



Code of Conduct

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Code of Conduct

Professional ethics is the set of rules that guide the behavior of individuals during the performance of their duties or activities. Its purpose is to regulate moral conduct, which is why this code of conduct is essential—to guide the conscience of every professional who interacts with Grupo Ramos Ferreira.

A Code of Conduct allows all stakeholders to understand the appropriate guidelines for performing their activities with excellence, ensuring alignment with the cultural standards that the company upholds and seeks to embody. Furthermore, it fosters alignment with some of the most important values established by both the company and society, enhancing relationships with colleagues, clients, suppliers, and other stakeholders.

Without guiding principles, identifying the desired path becomes a challenging task, compromising the company's objectives regarding its human capital and the values it upholds and aims to practice.

Our code is at the core of everything we do. It reinforces our identity, values, and business principles, reflecting the right way to work together.

This procedure refers to Portuguese legislation. However, in cases where it is necessary to initiate disciplinary proceedings for employees from other regions, as well as in matters related to employment and similar issues, the applicable legislation will be that of the respective region.

Message from the Chairman of the Board

"Ramos Ferreira Family,

The story of Grupo Ramos Ferreira does not belong solely to its founders, to me, or to any member of the board—it is built from the history of each one of you and everything you bring to us every day.

It fills me with immense pride to know that each of you has embraced the Group's values, especially professional ethics and the honesty we have always encouraged throughout the years.

We face an increasingly demanding mission: ensuring that these values and this spirit never fade—regardless of the number of employees, our global presence, or the challenges faced by the Group and the world.

With this Code of Conduct, we aim to clearly present the Group's values, our duties, the obligations of every employee, and above all, the behaviors we cannot tolerate—always ensuring the physical and moral well-being of all employees, stakeholders, and the protection of our assets.

For over 40 years, we have walked a path forged by a unique spirit of unity—working together in an environment of commitment, competence, resilience, and, above all, collective involvement. It is something that fills us with pride and allows us to look to the future with optimism.

And we will never forget our secret weapon: love.

I am counting on all of you!"

Carla Ferreira
(Chairman of the Board)



Objectives and Scope of Application of the Code of Conduct

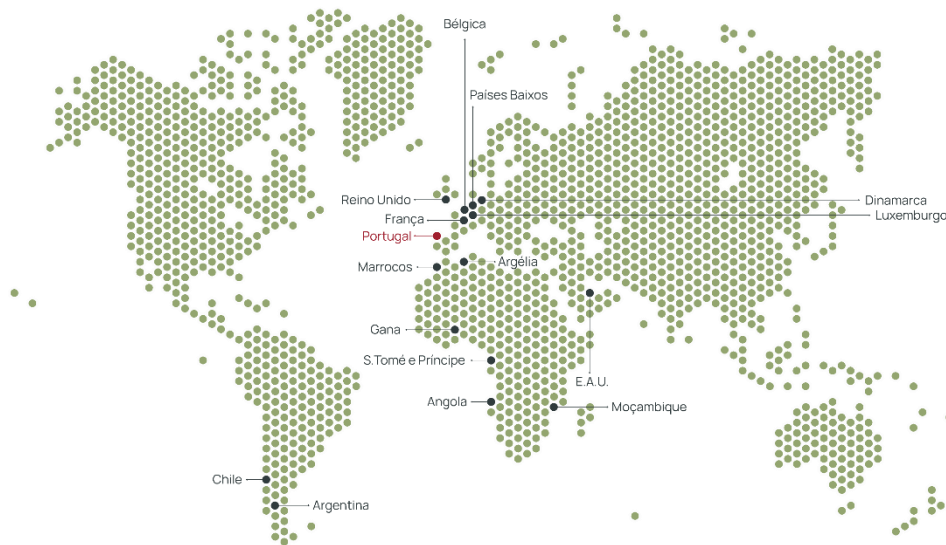
Grupo Ramos Ferreira Code of Conduct is the document that outlines a set of principles guiding the company's activities and a series of ethical and deontological rules to be observed by all stakeholders, both in internal relations and in their interactions with external entities.

Mission

To expand business volume, maintaining a constant commitment to sustainability at both national and international levels. To ensure professional and dedicated management with defined objectives, focused on total customer satisfaction and employee well-being.

