducting business with ethics, integrity, and in strict compliance with all applicable laws and regulations. We expect our Partner Suppliers to share this commitment by adopting best practices in all their operations. Adherence to this Code is a fundamental requirement for establishing and maintaining any business relationship with Rodolider Transportes.

2. COMPLIANCE WITH LAWS AND REGULATIONS

Partner Suppliers must be familiar with and strictly comply with all laws, regulations, standards, and guidelines applicable to their activities and business operations in all jurisdictions where they operate. This includes, but is not limited to:

- Labor and Social Security Laws: wages, working hours, employment conditions, and workers' rights.
- Tax Laws: tax obligations and accounting obligations.
- Environmental Laws: environmental protection and the use of natural resources.
- Data Protection: data privacy regulations (LGPD).
- Other Legislation: any other laws and regulations pertinent to its operations such as safety and quality standards applicable to its industry.

3. BUSINESS INTEGRITY AND THE FIGHT AGAINST CORRUPTION

Rodolider Transportes has a zero-tolerance policy toward any form of corruption, bribery, or fraud. Partner Suppliers must conduct their business with the utmost integrity and transparency.

- Prohibition of Illegal Acts: It is prohibited to offer, promise, give, authorize, or accept bribes, kickbacks, improper payments, gifts of excessive value, any undue advantage, directly or indirectly, to any person (including public officials, Rodolider Transportes employees, or third parties) with the aim of influencing decisions, obtaining undue advantages, or in exchange for any personal or business benefit.

NOTE: Only institutional gifts of low or no commercial value are permitted (or "nominal value"), such as office supplies (planners, pens, calendars) and promotional items (caps, books, glasses, mugs, etc.).

Combating Corruption, Fraud and Money Laundering: Suppliers and Partners must actively engage in implementing internal mechanisms to combat corruption, fraud, money laundering, cartel formation, unfair competition, and other illegal acts against public administration, whether public or private.

- Gifts, Entertainment, and Hospitality:
 - o They must be of nominal value, infrequent, and granted solely for legitimate commercial purposes.



- o They must never intend to influence decisions, obtain undue advantages or create obligations.
- o It is prohibited to offer or accept gifts in the form of cash or cash equivalents (e.g., gift cards, personal discounts).
- o It is prohibited to offer or receive gifts, entertainment or hospitality to public officials for the purpose of obtaining an advantage or consideration.
- Conflict of Interest: Partner Suppliers must identify, avoid, and immediately disclose to Rodolider Transportes any actual or potential conflict of interest that may arise in their interactions.
- Accurate Records: Maintain accurate, complete, and transparent accounting and financial records that faithfully reflect all transactions, in accordance with applicable standards. False, incorrect, or incomplete entries are not permitted..

4. RESPECT FOR HUMAN RIGHTS AND WORKING CONDITIONS

Rodolider Transportes expects its Partner Suppliers to treat all individuals with dignity and respect, promoting a fair, safe, and inclusive work environment.

- Basic Human Rights: Respect the basic human rights of all employees, as recognized internationally.
- Health and Safety: Take full responsibility for the health and safety of its employees. Provide and maintain a safe and healthy work environment, in compliance with occupational safety and health laws and regulations.
- Prohibition of Slave and Child Labor: The exploitation of labor in any form (forced labor, degrading labor, or labor analogous to slavery), as well as the use of child labor, is strictly prohibited. Partner Suppliers must ensure that their operations and supply chain are free of these practices.
- Non-Discrimination and Diversity: To provide a workplace free from any form of discrimination (based on race, color, sex, age, sexual orientation, ethnicity, disability, religion, nationality, among others) and harassment (moral, sexual, verbal, physical, or psychological). To promote diversity and ensure equitable treatment for all.
- Fair Employment Conditions: Ensure fair compensation in accordance with applicable laws, including benefits and overtime pay. Work hours must comply with legal limits and provide adequate rest periods.
- Freedom of Association: respect the right of its employees to join legally recognized labor organizations without retaliation or intimidation.

