

[Logo: **PETROCOQUE**]

== Uso Público Petrocoque ==

+ 55 (13) 3362-0200  
ROD. CÔNEGO DOMENICO RANGONI,  
KM 267,5 S/N - ZONA INDUSTRIAL  
CUBATÃO/SP - BRAZIL- CEP 11573-000

+55 (13) 3362-0200  
CANON 00 M ÊNI CO RANGONI MOTORWAY  
SP-055 - KM 267.5 - INDUSTRIAL AREA  
CUBATÃO/SP - BRAZIL - POSTCODE 11573-000

# CODE OF CONDUCT AND ETHICS

Petrocoque S.A.

## Message from the Chief Executive Officer

Welcome to our Code of Conduct and Ethics.

The Code of Conduct and Ethics is the set of principles and commitments that establishes the standards of behaviour that must be observed and followed by all who act on behalf of Petrocoque.

By following the Code of Conduct and Ethics during our activities and relationships, we demonstrate commitment and alignment with the Company's Values, reinforce our culture, generate trust and establish lasting relationships with each one of our audiences, whether they are employees, service providers, interns, customers, suppliers, community members, public agencies and shareholders.

The Code of Ethics is more than just a document to read and put away. It is a powerful tool to help each of us make the right decisions on a day-to-day basis. Whenever you are in doubt whether an attitude, decision or behaviour is aligned with Petrocoque Principles and Values, search and refer to the Code of Ethics, as it will be a clear and objective guide towards the direction to be followed.

You can also count on your manager's or the Compliance Committee's support to assist you in any situations that require understanding and applying Petrocoque's Code of Conduct and Ethics.

We rely on your commitment to respect and comply with this Code, incorporating it into your daily activities, decisions, and relationships, thereby ensuring Petrocoque continues to be a company recognised and admired for its high standards of conduct.

Guilherme Luiz de Carvalho Klingelfus  
Chief Executive Officer

## Application

This Code of Conduct and Ethics shall necessarily apply to the Company's Shareholders, to all members of the Board of Directors, the Auditing Committee, the Executive Board and advisory committees, and to employees, interns, business partners, customers, suppliers, service providers, and to anyone who acts on behalf of Petrocoque or who has a relationship with it, representing an individual and collective commitment from each and every one of us to comply with it and promote its compliance, throughout Petrocoque's whole production chain and in its relations with all of its stakeholders.

Failure to comply with the principles and commitments expressed in this Code may result in the adoption of disciplinary measures and suspension of the relationship with Petrocoque.

## Code of Conduct and Ethics Objectives

1. To become a relationship standard for Petrocoque Shareholders, for its directors, employees and interns, for service providers, customers and suppliers, for the community and public agencies, as well as for anyone who acts on behalf of Petrocoque, or who has a relationship with it.
2. To reduce the subjectivity of personal interpretation on moral and ethical principles.
3. To strengthen Petrocoque's image and that of its before its stakeholders.

## What we expect from you

We are all subject to any potential ethical and controversial dilemmas during our career paths. Whenever this occurs, ask yourself:

Is the fact or decision is in accordance with:

- The Law
- Petrocoque Values, Policies and Standards
- My personal values

How would I feel if my decision:

- Appears in the media.
- Becomes exposed to my family.
- Harms or puts someone at risk.

We hope that you understand and apply not only the Code guidelines, but also Petrocoque's policies and procedures, especially those linked to its business activities.

If the employee observes any dysfunction in a certain rule or procedure, they should get in touch with their line manager or the Compliance Committee to seek a definitive solution.

We do not accept any form of punitive action, either disciplinary or retaliatory, to be taken against anyone who raises or helps address a matter related to business conduct. If this occurs, we expect you to report it to your superiors, or to the Compliance Committee, or report the fact on the Petrocoque Complaint Channel.

## To Managers

- Monitoring the integrity of Employees is as important as monitoring their performance. Therefore, Managers are responsible for setting an example, encouraging, and engaging their teams in the compliance with this Code's guidelines and Petrocoque policies.
- It should be understood that, by providing an environment of trust, integrity and respect, the Manager encourages their employees to act in the same way, which translates into greater involvement with the organisation's objectives.
- It is also part of the Manager's role to promote an environment where Employees are encouraged to express opinions, which may be contrarian, and avoiding any form of retaliation to those who report possible Misconduct or cooperate with an investigation.

