

# CODE OF CONDUCT

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**RODOLIDER**  
transportes

# Message from the Board

The Code of Conduct GRANLIDER TRANSPORTES / RODOLIDER TRANSPORTES, hereinafter referred to as "RODOLIDER", summarizes our business culture and guides our daily actions in the development of our company. It serves to guide our actions and our attitude of integrity towards the audiences with which we interact: suppliers, partners, customers and the community.

This is not an exhaustive description of everything we do, but rather a set of guidelines that points to the direction we intend to follow. It seeks to reduce the subjectivity of personal interpretations of moral and ethical principles, while also strengthening the Company's image and that of its people, considering that ethics and transparency must be valued with the same emphasis as economic success.

Rodolider is a solid and reputable company providing road freight transport services, operating throughout the national territory.

The company was established in 1996, through a partnership formed between the brothers José Paulo Smozinski and Mauro Renato Smozinski, both with a strong connection to road freight transport since their youth, influenced by their father Miecislau Smozinski's work in the same field.

Rodolider is committed to the highest standards of ethical conduct, which are reflected in this Code of Conduct ("Code"), and requires the same commitment from any other entities or people with whom we maintain relationships, whether internal or external.

Rodolider's image and brand must be built and preserved daily by all employees and third parties as our most important asset. Any individual or collective action or attitude that compromises the reputation and credibility of this image will be considered a serious violation and will result in measures compatible with the severity of the violation.

It is essential that all of us - employees, clients, shareholders, business partners and suppliers - bear in mind that we must refrain from any conduct that may cause harm or put Rodolider's reputation at risk. Ethical conduct is part of our daily behavior, and beyond "acting fairly", we must all "combat, set an example and prevent unethical acts from being committed or repeated around us". The Code of Conduct is therefore a guide to action and a reference for our decisions, from the most routine to the most important. Its provisions indicate the standards expected in professional practice and in our day-to-day activities. We all have the duty to know it, comply with it and contribute to its implementation.

We are counting on you!



## **Board of Directors RODOLIDER**

*Mauro Smozinski – President*

*José Paulo Smozinski – President*

*Gustavo Smozinski - Director*

*Rafael Smozinski - Director*

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# Preamble

The scope, objectives and basic principles that govern the code of conduct at Rodolider are presented below.

## 1.1. Scope

The "Rodolider" Code of Conduct applies to all employees of this organization, regardless of hierarchical level, including temporary employees, interns, young apprentices, partners and service providers. It guides the integrity principles to be observed in internal and external relationships, including those with our clients, suppliers, other partners and related parties.

Commitment to these parameters is essential to ensure that everyone is aligned with the same objective and, first and foremost, reflects each person's commitment and responsibility in defending the interests of this organization.

## 1.2. Objectives

Be used, formally and institutionally, as a guide to the personal and professional conduct of all partners and employees of Rodolider, regardless of the position they hold, in order to become a standard of internal relationships and with our public that surrounds us: customers, partners, suppliers, service providers, competitors, society and communities.

We thus have a document that seeks to build constant transparency in our attitudes, based on respect and trust.

## 1.3. Core Principles

The principles that govern this "Rodolider" Code of Conduct are directly linked to our values, mission and vision:



### Mission

To serve our customers with the highest standards of quality and safety, with an unwavering focus on our activities, adding value to our services and the customer's product.



### Vision

To be a leader in management, quality, and productivity, ensuring satisfactory results for all partners involved.



### Values

Respect  
Valuing people  
Honesty  
Trust  
Ethics  
Transparency  
Humility  
Innovation  
Operational Excellence.

# Compliance with legislation and combating corruption

Rodolider's objective is to manage the Company based on the quality of its services and sound business principles. The Company does not support any effort to influence or harm competition through bribery and rejects any form of corruption or conduct that undermines fair business practices.

At Rodolider, all its employees and third parties are subject to effective observation and compliance with current legislation and regulations, which apply to their activities. Furthermore, employees must comply with internal standards, when applicable in a given situation.

The company actively promotes compliance with all local, state, federal and international laws applicable to its business. Any violation of law, rule or regulation will result in penalties for those responsible, with severity depending on the degree of violation.

All employees, representatives, partners and executives of Rodolider must be committed to the principle of legality and will act to prevent the Company from engaging in any illegal act or activity or with any external agent, public or private, who appears to be using the Company to carry out an illegal act or activity. Suspicions in this regard must be immediately reported by the Reporting Channel (<https://www.contatoseguro.com.br/rodolider>).

