



## **BATUX Business Code of Conduct**

### **1. WHAT IS THIS BATUX BUSINESS CODE OF CONDUCT?**

This Business Code of Conduct reflects how professionals, collaborators, and suppliers should act in relation to society. Everyone must act correctly, ethically, with integrity, and efficiently in the pursuit of results, incorporating the values expressed in this Code, obeying internal policies and current legislation.

### **2. OBJECTIVES OF THE BUSINESS CODE OF CONDUCT.**

The Business Code of Conduct was prepared with the following objectives:

- To clearly state the corporate values, so that all professionals and suppliers can understand, respect, and practice them.
- To serve as an individual and collective reference for the attitudes and behavior of each professional and supplier.
- To contribute to ensuring that these values are respected in all locations and that its professionals and suppliers act correctly, fairly, and respectfully towards the community and the environment.

### **3. TO WHOM DOES THIS CODE APPLY?**

The Business Code of Conduct applies to all professionals who work or provide services for BATUX and must regulate the relationships that these professionals maintain inside and outside the company with other professionals; suppliers, clients, banks, other partners, and competitors; public authorities at all levels; the local community and society in general. The Business Code of Conduct also applies to all suppliers, commercial partners, and natural and legal persons with whom BATUX interacts.

### **4. TERMS AND EXPRESSIONS USED:**

- **CONDUCT** - Behavior, moral procedure.
- **CODE** - Set of rules, laws, or norms.
- **ETHICS** - Study of the principles that guide human actions and help distinguish right from wrong.
- **FAKE NEWS** - Consists of the deliberate creation and distribution of disinformation, rumors, or sensationalist headlines via newspaper, television, radio, or online, with the intention of deceiving in order to obtain financial or political gain.
- **SUPPLIERS** - Commercial partners, natural and legal persons with whom BATUX interacts and buys products or services are considered suppliers.
- **BUSINESS CODE OF CONDUCT** - Norms and behaviors that govern the organization's actions and define what it expects from its professionals, suppliers, and other partners.
- **PROFESSIONALS** - All those who work in the company or provide services under contracts, regardless of position, function, or activity.
- **VALUES** - A company's values are a portrait of its DNA; it is what differentiates it from the competition. They impact everything from the employee experience to relationships with clients, partners, and suppliers. Values are, in essence, beliefs,

philosophy, and principles that guide business and activities. They are the motivation, direction, positioning, and acting with focus on objectives and with ethics. This set of values guides the way of doing business and the behavior of everyone, strengthening commitment, engagement, and basic rules of action. They are the foundation of an organizational culture, the identity of a company, and the strategic pillars.

- **RESPECT FOR PEOPLE AND THE ENVIRONMENT** - Always act correctly and fairly in relation to shareholders, professionals, clients, suppliers, governments, local communities, and society in general. Act responsibly towards the environment.
- **RESPONSIBLE ACTION** - Comply with the established legislation wherever we operate, acting with integrity. Respect diversity in accordance with universal norms of good human coexistence, without discrimination based on race, sex, creed, religion, position, function, etc.
- **TRANSPARENCY** - Provide clear and comprehensive information about activities, achievements, policies, and performance, in a systematic and accessible manner.
- **FOCUS ON RESULTS** - Always seek to maximize BATUX's performance as a way to guarantee its perpetuity, its investments, the return to shareholders, and the collective purposes of each professional, supplier, and client.
- **QUALITY IS INNOVATION** - Guarantee the quality of services and products, in addition to continuously investing in the improvement of professionals, tools, and technology.

## 5. BATUX'S ASPIRATION AND BEHAVIORAL COMPETENCIES

BATUX's actions and the expected behavior of its professionals and suppliers are guided, respectively, by the Aspiration and Behavioral Competencies, by this Code of Conduct, and by its Humanized Management Policy.

