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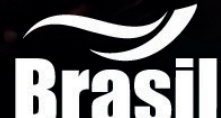
CODE OF CONDUCT



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NOSSA EMPRESA COM TRANSPARÊNCIA
E RESPONSABILIDADE

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Brasil
TERMINAL PORTUÁRIO
Believe and Innovate

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CHAPTER 1

PRESENTATION



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CHAPTER 1

PRESENTATION

This Code of Conduct aims to present and explain BTP's guiding ethical principles, as well as to outline the behavioral guidelines and ethical values that guide the integrity of our operations and interactions, both internal and external.

This Code of Conduct is intended for everyone:

- BTP employees, whether they are employees under the Consolidated Labor Law (CLT) or statutory contracts, even if temporary, as well as casual port workers
- Interns and apprentices
- Employees of companies contracted by BTP and their respective subcontractors, when they are providing services at BTP
- Legal representatives of BTP in Brazil and abroad
- Third parties with whom BTP has any commercial relationship, including suppliers, service providers, agents, clients and associates

Adherence to this Code is essential to ensure that BTP acts with integrity and remains a reference in the port sector, **strictly complying with the company's laws, standards, regulations, policies and internal procedures.**





CHAPTER 2

MISSION, VISION AND VALUES



CHAPTER 2

MISSION, VISION AND VALUES

At BTP, we share a set of mission, vision and values that guide the way we do business. This Code of Conduct contains rules that will guide our conduct based on our principles, our commitment to national and foreign legislation applicable to our business and our commitment to our employees, clients and the community. When forming our conduct, we also consider ethical standards and corporate guidelines from BTP shareholders.

In today's world of rapidly evolving economic and market conditions, the values remain key to ensuring we grow for the future in a sustainable way.

MISSION

Operate a modern port terminal efficiently and with quality, generating value for its clients, employees and shareholders, contributing to the growth of foreign trade, the social and economic development of the country, the city of Santos and its region.

VISION

To be a reference in port operations, recognized for international standard services provided safely and under responsible socio environmental management.

VALUES

- **Employee safety and health:** We prioritize safety in all our activities, through concrete actions to identify and prevent risks, and we are committed to the well-being of our employees
- **Ethics:** We base the management of our organization and all our relationships on ethical principles and we are transparent in our internal and external communication processes
- **Valuing people:** We recognize that our employees are our most valuable and important asset. We encourage an environment of teamwork and constant learning. We value and respect diversity in the workplace, where individual skills are respected. We reward excellence and superior performance from each individual
- **Operational excellence:** We are committed to setting a standard of excellence in every aspect of our business, aiming to achieve superior results in everything we do. We support our success in generating profits and recognize that we can only achieve this through the satisfaction of our clients
- **Socioenvironmental responsibility:** We are committed to the sustainability of our business and also to society. We support education and culture and respect the environment, thus contributing to social and sustainable development



CHAPTER 3

YOUR RESPONSIBILITY



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CHAPTER 3

YOUR RESPONSIBILITY



Complying with the Rules

As a BTP employee, you must comply with all applicable government rules and regulations, as well as all internal policies, wherever we do business. Allegations of pressure from your manager or another BTP member or demands arising from business conditions will not be accepted as justification for you not complying with the legislation.



Our Expectations

This Code of Conduct reflects our responsibilities. Its purpose is to explain the guiding principles of our conduct. BTP expects everyone to fully comply with the provisions of this Code.



Responsibilities

As a BTP employee, you make decisions every day. Therefore, it is essential that this Code of Conduct is applied in an objective and impartial manner. All employees have a responsibility to take appropriate action if any person fails to meet the required standards or exhibits behavior that is, or appears to be, inconsistent with this Code of Conduct. Failure to comply with this Code of Conduct will subject everyone to the applicable measures under the legislation in force, as well as BTP disciplinary actions, regardless of the position or function held.

Under no circumstances will individuals covered by this Code of Conduct have authorization or will be authorized to fail to comply with its requirements, either directly or indirectly, by themselves or through the use of any third parties.



Clarifications

Although this Code provides rules, guidance and standards on the expected behavior and conduct in daily activities, it is not intended to offer exhausted or definitive solutions for all situations that may arise.