## 2.1. Anti-Corruption

Rodolider adopts an Integrity Program aligned with the parameters of Law 12,846/13 and Decree 11,129/22, based on pillars such as: the commitment of senior management, risk analysis and management, communication and training actions, regulatory instruments and continuous control and monitoring mechanisms.

Financial, accounting, administrative, personnel and other relevant management information must be prepared, recorded and disclosed with integrity, accuracy, impartiality and clarity, based on applicable legislation, tax rules and internal rules of Rodolider. Records must always be based on true information, extracted from legitimate documentation.

## 2.2. Anti-Money Laundering

Rodolider is aware of Law 12,683/12 on money laundering, which addresses the concealment of resources arising from illicit activities or concealment of the nature, origin, location, disposition, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.

The financial market is widely used to commit money laundering crimes. To prevent such actions, Rodolider is aware that it must communicate to the Financial Activities Control Council - COAF, by electronic means, in all cases in which payment is received in cash above the threshold established by the aforementioned Law and its updates.

## 2.3. Financial and Accounting Records

The company always ensures that documents and accounting records, created by it or under its responsibility, are complete, accurate, honestly reflect each transaction or expense and are generated in a timely manner and in accordance with applicable accounting rules and standards. Furthermore, Rodolider collects all taxes due from the public coffers, not admitting any kind of artifice with the aim of evading amounts owed to the Tax Authorities or public administration bodies.

Fraud of any nature is prohibited, including facilitation/extortion payments.

These actions aim to comply with Rodolider regulatory requirements and maintain transparency and trust in the financial market, supported by independent systematic auditing.

The Company will maintain document and record retention standards and schedules (Retention Policy). Exceptions to this Policy may be decided by the Ethics Committee, in legitimate and legal circumstances.

# Workplace Conduct

Rodolider treats everyone with dignity and provides a work environment that supports professional and personal growth, while respecting diversity. In this sense, this Code of Conduct establishes guidelines for healthy relationships among employees, managers, directors, partners, service providers, suppliers and clients.

Coexistence in the work environment must be based on the ethical conduct of everyone, employees, service providers, suppliers, customers and partners, regardless of hierarchical position. The company considers that transparency in relationships is a fundamental issue to build an environment of mutual trust and social responsibility.

## 3.1. Employment Opportunities and Work Environment

Rodolider offers equal employment opportunities to everyone who is part of the Company. We are committed to Human Resources policies grounded in fairness, transparency, impartiality and professionalism, including initiatives that support the qualification and advancement of women.

The recruitment and selection processes are transparent and free from any external influence. It is important to highlight that everyone must go through the selection process in a fair and equal manner.

The company values teamwork and does not accept conduct that creates a hostile, intimidating or offensive work environment; any attitude that constitutes an offense to morals and physical integrity, such as moral and sexual harassment, prejudice, discrimination, or any other behavior that does not comply with the guidelines of this Code of Conduct, will result in penalties, with severity depending on the degree of violation.



## Managers have the role of acting as an example and encouragement to their team, to always act in accordance with ethics and integrity.

Therefore, in line with a good work environment, all professionals Rodolider must:

- Act with probity, good faith and professional ethics, employing the appropriate care and diligence of a professional in its activities, in relation to internal and external customers.
- Carry out your activities responsibly, seeking the best result for the Company and placing professional integrity and the interests of internal and external clients above personal interests;
- Practice and encourage others to act ethically, always protecting Rodolider's business and the professionals connected to it;
- Ensure the application of preventive and risk mitigation measures, including measures against fraud, corruption and prevention of money laundering and terrorist financing.

Preserving the health and physical integrity of employees and promoting quality of life in the workplace is a fundamental premise for the development of Rodolider's activities. Therefore, we support all international standards and codes relating to human rights, including the Universal Declaration of Human Rights.

### 3.2. Conflict of Interest

A conflict of interest occurs when an employee uses their influence or commits acts to benefit particular interests. It also occurs when taking on parallel activities, generating conflict in the employee/company relationship. In this sense, it is considered a conflict of interest when an employee, a third party related to him or a partner of the company is in a position in which he can benefit, unduly, from the result of his relationship with Rodolider, whether through commercial deals with suppliers or customers, or even in hiring personnel, such as:

- Close relatives - parents, spouse, children, siblings, grandchildren, grandparents, brothers-in-law and first cousins - in the hierarchical reporting line.
- Relatives in decision-making power in public bodies.
- Relatives with decision-making power working in companies that have some relationship with Rodolider.
- Personal relationship with a client or competitor.

We respect the personal and family relationships that connect our employees. We highlight that relatives of our employees can be hired for vacancies at Rodolider, as long as there are no direct or indirect subordination relationships.