- **ASPIRATION:** Generate value for shareholders, investors, clients, professionals, and partners.
- **BEHAVIORAL COMPETENCIES:**
  - **PROTAGONISM** - Be proactive and results-oriented, understanding oneself as a fundamental part of the solution.
  - **COMMITMENT TO RESULTS** - Be committed to the profitability of the business, client satisfaction, agreed deadlines and quality, and cost austerity.
  - **HUMANIZED AND EFFECTIVE LEADERSHIP** - Influence and mobilize people to achieve business objectives, inspiring and directing their team, pursuing high performance.
  - **EXCELLENCE IN RELATIONS** - Build and maintain relationships based on trust, respect for differences, and transparency, taking responsibility and adopting clear and empathetic communication.
  - **ADAPTABILITY** - Be available, act to incorporate new concepts, and be resilient to deal constructively with conflicts.
  - **SENSE OF RESPONSIBILITY** - Be disciplined, prioritize activities effectively, and take calculated risks to achieve goals, taking responsibility for the consequences of decisions and committing to resource management.
  - **STRATEGIC AND SYSTEMIC THINKING** - Plan and act to add value to the business, identifying the possibilities for contribution and the impact of their activities on the whole.



- **COOPERATION** - Work collaboratively, offer and accept help, and encourage integration between areas, recognizing the importance of each individual's contribution to the whole.
- **INNOVATION** - Be open and available to new ideas for continuous improvement in the search for differentiated results and value generation.

## **6. GENERAL CONDUCT OF BATUX IN RELATION TO ITS PROFESSIONALS AND SERVICE PROVIDERS.**

1. BATUX believes that the diversity of its professionals is one of the main factors for maintaining its success, permanence, and growth. For this reason, it seeks to recruit and retain efficient and talented people and continuously invests in their development.
2. BATUX is committed to equal employment opportunities for all, regardless of race, sex, religion, beliefs, or nationality. Career progression depends exclusively on individual performance, talent, commitment to its values, results achieved, and individual involvement.
3. **NON-DISCRIMINATION** - Discriminatory practices against any professional, job applicant, or service provider are not tolerated. Thus, BATUX will only decline a candidate for any type of position or service if there are strong indications that the hiring has characteristics and/or interests unrelated to those solely linked to their competence and professional expertise.
4. **PROFESSIONAL DEVELOPMENT** - It is part of BATUX's business policy to promote the development of its professionals and service providers and to recognize people based on the results achieved and ensure that working at the company is a space for creation and fulfillment where everyone can pursue their professional goals.
5. **HUMAN RESOURCES POLICY** - Encourages collegiality and partnership in professional relationships, teamwork, responsible leadership, and initiatives such as quality of life programs, clear and transparent communication, among others, that can promote a differentiated organizational climate. The organization encourages respect and collaboration among professionals, in order to create a favorable internal environment for business growth and the agency's perpetuation.
6. **HARASSMENT** - Moral or sexual harassment are inadmissible practices in a respectful and dignified work environment and will not be tolerated. Acts of intimidation, offense, or aggression committed by professionals, on the organization's premises or in the exercise of their function, whether against colleagues or people not directly linked to the company (clients, suppliers, consumers, authorities, community members, etc.) will be treated in accordance with legislation and internal regulations. If you are a victim of any such constraint or know of someone who has gone through this situation, inform your immediate superior or the Human Resources department, or through the Ombudsman Channel.
7. **DRUGS AND WEAPONS** - The possession of drugs or weapons is not permitted in any way in the workplace and is considered a serious offense, subject to labor and criminal sanctions.
8. **RESPECT** - Every professional, regardless of their function, position, role, or remuneration, will be treated with respect and attention, and will be offered conditions for personal and professional development within the reality and competitive conditions of their work unit.
9. **HEALTH AND SAFETY** - Health and safety conditions at work must be the object of permanent attention and must ensure professionals the lowest possible risk in the

performance of their duties. For this to occur, everyone must comply with general preventive health and safety standards and participate in training and guidance activities. Safety is a fundamental value, reflected in the phrase: "We will do it safely or we will not do it."

10. **CHANNELS** - Our Integrity and Compliance channels were created to clarify doubts, make complaints or denunciations related to the ethical principles established in this Code, or any other related policy. If for any reason you wish to clarify any doubt related to the Batux Code or Policies, or wish to make a complaint, the following mechanisms are available:
  - **DOUBTS** - Talk to your Immediate Superior: your immediate superior is the main guide and can help clarify some doubts about daily work, as well as some issues related to the Code.
  - Contact the Compliance Area through the Ombudsman channel: it is the main promoter of the Code. With the support of the Steering Committee, it can offer guidance in finding an appropriate and ethical solution.
  - **DENUNCIATIONS** - Through the Denunciation Channel, the denunciations, comments, or doubts made will be received and treated impartially and confidentially. Each case will be duly evaluated for the adoption of appropriate measures. Reports made using a valid e-mail address will receive feedback on their progress.