## Human Rights

We support diversity and believe that respect for human rights must be ensured for all. We understand that everyone's privacy and personal rights must be protected and we are committed to provide a non-discriminatory work environment. In a concerted effort, we expect everyone to be treated with respect by promoting diversity in our work environment. Discrimination based on origin, nationality, religion, sex, race, age, gender, sexual orientation, or other characteristics protected by law will not be tolerated under any circumstances. We do not accept any type of verbal or physical harassment of any kind. We encourage and direct employees who feel that their work environment is not aligned with the aforementioned principles, to report their concerns and opinions to the Human Resources Department or to the Compliance Committee.

## Our Values



### **SAFETY**

We value life, people and the environment



### **Respect**

We act ethically, with integrity and transparency with all those in which we have a relationship.



### **TIME**

We achieve better results when we work as a team.



### **Excellence**

We are committed to continuous improvement, adopting the best practices in our operations.

## Our Ethical Principles

Respect for life and for all human beings, truth and transparency, commitment, legality and cohesion between discourse and practice are the ethical principles that guide Petrocoque actions.

1. Respect for life in all its forms, manifestations and situations is the fundamental ethical principle and guides our care for quality of life, health, environment and safety at Petrocoque.
2. Truth and transparency are manifested as respect for the public interest and all stakeholders, and it is done in a manner compatible with Petrocoque personal privacy rights, policies and standards.
3. Petrocoque pledges to maintain a relationship with its competitors based on the principles of honesty and respect.
4. Petrocoque is committed to maintain conduct that is compatible with Petrocoque Values.
5. Merit is the decisive criterion for all forms of recognition, reward, evaluation and investment in people, and any type of favouritism is unacceptable at Petrocoque.
6. Legality and impersonality are constitutional principles that preserve the legal order and determine the distinction between personal and professional interests in relations with Petrocoque.
7. Petrocoque respects the legal, social, and cultural specificities of the various environments, regions, and countries in which it operates, always in accordance with its values and principles, and with the legislation in force.

## Relationships with Stakeholders

### **1. In the relationship with its EMPLOYEES, Petrocoque is committed to:**

- a) Ensure health and safety at work, providing the appropriate conditions and necessary equipment.
- b) Promote work conditions that provide balance between professional, personal and family life for all employees.
- c) Not discriminate against any employee on the basis of race, colour, sex, sexual orientation, gender, marital status, pregnancy, paternity status, religion, belief, political opinion, nationality, ethnic heritage, social origin, social status, disability, incapacity or age.
- d) Respect the participation of employees in unions and not to practice any kind of discrimination with respect to their unionised employees.
- e) Promote equal opportunities for all employees, in all policies, practices and procedures.
- f) Provide formal listening channels to welcome and handle your suggestions, aiming at improvements with internal management processes.
- g) Provide knowledge of the terms and conditions for hiring the employee.
- h) Ensure the right of refusal for its employees in case there is a serious and imminent situation that risks their life or their physical integrity and/or that of their co-workers, accepting suspension of their activities, after having taken corrective measures and reported the fact immediately to your immediate manager.
- i) Not use forced, compulsory or child labour or any other form of exploitation that denigrates human dignity, inside or outside the Company.



**2. In relations with *PETROCOQUE*, its employees are committed to:**

- a) Comply with the obligations of their employment contract with the maximum in performance and technical capacity.
- b) Take care of the Company's image.
- c) Act in an honest, fair, dignified, and courteous manner, respecting any individual differences.
- d) Not practice or submit to prejudicial and discriminatory actions, threats, extortion, false testimony, moral harassment, sexual harassment, or any other act contrary to the principles and commitments of this Code of Ethics, and immediately denounce the transgressors.
- e) Have an understanding of the terms and conditions in their hiring.
- f) Not consume alcohol and illegal drugs, as well as not to be under their influence, during the work day and/or in the work environment.
- g) Not make, on behalf of Petrocoque, any contribution in value, goods or services to campaigns or political/partisan causes.
- h) Properly use internal channels to express opinions, suggestions, complaints, criticisms and reports, engaging in the continuous improvement of Petrocoque processes and procedures.
- i) Be polite and respectful in personal activities on social media, remembering that a person's conduct can affect the Company's image.
- j) Not make any contact with the press on behalf of Petrocoque, except those formally designated as spokespersons of the Company.
- k) Not promote the disclosure of confidential or false information about the Company.

