



CORPORATE ETHICS AND SUSTAINABILITY POLICY

Sulplast Fiberglass and Thermoplastic Ltda.



1. PURPOSE AND SCOPE

SULPLAST adopts practices, policies, and commitments aligned with the ESG philosophy and the **ISO 9001**, **IATF 16949**, **ISO 14001**, **AS9100D**, **and TISAX standards**, while also complying with mandatory regulations applicable to our industrial activity. Our purpose is to ensure ethical, transparent, and responsible conduct, fostering corporate sustainability and ensuring regulatory compliance across all areas. We are committed to:

- **Human and Social Rights** → respect and promote human rights, equity, diversity, and inclusion, ensuring fair labor standards, the elimination of child and forced labor, as well as providing safe and healthy working environments.
- Women's Rights → promote equal opportunities, respect, and the prevention of any form of discrimination or harassment, ensuring fair and safe working conditions.
- **Environment** → prevent pollution, reduce air, water, and noise emissions, promote the efficient use of natural resources, adopt circular economy practices, and protect biodiversity, in compliance with ISO 14001 and other legal requirements.
- Right to Land, Forest, Water, and Protection from Forced Eviction → respect local
 communities and traditional peoples, safeguarding fair and safe access to natural resources
 and rejecting practices that may lead to expropriations or forced evictions not in accordance
 with the law and human rights.
- Quality and Sustainability in the Value Chain → deliver products and services with quality and reliability, meeting customer requirements and industry standards (ISO 9001, IATF 16949, AS9100D), while encouraging and influencing suppliers and partners to adopt the same ethical and sustainable principles.
- Information Security and Privacy → protect corporate and personal information against unauthorized access, ensuring data confidentiality, integrity, and availability, in accordance with TISAX requirements and applicable laws (LGPD).
- Ethics, Integrity, and Compliance → combat any form of corruption, bribery, or conflict of interest, ensuring that our business decisions and relationships are guided by integrity, transparency, and responsibility.
- Continuous Improvement and Governance → periodically review our practices, objectives, and performance indicators, fostering the engagement of employees and stakeholders, and ensuring the continuous improvement of our processes and management systems.

This document is an integral part of employment contracts, including all relevant stakeholders. Everyone must apply compatible practices, consistently demonstrating awareness, agreement, and adherence to this Corporate Ethics and Sustainability Policy.



2. BUSINESS CONDUCT - CORPORATE RESPONSIBILITY

2.1 RELATIONSHIPS WITH EMPLOYEES

SULPLAST ensures adequate safety, health, and well-being conditions for its employees, promoting a safe, healthy, and inclusive work environment. We encourage continuous training, the development of technical and behavioral skills, and the individual responsibility of each employee for their own improvement, personal safety, and the growth of their colleagues.

To this end, the company will provide appropriate conditions and resources, following regulations, standards, and best practices for accident prevention and occupational health promotion, ensuring a respectful and inclusive environment that values quality of life and supports the professional and personal development of all.

The hiring and promotion process will be based exclusively on technical and behavioral requirements, without any form of discrimination based on race, religion, creed, color, nationality, ethnicity, sex, sexual orientation, political or other convictions, age, marital status, disability, or any other criterion that could lead to inequality.

In exceptional cases, the hiring of relatives of employees may be considered, provided technical criteria and equitable conditions relative to other candidates are observed. In such cases, the Human Resources Department and the Board of Directors will be consulted to ensure impartiality and alignment with the company's interests.

SULPLAST maintains open and transparent dialogue with labor organizations, promoting harmony in labor relations and ensuring efficiency, competitiveness, and legal compliance in all people management processes.

2.2 RELATIONSHIPS WITH CUSTOMERS

SULPLAST seeks to provide solutions that strengthen the competitive advantage of its customers by developing products and services in compliance with technical specifications, legal requirements, applicable standards, and quality criteria, promoting continuous improvement, operational efficiency, and cost reduction. All products and processes ensure traceability, safety, and regulatory compliance in accordance with ISO 9001, IATF 16949, and AS9100D standards.

Our customers receive clear, complete information and the necessary technical support, ensuring the efficient and safe use of our products, fostering customer satisfaction and mutual trust.

Customer relationships are conducted with integrity, honesty, and transparency, following best practices in compliance, governance, and corporate ethics. Offering illicit payments, undue advantages, or any act constituting bribery or corruption is strictly prohibited. Exceptions to this prohibition include company promotional items, participation in social events organized by **SULPLAST**, or other normal business courtesy actions, provided they are carried out transparently, proportionally, and are properly documented.