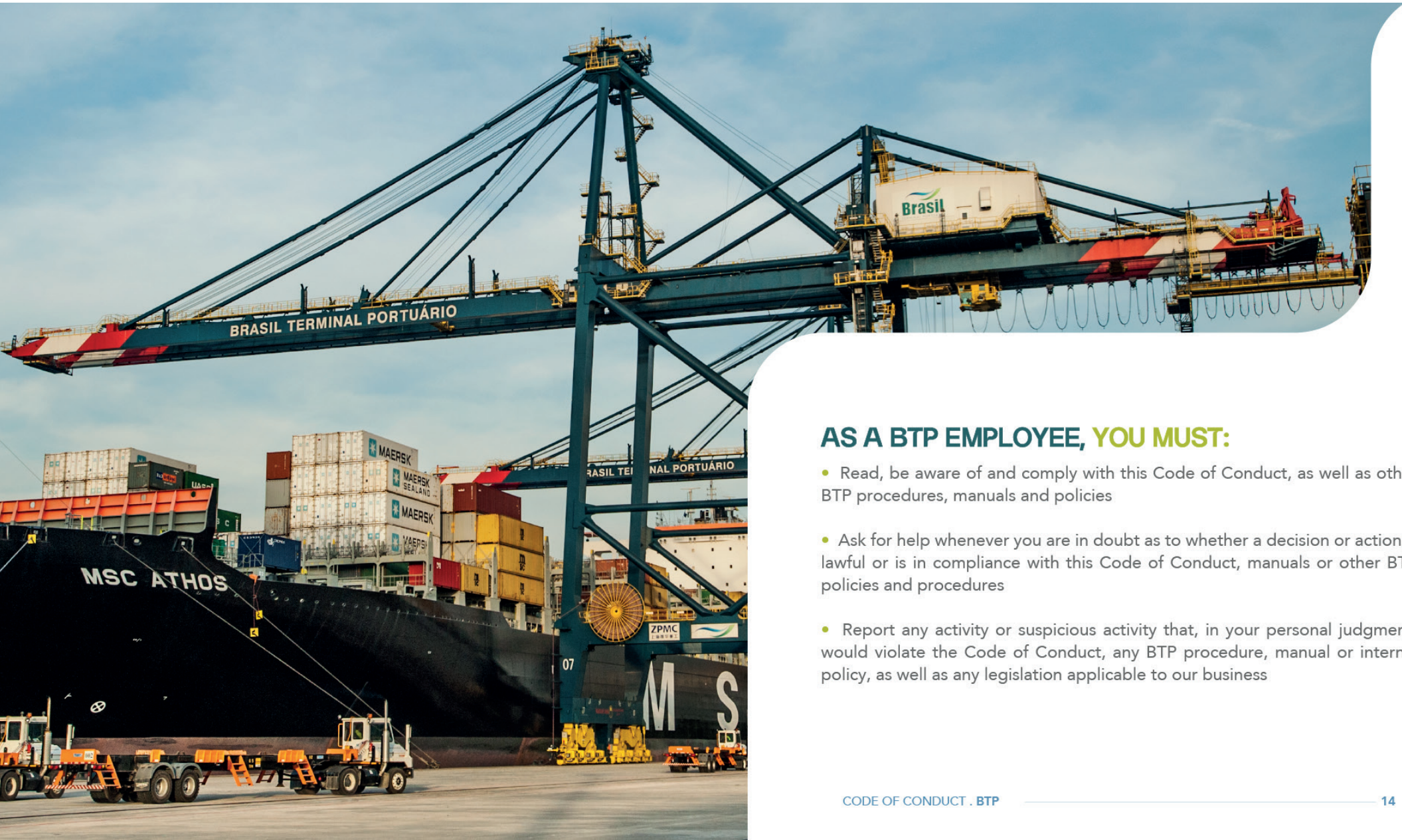
If you have any questions about how to apply or interpret the guidelines described here, or when making decisions in specific situations, ask your immediate manager or the Legal & Compliance Manager for guidance.



Disclosure and Training

It is essential that everyone attests to their knowledge and compliance with this Code of Conduct, as well as participates in the training offered by BTP. The Code of Conduct is provided on a mandatory basis for all employees after the integration process, upon proof of reading in the system, which will be duly filed in the employee's file.

In the case of third parties to whom this Code of Conduct applies, it will be published on the BTP website for viewing and consultation, as well as it will be included in the Agreement signed between the Parties.



AS A BTP EMPLOYEE, YOU MUST:

- Read, be aware of and comply with this Code of Conduct, as well as other BTP procedures, manuals and policies
- Ask for help whenever you are in doubt as to whether a decision or action is lawful or is in compliance with this Code of Conduct, manuals or other BTP policies and procedures
- Report any activity or suspicious activity that, in your personal judgment, would violate the Code of Conduct, any BTP procedure, manual or internal policy, as well as any legislation applicable to our business

AS A MANAGER, OFFICER OR ANY OTHER STATUTORY OR OTHER FUNCTION OF BTP, YOU MUST:

- Set an example through your actions and words
- Promote open and honest communications with your employees, encouraging them to bring up questions and concerns
- Recognize and support any employee who approaches you to discuss an issue or report a potential violation, ensuring that there will be no retaliation for doing so
- Ensure that action plans to address compliance risks are promptly implemented
- Promote BTP policies, manuals and procedures designed to prevent and detect non-compliant or illegal conduct

Report any activity or suspicious that, in your personal judgment, would violate the Code of Conduct, any BTP procedure, manual or internal policy, as well as any legislation applicable to our business.

Discuss this Code of Conduct and BTP values with your team and ensure that employees are trained and informed about the policies, procedures and compliance risks that apply to their positions.





CHAPTER 4

WORK ENVIRONMENT AND EMPLOYEE CONDUCT



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CHAPTER 4

WORK ENVIRONMENT AND EMPLOYEE CONDUCT

BTP is committed to maintaining a safe workplace for its employees, ensuring equal opportunities for employment, remuneration and professional development, free from any form of discrimination or behavior that may generate, accept or encourage offenses, intimidation or impropriety.

✓ Health, Safety and Respect In the Workplace

BTP is committed to creating and maintaining a safe and healthy working environment for everyone, and expects interactions to always be respectful and collaborative, maintaining a cordial environment completely free from discrimination, insults, violence or any form of disrespect.

It is strictly prohibited to:

- Carry or use drugs or illegal substances, or be under the influence of alcohol, drugs or illegal substances, during working hours or at any time, within the company's premises, except for the consumption of alcoholic beverages at events predetermined by BTP
- Carry or store weapons not authorized by BTP
- Threats, acts of violence or any act that puts the physical integrity of any individual at risk

- Behaviors that are incompatible with socially accepted standards and current morals, which may cause discomfort in the work environment

We must all be, and remain, aware of potential health and safety issues, and raise our concerns when we see anything that poses a threat to health, safety or well-being. If an accident occurs, it is essential to act quickly to ensure the well-being of those involved.

EXAMPLES:

- Do not engage a supplier that does not implement safety standards that are consistent with our standards
- Do not carry out tasks such as operating equipment for which you are not trained, skilled, medically fit and sufficiently rested
- Do not attend work under the influence of drugs or alcohol and inform the Occupational Physician, as well as your direct manager, of any prescribed medications that may impact your ability to perform your work in a safe manner



REFLECTION POINTS:

- Have you ever considered how your behavior might influence the safety and well-being of your colleagues?
- If something goes wrong due to a lack of training, who else might be affected besides you?
- Could your decision not to report a risk impact your colleagues and the work environment?