- l) Not obtain undue advantages arising from the role or position they occupy at Petrocoque.
- m) Assume the commitment to understand and comply with the Golden Rules in force at Petrocoque, in all its activities.
- n) Take care of yourself, take care of others and let yourself be taken care of.

**3. *In relations with CUSTOMERS, Petrocoque is committed to:***

- a) Contribute to the process of creating value for its customers, by meeting their expectations and developing innovative solutions.
- b) Not discriminate against customers, whether by origin, economic size or location.
- c) Be informative about Petrocoque products and services in an ethical and transparent manner.
- d) Act in a manner so that its products strictly follow the legal requirements of the market to which they are intended.
- e) Not require, nor insinuate, accept or offer any kind of favour, advantage or benefit in order to facilitate the sale of Petrocoque products and/or services.

**4. *In relations with SUPPLIERS, Petrocoque is committed to:***

- a) Make available the same healthy and safe working conditions offered to its own employees to those employees from service provider companies, interns and underage apprentices, when working at Petrocoque facilities, reserving the right of management knowledge and information security.
- b) Require from service providers that their employees respect the commitment to ethical principles and conduct defined in this Code, for as long as their contracts with Petrocoque last.

- c) Select and hire suppliers and service providers based on strictly legal and technical criteria of quality, cost and punctuality, and require an ethical profile in their management practices and social and environmental responsibility, refusing unfair competition practices, child labour, forced or compulsory labour, and other practices contrary to the principles of this Code, included in the production chain of such suppliers.

**5. *In relations with the COMMUNITY, Petrocoque is committed to:***

- a) Maintain permanent communication and dialogue channels with the communities wherein it operates, with the objective of preventing, monitoring, evaluating and controlling the impacts of Petrocoque activities.
- b) Participate in the development and implementation of social, cultural and environmental projects, guided by the demands of the surrounding communities, in order to fulfil projects committed to promoting social transformation.
- c) Encourage the participation of its employees in volunteer programmes, for the benefit of the communities in which it operates.
- d) Repair possible losses or damages arising from damages under its responsibility to the people or communities affected, with maximum agility.

**6. *In relations with PUBLIC AGENCIES, Petrocoque is committed to:***

- a) Contribute to public authorities in the preparation and implementation of general public policies, specific programmes and projects committed to sustainable development.
- b) Stimulate social awareness and the practice of active citizenship among its employees.

**7. In its relations with SHAREHOLDERS, Petrocoque is committed to:**

- a) Conduct its business with transparency, integrity and accountability, cultivating credibility with its shareholders and other stakeholders, seeking to achieve growth and profitability with social and environmental responsibility.
- b) Encourage all stakeholders, internal and external, to disclose the ethical principles and conduct commitments expressed in this Code of Ethics.

## Conflicts of Interest

A conflict of interest is characterised when a relationship, activity or personal interest may influence your judgment and the ability to perform your work in an impartial, objective manner and for the best benefit of the Company. In this regard, all those to whom the Code applies are committed to:

- a) Seek ethics and transparency in relations with all stakeholders. Not take advantage of a position or authority in the Company to obtain personal benefits with customers, suppliers, business partners, competitors, or government authorities.
- b) Not to disclose or make use of privileged information for their own benefit or that of third parties, obtained as a result of the activities performed.
- c) Not perform parallel activities that conflict with Petrocoque business, which affect its performance within working hours, which use the Company's structure for private purposes or that are linked to competition.
- d) Receiving gifts is accepted, as long as they have no commercial value and that the value is limited to R\$200.00 (Two hundred Brazilian Reals), in addition to the request for approval from the Immediate Supervisor or the Compliance Committee.
- e) Not accept hospitality services, including expenses for travel (air, sea and/or land), lodging, food, travel, tours, entertainment, event tickets, among other services. Furthermore, the offer of hospitality services is allowed provided that there is prior consultation, when the fact is known, or that is later justified, but, in both cases, the immediate manager or the Compliance Committee must be contacted.