Expenses related to customers, such as meals, transportation, or accommodation, are acceptable only when associated with business meetings or customary business practices and must respect reasonable limits without creating any sense of obligation or expectation of reciprocation.

Furthermore, **SULPLAST** encourages sustainable practices throughout its relationship chain, promoting social and environmental responsibility in service delivery and product supply, in alignment with ESG principles and applicable legislation.

2.3 RELATIONSHIPS WITH SUPPLIERS AND SERVICE PROVIDERS

SULPLAST conducts its relationships with suppliers and service providers with loyalty, transparency, and integrity, fostering long-lasting and ethical partnerships in compliance with ISO 9001, IATF 16949, AS9100D, ISO 14001, and TISAX standards, as well as applicable legislation.

Suppliers and service providers are responsible for adopting and promoting the principles of this Corporate Ethics and Sustainability Policy among their employees, subsidiaries, affiliates, and subcontractors, ensuring compliance and integrity throughout the supply chain.

Decisions regarding the hiring and maintenance of partnerships will be based on technical merit, competitiveness, cost, quality, legal compliance, and sustainability, prioritizing joint development and the efficiency of materials, processes, and services. All suppliers must meet the legal, regulatory, and statutory requirements of the countries of origin, shipment, and destination of the products.

It is strictly prohibited for **SULPLAST** employees, regardless of hierarchical level, to request or accept gifts, gratuities, or any personal advantage from suppliers and service providers.

Additionally, **SULPLAST** encourages suppliers and partners to adopt sustainable and socially responsible practices, including respect for human rights, environmental protection, reduction of impacts such as noise emissions, and preservation of natural resources (land, forest, and water), aligning the entire supply chain with ESG principles and applicable legal and regulatory requirements.

2.4 RELATIONSHIPS WITH THE COMMUNITY - SOCIETY - SOCIAL RESPONSIBILITY

SULPLAST operates with a focus on sustainability as an integral part of its business, guided by the ESG concept – Environmental, Social, and Governance – adopting a strategic vision for long-term value creation and positive socio-environmental impact.

Therefore, with the aim of ensuring a prosperous future, we always work sustainably, considering the preservation of natural resources, socio-economic development, diversity, and inclusion, striving to promote equity and quality of life for all people, especially our suppliers, employees, customers, and other stakeholders.



2.5 RELATIONSHIPS WITH THE ENVIRONMENT

SULPLAST embraces socio-environmental responsibility and economic balance as pillars for sustaining life on the planet, considering sustainable development as a fundamental principle in all its operations.

To use natural resources responsibly and promote a culture of sustainability, we adopt practices that include:

- Lifecycle Perspective → apply a lifecycle approach in all procedures related to the acquisition, manufacturing, and disposal of products.
- Waste Management → ensure the safe storage of environmentally hazardous waste with ventilation and containment barriers, and sends 100% of solid waste for recycling, coprocessing, or reuse.
- Renewable Energy → utilize clean and incentivized energy sources.
- Greenhouse Gas (GHG) Emission Inventories \rightarrow systematically measure direct and indirect emissions, with the purchase of carbon credits to offset residual emissions.
- Awareness and Training → implement ongoing programs for employees aligned with ISO 14001.
- Environmental Impact Reduction → reduce noise, protects land, forests, and water, and prevents forced evictions.
- Continuous Improvement and Traceability → monitor and document environmental practices, ensuring compliance with standards, legal requirements, and stakeholder expectations.
- Value Chain Integration → encourage suppliers and partners to adopt responsible environmental practices, ensuring sustainability across all operations.

SULPLAST is committed to contributing to the improvement of quality of life in the present, ensuring the availability of natural resources for future generations, and aligning all productive activities with principles of ethics, responsibility, and corporate sustainability.

2.5.1 SPECIFIC ENVIRONMENTAL AND SOCIAL COMMITMENTS

SULPLAST reaffirms its commitment to business ethics and sustainability, adopting responsible practices aligned with the best international standards. In this regard, the Company establishes specific guidelines related to:

• Land, forest, and water rights, and protection against forced eviction: respect for communities, preservation of natural resources, and prevention of practices that may result in forced displacement.