✔ Fight Against Harassment and Sexual Misconduct

Sexual misconduct is defined as the act of constraining someone with the intention of obtaining sexual advantage or favor, using their hierarchical superior status or ascendancy inherent to the exercise of employment, position or function. Sexual misconduct is defined as the practice of a lewd act against someone, without their consent, with the aim of satisfying one's own desire or that of third parties.

These behaviors can manifest themselves in a variety of ways, whether explicit or disguised, spoken, insinuated, written, or demonstrated through gestures or physical touch. They can also express themselves through coercion or blackmail.

EXAMPLES:

- Physical touching without consent
- Sending messages, emails or digital communications with sexual content without the recipient's authorization
- Insisting on invitations for romantic or sexual encounters, even after refusal

REFLECTION POINTS:

- Would you recognize a situation of harassment and know how to act to resolve it?
- What would you do if you noticed a colleague feeling uncomfortable with inappropriate comments or actions?
- How do your words and actions contribute to creating a workplace free from harassment?



BTP does not tolerate and vehemently repels any type of conduct characterized as harassment and/or sexual misconduct, and reminds you that, in Brazil, such practices are considered crimes under the Criminal Code, with penalties that can reach up to 5 years in prison.

✔ Combating Moral Harassment and Abusive Conduct

Every employee has the right to work in an environment free from offensive and inappropriate behavior. At BTP, the corporate culture is firmly opposed to any form of harassment, violence and bullying, which are strictly unacceptable.

Moral harassment in the workplace occurs when a person is repeatedly subjected to humiliating, embarrassing or degrading situations, compromising their dignity and physical or psychological integrity. This abusive behavior can occur through words, gestures, attitudes or behaviors that aim to emotionally destabilize the victim, regardless of the hierarchical level involved.

BTP repudiates any form of moral harassment, humiliation, threats or verbal violence. The company is adamant in its position of not tolerating practices that could harm the well-being of its employees, such as disproportionate workload, social isolation or public embarrassment. In situations where these practices are identified, it is expected that they will be promptly reported to the Ethics Channel, ensuring an adequate investigation and the taking of necessary measures to preserve a healthy and respectful work environment.

EXAMPLES:

- Assigning humiliating or vexatious activities
- Assigning excessive tasks or unrealistic deadlines with the intention of overloading and emotionally destabilizing the employee
- Purposefully excluding an employee from meetings, events and other professional interactions, isolating them socially within the work environment
- Depriving an employee of information essential to the performance of their duties, making their work more difficult and affecting their professional development
- Making constant and disproportionate criticisms, without grounds or in a destructive manner, aiming to demoralize and demotivate the employee

REFLECTION POINTS:

- Have you ever put yourself in the place of a colleague who is being treated disrespectfully or humiliatingly?
- How do your words and actions impact the emotional well-being of the team?
- Can you identify when feedback or demands cross the line from professional to abusive?
- If you witness a case of moral harassment, how can you act to protect your colleague without fear of retaliation?
- Does your approach to handling others' mistakes promote learning or create an atmosphere of fear?



✓ Diversity and Inclusion

We provide an inclusive environment and equal opportunities for employment, remuneration, and professional development. We encourage bringing perspectives, skills and diverse talents to the organization. Diversity of thought makes us stronger.

We must all be able to interact and collaborate effectively with colleagues of diverse nationalities, genders, generations, religions, disabilities, sexual orientations, ethnicities and perspectives. BTP's success is intrinsically linked to this capacity for diversity and inclusion. Therefore, at BTP, discrimination in any form is strictly intolerable.

Discrimination can take many forms, including unequal treatment based on race, sex, gender identity, sexual orientation, age, language, religion or disability.

At BTP, we treat all employees and job applicants equally, fairly and respectfully, without any discrimination based on race, gender, sexual orientation, age, special needs, religion, political opinion or cultural background. This applies to all processes involving employees, such as recruitment, selection and promotion decisions.

Our goal is to create an inclusive culture that encourages new ways of thinking and leverages diverse skills and talents. This means that diversity must be valued and that our employees must have the freedom to innovate and collaborate, helping us achieve success as one global team.

✓ Labor Relations

Our employees are an essential component of BTP's success. We are committed to establishing constructive and productive labor relations with our employees and their union representatives, resulting in good and fair labor conditions. We respect the labor rights of our employees, providing a healthy and safe work environment. We treat employees with respect and dignity and will not tolerate discrimination, child labor or forced labor. We respect freedom of association and the right to collective bargaining.

✓ Conflict of Interest

We promote transparent and sound business dealings by avoiding conflicts of interest. Everyone must take actions and make decisions that are in the best interests of BTP, ensuring that actions and decisions are not influenced by personal interest and do not conflict with the interests of BTP, or cause damage to its image and reputation.

The employee must, during the working hours for which he/she was hired, dedicate all his/her time and apply all his/her efforts and BTP resources to promote BTP's business and interests, and shall not use his/her working hours for other activities. Furthermore, at any time, the employee may not exercise, be employed by or associated with any other company, enterprise or commercial activity, which may be in conflict with the requirements of his/her employment or the interests of BTP, without obtaining prior written authorization. Finally, all contractors qualified to provide services to BTP must sign a specific document attesting to the absence of any conflict of interest.

Where a close friend or family member is employed by a competing business, a client, or a key supplier, this may create a potential conflict and should be communicated in writing to the Legal & Compliance Manager, who will analyze the case. Please check the Compliance Program Policy for more detailed information.