5. ENVIRONMENTAL PROTECTION AND SUSTAINABILITY

Rodolider Transportes is committed to protecting the environment and expects its Partner Suppliers to share this responsibility.



- Environmental Compliance: acting in accordance with applicable local, national, and international standards regarding environmental protection, and obtaining and maintaining all necessary permits and authorizations.
- Resource Management: Implement measures to reduce resource consumption (water, energy, raw materials), as well as waste generation and emissions.
- Sustainable Practices: encouraging practices that contribute to sustainability, the circular economy, and the protection of biodiversity in its operations.

6. ASSETS, INFORMATION, AND DATA PROTECTION

Partner Suppliers must protect Rodolider Transportes' assets and information, as well as ensure data security and privacy.

- Asset Protection: protecting physical and digital assets of Rodolider Transportes against theft, loss, misuse, damage, or unauthorized access. Rodolider Transportes' assets must be used exclusively for agreed-upon commercial purposes.
- Confidentiality: Treat all information (including intellectual property, trade secrets, financial data, and product and customer information) belonging to RODOLÍDER or its customers to which you have access as strictly confidential. Such information must not be disclosed, used, or transferred to third parties without express authorization, even after the termination of the business relationship.
- Data and Privacy Protection: access, use, storage and disposal of personal data must be carried out in a secure manner, using appropriate technical and organizational measures to prevent leaks, unauthorized access, or any type of breach.

7. SUPPLY CHAIN MANAGEMENT

Partner Suppliers have the responsibility to promote the principles of this Code in their own supply chains.

- Extended Responsibility: Ensure that your subcontractors, suppliers, and business partners also understand and comply with the requirements of this Code and applicable laws. This includes conducting due diligence to identify and mitigate compliance, ethical, and sustainability risks in its own supply chain.

8. DUE DILIGENCE, MONITORING AND AUDITS

Rodolider Transportes expects full cooperation from Partner Suppliers in processes of due diligence and monitoring.

- Cooperation: fully cooperate with the requests of Rodolider Transportes for the performance of due diligence, audits (including compliance and performance audits), and the provision of data, information, and certifications related to compliance with this Code and applicable laws.
- Update of Information: keep your registration information up to date, promptly reporting any relevant changes in your health or operational status.





9. COMMUNICATION, QUESTIONS, AND REPORTING CHANNELS

It is essential that everyone involved understands and follows this Code.

- **Internal Dissemination:** Suppliers Partners are responsible for communicating the guidelines of this Code to all their employees, representatives, and partners who, in any way, provide services or interact with Rodolider Transportes.
- **Questions:** Please contact your local contact person at Rodolider Transportes or the Compliance Department if you have any questions regarding the application of this Code.
- **Ethics Channel:** any suspicion or knowledge of a violation of this Code or applicable laws and regulations, or applicable laws and regulations, must be reported through our Whistleblower Channel. This channel guarantees the confidentiality and, if desired, the anonymity of the whistleblower, as well as protection against retaliation.

Rodolider Transportes values an environment open to suggestions, opportunities for improvement and problem resolution.

- o **Website:** <https://rodolider.com>
- o **Phone:** 0800 517 1300
- o **E-mail:** compliance@rodolider.com

10. VIOLATIONS AND CONSEQUENCES

Failure to comply with the guidelines established in this Code will be treated seriously and may result in serious consequences.

- **Investigation:** all allegations and suspicions of violations will be investigated in an impartial and transparent manner.
- **Applicable Measures:** Rodolider Transportes reserves the right to apply the measures it deems appropriate in the event of non-compliance, including, but not limited to:
 - o Requirement for corrective action plans.
 - o Immediate suspension of contractual operations during the investigation.
 - o Application of contractual penalties.
 - o Termination of the contract and of the business relationship, without prejudice to other applicable legal actions.