Vision

To project and consolidate its position as a reference Group in the various business areas and geographic regions in which it operates. This is achieved through a continuous commitment to improving its competencies in human resources, technology, research, and development.



Values and Ethical Principles



Innovation

In the constant pursuit of creative solutions that foster distinctive relationships with our clients and add value to the relationship of trust.



Integrity

In the ethics and principles of loyalty, honesty, and transparency that guide us and of which we are proud.



**Continuous
Improvement**

In **personal training and development**, in the pursuit of knowledge, and in the sustainable growth of the companies in the Group.



Competence

In the responsible attitude, in the **demand and dedication** in all processes with the aim of achieving concrete objectives and **total customer satisfaction**.



Family

In **mutual help, multiculturalism, solidarity, and love**. A determining value and one of the foundations of our success.

Conduct in the Workplace

Respect for human and labor rights

It is a requirement of the Ramos Ferreira Group that its suppliers treat their workers and employees fairly, respecting applicable local labor laws and international law principles, as well as international organizations such as the ILO, ensuring all rights and benefits in local legislation and promoting the improvement of conditions. To this end:

- a) they will not allow any human rights violations within their organization;
- b) they will not employ child labor, adhering to the criteria established in each applicable national legislation;

- c) they will not permit any form of harassment, abuse of authority, or intimidating, degrading, or offensive treatment of personal rights and employees, rejecting any form of violence or mistreatment;
- d) they will not allow any forced or compulsory labor, understood as work required from a person in a situation of servitude or under threat, coercion, extortion, or physical or psychological violence;
- e) they will not impose working conditions or social security conditions that contradict legal regulations, collective labor agreements, or the applicable individual contract; nor will they hire foreign workers who do not have work authorization; nor engage in any practices related to the illegal trafficking of labor or illegal immigration;
- f) they will promote equal job opportunities between men and women and reject any form of discrimination. The Ramos Ferreira Group understands discrimination as any distinction, exclusion, or preference based on racist, anti-Semitic, or other ideologies, religions, or beliefs, family situation, ethnicity, race, nationality, gender, sexual orientation or identity, disease, or disability;
- g) they will respect the hiring quotas for workers with disabilities, committing to comply with the legal reservation for social employment of people with disabilities, when applicable in the respective country;
- h) they will respect the rights of union association, strikes, and collective bargaining for their workers and employees, respecting the norms applicable in each case, as well as the rights of ethnic minorities and indigenous peoples in the areas where they operate;
- i) they will commit to respecting the applicable laws and local practices, including minimum wage, overtime, and social benefits, seeking to favor the balance between work and family life for their workers and employees;
- j) they will provide their workers and employees with a safe working environment, always complying with safety, health, and hygiene requirements set out in the

applicable legal framework on professional risk prevention, in line with internationally accepted standards;

k) they will ensure respect for personal data access, not allowing actions, behaviors, or practices that would be an unlawful intrusion or violation of communication privacy, personal privacy, and the protection of personal information of their workers and employees, except when determined by court order.

Discrimination and Harassment

Workplace harassment is unwanted behavior, practiced with some degree of repetition, with the aim of affecting a person's dignity or creating an intimidating, hostile, degrading, humiliating, or destabilizing environment. Workplace harassment, whether sexual or moral, contaminates the work environment and can have a devastating effect on both the victims and the company itself.

Victims typically see their health, confidence, morale, and professional performance affected, leading to decreased work efficiency and even absence from work due to illness. In some cases, people can become unable to behave normally, either at work or in their daily life. Harassment can cause post-traumatic stress, loss of self-esteem, anxiety, depression, apathy, irritability, memory disturbances, sleep disorders, and digestive problems, and may even lead to suicide.

For the company, this can result in unexpected increases in costs due to higher absenteeism, sudden drops in productivity, and higher staff turnover rates.

Anyone, whether female or male, in any type of job position, can be a victim of moral or sexual harassment, and this can be perpetrated by anyone with access to the workplace, including hierarchical superiors, both direct and indirect, colleagues, service providers, suppliers, and clients.