Any applicant, regardless of the origin of their referral, will participate on an equal footing in the BTP Recruitment and Selection process as long as they meet the criteria for participation in the Selection Processes. An applicant cannot have direct relatives in the same line of subordination (supervisory level), working in the area in which the vacancy is open.

EXAMPLES:

- Ownership, by the employee or a member of his/her family, of any external business that does or seeks to do business with BTP or that is its direct competitor
- Provision of services as an officer, executive, partner, consultant or manager of an external business that does or seeks to do business with BTP or that is a direct competitor of BTP
- Recommendation that BTP does business with a company where a close friend or family member works, or with which the employee has a personal relationship without disclosing this information to the Legal & Compliance Manager

REFLECTION POINTS:

- Have you ever analyzed whether your decisions at work could unduly benefit someone in your close circle?
- Are you able to separate your personal relationships from your professional responsibilities?
- If a project involving a friend or relative arose, would you inform your manager to avoid suspicion?
- Do I promptly and transparently disclose to my manager as well as the Legal & Compliance Manager any potential situation that could involve a conflict of interest or appear to be one?



✔ Relationship with Suppliers

BTP only deals with honest, qualified, duly regularized and competent third parties to provide services. All contracts for goods and services must be made with BTP's interests in mind. BTP's potential suppliers and business partners will be evaluated and selected using clear, honest criteria, without any discrimination or favoring.

Anyone acting on behalf of BTP in these matters cannot be influenced by personal interests, those of any family member or interested third parties. If there is a conflict of interest or if there is doubt about the existence of a conflict of interest, the employee must immediately inform the Legal & Compliance Manager about it.

EXAMPLES:

- Inform suppliers about order or deadline changes in advance to avoid issues
- Meet agreed deadlines to strengthen trust in the partnership
- Negotiate discounts or exclusivities by maintaining a long-term relationship
- Resolve quality or delivery issues collaboratively, without conflict



REFLECTION POINTS:

- Am I basing all business decisions on objective business criteria, or am I showing favoritism toward people close to me?
- Am I selecting suppliers in compliance with the BTP procedure as outlined in the Procurement Department Procedure?
- When negotiating with a supplier, do you ensure that all conditions are clear and documented?
- Do you avoid forming personal ties with suppliers that could compromise your impartiality?
- If you notice unethical practices from a supplier, do you know how to report them appropriately?

✓ Data Privacy and Protection

BTP respects the privacy and protection of personal data of all people with whom it interacts. Therefore, BTP uses personal data responsibly and ethically, and processes only data that is relevant and necessary, maintaining data confidentiality and implementing technical and administrative information security measures;

Computers, smartphones and electronic addresses and all other tools made available for the performance of work, whether physical or virtual, are the exclusive property of BTP and, as such, may be requested and/or inspected at any time, regardless of prior knowledge or notification to the employee. Such information will only be used for specific and legitimate purposes and we will store it securely and only for as long as necessary.

✓ Communication and Social Media

We work proactively with the media to promote BTP's image and reputation. All media communication on behalf of BTP must be accurate and reliable. We protect our brand while fostering transparency. We act according to our values and demonstrate respect, and inclusiveness in our social media interactions. We recognize the importance of interaction through social media and promote its responsible use.

All posts on personal social media or on platforms such as LinkedIn, Facebook and Twitter, among other media, should be considered public and not disclose confidential information, as per BTP's internal procedure. Posts and comments on social media should be clear in the sense that they reflect personal views and not those of the company, unless posted by an authorized representative of BTP. We expect everyone working for or with BTP to consider the impact on our brand and to avoid any damaging or derogatory communications. Comments on existing posts should be constructive and reflect our values.

✓ Media Contact on BTP Issues

Through their employment agreement, the employee is bound by an obligation of confidentiality and may not, under any circumstances, provide or confirm any information or comment and/or respond officially to the media without due authorization. The company will only communicate with the media through duly authorized spokespersons and with the express delegation of the CEO. In all cases, the media must be forwarded to the Corporate Communications Manager.

EXAMPLES:

- All BTP media communication must be reliable and protect the brand's integrity, with external interactions managed by the CEO together with the Communications team
- Employees' social media posts should reflect personal views, avoiding the disclosure of confidential company information
- Social media comments must be respectful, aligned with BTP's values of inclusion and transparency
- Respect for the company's image: Avoid posts or comments that could harm BTP's reputation

REFLECTION POINTS:

- Before responding to a media inquiry, do you verify if you are authorized and prepared to do so?
- Do you have clarity about which information can be publicly shared without compromising BTP's image or strategy?
- Am I selecting suppliers in compliance with the BTP procedure as outlined in the Procurement Department Procedure?
- If approached by the media, do you know who to direct the questions to in order to ensure an official and aligned communication?
- In case of doubts about a media request, do you seek guidance from the Communications or Legal department before taking action?



✓ Confidentiality

All information relating to BTP, including all financial information, data, records and documents relating to the company's activities, must be considered confidential and treated with discretion at all times. This data may only be discussed with superiors or colleagues at the relevant levels and in the appropriate places; information considered confidential by BTP must also be treated as such in relationships with third parties. Without limiting this restriction, suppliers to whom confidential information is transmitted must be expressly advised of the need for confidentiality at all times.

The use of information obtained at work, whether for one's own benefit or that of third parties, or to the detriment of BTP, will be considered a violation of this Code and the applicable legislation, and may result in the adoption of disciplinary measures and legal implications.

✓ Copyright And Intellectual Property

The ownership and rights of any invention, projects, designs, trademarks, copyrights (including the development of any computer program or software) or any form of intellectual property rights, which relate in any way to the service, business or operations of BTP, written or produced by the employee for BTP during the period in which he/she works for it, are the property of BTP.