- **Decarbonization:** promotion of actions and technologies that contribute to the reduction of greenhouse gas emissions, in line with the transition to a low-carbon economy.
- **Air quality:** monitoring and controlling activities that may impact people's health and well-being, as well as environmental balance.
- **Noise emissions:** prevention and mitigation of sound impacts resulting from our operations, in compliance with legal limits and seeking to minimize discomfort for the community and the environment.

These commitments reinforce Sulplast's responsible conduct, in accordance with applicable laws, internal policies, and the expectations of our stakeholders.

2.6 HUMAN RIGHTS - SOCIAL STANDARDS

SULPLAST bases its social relationships on the principles of the Universal Declaration of Human Rights (UN, 1948), promoting diversity, inclusion, equity, and absolute respect for all individuals, regardless of race, religion, creed, color, nationality, ethnicity, sex, sexual orientation, political conviction, age, marital status, disability, or any other intrinsic condition or personal choice. Special attention is given to **Women's Rights**, ensuring equal opportunities, protection against harassment and discrimination, and equitable access to positions, professional development, and benefits.

SULPLAST fully complies with Brazilian and international labor laws, and the following are expressly prohibited:

- Excessive, degrading, or unsafe work.
- Any practice that constitutes forced labor, akin to slavery, or modern exploitation.
- Actions that compromise the dignity, physical integrity, or moral well-being of employees.

Furthermore, the company ensures that suppliers and business partners adopt the same principles of respect for human rights, guaranteeing social and ethical responsibility throughout the supply chain.

These topics are addressed in more detail in our "Health and Safety Policy", ensuring traceability, monitoring, and continuous improvement of labor and social conditions.

2.7 2030 AGENDA - UNITED NATIONS (UN)

The 2030 Agenda is a global UN plan that establishes 17 Sustainable Development Goals (SDGs), aimed at eradicating poverty, protecting the environment and climate, and promoting peace and prosperity for all people, everywhere.

In alignment with the 2030 Agenda, **SULPLAST** carries out direct and indirect actions that contribute to the achievement of the SDGs.



Among these goals, the following are aligned with **SULPLAST's** organizational and operational activities:











2.8 COMMERCIAL INTEGRITY

SULPLAST and its business partners must conduct all activities based on the highest standards of ethics, legality, integrity, and transparency, in compliance with national laws, international standards, and corporate governance principles.

The following practices are strictly prohibited:

- Corruption in any form, including bribery, extortion, kickbacks, facilitation payments, or undue advantages.
- Conflicts of interest that may compromise impartiality in business decisions.
- Fraud, forgery, or manipulation of financial, accounting, technical, or environmental information.
- Tax evasion, money laundering, or practices that violate anti-corruption laws.

SULPLAST encourages its employees, suppliers, and partners to use the company's official reporting channels to report, in good faith and without fear of retaliation, any indications of irregularities or behaviors that violate this Policy.

Commitment to commercial integrity is an essential part of **SULPLAST's** credibility and sustainability, strengthening trust across the entire value chain and ensuring fair and responsible business practices.



a. CORRUPTION, BRIBERY, AND EXTORTION

SULPLAST adopts a zero-tolerance policy toward any form of corruption, bribery, extortion, financial fraud, money laundering, facilitation payments, or any other type of undue or illegal advantage, regardless of the circumstances.

This directive applies to all employees, suppliers, service providers, subcontractors, and other business partners.

The following are strictly prohibited:

- Bribes, commissions, kickbacks, and undue incentives, including those involving public officials, customers, suppliers, or any other counterpart.
- Facilitation payments (even of small amounts), made to induce or expedite administrative acts by public officials or third parties.
- Opaque or unrecorded financial transactions that may constitute fraud, tax evasion, or money laundering.
- Conflicts of interest and intentional omissions that may unduly benefit individuals or legal entities.

By agreeing to work with **SULPLAST**, partners commit to:

- 1. Comply with all applicable anti-corruption laws in every jurisdiction in which they operate, including local and international legislation.
- **2.** Not offer, promise, or authorize payments, advantages, or valuable items with the purpose of obtaining any improper benefit for themselves, **SULPLAST**, or third parties.
- **3.** Not request, accept, or agree to undue advantages in exchange for preferential treatment in dealings with **SULPLAST**.
- **4.** Not make suspicious financial transfers that could be, in whole or in part, intended by public officials or third parties for illicit purposes.
- **5.** Not induce, assist, or allow any other person to violate the rules of this Policy or applicable laws.

SULPLAST maintains official reporting channels that are accessible and secure, ensuring anonymity and protection against retaliation, and encouraging employees and partners to report, in good faith, any indications of violations of this Policy.