Thus, in compliance with article 127, paragraph 1, subparagraph k) of the Labor Code, recently amended by Law No. 73/2017 of August 16, the Ramos Ferreira Group has adopted a specific internal procedure for the prevention and combat of workplace

harassment, aiming to guide all employees, regardless of hierarchy, on the prevention and combat rules for moral and sexual harassment, publicizing the reporting channels, and establishing guidelines to enable the prevention and combat of harassment in the workplace.

Illegal or Violating Conduct

Any employee has the duty to report all cases of improper conduct and irregularities they are aware of, in accordance with the Code of Conduct of the Ramos Ferreira Group. All reports will be duly investigated, with a commitment to full confidentiality for any reports that may be made.

These will be addressed in a way that, in the first stage, the situation is informally resolved with the adoption of necessary corrective measures or, if justified, with the initiation of the appropriate disciplinary process.

Examples of illegal conduct: any alteration of commercial proposals without the consent of the responsible parties, alteration of materials and services that have been awarded by clients without their formal acceptance of the changes, etc.

Health, Safety, and Well-being

We ensure a safe and healthy environment for all employees, in compliance with occupational health and safety standards. The company is committed to adopting all necessary measures for accident prevention and the well-being of its workers.

Rights and Duties of Employees

What does the Ramos Ferreira Group expect from each of its people

All employees, administrators, and suppliers must:

- Comply with the applicable laws and standards in their scope of work
- Treat all people they work with and/or interact with professionally in a fair and respectful manner;
- Promote a positive and engaging work environment based on trust, free from discrimination and harassment;
- Commit to their development and engage in qualifying the technical knowledge and skills necessary for their position;
- Focus on the growth and development of all colleagues, enhancing their learning through knowledge sharing;
- Adopt a socially responsible attitude within the community and towards public opinion and the market, maintaining a close-dialogue approach, and adopting a conscious environmental sustainability policy, respecting the responsible use of available resources.

What can be expected from the Ramos Ferreira Group

- Respect and promotion of the balance between professional and personal life of the employee;
- Guarantee of compliance with current legislation;
- Compliance with current safety and hygiene conditions;

Knowing that our employees and clients feel safe and have proper hygiene conditions is one of the Group's concerns, as before being workers and clients, they are valued as people, deserving of and entitled to the best conditions.

Article 127 of the Portuguese Labor Code enumerates the general obligations of Ramos Ferreira as an employer. Among them, the following stand out:

- Ensure the worker's safety and health conditions in all work contexts;
- Safeguard the exercise of activities under safe and healthy conditions for employees, considering the general principles of prevention;
- Ensure that the implementation of prevention measures results from risk assessments associated with the various phases of the production process;
- Provide adequate information and training to employees to develop activities under safe and healthy conditions;
- Adopt measures and give instructions for employees to cease activity in case of serious and imminent danger;
- Ensure the health surveillance of employees based on the risks they are potentially exposed to;
- Establish measures to be adopted in first aid, fire-fighting, and evacuation, identifying the workers responsible for their implementation;
- Organize prevention means considering employees and third parties who may be susceptible to the risks associated with the work being performed;
- Observe the legal prescriptions, both general and specific, regarding safety and health to be applied within the company, establishment, or service;
- Cover the expenses with the organization and functioning of the occupational health and safety service and other preventive measures (exams, exposure assessments, etc.).
 - Ensure the training and development of all its employees;
- According to the current Labor Code in Portugal, training is understood as education and qualification after leaving the education system or entering the job market. Mandatory professional training is extremely important, not only to adapt human

resources to changes in companies but also to improve productivity and competitiveness indices and to enhance employees' value.

- Every worker is entitled to a minimum of 40 hours of continuous training annually or, if hired for a fixed term of 3 months or more, a minimum number of hours proportional to the contract duration in that year. Similarly, the worker cannot refuse to participate in professional training activities.

- Each year, the Ramos Ferreira Group must ensure professional training for at least 10% of the company's employees. Additionally, it has the duty to promote employee qualification, ensure the individual right to training, organize annual or multi-annual training plans, recognize and value the qualification acquired by the employee, and enable employees to prevent risks associated with their activity.

- Ramos Ferreira invests in training from the day the employee is hired. In this way, it believes the integration into the department, the company's business area, and all routines will be more effective, thus facilitating the adaptation and integration period. This training is provided to new employees or when it's necessary to master another area of work, with the aim of increasing employees' knowledge to achieve a higher level of performance in their functions.