✓ Protection Of Company Assets

BTP complies with all standards and technical requirements related to occupational safety, ensuring a safe, healthy and accessible working environment for everyone. Each employee is responsible for protecting and caring for the company's resources. Therefore, employees are expected to use the facilities and equipment appropriately and safely, following the guidelines provided for their correct use.

BTP does not tolerate the use by an employee of any BTP asset, establishment or services for any illegal, improper purpose or unauthorized personal use.

Equipment, systems and facilities may only be used for conducting legitimate business or for other purposes specifically authorized by the management. These limitations apply to all BTP assets, including the internet, intranet, email, telephone and fax systems. BTP assets in the possession of an employee must be properly cared for, maintained and protected.

The software that can be installed and used on your computer is licensed and purchased by BTP from licensed suppliers. Such software may not be copied unless authorized and in accordance with the license agreement. The employee may not violate any equipment or software license agreement entered into by BTP. The passwords used to access BTP computer systems are the responsibility of each employee - such passwords must not be shared. A password is similar to an electronic signature and any abuse or unauthorized use of passwords is unacceptable.

BTP may monitor, access and review all electronic communications, including the internet, intranet, emails, email attachments and electronic files, whenever it deems necessary, to protect its interests and assets, without prior notice to employees. When an employee leaves BTP, he/she must return all assets in his/her possession in good condition and may be charged for costs due to misuse or neglect.



CHAPTER 5

COMPLYING THE LAW AND ACTING WITH INTEGRITY



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CHAPTER 5

COMPLYING THE LAW AND ACTING WITH INTEGRITY

✔ Corruption Mitigation Strategies

Interactions with the Public Administration and with public and private agents must be conducted in an ethical, professional and transparent manner, always in line with BTP's values and principles, as well as in accordance with the legislation, including Law No. 12.846/2013 (Anti-Corruption Law).

We do not tolerate corruption and bribery, regardless of the amount involved. We will not offer, authorize or accept bribes, kickbacks, facilitation payments or anything of value for the purpose of obtaining or retaining business or any other improper advantage for BTP. We do not make any payments, of any nature, to public or private agents, whether domestic or foreign, for these purposes.



This also means our Employees and representatives must never accept, give or promise something that could be interpreted as intending to improperly influence a governmental or commercial decision. Corruption can happen in many ways, including not necessarily involving money.

If there is any suspicion or signs of practices that violate the legislation or the guidelines of this Code, it is essential that the situation is promptly communicated to superiors or to the BTP Ethics Channel. Any violation of the aforementioned rules, whether by employees or third parties linked to BTP, will be treated with the utmost seriousness by the company and may lead to dismissal, termination of agreements and/or application of fines, in addition to possible notification to the competent authorities.

Certain gifts or entertainment may be considered a bribe, which is why we have specific internal policies, manuals and procedures.

EXAMPLE:

- Do not enter into a secret agreement with a Government Officials to hire a company requested by him
- Do not give a secret bonus to anyone in exchange for any business
- Do not defraud bidding processes or administrative agreements
- Do not establish any type of obstruction, intervention or difficulty in the actions of public bodies, entities or agents in their activities, investigations or inspections
- Providing a voucher is the same as providing money

REFLECTION POINTS:

- Do I always refrain from offering or accepting anything which may improperly influence decision-making?
- Do I take steps to ensure that we do not do indirectly what we cannot do directly?
- Do I require third parties to follow our anti-corruption policy and monitor their performance?
- Do our accounting records correctly describe the nature of the transaction?



✓ Interaction With Government Entities and Government Officials

We promote transparent and lawful interaction with government entities and Government Officials. Interacting with Government Officials is often part of doing business at BTP, as the State regulates our activities.

Everyone must always be honest, accurate and transparent in all negotiations and contacts, using formal, clear and concise language. It is your responsibility to ensure that you and your staff are familiar with any recipient and BTP procedures, policies, manuals or requirements before interacting with government officials.

EXAMPLES:

- Do not agree to provide a benefit such as a gift or pecuniary amount to a government official personally involved with the granting or maintenance of any license or permit related to BTP
- If a Government Official requests any undue advantage, the immediate response must be that BTP vetoes this practice. Never leave any impression that you will “talk to your superiors about it”
- Do not agree to hire a relative of a government official or a vendor close, or related, to a government official, by indication or demand
- Do not give away gifts or provide entertainment outside the parameters defined by BTP

REFLECTION POINTS:



- Do you understand the importance of maintaining transparency and ethics when interacting with government representatives?
- Do you have clarity about the legal limits when offering any kind of benefit or collaboration to public officials?
- How should you act if you notice that a request from a public official may be inappropriate or irregular?
- Do you know which information can be shared with public entities and when it is necessary to consult a superior or legal department?

✓ Working with Third Parties

We are responsible for what others do on our behalf. We must not use third parties, such as agents, consultants, advisors or brokers, to do what we are not permitted to do ourselves. BTP shall only engage third parties in cases of necessary legitimate business.

It is our policy to conduct business with third parties based on sound, objective and lawful business criteria. We require honesty, impartiality and accuracy in our relationships with clients, suppliers, contractors and public entities and forbid unlawful or unethical business practices, whether by BTP employees or anyone acting on our behalf. We expect everyone to avoid and report any conflict of interest or the appearance of improper bias or misconduct.

Any third party representing BTP in any context is required to comply with the principles of this Code of Conduct, as well as any specific applicable rules.

All manpower suppliers and service providers must be advised of our Code of Conduct and agree to make it (or their own comparable code) available to, and to apply it to their employees performing the services contracted by BTP.

All agreements signed with third parties, partners, service providers, suppliers and legal representatives of BTP must be in writing and contain the anti-corruption section. Subcontracting is only permitted after express authorization from BTP.