## 7. PROFESSIONAL'S PERSONAL CONDUCT

1. Activities and personal relationships that conflict with BATUX's interests should be avoided. If in doubt about the existence of conflicts of interest, consult your manager, the Human Resources department, or the BATUX representative responsible for your service agreement.
2. Invitations to serve as a Board Member in other companies must be previously informed for evaluation.
3. Any work or activity carried out in BATUX's name, or using its name or facilities, must have prior approval from the area director.
4. Inform your director in advance when any company owned by you, your family members, or people closely related to you is applying or will be contracted to provide services or supply products to BATUX.
5. The indication of relatives and friends for existing vacancies is a traditional practice. It is up to the responsible areas to decide on the selection and hiring, and pressures to influence the admission, promotion, or dismissal by related professionals are not admissible.
6. Direct subordination of relatives will not be permitted.

## 8. CONDUCT REGARDING GIFTS

1. The acceptance of gifts of significant value (over R\$ 200.00) must be communicated to your manager. If refusal or return is not possible, gifts exceeding the established value limits will be made available to the Steering Committee for final destination.
2. Invitations to events, trips, parties, from suppliers, must be communicated to the Directorate of the area of operation.
3. The offering of gifts by BATUX is prohibited, with the exception of symbolic value gifts for clients and motivational gifts for campaigns.



## **9. CONDUCT IN RELATION TO THE MARKET – CLIENTS, SUPPLIERS, BANKS, PARTNERS, AND COMPETITORS**

### **CUSTOMER SERVICE**

1. In addition to ensuring the quality of the products and services it offers, BATUX is committed to serving clients and consumers always with efficiency, speed, courtesy, and transparency.
2. When a client or consumer cannot be served, this must be clearly stated, explaining the reasons in an evident and respectful manner.

### **QUALITY AND CONFORMITY**

Only products or services that comply with legislation and sector regulations will be offered. If any non-conformity is found, explanatory or compensatory measures must be taken.

### **CONFIDENTIALITY**

BATUX, as well as its professionals and service providers, are committed to maintaining the confidentiality of information received from clients and business partners.

### **TRUST**

Trust is one of the foundations of the relationship with the market.

## **10. COMPETITION AND CONSUMER RIGHTS**

1. BATUX understands that loyalty in competition and respect for consumer rights are factors that favor the development of the market on a sustainable basis. No client can be forced to accept conditions that contradict these rules to acquire products or services.
2. **COMPETITION.** BATUX respects its competitors and seeks to outperform them in a healthy way, offering products and solutions with a differentiated cost-benefit ratio to its clients. Attitudes that may constitute slander or defamation of competitors are not permitted.
3. **PURCHASES AND CONTRACTS.** The relationship with suppliers and other partners must always be based on the pursuit of quality, an adequate cost-benefit ratio, technical and financial reliability, integrity in the conduct of negotiations, with regard to legislation, the environment, and commercial, social, and contractual rights. With the aim of expanding its sustainable operations, BATUX recommends that its Purchasing and Supply areas seek permanent ways to influence its suppliers of products, services, and equipment to adopt responsible practices in the social and environmental areas, and to be signatories of this Business Code of Conduct.

## **11. GENERAL CONDUCT OF BATUX IN RELATION TO ITS SUPPLIERS**

1. BATUX believes in the solidity of its relationships with its suppliers. To this end, it is essential that suppliers know and act in accordance with the legislation and this Code, being responsible for disseminating, monitoring, and ensuring its compliance in all their activities.