Commitment to ethics and integrity is essential to ensure the credibility, regulatory compliance, and sustainability of **SULPLAST's** operations throughout its entire value chain.



b. ECONOMIC SANCTIONS AND EXPORT CONTROLS

SULPLAST complies with applicable laws and regulations related to economic sanctions, export controls, and restrictive trade measures imposed by international organizations and governments, including, but not limited to, the United Nations (UN), the European Union (EU), the United States (US), and Brazil.

These laws impose different prohibitions on different countries and entities and change rapidly in response to global events. Currently, the countries and territories subject to sanctions by the Office of Foreign Assets Control (OFAC) are: Cuba, Iran, North Korea, Sudan, Syria, Crimea (Ukrainian territory), and Russia:

- 1. **SULPLAST** is committed to not conducting commercial transactions or establishing business relationships with:
- 2. Governments, departments, agencies, state bodies, or subdivisions of sanctioned countries and territories.
- 3. Entities controlled by such governments.
- 4. Individuals or entities are domiciled, headquartered, or subject to the jurisdiction of such countries and territories
- 5. Organizations or individuals identified as being involved in terrorist activities, money laundering, or the proliferation of weapons of mass destruction.

SULPLAST commits to:

- Conduct ongoing due diligence with suppliers, customers, and service providers to ensure compliance with international sanctions.
- Periodically monitor updated sanctions lists through official sources.
- Immediately terminate any negotiation or contract if a violation of these restrictions is identified

Strict compliance with these rules is essential to preserve the integrity, reputation, and legality of **SULPLAST's** operations on a global scale.

c. FAIR COMPETITION AND ANTITRUST

In countries with a free-market economy, free competition is a fundamental principle protected by the State to ensure that competition among economic agents facilitates the most efficient allocation of resources, lower prices, encourages product variety, and creates incentives for creativity and technological innovation. In this way, antitrust/competition laws aim to preserve this context by prohibiting anticompetitive behavior by a single economic agent or by multiple economic agents acting collectively.



SULPLAST is committed to the principles of legal and free competition, based on the merits of products and services. Therefore, we comply with all applicable antitrust/competition laws in all countries where we operate. In addition, we require our business partners to maintain a similar level of commitment to fair competition.

All company representatives and other third parties are personally responsible for conducting their activities in accordance with applicable antitrust/competition laws. No company representative has the authority to engage in any conduct or knowingly allow a subordinate to participate in violations of applicable antitrust/competition laws. If behavior that violates this guideline is identified, appropriate disciplinary or corrective measures will be applied, including dismissal and potential legal penalties.

The Compliance department is responsible for establishing and monitoring the effectiveness of this section of the policy, as well as implementing procedures that ensure its proper functioning. Moreover, in collaboration with the Legal department, Compliance shall support all company representatives and other third parties on matters related to antitrust legislation, providing professional and technical guidance and acting as consultants on related issues. Based on the above, in cases of potential ethical or compliance risks, any final decision must be made in consultation with and in accordance with the positions of the Compliance and Legal departments.

d. RESPECT FOR INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS

SULPLAST fully values and respects industrial and intellectual property rights. In this regard, all employees, suppliers, and service providers must strictly comply with the applicable legislation on the subject, refraining from any form of unauthorized use or appropriation of research, studies, texts, publications, technical standards, computer programs, artistic works, or any other creations protected by law.

Furthermore, it is the responsibility of everyone to safeguard these rights, ensuring that the company's activities are always conducted in accordance with ethics, legality, and respect for the creations of third parties.

2.9 CORPORATE COMMUNICATION GUIDELINES

SULPLAST recognizes access to public information as a fundamental right of society and respects all prerogatives of press freedom guaranteed by the Federal Constitution. In this regard, it maintains a full commitment to the accuracy of information shared in its interactions with journalistic outlets, publications, and other corporate communication channels.

At the same time, in respect for its stakeholders and in compliance with contracts, agreements, and other relevant documents or policies—all backed by applicable law—SULPLAST safeguards the right



to withhold information concerning the company, employees, suppliers, customers, and other stakeholders when such information does not qualify as being of public interest.

Regarding freedom of expression, **SULPLAST** adopts practices aligned with current legislation, reinforcing the prohibition of any form of internal or external communication that contains hate speech, incitement to violence, war propaganda, or discrimination or prejudice of any kind. Moreover, the company uses its communication channels as tools to promote equity, diversity, inclusion, respect for human rights, social development, and environmental preservation, in alignment with its broader socio-environmental initiatives.