EXAMPLES:

- Ensure that services provided by contracted third parties have been correctly documented, so that BTP can prove the provision of the service versus payment for them
- Do not hire third parties that have been recommended by Government Officials, unless the compliance area has reviewed and approved the hiring in a duly documented manner, so that BTP can keep it in its records

REFLECTION POINTS:

- Did I receive the necessary approval before contracting the supplier?
- Have I carried out the necessary background check to ensure that the hiring does not present possible compliance risks?
- Do I have appropriate and sufficient documentation regarding the service provided to BTP by the third party?



✔ Gifts, Presents, and Hospitality

We recognize that gifts (institutional items with low commercial value), presents and hospitality (expenses with trips, meals, accommodation or entertainment) are often used to maintain business relationships, but this can be a problem if they are used to influence decision-making.

It is important that no gift, present or hospitality conveys the idea of inappropriate behavior, or is used as a mechanism to influence the business decision-making of third parties.

In accordance with BTP guidelines, gifts that (i) have no commercial value, or (ii) are distributed by entities of any nature as a courtesy, advertising, regular publicity, or on special events, entertainment and commemorative dates will not be considered gifts, provided that they do not exceed the amount of three hundred reais (BRL 300.00).

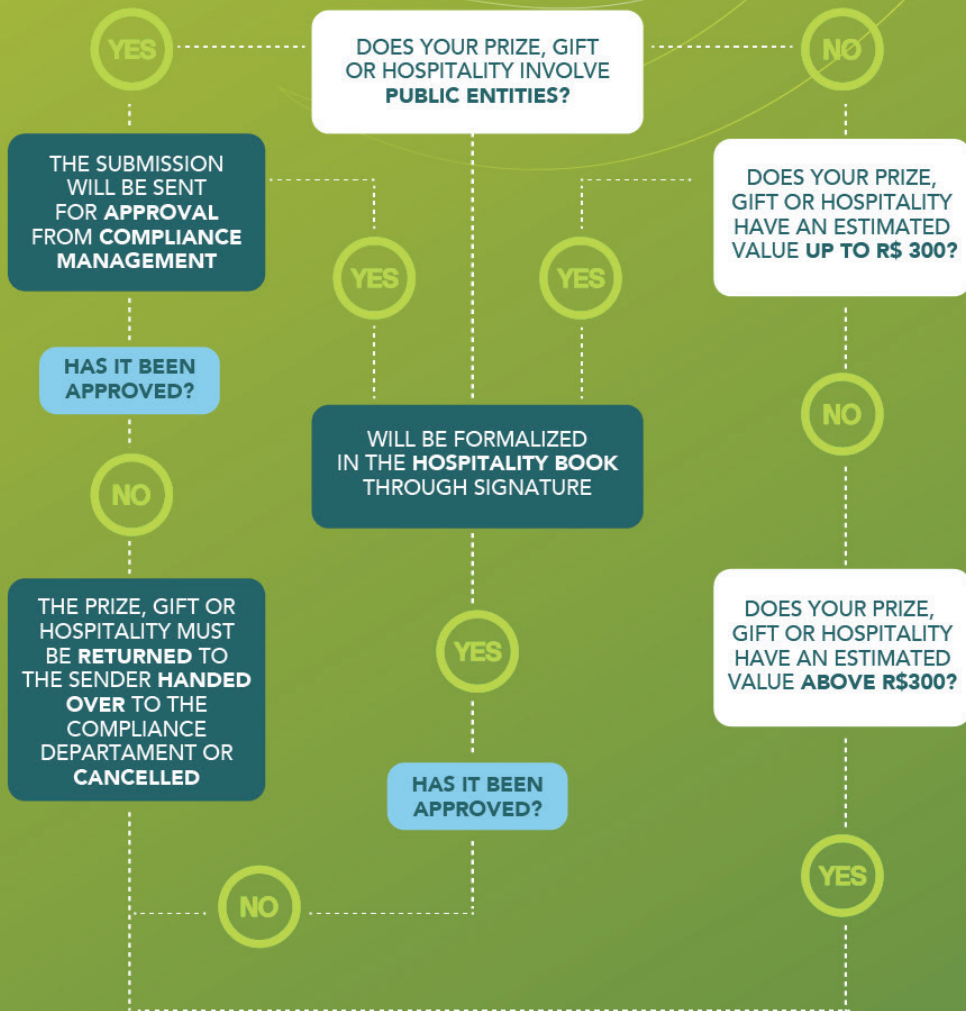
Examples of entertainment include dinners, shows, races, and VIP boxes, among others.

Therefore, before accepting or offering any gift, present or hospitality, ensure that it is in accordance with this Code of Conduct and other BTP policies, manuals and procedures, as well as any local rules that may apply to BTP and the intended recipient.

Gifts and hospitality offered or received that exceed the amount mentioned above must, before being accepted, be approved by the Direct Area Manager, the corresponding Officer and the Legal & Compliance Manager. Furthermore, they must be recorded in a document certified by the Legal Department and filed in a specific folder on the network or in the respective system, under the custody of the Legal and Compliance Department.

Cash gifts are strictly prohibited.