Thus, each employee should permanently seek the improvement and updating of their knowledge, skills, and qualifications with a view to maintaining, developing, and improving their personal and technical capabilities and, simultaneously, their professional performance.

Our Commitment to Ethics and Integrity

Bribery and Corruption

Employees should under no circumstances, directly or indirectly, offer, promise, or receive any type of improper financial or personal advantage to gain benefits over third parties. They should be aware that such a situation may result in disciplinary sanctions or even criminal charges.

Fraud

Fraud is any act carried out with the intent to deceive, for personal benefit and gain, that harms the company. Examples of fraud include document forgery, theft, and omission of facts. Employees should only use company resources when approved by their superiors and available for their positions and functions, also being responsible for the proper use of assets.

Conflict of interest

A conflict of interest exists when personal interests override or contradict those of the company, potentially affecting the efficiency and effectiveness of the employee's performance. This conflict can also harm the company, which sees its interests and objectives compromised by the employee's improper exercise of their duties.

Physical and Moral Violence

The relationship between employees should be based on mutual respect, integrity, team spirit, and fairness, contributing to a good work and team environment. All employees should thus contribute to creating and maintaining an environment where everyone feels respected and valued.

All employees must demonstrate tolerance and respect for cultures, opinions, and lifestyles different from their own. They should always consider how their behavior affects others. It is prohibited to adopt any discriminatory conduct, intimidation, harassment, or physical or psychological aggression in the workplace. Workplace intimidation is unacceptable behavior by one employee towards others.

Hierarchical superiors, leaders, and managers have a special responsibility to promote a work environment that fosters honesty, integrity, respect, and trust.

Disrespect for the Group's Assets

All assets of the Group, including equipment, materials, resources, and proprietary information, must be used solely for the defined professional purposes and should be used efficiently and as if they were their own, protecting them from misuse, loss, fraud, or theft and for their intended purposes.

Theft, negligence, and waste have a direct impact on the company's profitability. Therefore, measures should be taken to prevent damage, theft, or misuse of Ramos Ferreira's property.

Whenever an employee leaves the Group, they must return all property belonging to the company, unless specifically exempted from doing so.

Disrespect for the Group's Policies

Ramos Ferreira Group has several policies regarding Quality, Environment, Safety, Human Resources, etc., which outline the behavior that the group, especially all its employees, should adopt in these matters. Any deviations or disrespect may result in Warnings or Disciplinary Procedures.

Use and Misappropriation of Group Information and Documents

Group's information must be kept confidential. Employees must maintain confidentiality about all information they have access to in the performance of their work, even if such information is not classified as confidential (e.g., information about shareholders, customers, competitors, employees, suppliers, markets, public organizations, sales, marketing, and business plans, financial data, technical information on products, merger or acquisition activities, management changes, trade secrets, current and future products or services, research and development activities, inventions, potential contracts, market research, financial results, undisclosed information, financial projections, etc.).

All documentation related to the Integrated Management System, Manuals, Policies, Commercial Proposals, Market Studies, Quality Work Plans, Projects, etc., is the property of the Group and should not be used for the benefit of employees or third parties. Copying or using this material outside the scope of the Ramos Ferreira Group is prohibited.

Combating Counterfeiting

- Prohibition of Counterfeit Parts: It is strictly prohibited to manufacture, distribute, or use counterfeit parts. All products must be authentic and meet the established quality standards.

- Verification of Authenticity: We implement rigorous verification processes to ensure the authenticity of all parts and components used in our operations.