Employees must not work in parallel activities that are in conflict with the company's activity, of a nature equivalent to that carried out in the company or that the period of parallel work compromises working hours, fair intra-day rest and the professional performance for which they were hired. Directors, partners and other leaders must not exercise their authority for their own benefit or that of third parties, a position that must be repeated by all levels of management at Rodolider.

If an employee, representative, partner or executive of Rodolider has family, emotional or commercial relationships with any of our customers or suppliers, or employees, representatives, partners or executives of our customers or suppliers, such relationships must be immediately reported to the Ethics Committee. It will be up to the Committee to assess the situation, prioritizing the guarantee of the absence of any interference between that professional and the client or supplier with whom they have family, emotional or commercial relationships.

It is important to highlight that having a conflict of interest does not necessarily represent a violation of this Code of Conduct, as long as the case is notified in advance. Therefore, in a situation of conflict of interest, the employee must communicate the case to their superior or to the Ethics Committee (to resolve the situation in a fair and transparent manner. [comitedetica@rodolider.com](mailto:comitedetica@rodolider.com)),

### **3.3. Privileged, Strategic and Confidential Information**

Rodolider does not accept that employees, executives or partners obtain any personal benefit arising from the privilege of information or advantage obtained in a work situation.

Documents, contracts, financial and accounting records, reports of any nature, projects, opinion and market research, commercial plans and information management programs are examples of company property and cannot be used outside the company or disclosed without prior and clear authorization.

Each employee, company partner, service provider or supplier must ensure that information owned by Rodolider, which is not in the public domain, is properly protected and cannot be accessed by unauthorized personnel or used for hidden purposes, committing to the aspects of conflict of interest already mentioned.

Everyone is, therefore, responsible for the safe and accurate information contained in the records and documentation that enable the confederation's activities and must ensure the correctness and adequacy of the data, maintaining and safeguarding it in accordance with the established procedures, in accordance with Law 13,709/18, known as the General Personal Data Protection Law – LGPD.

Rodolider is equally committed to preserving privileged, strategic and confidential information from third parties. All our employees, representatives, partners or executives must refrain from accessing, without authorization or legal support, any privileged, strategic and/or confidential information from third parties, including our competitors, customers and suppliers. If, even without their initiative or through an act attributable to another, any of our employees, representatives, partners or executives has access to privileged, strategic and/or confidential information from third parties, they must immediately inform the Company's Legal Department and/or the Ethics Committee, who will analyze the situation and take the appropriate measures. In such a situation, the employee, representative, partner or executive must refrain from sharing said information with any other person.

### **3.4. Intellectual Property**

Rodolider respects intellectual property rights and, in this sense, employees must safeguard the ideas, programs, plans and projects conceived by the company or developed by employees when and during the period of their professional relationship.

The programs, plans and projects developed during the employee's working time are the property of Rodolider. Such material may only be removed or disclosed when carrying out professional duties on behalf of Rodolider and returned to its files.

### **3.5. Company Assets**

All employees and service providers are responsible for the use, maintenance and protection of the company's assets, facilities and equipment. Managers are responsible for establishing and communicating to their employees the policies and procedures necessary for the adequate preservation of the company's material and physical resources. No employee or service provider may appropriate the company's assets or resources, nor use them for their own benefits. The use of electronic equipment, resources and means - electronic mail, internet, etc. - Rodolider must occur only for the exclusive purposes of the company's activity.

### 3.6. Use of Electronic Information Systems and Data Protection

Electronic communication resources and equipment are company assets for exclusive use in its activities. Rodolider reserves the right to control and monitor any transactions and Internet access of all equipment interconnected to its information technology system.

All company information that may be disclosed is available on our website; Transmission by any physical or electronic means of any confidential information or internal document is not permitted.

Employees and service providers are responsible for sending, maintaining and protecting data. Likewise, parsimony is requested on social networks. Employees and service providers in general must not use the name of Rodolider on their social networks in disagreement with the company's values, this Code of Conduct or without authorization from the company. No software that does not comply with company policies or applicable licensing and copyright agreements may be added to the company's electronic communications system. The transmission of files, images, interactive games, or messages that are not of interest to the company is not permitted.

All employees and service providers must use available electronic communication resources only for professional purposes within legal requirements and respecting the ethical principles of this Code of Conduct. It is not permitted to transmit defamatory comments, use pornographic, offensive languages, images or files or that induce any form of discrimination. The use of any password other than your own is also not permitted. Passwords are personal and non-transferable: misuse may result in disciplinary measures.