FLOW ACTIONS PRIZES, GIFTS AND HOSPITALITY

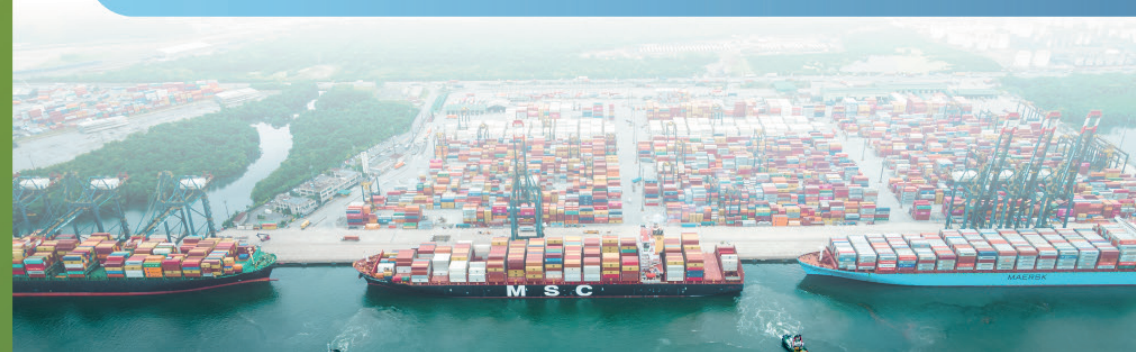


EXAMPLE:

- Do not provide tickets to a client or their family during the bidding or contract renewal process
- Do not provide goods in cash to any third party
- Invite potential clients to a meal only within the limits accepted by BTP

REFLECTION POINTS:

- Did I obtain the necessary prior approval before giving or receiving gifts and entertainment?
- When giving a gift or offering entertainment, do I apply the "shame test": Would I feel comfortable if it were reported on television?
- When receiving a gift, do I consider whether it could create an expectation of reciprocity or influence my professional decision-making?
- If I realize that a gift or favor could create a conflict of interest, do I know how to proceed transparently?



✓ Sponsorships and Donations

We encourage direct engagement with the communities in which we operate, through lawful and transparent means, in accordance with BTP's internal policies, manuals and procedures. Donations and sponsorships should not be made when they could be seen by third parties as a way of trying to buy influence or a means of disguising illegal payments to private individuals or Government Officials. All donations and/or sponsorships must be previously approved by the Compliance department. The transaction regarding any donation and sponsorship carried out by BTP must be formalized through a written agreement, after approval by the compliance department, and the Legal & Compliance Manager must be informed, registering the data in the "Digital Book of Hospitality, Entertainment, Gifts, Donations and Sponsorships", by means of signature on an electronic platform.

It is BTP's policy not to make any donations for political-party purposes, whether through political parties or for electoral campaigns. This limitation also applies to those made through its officers, managers, employees, business partners or any other third parties, on behalf of BTP.

✓ Political-Partisan Manifestations

BTP maintains a position of neutrality and impartiality in relation to any political-partisan manifestations.

BTP recognizes the right of its employees to actively participate in political life. However, personal campaigns or the dissemination of materials related to politics or religion are not allowed in the workplace or using company resources. Furthermore, all political-partisan manifestations must be expressly presented as individual opinions, without any link to BTP.

✓ Relationships with Competitors

We compete fairly, respect and encourage free competition.

Our interactions with competitors are limited. When interacting with competitors, we do not exchange commercially sensitive information or discuss specific markets or opportunities with them. New business opportunities are explored independently from competitors, unless a joint bid or acquisition is contemplated. In such cases, the Legal & Compliance Manager must be consulted before any discussion takes place.



SITUATIONS THAT MAY OCCUR:

- Do not discuss or agree, even informally, with competitors on pricing, capacity, clients, markets, decisions to bid or not to bid on a project, or other business plans or commercial strategy. If you believe there is a legitimate reason, always contact the Legal & Compliance department first
- Do not exchange, receive or share commercially sensitive information on, for example, prices or commercial strategies with potentially competing companies
- Object immediately if commercially sensitive topics arise in a meeting with competitors and leave the meeting if the discussion continues. Ensure your departure is recorded in the minutes and notify the Legal & Compliance Manager immediately

EXAMPLES:

- Maintain an ethical stance, respecting the practices and strategies of competitors
- Focus on highlighting BTP's differentiators without undermining competitors
- Observe competitors constructively to improve our own processes and products
- Participate in market competition transparently, always in line with BTP's values

REFLECTION POINTS:

- Did I seek legal counsel before interacting with competitors?
- Did I ensure that no commercially confidential information was shared with a competitor or another third party who might share it with a competitor?
- Did I seek guidance from the Legal & Compliance Manager when considering new business initiatives?



✓ Trade Controls

We respect international trade sanctions and embargoes, including those imposed by the United States and the European Union. Foreign trade controls restrict business transactions with certain countries, organizations, and individuals. These controls may involve restrictions on the export or import of specific products or technology, or may prohibit any business dealings with certain countries or individuals. It is our policy to fully comply with these sanctions and restrictions, including those set forth by US and EU sanctions programs, wherever we seek to do business.

Compliance must review and verify any transactions involving restricted or sanctioned parties. Employees are required to be aware of these restrictions and ensure that they do not engage in transactions with any restricted or sanctioned individuals, organizations, or countries.





CHAPTER 6

OUR FINANCIAL INTEGRITY



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CHAPTER 6

OUR FINANCIAL INTEGRITY

Financial integrity is key to our business and our reputation. To ensure financial integrity, we implement and maintain strong and robust internal controls.

✓ Financial Reporting and Control

We maintain a strong financial reporting and controls structure. Financial integrity is fundamental to our reputation and as such we have a strong culture of honesty, fairness and compliance in place. We have a strong control structure in order to ensure reliable internal and external financial reporting, as well as the compliance with laws and accounting standards. We also develop and foster good and transparent working relationships with tax authorities and other government bodies.

Each of us is responsible for all records in our area. This means the records must be accurate, complete, processed, retained and destroyed in accordance with the law and our internal policies.

EXAMPLE:

- Do not submit or approve any business record that does not accurately and completely reflect the nature of the underlying transaction
- Do not agree to charge an expense to an unrelated account



REFLECTION POINTS:

- Do we have a system of internal controls for all cash transactions? Am I familiar with them and do I follow them?
- Are my accounting entry documents accurate?
- Do I submit all business transactions for recording by our finance and accounting professionals?

✓ Fighting Money Laundering and Financing Criminal Activities

BTP is committed to preventing and detecting any suspicious money laundering and financing of criminal activities operation and does not accept any proceeds from illegal activity.