Ethical Recruitment

An ethical recruitment process follows principles of fairness, transparency, and respect for the candidates' rights. The key elements for the Ramos Ferreira Group in ethical recruitment are:

- **Transparency: Clear Information:** Provide clear and accurate information about the job, including responsibilities, requirements, and working conditions.
- **Selection Process:** Clearly explain the steps of the selection process and the evaluation criteria.
- **Equal Opportunities: Non-Discrimination:** Ensure that all candidates are evaluated based on their qualifications and skills, without discrimination based on race, gender, age, religion, sexual orientation, or any other personal characteristic.
- **Accessibility:** Ensure that the recruitment process is accessible to all, including people with disabilities.
- **Respect and Dignity: Fair Treatment:** Treat all candidates with respect and dignity throughout the recruitment process.
- **Confidentiality:** Protect candidates' privacy and maintain the confidentiality of personal information provided.
- **Integrity and Honesty:** Be honest about job expectations and growth opportunities within the company.
- **Feedback:** Provide constructive feedback to candidates when possible, especially to those who were not selected.
- **Social Responsibility: Community Impact:** Consider the impact of recruitment on local communities and ensure that hiring practices do not harm the rights of communities.
- **Sustainability:** Promote recruitment practices that contribute to sustainability and social well-being.

Our Commitment to the Outside World

The stakeholders of Grupo Ramos Ferreira are all entities or individuals who influence or are influenced by the activities and intervention of the Group, in the multiple geographies where it operates. The dialogue between Grupo Ramos Ferreira and its stakeholders is essential to building, consolidating, and modernizing the institutional image, overcoming everyday organizational challenges, and optimizing communication channels that enable the establishment of trust-based relationships, with the ambition of continuous improvement and proximity.

Grupo Ramos Ferreira is aware that its existence and permanence are due to its customers and, therefore, commits to treating them with the highest professionalism, eloquence, and courtesy.

The success of a company is always the work of all its employees. The growth story of Ramos Ferreira is that of a solid team that, sharing the same values, nurtures the spirit of cohesion and mutual assistance. Composed of people open to knowledge and continuous evolution, the Ramos Ferreira team is a large family. Everyone actively contributes to the competitiveness and success that, while reserving space for affection, gives rise to emotion and promotes connection. Outings, recreational contests, parties, or sports tournaments are examples of activities held throughout the year.

Thanks to charismatic and caring management, the Group incorporates, in accordance with its business philosophy, global concern for society and the world. Social awareness is part of its criteria, reflected both in support for solidarity institutions and causes and in environmentally friendly practices.

Compliance with the Group's Conduct Guidelines

Suppliers must accept the conduct of audits to verify the proper compliance with our Code of Ethics and Conduct. For this purpose, Suppliers will authorize the Ramos Ferreira Group and/or third parties designated by it to conduct these audits, providing

the means and access to their facilities, as well as the necessary documents to ensure compliance with this document.

We emphasize that failure by the Supplier to comply with our Code of Ethics and Conduct may result, depending on the severity and other circumstances, in the immediate and early termination of its contractual relationship with the Ramos Ferreira Group, without prejudice to the adoption of any other legally prescribed measures by the Group in the due defense of its legitimate interests and strict legality.

Integrity and Legality

The Suppliers of the Ramos Ferreira Group will comply with all applicable laws and regulations in their respective countries and internationally, with particular attention to criminal and administrative legality.

The Ramos Ferreira Group will not contract Suppliers convicted by a final and unappealable decision for crimes such as terrorism, membership or participation in a criminal organization or group, human trafficking, illegal human organ trafficking, prostitution, sexual exploitation, corruption of minors, embezzlement, fraud, misleading advertising, document or accounting forgery, public or private corruption, money laundering, financing of terrorism, illegal labor trafficking, fraudulent immigration, public health crimes, promotion or incitement to hate, hostility, discrimination, or violence against individuals, or the loss of civil rights to practice any profession, trade, industry, or commerce. This prohibition also applies to Suppliers who are legal entities held criminally responsible for any of these crimes, as well as those whose administrators or legal representatives are in this situation during their term of office and representation until resignation.

Suppliers must comply with the current legislation under Anti-Corruption and Money Laundering Laws, specifically anti-bribery and corruption norms applicable in the countries where they operate, including Law No. 83/2017 of August 18, UK Bribery Act 2010 (“UKBA”), and, in general, all international laws in force in the countries where the Group operates, to ensure compliance with the Organisation for Economic Co-operation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials (“OECD Convention”) and the United Nations Convention Against Corruption (AR Resolution No. 47/2007 of 21/9).

Suppliers cannot offer, directly or indirectly, cash payments, in-kind benefits, or any other type of benefits to any individual or legal entity, public or private, to unlawfully obtain or maintain any business or advantage. Nor may they do so in order for such person or entity to misuse their influence, real or apparent, to illicitly obtain any business or advantage.