### 3.7. Diversity and Inclusion

Rodolider values human diversity and encourages inclusion in relationships and the work environment. Therefore, all people must be given respectful, cordial and fair treatment, regardless of the position or function they occupy. We respect all differences and expect all our employees to act in the same way.

The company combats all forms of discrimination or prejudice, based on age, race, personal aesthetics, nationality, gender, affective-sexual orientation, politics, religion or belief, conditions, disabilities or physical limitations and other possible individual differences. It stands out like this:

- Combat all forms of prejudice and discrimination, communicating any cases experienced or witnessed with guests, employees, suppliers or third parties.
- Do not joke about personal characteristics and options, so that a healthy and mutually respectful work environment is created.

To realize this value, Rodolider:

- Adopts a non-discriminatory remuneration and salary practice, ensuring that factors of gender, race, origin, gender identity, sexual orientation, disability, among others, do not influence the determination of our employees' remuneration.
- Provides employment and professional growth opportunities to all people, without distinction
- Will comply with all legal parameters and provisions relating to diversity and inclusion
- We do not and will not tolerate any discriminatory practices in our work environments or in our business relationships with any professionals or partners
- It requires full commitment from its employees, partner representatives and directors to the best diversity and inclusion practices.

### 3.8. Prevention of Child Labor and Forced Labor

It is strictly prohibited:

- The use of child labor and the work of minors, except through the hiring of a "minor apprentice", according to art. 402 and following of the Consolidation of Labor Laws, companies that adopt the illegal practice of child labor.
- The exploitation of work analogous to slavery, forced by intimidation and unpaid.

Rodolider will not establish relationships with companies that adopt the illegal practice of child labor or those similar to slavery and reserves the right to immediately terminate any commercial, contractual, or other relationship with any partner that is involved in the use of child labor.



### **3.9. Harassment, Abuse of Power and Violent Practices**

Harassment consists of repeatedly approaching another person, with the intention of obtaining advantages (sexual or otherwise), through the imposition of will. It offends a person's honor, image, dignity and intimacy.

The company repudiates any type of conduct that causes embarrassment, whether carried out verbally, written or physically, resulting from disrespectful acts, through offensive words, intimidation, moral or sexual harassment, psychological or physical aggression. We are committed to building a healthy, safe, inclusive and respectful environment for all people.

If an employee considers themselves to be a victim of embarrassment of this type or is aware of someone who has experienced such a situation, they must inform their superior or forward the complaint through the Reporting Channels established in this Code of Conduct.

Rodolider does not agree with any violent practice, at work or outside, perpetrated by its employees or partners, especially within the company. Any practice of violence, whether physical, moral and/or psychological, must be reported to superiors and the competent authorities.

In accordance with Law 14,457/22, Rodolider promotes regular training on harassment prevention, awareness campaigns and ongoing educational actions. CIPA - Internal Commission for Accident and Harassment Prevention - acts proactively in guiding and mediating psychosocial risk situations, always with confidentiality and protection for the victim.

### 3.10. Use of Alcohol, Drugs, Weapons and Trading of Goods

Rodolider does not accept the consumption of alcoholic beverages or illicit drugs, as well as being under the influence of these, during working hours or on company duty. It is important to highlight that employees should not consume alcohol in any way, knowing that they will drive, even if alcoholic drinks are served at the event, after all, they will be violating a federal law, therefore, their sole responsibility.

The use and possession of illicit drugs and remaining in the work environment in a state altered by the use of these substances are also prohibited.

It is important to highlight that Rodolider promotes constant guidance regarding the damage caused to health and even to society with the use of narcotics and alcohol consumption. Drivers are periodically subjected to toxicological tests, in order to guarantee greater safety for all users of the roads on which the vehicles travel Rodolider, which are only entrusted to trained and conscientious professionals.

Under no circumstances is the carrying of weapons of any kind on company premises tolerated, except by professionals expressly authorized to do so.

The sale of goods of particular interest on the company's premises is not authorized, such as the sale of products, raffles, lists or chains of any nature. Likewise, do not practice any form of gambling on Rodolider premises.

### 3.11. Employee Participation in Political Activities and Labor Unions

Rodolider respects the political and religious associations of its employees, even if the company does not adopt religious or political party positions. In this context:

- Do not promote or participate in political party activities or religious services during working hours, except in cases authorized by Rodolider.
- Do not carry out political, party or religious propaganda on company premises.
- Inform the HR department if you intend to apply for public positions.

Employees who get involved with civic/political issues must do so outside of their working hours and at their own expense, and make it clear that such manifestations are theirs, not the company's.