- f) Not engage in activities of a political/partisan nature, those for religious or financial gain during working hours, or use Petrocoque resources for this purpose.
- g) Report any family relationships\* that may exist with Petrocoque employees, competing companies, suppliers or service providers, by completing the Statement of a Conflict of Interest, updating it whenever there is any change.
- h) Report the occurrence of any conflict of interest or the appearance of its existence, immediately and formally to the hierarchical superior, to the Ombudsman, or to the Compliance Committee, through the available channels.

When in doubt about how to proceed, contact your immediate manager or the Compliance Committee.

### **Hiring Relatives**

Petrocoque prioritises meritocracy in its work relationships, whether related to the hiring of professionals or the appointment of employees to new activities. At the same time, it respects family relations and affective ties that may potentially unite its employees. Regarding this, in order to avoid conflicts of interest, the hiring of professionals who maintain a family relationship\* with a Company employee will be allowed, provided that there is no level of subordination between them and/or if they come to work in departments and processes with potential conflict of interest.

When in doubt about how to proceed, contact your immediate manager, the Human Resources department, or the Compliance Committee, also adhering to the provisions in table 1 below, which explains the condition of direct and collateral kinship:

**Table 1 - Kinship Relationship**

FORMS OF KINSHIP			DEGREES OF KINSHIP		
			1 <sup>st</sup>	2 <sup>nd</sup>	3 <sup>rd</sup>
Consanguineous Relatives	In a direct line	Ancestors	<b>PARENTS</b> (Including stepmother and stepfather)	<b>GRANDPARENTS</b>	<b>GREAT-GRANDPARENTS</b>
		Descendant	<b>CHILDREN</b>	<b>GRANDCHILDREN</b>	<b>GREAT-GRANDCHILDREN</b>
	In a collateral line			<b>SIBLINGS</b>	<b>UNCLES AND NEPHEWS</b> (and their spouses)
Relatives by affinity	In a direct line	Ancestors	<b>IN-LAWS</b> (including stepmother and stepfather of spouse or partner)	<b>SPOUSE OR PARTNER'S GRANDPARENTS</b>	<b>SPOUSE OR PARTNER'S GREAT-GRANDPARENTS</b>
		Descendant	<b>STEPCHILDREN, DAUGHTER AND SON-IN-LAWS</b> (Including the spouse or partner)	<b>GRANDCHILDREN</b> (Excluding spouse or partner)	<b>GREAT-GRANDCHILDREN</b> (Excluding spouse or partner)
	In a collateral line			<b>BROTHERS-IN-LAW</b> (Excluding spouse or partner)	<b>UNCLES AND NEPHEWS OF THE SPOUSE OR PARTNER</b> (and their spouses)

## **Bribery**

Bribery consists of offering, donating, and/or receiving something of value in exchange for favourable treatment by a Company, institution, official authority and/or public agent.

Under no circumstances should employees offer, promise, grant or authorise, a donation of any nature, goods or amounts, bribes, kickbacks or other similar types of payments, directly or indirectly, during the performance of commercial activities in order to obtain an improper advantage.

## **Anti-Corruption Law**

Petrocoque repudiates every and any kind of corruption.

It is the responsibility of everyone to know about current Anti-Corruption legislation Law 12.846/13\*, as well as any updates thereof, in addition to applying the rules and precautions established in the Company's policies and standards, as well as report, if aware of any doubtful conduct, by using the Petrocoque Reporting Channel.

Law 12.846/13, which provides for the objective administrative and civil liability of legal entities for the practice of infractions against public, national or foreign administration, duly regulated by Federal Decree No. 8.420/2015, issued on March 15 and 2015, is presented in full on the Intranet, as an appendix to this Code.