Suppliers may not make or offer, directly or indirectly, small payments to facilitate or expedite procedures with a public or private entity in exchange for a personal benefit or for the benefit of their company. These payments, known as facilitation payments, are illegal in most countries and are prohibited by the Ramos Ferreira Group, unless they are legal in the country of operation and are properly accounted for.

Notwithstanding the previous paragraph, under no circumstances will offers, gifts, or hospitality demonstrations be accepted that, due to their frequency, characteristics, timing, and other specific circumstances, could inappropriately affect or be interpreted as intended to inappropriately affect the independence of judgment, integrity, honesty, and impartiality of the recipient.

The professionals of the Ramos Ferreira Group are required to reject any offer or delivery of a gift, invitation, or demonstration of hospitality of any nature from any Supplier (or potential Supplier) of the Group, in accordance with the criteria defined in the previous sections.

The Ramos Ferreira Group will also not engage with Suppliers who do not fully and promptly comply with their tax obligations and social security contributions. For this purpose, the Ramos Ferreira Group will regularly require Suppliers to submit updated Fiscal and Social Security Status Declarations.

Conflict of Interest

Suppliers (or potential suppliers) of the Ramos Ferreira Group are obligated to report any situation that may represent a potential conflict of interest.

A supplier is in a potential conflict of interest situation when any of its directors, legal representatives, professionals, workers, or employees are connected to a professional from the Ramos Ferreira Group in any of the following ways, either personally (such as an affective or familial relationship) or through business ties.

Suppliers of the Ramos Ferreira Group are committed to taking the utmost care in preserving the image and reputation of the Group in their professional performance, ensuring appropriate and correct use of the Group's image, both by their employees and subcontracted companies.

Confidentiality and Accuracy of Information

It is the responsibility of the Supplier and all of its workers and collaborators to adopt appropriate and sufficient security measures to prevent any alteration, loss, unauthorized processing, or access to confidential information and personal data of the Ramos Ferreira Group that they may have access to.

All commercial, business, promotional, economic, legal, contractual, technical, and other information provided by the Supplier to the professionals of the Ramos Ferreira Group must be true, clear, and transparent, and not intended to mislead or cause confusion.

The Suppliers of the Ramos Ferreira Group are prohibited, under any circumstances, from appropriating, discovering, spreading, disclosing, revealing, transferring, or using any non-public information that may be considered a trade secret of a third party (whether a competitor or not), even if they were not involved in obtaining it, but whose origin could reasonably be considered illegal.

Accurate and transparent books and records must be maintained permanently, and compliance with applicable laws and regulations must be demonstrated. Suppliers must promptly inform the Ramos Ferreira Group of any irregular payment, suspicious transactions, or suspicion of money laundering that may affect them.

Environmental responsibility

The Suppliers of Ramos Ferreira Group are required to comply with the applicable environmental legislation in different geographies, committing to develop practices that promote environmental conservation and reduce the negative impact their activities may have. Ramos Ferreira Group will prefer Suppliers that use products and raw materials obtained or manufactured with more sustainable materials, whose waste and production have a lower impact on the environment.

The Suppliers of Ramos Ferreira Group commit to meeting environmental and sustainability standards established by the Group. They will be rigorous, transparent, and truthful in surveys, certifications, evaluations, and audits related to environmental, sustainability, and corporate social responsibility matters to which they are subjected by the Group.

Consultations and Complaints of Non-Compliance

Suppliers and third parties of the Ramos Ferreira Group may make inquiries regarding the application and interpretation of the provisions of our Code of Ethics and Conduct, as well as file reports of non-compliance for actions contrary to it by a professional of the Group, another Supplier (or their Subcontractors), or their

respective workers and collaborators. Suppliers and their Subcontractors have the obligation to report any non-compliance with our code to the Group.

To do so, the Ramos Ferreira Group provides a Whistleblower Channel on the Group's website: **www.ramosferreira.com**. The following means may also be used:

- By email, to the address: **fornecedores@ramosferreira.com**
- By mail, to the following address: Rua Senhora Mestre, 22 4410-511 Vila Nova de Gaia

Communications made to the Supplier's Whistleblower Channel are to be made in good faith and truthfully, and cannot be used for purposes other than ensuring the proper interpretation, application, and compliance with our Supplier Code of Ethics and Conduct.