It is prohibited to make, in this way, any contributions in value, goods or services to political campaigns and causes, in the name of Rodolider. The company does not accept making or receiving donations of funds or support of any nature, from political representatives or activists, including leisure, transportation, rental or gifts. The company's relationships in the workplace are congruent with the values it practices, with applicable collective agreements and contracts, observing current legislation and standards. Joining unions is a respectable act and one of total openness to dialogue with Rodolider.

**Rodolider supports freedom of association and the recognition of the right to collective bargaining.**



# Market relations

It is important to first highlight that Rodolider maintains an open channel with the press, making available all the information necessary to clarify and publicize its actions, for the benefit of its customers, partners and the community in general.

Only the Executive Board or specifically authorized employees may offer or disclose information to the media or other bodies.

Rodolider strives for clean competition and does not engage in activities or businesses that are harmful to consumers, public administration or society. Likewise, the company does not relate to competitors with the aim of agreeing on prices, market sharing, or attitudes that eliminate healthy competition and we expect the same attitude from our suppliers, partners and competitors.

Rodolider also takes care of its commercial relations, which will always be based on the values of transparency, ethics, mutual respect, legality and responsibility. We will honor our partnerships and commercial contracts as well as prioritize relationships with partners (customers and suppliers) who are guided by the same values.

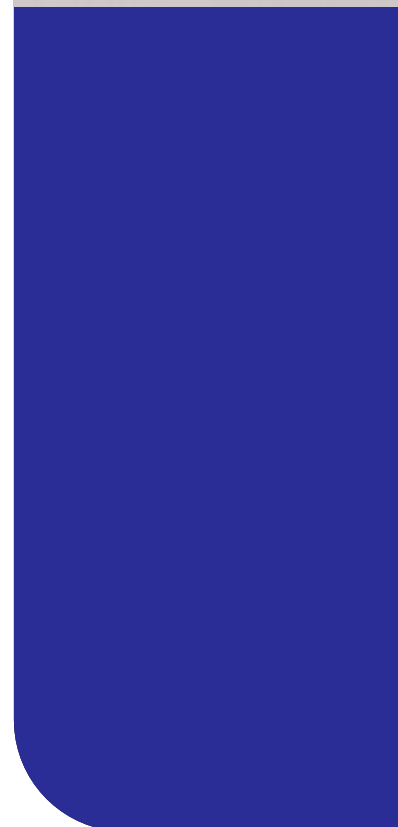
## 4.1. Clients

Rodolider is proud to have a strong and respectable relationship with its customers. This relationship is the key to our success, therefore, we permanently ensure the quality of our services – quality that is guided by responsibility in marketing, honesty and respect.

Processes relating to customers must observe the following assumptions:

- Treating and offering services with honesty and respect;
- Impersonality, impartiality and impartiality, which cannot be affected by personal interests and relationships between individuals representing the Company and those representing Customers;
- Correct recording of prices and sales conditions, in accordance with established policies;
- Confidentiality regarding confidential and sensitive information, whether from Rodolider or our customers;
- Compliance with the technical criteria presented in the RFP or other technical documents of the Customer's competition;
- Respect for this Code of Conduct and the Customers' standards of conduct and code; and
- Legality.

It is strictly prohibited to make illegal or improper payments of any nature, with the aim of facilitating business with customers.



No employee, representative, partner or executive of Rodolider is authorized to use personal relationships and criteria to conduct relationships with the Company's customers. The receipt and/or payment of amounts to employees or representatives of our Clients outside the contracted terms and conditions is strictly prohibited.

No employee, representative, partner or executive of Rodolider is authorized to offer gifts to employees and collaborators of our clients, whether in cash, gifts, trips, meals, or any other benefit with or without monetary expression, except within the limits of item 4.7 below.

Rodolider reserves the right to terminate any commercial relationship in the event of a conflict of interest or if it poses risks, whether of an environmental, social or legal nature, subject to current contracts. If any Rodolider employee is aware that the client is carrying out any illicit activity, they must report the matter in a timely manner to their immediate supervisor or superior.

Rodolider undertakes to adhere to the standards of conduct and codes of ethics of its customers, to the extent that they do not conflict with the values and principles of Rodolider, as established in this Code.

All Rodolider employees and partners must be aware of and adhere to the standards of conduct and codes of ethics of the clients they serve in their respective roles, committing to strictly respect such standards and codes, as if they were standards and codes of Rodolider itself.