2. **INTEGRITY** All suppliers are expected to demonstrate high ethical standards and maintain integrity in all interactions with BATUX and the public administration. Thus, any form of corruption, extortion, or fraud will not be tolerated.
3. BATUX does not condone coercive commercial practices to gain an advantage or any type of harassment (moral, sexual, political, and religious).
4. **CONFIDENTIALITY** According to ABNT (Brazilian Association of Technical Standards), "Information is an asset that, like any other important asset, is essential for an organization's business and, consequently, needs to be adequately protected. Information can exist in various forms. It can be printed or written on paper, stored electronically, transmitted by mail or electronic means, presented in films, or spoken in conversations. Whatever the form of presentation or the medium through which information is shared or stored, it is recommended that it always be adequately protected." In accordance with Batux's Privacy Policy, Information Security Policy, and Supplier Hiring Policy.
5. Trust is one of the foundations of BATUX's relationship with its suppliers; therefore, all data, details, and information transmitted by BATUX are expected to be treated as confidential by the supplier, who must protect the information from threats to ensure business continuity and minimize risks to the company.

## **12. CONDUCT IN RELATION TO COMMUNICATION MEDIA.**

1. BATUX considers legitimate the right of the population to be informed about matters of public interest, even when related to a private company, and considers it the role of the press to obtain and disseminate this information. Furthermore, it understands that the existence of a free, independent, and impartial press contributes to the improvement of the market, the democratic State, and citizenship.
2. BATUX repudiates the use of economic power to constrain the action of the press or to induce it to disseminate untrue facts.
3. BATUX considers the role of the press in forming the organization's image before public opinion to be important and seeks to provide information or respond to requests, when pertinent, considering the right not to comment on issues that contradict its interests or to maintain secrecy about information considered strategic.
4. Only professionals and suppliers designated to act as spokespersons are authorized to speak on behalf of the company. If you are approached to provide information, write articles, or give interviews and statements on behalf of the company to any media outlet, inform the Directorate of your unit.

## **13. CONDUCT IN RELATION TO COMPANY ASSETS**

1. Each professional and supplier is responsible for the correct use and safekeeping of the company's goods and assets that are part of their work, directly or indirectly. This applies to the goods of clients, suppliers, and partners used in the company's activity. These goods and assets must not be used for personal benefit, except when expressly authorized. Among these goods and assets are real estate, equipment, facilities, business plans, technical and market information, software, models, papers and work documents, computer or cloud files, and others that are part of the company's assets.
2. The appropriation or misuse of any of these goods, including their copying, sale, or distribution to third parties, are serious offenses that may result in applicable labor, civil, criminal, and/or administrative sanctions.

3. **PATENTS AND INVENTIONS** - Innovations developed by professionals and suppliers through their work, and the patents and property rights arising from these inventions, are incorporated into the company's assets and remain with it even after the professional's departure or the termination of the service contract.
4. **INTERNAL AND EXTERNAL COMMUNICATION** - The use of the company's equipment and means of communication (telephone, e-mail, internet, and others) for personal communications and contacts should be restricted to what is necessary. The internet cannot be used for the transmission or reception of offensive, aggressive, pornographic information, or information about political, religious, or other positions.

#### **14. INFORMATION ABOUT BATUX AND ITS BUSINESS.**

1. Information must be disclosed internally and externally only by those authorized to do so and in an accurate, objective, and appropriate manner. Each professional and supplier is responsible for the custody of the information they possess and must inform their leadership about any fact that may seem strange or incompatible with our values.
2. False, slanderous, or malicious statements about colleagues, the company, its business, partners, suppliers, or clients may be subject to labor, civil, and/or criminal sanctions.
3. Professionals and suppliers who have knowledge of non-public information have a duty to keep it confidential, even after leaving the company or terminating the contractual relationship. The use of privileged information for personal or third-party benefit is a crime, subject to labor, civil, and criminal sanctions.

#### **15. CONDUCT IN RELATION TO THE NEARBY COMMUNITY AND THE ENVIRONMENT**

BATUX is a signatory of the UN GLOBAL COMPACT, with which it has established its goals linked to the SUSTAINABLE DEVELOPMENT GOALS and has established an internal ESG committee that works in conjunction with the Global Compact, seeking to contribute to a better world that leaves no one behind.

#### **16. CHILD LABOR OR SLAVERY-LIKE CONDITIONS**

1. BATUX does not employ child labor and respects workers' rights by providing them with fair remuneration aligned with their labor market, ensuring their protection within its safety and accident prevention at work policy, and maintaining a respectful relationship within its Humanized Management policy.
2. Our managers must ensure that their suppliers follow the same principle.