Ramos Ferreira Group ensures appropriate handling of personal information and is committed to not adopting or allowing any form of retaliation, directly or indirectly, against anyone who has made use of this Channel in good faith.

The identity of the whistleblower, if known, as well as the documents submitted through the Channel, may be made available to both administrative or judicial authorities (as required in connection with any process resulting from the subject of the Non-Compliance Report) and to the individuals involved in any subsequent investigation or judicial process initiated as a result of that investigation.

Antitrust and Commercial Fairness

Ramos Ferreira Group is focused on creating value and making a difference by using corporate values as a guiding thread. It is prepared to deal with all direct and indirect competitors, complying with all the assumptions of competition laws and commercial fairness, including:

- Commercial and pricing policies will be defined independently and will never be agreed upon, formally or informally, with competitors or other unrelated parties, directly or indirectly;
- Customers (from all geographical areas of Ramos Ferreira's operations) or markets will never be shared through agreements between Ramos Ferreira and its competitors and will always be the result of fair competition;
- Customers and suppliers will be treated fairly;
- All employees, especially those involved in commercial negotiations (buying and/or selling) or who regularly interact with competitors, are responsible for ensuring they know the current competition laws and the Group's practices.

Prevention of money laundering and terrorist financing

Ramos Ferreira Group promotes a prevention culture and ensures compliance with legal and regulatory standards, approving and adhering to internal policies and standards applicable to fraud prevention, prevention of the use of the financial system for money laundering or terrorist financing, and the application and enforcement of restrictive measures approved by the United Nations and the European Union.

To this end, the Group acts with particular care and diligence in conducting the established procedures for customer identification, acceptance, and knowledge, and in the continuous monitoring of the business relationship, particularly through the meticulous application of internal control and risk management procedures, analyzing operations conducted during this relationship and verifying the existence of any conduct, activities, or transactions that, in light of professional diligence criteria and suspicion indicators disclosed by the authorities, are considered suspicious of being linked to criminal activities or terrorist financing, refraining from participating in those activities or refusing to carry out those transactions.

Ramos Ferreira Group is committed to collaborating with the authorities and communicating, as required by law, situations in which there are sufficient grounds to suspect that funds or other assets, regardless of the amount or value involved, derive from criminal activities or are related to the financing of terrorism.

Confidential Information

Ramos Ferreira Group values and protects its confidential information and respects external and confidential information. Confidential information is any information that is not public knowledge and that could lead to financial losses, damage to image, loss of competitiveness, among others, including trade secrets, business plans, marketing plans, consumer viewpoints, engineering ideas, industry processes, designs, databases, employees' personal information, salary information, and any unpublished financial or other data.

Internal Control System, Internal Audit, and Compliance

Ramos Ferreira Group will promote the implementation and maintenance of (i) adequate internal control systems, aimed at ensuring the effective use of assets and resources, prudent management and control of risks, the existence of complete, relevant, reliable, and timely financial and management information, and compliance with applicable regulations, as well as (ii) robust and independent control functions (especially in the areas of internal audit, compliance, and risk), in accordance with the requirements of applicable legal and regulatory standards. It will also promote internal procedures that allow employees to report situations they become aware of or have reasonable suspicion of activities related to money laundering, terrorism financing, insider trading, fraud, or corruption in the performance of professional activities by another employee or any goods or services supplier."

Rights to Land, Forest, Water, and Forced Eviction

Respect for the Rights of Local Communities

- Right to Land and Forest: We recognize and respect the rights of local communities to land and forests. Our operations should not compromise the traditional ownership or use of these lands and natural resources.
- Right to Water: We ensure that our activities do not harm the local communities' access to clean and safe water. Responsible management of water resources is a priority in all of our operations.

Forced Eviction

- Prohibition of Forced Eviction: We do not tolerate forced evictions. Any necessary relocation must be carried out in accordance with applicable law, ensuring due process and fair compensation for those affected.
- Consultations and Agreements: We conduct consultations with affected communities to ensure their voices are heard and that any relocation is done in a fair and consensual manner.