Violations of our clients' standards of conduct and codes of ethics will be considered violations of our own standards and, once brought to the attention of the Company, will be subject to evaluation by the Ethics Committee for the adoption of appropriate measures, including labor disciplinary measures and contractual sanctions.





## 4.2. Suppliers

Suppliers are an important part of the company's business, therefore, they must be honest, deliver and practice the contracts signed, ethically complying with the agreed commercial conditions. Rodolider guarantees ethical practices in selection and negotiation, without privileges or discrimination of any nature, regardless of the volume of business they maintain with the company.

All employees Rodolider must respect contractual and commercial conditions, as well as safeguard the confidentiality of information established between the company and suppliers. Likewise, suppliers are also obliged to uphold the conditions of mutual trust regarding confidentiality and contractual guarantees under penalty of breaking commercial relations.

The company does not allow that, when dealing with suppliers, the employee or service provider obtains personal advantage through the influence of their position in the company. Therefore, no employee should accept any type of gift (except institutional gifts, as per item 4.7 below), payments in cash and/or goods, trips, meals, or any other services offered by suppliers. Commercial relationships with suppliers of products and services involving close relatives (parents, spouse, children, siblings, grandchildren, grandparents, brothers-in-law and first cousins), directly related to the area of competence and responsibility of employees, will only be carried out with the approval of the executive board of Rodolider.

To ensure and encourage a responsible and sustainable supply chain, Rodolider suppliers must be responsible for:

- Be in compliance and operate within current standards and legislation;
- Promote the fight against corruption within its activities;
- Employ in safe and healthy working conditions;
- Ensure that employees are treated with respect and dignity, not tolerating forms of discriminatory or prejudiced treatment of any nature;
- Eradicate forced or compulsory labor, as well as exploitation and child labor;
- Respect freedom of association and recognition of the right to collective bargaining;
- Take measures to avoid risks to human life and the environment;
- Limit the environmental impact of operations and manage environmental resources responsibly.

## 4.3. Business Partners

In addition to requirements relating to suppliers, our employees must:

- Evaluate the qualifications and reputation of these third parties before hiring (due diligence).
- Ensure partners understand our company principles and align with them.
- Monitor the activities of partners to ensure that they comply with the principles of ethics and socio-environmental responsibility.
- Do not use partners, under any circumstances, to carry out any illegal activity or that goes against the requirements of this Code of Conduct.

#### **4.4. Competitors**

Rodolider considers fair competition in its operations as one of its basic premises, preserving the competitive nature of public and private competitions. We are against and do not condone any forms of corruption, cartel formation and dumping. Therefore, employees are prohibited from colluding with potential competitors in order to fix prices or create market restrictions with a view to limiting the effects of free competition.

Our differentiation in relation to the competition is based on the competence and quality of our services. The company does not accept its employees making defamatory comments about competitors, who deserve the same respectful treatment that we expect to receive.

No employee - whatever their hierarchical level - is authorized to provide information or discuss with competitors the marketing, promotion or dissemination plans for our products or services. The Executive Management is responsible for ensuring institutional actions.

#### **4.5. Public Authorities**

The company maintains a high standard of integrity in its relations with government representatives. All of our relationships – occasional or ongoing – with direct or indirect Public Administration entities will always be guided by compliance with the principles of legality, impersonality, morality, publicity and efficiency, which guide the activities of the Public Administration in Brazil.

Rodolider prohibits the practice of acts harmful to the Brazilian or foreign Public Administration, which threaten national or foreign public assets, against principles of public administration, such as offering, promising or giving money or other valuable goods to a public agent with the purpose of obtaining or maintaining undue favor.

Relationships with all spheres of government, including municipal, state and federal public bodies, must always be formalized through registration, with due guidance from the Legal Department or the Executive Board. Meetings involving public agents must be attended by at least two employees from Rodolider.

Whenever a demand is presented by a government representative, including inspection processes or legal acts, the employee must submit it to the Legal Department or Executive Board before any forwarding. Likewise, if you are an employee of Rodolider and need to interact with a representative of the direct or indirect Public Administration and do not know the legal parameters for this interaction, consult the Legal Department and the Company's Executive Board prior to any action.

It is expressly prohibited for employees in contracts and tenders with the Public Authorities:

- Make prior agreements with competitors, which aim to defraud the competitive nature of the bidding, established by Law 14,133/21 and other applicable rules;
- Frauding the execution of a bid or resulting contract, including practices that attempt to illegally remove competitors, including by offering any type of advantage;
- Hinder investigation or inspection activities of public bodies, entities or agents, or intervene in their activities.