#### **17. POLITICAL-PARTY ACTIVITIES**

BATUX does not engage in political activities, and any professional wishing to participate in this process must do so individually, without involving the company's name or resources. No professional is authorized to solicit participation, support, funding, or involvement from other professionals or business units for any candidate or party. Political activities carried out by professionals must occur outside the workplace and working hours.

#### **18. UNION ACTIVITIES**



BATUX seeks to maintain a relationship of respect with union entities and does not practice any type of discrimination against unionized professionals.

## **19. RELIGIOUS ENTITIES**

BATUX seeks to maintain the best relationship with religious entities, respecting all creeds and beliefs, both of its professionals and of the communities where it operates.

## **20. CONDUCT IN RELATION TO PROFESSIONAL, BUSINESS ASSOCIATIONS AND ENTITIES**

1. BATUX's philosophy is to participate in representative entities and associations of its sectors of activity, whenever this participation contributes to the development of the sector and does not imply violations of free competition rules and principles. The form of participation must be defined on a case-by-case basis by the Board of Directors, taking into account the profile of local associations.
2. The active participation of professionals in social, cultural, or charitable entities with public recognition, carried out individually, is seen as an important contribution to society and the country, as long as it does not affect their activity and regular work at BATUX.
3. **VOLUNTEERING AND SOCIAL RESPONSIBILITY** BATUX practices and encourages social responsibility activities and internal volunteering through its SOCIO-ENVIRONMENTAL COMMITTEE. These activities are considered part of the responsibility towards the community where it operates and must be structured and organized to obtain the maximum possible social return in relation to the resources employed and the time of the professionals involved.

## **21. CONDUCT IN RELATION TO PUBLIC AUTHORITIES**

1. Relationships with authorities, politicians, and public agents must be based on professional and correct attitudes.
2. BATUX repudiates any harmful act against the public patrimony of any country. It is the duty of each and every BATUX professional and all suppliers to base their activities and relationships with public bodies and agents on the strictest legality and morality.
3. BATUX does not tolerate practices involving any undue advantage to and/or from a public agent, fraud in contracts and/or bidding procedures, manipulation of the economic-financial balance of contracts, impediment or obstruction of investigative or supervisory activity of public bodies, and it is the obligation of BATUX professionals and suppliers who have knowledge of such attitudes to report them to their immediate superior or the COMPLIANCE AREA, or to immediately notify the company through the OMBUDSMAN CHANNEL.
4. BATUX's philosophy is the strict compliance with current legislation, and it expects the same behavior from its professionals and suppliers. It considers, however, that it is legitimate to challenge abusive, discriminatory, or incorrect legal or fiscal measures, which will be done through administrative and/or judicial actions in the competent authorities.

## **22. RESPONSIBILITY FOR THE BUSINESS CODE OF CONDUCT**



The overall responsibility for BATUX's Business Code of Conduct lies with the STEERING COMMITTEE.

1. **LEADERSHIP** - Each team leader is a representative of BATUX in relation to the professionals and suppliers under their management and has the obligations described below: a. To know the Code in detail in order to clarify the doubts of their team; b. To disseminate BATUX's values and the definitions of the Code to their team, partners, clients, suppliers, and other social segments with whom they maintain contact, guiding them on the foreseen procedures; c. To identify violations of the Code and act to correct and eliminate them, bringing cases to the attention of the STEERING COMMITTEE for information and possible additional actions.
2. **INDIVIDUAL RESPONSIBILITY** - Each BATUX professional and each supplier must ensure compliance with the Business Code of Conduct and inform their immediate superior, the Human Resources department, or the STEERING COMMITTEE when they become aware of any violation of the rules.

### 23. ETHICS LINE

Any professional and/or supplier who is unsure how to act or has knowledge of any illegal act or non-compliance with this Business Code of Conduct, or who suffers any form of pressure or illegal request, must immediately notify the company through their chain of command or through the complaint channel with the OMBUDSMAN.

São Paulo, August 16, 2024

STEERING COMMITTEE

#### Declaration of Commitment to the Business Code of Conduct

.....declares to be aware that BATUX's professionals and suppliers must guide their behavior by the values and norms contained in the Business Code of Conduct that I/we am/are receiving herewith, and I/we assume the commitment to comply with it.

Date --,-----,20--

This declaration must be included in all service agreements with suppliers and employment contracts with employees. If these contracts have already been signed, an addendum to this effect must be attached to them.