Commitment to Sustainability

- Sustainable Practices: We adopt sustainable practices that minimize environmental impact and promote the conservation of natural resources.
- Social Responsibility: We work to create a positive impact in the communities where we operate, promoting sustainable development and respecting human rights.

Use of Private or Public Security Forces

Ramos Ferreira Group adopts principles and guidelines for the use of private or public security forces, ensuring that all actions are proportional, legal, and respect the fundamental rights of individuals.

- Legality and Compliance: The company commits to ensuring that any use of security forces is always in compliance with the applicable laws and regulations in each location of operation, respecting both national and international legislation.
- Human Rights and Dignity: The company reinforces its commitment to human rights and the dignity of all individuals, ensuring that security operations do not result in abuse or inhuman treatment.
- Communication and Transparency: In any situation involving the intervention of security forces, the company commits to communicating transparently with its employees and, when necessary, to the public, ensuring due process in investigating any incident.
- Exceptions and Limitations: The use of security forces should always be appropriate to the situation. The company has established clear restrictions to ensure that the rights and safety of individuals are not excessively or unnecessarily compromised.

Data Protection

Ramos Ferreira Group is committed to respecting and protecting the privacy of its employees and stakeholders, ensuring compliance with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND THE COUNCIL of April 27, 2016.

The purpose of the data protection policy is to define how personal data of all employees, candidates, temporary workers, subcontractors, clients, and partners of the Ramos Ferreira Group are processed.

Integrated into the Integrated Management System (SGS), the Ramos Ferreira Group has established a procedure for the scope and application of the general data protection policy, which should serve as guidance for all companies within the Ramos Ferreira Group and can be freely accessed in the SGS documentation repository.

All questions related to personal data protection or, if there is direct or indirect knowledge of any violation of the regulation, the information and/or reports should be communicated to the Data Protection Officer or to the following address: **dados.pessoais@ramosferreira.com**.

Intellectual Property

Respect for Intellectual Property

- Protection of Rights: We respect and protect the intellectual property rights of third parties. We do not tolerate the violation of patents, trademarks, copyrights, or trade secrets.
- Legal Use of Software and Content: All software and content used must be legally licensed. Piracy and the unauthorized use of materials protected by copyright are prohibited.

Export Controls and Economic Sanctions

Compliance with Regulations

- Export Controls: We comply with all applicable export control laws and regulations. We ensure that our products and technologies are not exported to sanctioned countries or entities.
- Economic Sanctions: We comply with all economic sanctions imposed by government authorities. We conduct compliance checks to avoid transactions with sanctioned parties.

Monitoring the application of this code

Any violation of the Code of Conduct must be reported confidentially through the reporting channels. The Group guarantees protection against retaliation for good-faith whistleblowers and commits to investigating all occurrences in a fair and impartial manner.

Reporting of Illicit Acts and Protection Against Retaliation

Whistleblowing Channels

- Reporting of Illicit Acts: We encourage employees to report any illegal activity or unethical behavior. We provide secure and confidential channels for making reports.
- Protection Against Retaliation: We ensure that whistleblowers are protected from any form of retaliation. The company will take strict measures to protect the rights of whistleblowers and investigate all reports impartially.

Disciplinary Procedure

In the case of a report or knowledge of a violation of this code, Grupo Ramos Ferreira will initiate a Disciplinary Process, which will be handled in accordance with the current legislation and the existing internal procedure, as outlined in the Integrated Management System.

The responsibility for opening the process lies with the Human Resources department, so any inappropriate conduct must be immediately communicated through the following channels:

- Human Resources Responsible
- Immediate Superior

If the practice or omission of improper conduct is proven, disciplinary sanctions will be applied according to the internal procedure, ensuring compliance with the applicable legislation. The sanctions - type and measure - will consider their appropriateness, effectiveness, and proportionality, in light of the severity, fault, and consequences associated with the act/omission committed.

Therefore, it is the responsibility of each employee to ensure full compliance with the terms of this code and to seek guidance, whenever necessary, from their superior or the Human Resources responsible. Any attempt to violate or fail to comply with this code may result in disciplinary measures, including the possibility of dismissal, as stipulated by the law or applicable Collective Agreement.