#### **4.6. Political Contributions**

Contributions to campaigns by political parties, candidates or political causes are prohibited under the terms of Law 13,165/15 and other applicable provisions.

The employee may make contributions of this nature, at their own expense, without any type of involvement with Rodolider.

#### **4.7. Gifts, Entertainment, and Hospitality**

Institutional gifts and gifts without commercial value can be accepted, such as office supplies, diary, pen, calendar, cap, book, etc.

It is prohibited to accept and/or request, in your name or that of your family, any type of gift or gift in the form of a favor, money or valuable object, as well as participating in events sponsored or promoted by partners, suppliers without the formal approval of the responsible Executive Board.

Meals with customers and suppliers must be strictly professional in nature and preferably be held in the dining areas of those companies or Rodolider. If this is not possible, external meals must follow standards compatible with the professional relationship, preferably with each professional bearing their own costs individually.

It is the employee's duty to promptly declare to their immediate superior any cases in which it is not possible to avoid receiving gifts or any type of benefit that is not institutional.

#### **4.8. Invitations and Events**

The participation of our employees and representatives in fairs, seminars and training must have prior and formal authorization from the Executive Board.

We do not encourage acceptance of invitations to travel, seminars, symposiums, fairs and events in general that are not paid for by Rodolider, nor the issuing of invitations to customers and suppliers for the same purpose.

Exceptions - whether for the formulation of invitations for suppliers and/or customers to participate in events, at the expense of Rodolider, or for the acceptance of invitations to participate in events at the invitation of suppliers and/or customers - will depend on prior and formal authorization from the Executive Board, through alignment with the Ethics Committee, which will guide the Executive Board based on the analysis of the circumstances of the specific case.



# Relationship with communities and the environment

## 5.1. Communities

The company seeks to invest in the preservation and support of the communities in which it operates and can work in partnership with social programs that contribute to the development of these communities, providing opportunities for work and social participation.

Employees and service providers must act responsibly and in accordance with ethical principles, defending the company's image and reputation, whenever and when participating in activities in the community.

## 5.2. Donations, Contributions and Sponsorships

A donation will only be permitted if it is transparent, tax deductible and, at any time, it is possible to justify its reason and destination.

Donations are prohibited through deposits into private accounts or to individuals, political parties, candidates for public office or any institution that poses a risk to the reputation of our company or the improper application of the donated resources.

Sponsorship requires compensation, such as promoting our brand in the market. Therefore, all contributions in the form of sponsorship must be transparent, based on a written contract and appropriate to the compensation offered.

It is not permitted to promise, offer or provide contributions with the purpose of guaranteeing unjustified competitive benefits and contributions may not be made to events organized by people or organizations with objectives that are incompatible with our business principles and/or that may harm our company's reputation.

## 5.3. Environment, Health and Safety at Work

Rodolider respects and strives for actions to protect, conserve and regenerate the environment. In this aspect, all employees must carry out their activities respecting the environment, always trying to follow the rules and regulations so as not to harm the natural balance.

The company will act to protect the environment in all its activities, as well as promoting the dissemination of the culture of environmental preservation in its surroundings and community.

We offer a safe working environment and therefore everyone, regardless of position or function and all third parties who are on Rodolider premises, must be constantly aware of work safety and occupational health, both for their own benefit and that of their colleagues and take measures to avoid risks to human life and the environment. This way, you need to:

- Be informed about how to proceed in emergency situations and report unsafe acts or conditions.
- Use uniforms and personal protective equipment, where applicable, as established by internal and work safety standards.
- Carry out health checks periodically.

We consider our voluntary participation in pacts or other civil society agreements as an important factor in demonstrating our extra effort towards a culture of sustainability.

## 5.4. Human Rights

Rodolider has an unwavering commitment to human rights. We believe that all of our activities can only be carried out if they are aligned with the preservation and achievement of the rights of all professionals and people involved or affected by them. We conduct our activities in accordance with recognized international benchmarks, including:

- United Nations Guiding Principles on Business and Human Rights
- Universal Declaration of Human Rights
- Fundamental conventions of the International Labor Organization

We expect all our employees and business partners, including customers and suppliers, to act with equal respect for principles related to human rights, including, but not limited to:

- a. Guaranteeing the health and safety of all people and professionals involved in or impacted by our activities;
- b. Respectful and dignified treatment of all people
- c. Decent remuneration for all members of our value chain
- d. Prohibition of discriminatory, exploitative, intimidating, harassing or reprisal practices
- e. Respect for labor standards and promotion of a healthy work environment, mentally and physically
- f. Respect for local communities
- g. Respect for all ethnic and racial groups and any and all minorities.