BTP employees must be vigilant to identify any activity or transaction that appears suspicious and may be related to money laundering or the financing of criminal activities. Any unusual signs or behavior must be immediately reported to superiors or to the Ethics Channel, so that BTP can investigate the case appropriately.

✔ Fraud

At BTP, there is no tolerance for fraud. We recognize that fraud is a serious problem for many businesses and takes many forms, including theft, embezzlement and fraudulent misrepresentation. This crime exposes us to significant risks, both financial, legal and reputational. Therefore, we are committed to preventing, identifying and investigating any dishonest behavior that may affect us. We expect all employees to immediately report any suspected fraud.

EXAMPLE:

- Do not accept photocopies of documents where our procedures, manuals or policies require originals
- Do not process payment requests without the required internal authorizations and do not break a debt into multiple, smaller payments in order to avoid authorizations
- Do not approve any transaction for goods or services that is not in line with documentation and agreements
- Only make cash payments if your manager has agreed to make an exception in accordance with the company policy

REFLECTION POINTS:

- Is the amount charged for goods or services in line with market prices?
- Have I verified whether expenses in expense reports are properly classified?
- Do I always foster and enhance an environment of transparency and deliver on our commitment to prevent and detect fraud?





CHAPTER 7

SUSTAINABILITY



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CHAPTER 7

SUSTAINABILITY

We aim to achieve long-term business success through socioeconomic development that contributes to a healthy environment and a fair society.

✓ Sustainability Commitment

We strive to improve the ways in which we contribute directly or indirectly to the sustainable development of the communities in which we operate and society at large.

We are all responsible for the records in our area. This means the records must be accurate, complete, processed, retained and destroyed in accordance with the law and our internal policies.



Our aim is to ensure that our investments have a sustainable benefit and address key social, environmental, health and safety, education and economic development issues of local communities.

EXAMPLE:

- BTP proactively engages with local communities to understand their genuine needs, and considers meaningful actions which will have a positive impact for both the community and for BTP
- Contributions to causes linked to Government Officials and/or institutions and/or entities that interact with BTP must be previously approved by the Executive Committee

REFLECTION POINTS:

- Are my actions aligned with our policies on corporate sustainability, donations and community investment?
- Could the community investment of donations damage the brand?
- Do I have all the necessary approvals before making a donation?





✓ Environment

We are committed to protecting the environment. This is reflected in the emphasis we place on the environmental aspects of managing our business operations.

A strong economy depends on a healthy environment. We constantly strive to reduce our environmental impact through the responsible use of natural resources and the reduction of waste and emissions arising from our operations.

EXAMPLE:

- Always dispose of waste generated by our operations in a way which is lawful and does not harm the environment
- For services, installations and equipment, do not engage a supplier that does not uphold environmental standards

REFLECTION POINTS:

- Do we apply environmental legislation locally and regularly renew our local permits/licenses?
- Do we immediately report all incidents and unsafe procedures to the person responsible for the environment?



✓ Human Rights

BTP carries out its activities based on human rights principles and expects third parties that have a relationship with the company to adopt the same attitude. BTP supports the principles set out in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the Core Conventions of the International Labor Organization.

BTP believes that everyone should join and work at the company by their own choice, always in accordance with the labor legislation. The company firmly rejects child labor and any form of slave-like work, and does not establish partnerships with third parties that violate, or run the risk of violating, these rights.

All employees have a shared responsibility to respect human rights and raise concerns when they see anything that suggests they are being violated.





CHAPTER 8

WHERE TO GET HELP OR INSTRUCTIONS



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CHAPTER 8

WHERE TO GET HELP OR INSTRUCTIONS

✓ Whom to ask?

Further information is available in BTP policies, manuals and procedures which can be found in our archives. If you have any questions, ask your immediate manager or the Legal & Compliance Manager. Oftentimes, this person is your best resource and is most familiar with your day-to-day responsibilities. If you don't feel comfortable talking to your immediate manager or if the conversation didn't lead to any practical results, here are some other resources available that you can use:

- Legal & Compliance Manager
- Another manager or officer in the company
- Human resources (especially with workplace issues like remuneration, benefits, discipline or promotions)
- Our Ethics Channel, through the BTP website, our intranet or directly by typing <https://www.canalintegro.com.br/btp>

✓ Who should I report an Incident or Suspicion to?

In the event of acts against anti-corruption, competition, fraud or non-compliance with BTP regulations or internal policies, anyone can make a report through our Ethics Channel, which can be accessed via the BTP website, our intranet or directly at <https://www.canalintegro.com.br/btp>.

The employee may also communicate directly with the Audit Departments of TIL (BTP shareholder) via email compliance.department@tilgroup.com.

Reporting must be responsible and consistent. BTP expects that, whenever possible, complaints include detailed reports, with evidence of the reported conduct, so that the investigation can be conducted as quickly as possible.

✓ Investigation and non-Retaliation

BTP will treat all reports seriously, impartially and confidentially; it will carefully analyze all information provided and will conduct investigations as necessary.

BTP expressly forbids retaliation against anyone who has reported in good faith a possible violation of this Code of Conduct, the applicable laws or regulations, even if the person who made the report is mistaken. This protection also extends to anyone who cooperates with the investigation of the possible violation.

All BTP employees and partners must provide accurate information when requested and cooperate with investigations about misconduct conducted by BTP or contracted third parties.

The identity of anyone reporting any suspicion will be protected and anonymity will be respected if requested. Acts of retaliation must be immediately reported to the Ethics and Compliance Committee, and these must be investigated and, if applicable, appropriate and necessary disciplinary measures must be applied at the end of the investigations.

If violations are proven, BTP will take the disciplinary measures applicable to each case, regardless of the position or function held by the offender, including in relation to members of senior management and third parties.

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