## **General Data Protection Law**

Petrocoque operates in compliance with the LPGD.

The provisions of the General Law for the Protection of Personal Data (LPGD), Law No. 13.709/2018, which regulates operations for processing personal data, must be strictly observed, ensuring that the Company's departments are directed in regard to the organisation of protecting the data of natural persons received and/or transmitted as a result of labour relations and/or functional ties, as well as institutional, commercial and/or operational relationships as well as their policies, rules and internal procedures.



## Use of electronic information systems

Electronic systems as well as technological and communication resources are available to employees for the proper performance of their duties, in compliance with established guidelines of a technical nature, and the instructions related to the guidelines imposed because of the LGPD. Its use for personal matters is allowed if in compliance with internal policies, norms and procedures, and that it does not interfere with work progress. In this regard, it is established that:

- a) The exchange, redemption, storage or use of obscene, pornographic, violent, discriminatory, racist or defamatory content that disrespects any individual or entity, or that is contrary to Petrocoque policies and interests, is prohibited.
- b) Users in general should not have an expectation of privacy when using these systems and resources. For this reason, Petrocoque may, at its discretion, use and monitor any information transmitted or contained in these resources. This rule covers information written or stored on Company servers. It also includes information that is technically developed, information acquired by associations, or by acquisition, licence, purchase or that entrusted to it.
- c) All files and information related to professional activity created, received or stored on Petrocoque servers are the property of Petrocoque and constitute commercial and legal assets. Therefore, in the event of changes or dismissing an employee, this information maintained by him/her should be forwarded to immediate leadership.
- d) The access password to the systems is for exclusive personal use, as it is not allowed to be given to third parties, even to a co-worker, except in expected cases for sharing in IT regulations.

## **Management and Modifications of the Code of Conduct and Ethics**

1. The Human Resources department is responsible for delivering Petrocoque's Code of Conduct and Ethics to each employee upon hiring, as well as collecting the Statement of Commitment signed by the same.
2. It is up to managers, at all levels, to ensure that their subordinates know and apply the precepts of this Code and to be an example of conduct to be followed by all employees.
3. It is up to the Provider department, together with the contract manager, to ensure that contracted service providers know and apply the precepts of this Code of Ethics.
4. The Code of Ethics shall be reviewed every 3 (three) years, or whenever necessary and submitted to the approval of the Board of Directors, in cases that contain any amendments, as established in the Company's Bylaws.
5. Any suggestion, praise, complaint or criticism about this code should be forwarded to the Petrocoque Ombudsman.
6. Any questions may be referred to the Petrocoque Compliance Committee.
7. Any complaint about non-compliance with this code should be forwarded to the Petrocoque Complaints Channel.
8. The signing of the Statement of Commitment attached to this Code, which may be implemented by both physical and electronic form, is mandatory and expresses consent and agreement as to compliance with the principles and guidelines contained therein.

**For suggestions, praise, complaints or criticism**

**Petrocoque Ombudsman**

[ouvidoria.petrocoque@petrocoque.com.br](mailto:ouvidoria.petrocoque@petrocoque.com.br)



**For questions**

**Compliance Committee**

[comitedeconformidade@petrocoque.com.br](mailto:comitedeconformidade@petrocoque.com.br)



**For complaints**

**Complaints Channel**

[www.canaldedenuncias.com.br/petrocoque](http://www.canaldedenuncias.com.br/petrocoque)

**Tel.: 0 800 377 8013**

**(electronic service 24 hours a day, seven days a week, and with personal service, from Monday to Friday, from 09:00 to 17:00.)**

This Code of Conduct and Ethics was approved by the Petrocoque Board of Directors at RCA No. 3, from February 13, 2023.

## STATEMENT OF COMMITMENT

I declare that I have read and understood the Petrocoque Code of Conduct and Ethics and I will make a commitment to comply with and respect it in all my activities at the Company, ensuring its application.

_____ Employee's Full Name	_____ Full Name of the Immediate Supervisor
_____ Department	_____ Department
_____ Date	_____ Date
_____ Employee Signature	_____ Immediate Supervisor Signature