If you witness or have information about any violation of human rights principles or standards in our production chain, you must immediately report it to our Reporting Channel.



## Reporting channels

Valuing its commitment to transparent management, Rodolider offers communication channels exclusively dedicated to reporting complaints. These channels can be used by all employees, suppliers, service providers, customers and the community in general, whenever there is a suspicion of an illegal act within Rodolider.

The company remains committed to privacy and undertakes to treat all reports confidentially, maintaining the anonymity and protection of the whistleblower in good faith. Reports are received and processed by; decisions, if applicable, are made by the Ethics Committee.

Reports will be analyzed as quickly as possible, taking into account their nature and complexity. For the proper handling of complaints, it is requested that they be presented in the most complete way possible, and, as far as possible, provided with descriptions or elements that demonstrate the transgression or irregularity.

Reporting to the Reporting Channel can be made as follows:

- To your Manager or Compliance area (Integrity);
- By phone: 0800 517 1300.
- Or website: [www.contatoseguro.com.br/pt/rodolider/relato/denuncia/](http://www.contatoseguro.com.br/pt/rodolider/relato/denuncia/)

# Respect for the Rodolider code of conduct

## 7.1. Code Compliance

This Code of Conduct applies to all those described within the scope of this document and reflects the values and culture of Rodolider. Compliance with it reveals our commitment to professionalism, honesty and transparency in our actions.

Rodolider will promote periodic training on this Code of Conduct. All employees, representatives, partners and Executives of Rodolider must be trained at least 1 (one) time a year on this Code. Knowledge of and compliance with this Code will be measured through internal audits, interviews with employees, analysis of procedures, records and reports, aiming to make this code an integral part of the company's routine.

Everyone is responsible for knowing, accepting, respecting and disclosing the information in this Code of Conduct, in addition to ensuring strict compliance with its provisions. They must also remain vigilant in preventing and detecting violations of this Code of Conduct, reporting any violation to the Ethics Committee.

In this sense, employees, managers, directors, partners and service providers and suppliers of Rodolider must sign the Term of Commitment, the text of which is attached to this Code.

## 7.2. Violation of the Code

The Code must be respected by everyone and any violation will result in appropriate disciplinary measures, which may range from a verbal warning, a formal warning, in writing, suspension, dismissal to dismissal for just cause, depending on the severity of the situation.

Everyone to whom the Code of Conduct applies has a duty to report any misconduct. Failure to address possible violations compromises the integrity and loyalty of relationships with the company and will be considered unethical conduct, resulting in the same sanctions applicable to other violations.

All information regarding ethical violations or illegal activities will be received and treated confidentially, and retaliation of any nature will not be accepted. The company is committed to maintaining confidentiality regarding the identity of those who reported and/or participated in an investigation.

Whenever there are reports about possible non-compliance with this Code of Conduct, other Company standards and policies, legal texts and/or standards of conduct and ethical codes of our partners (such as suppliers and customers), possible incidents will be investigated considering the following parameters and principles: (i) reasonable balance between the confidentiality of the channel and the principle of contradictory and listening to the agents allegedly involved, (ii) impartiality of the investigation, (iii) preservation of the whistleblower's anonymity, (iv) maximum possible efficiency and agility in investigations, and (v) justice and proportionality in the use of investigative instruments and in the measures adopted at the end.

During the investigation process, it may be necessary to suspend contracts, commercial relationships, partnerships and even employment contracts, in order to better determine the facts.

Whenever possible, we will prioritize creating an action plan to correct the situation and prevent future events. If the Ethics Committee concludes that a problem cannot be reversed or that the causative agent did not demonstrate cooperation in the process and/or presents conditions for recovery, it may determine the immediate and complete termination of the relationship with that agent. In situations of doubt regarding the policies and practices of this Code, employees or service providers must contact their immediate supervisor. If your doubts still persist, you should contact a member of the Ethics Committee, the Legal Department or the Personnel Department.

Failure to comply with the Code of Conduct may result in disciplinary sanctions or immediate suspension of the contract and, depending on the case, legal proceedings.



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## Term of Commitment

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I, \_\_\_\_\_ (name)  
, \_\_\_\_\_ (function or position), I declare that I have read and understood the provisions contained in the Rodolider Code of Conduct, a copy of which was delivered to me herein, committing myself to respect, in the performance of my activities, all of its terms, conditions and ethical principles.

I further declare that in case of doubt or perception of misconduct, I will immediately inform the company, through the Ethics Channel.

\_\_\_\_\_  
(city and date)

\_\_\_\_\_  
(signature)