To protect the company and its stakeholders, only formally authorized representatives may disclose institutional information or express public opinions on behalf of **SULPLAST**. Employees and service providers are prohibited from using social media or any other media to harm the company's image, whether through direct content creation or the indirect dissemination of information.

Regarding the establishment of partnerships in sports, cultural sponsorships, or other advertising initiatives, **SULPLAST** reserves the right to make choices freely, always based on internally defined technical and commercial criteria, in accordance with the guidelines of this policy and in pursuit of consistent and sustainable results.

2.10 POLITICAL ACTIVITIES AND CONTRIBUTIONS

In accordance with constitutional rights, the principles of freedom of expression, and its commitment to strengthening democracy, **SULPLAST** ensures its employees full freedom to engage in political activities in their personal capacity, fostering a work environment that respects the diversity of ideas. The company emphasizes that political beliefs will never be used as a criterion in performance evaluations or in any decisions related to professional life.

However, such activities must not take place in the workplace, nor involve company resources, materials, or equipment. The use of uniforms, logos, trademarks, or any elements associated with **SULPLAST's** corporate identity is expressly prohibited during political demonstrations. Furthermore, employees are not permitted to engage in actions that could associate the company's institutional image with political parties, candidates for public office, or specific ideologies.

2.11 ETHICS AND COMPLIANCE POLICY

The term **compliance** refers to the duty to adhere to and ensure the fulfillment of laws, decrees, regulations, and the company's internal rules, recognizing that noncompliance with these regulations may result in administrative, civil, and criminal penalties.

SULPLAST's business conduct is based on strict compliance with applicable legislation, combined with the application of ethical principles such as legality, morality, transparency, and integrity in all relationships with employees, suppliers, customers, business partners, and other stakeholders. In



this regard, the company encourages all employees to act within the law and uphold ethical standards, adopting practices that promote the prevention and combat of any form of corruption.

To reinforce this commitment, **SULPLAST** implements control and monitoring mechanisms aimed at identifying activities susceptible to corruption risks, such as bribery, extortion, fraud, money laundering, and other illegal acts. These mechanisms are continuously evaluated, reviewed, and improved to strengthen the prevention system and ensure the effectiveness of oversight over potential misconduct.

One of the pillars of this system is the existence of accessible reporting channels that guarantee confidentiality, data protection, anonymity for whistleblowers, and the express prohibition of any form of retaliation. These channels enable the detection of irregularities and ensure proper investigation, fostering a culture of integrity at all levels of the organization.

2.12 ACCOUNTING RECORDS

SULPLAST's accounting records must always be accurate, complete, consistent, and truthful, faithfully reflecting all transactions carried out. The bookkeeping of accounting records shall strictly comply with applicable laws, regulations, and standards, particularly the guidelines established by the International Financial Reporting Standards (IFRS).

All accounting entries must be supported by the corresponding documentation, and no transaction may be recorded in a parallel, incomplete, or improper manner.

All official records shall be made available for review by the Compliance department and other internal control bodies, ensuring transparency and traceability.

In cases provided by law, tax or judicial authorities shall have access to accounting and tax records, and their investigations must respect legal limits in order to preserve the company's fiscal and accounting confidentiality.

Furthermore:

- All payments made by SULPLAST require prior authorization from the competent department and must be recorded with sufficient detail to ensure compliance with legal regulations and accounting principles.
- Access to, movement of, or immobilization of the company's assets shall always require prior authorization, in accordance with internally defined levels of authorization and delegation of powers.



2.13 PRIVACY AND DATA PROTECTION

At **SULPLAST**, privacy and information security are treated as strategic priorities. Therefore, we are committed to ensuring transparency in the processing of personal data of our employees, customers, suppliers, business partners, and users of our computerized systems.

To uphold this commitment, **SULPLAST** employs robust cybersecurity tools and implements effective data governance practices, in full compliance with the General Data Protection Law (LGPD – Federal Law 13,709/2018) and other applicable legal regulations.

Our management model also includes:

- Clear internal policies on the collection, storage, sharing, and disposal of data.
- Ongoing employee training on best practices in privacy and information security.
- Service channel for requests related to data subject rights, ensuring that they can fully exercise their legal prerogatives.
- Monitoring and prevention mechanisms against unauthorized access, leaks, or security incidents.
- The appointment of a Data Protection Officer (DPO), responsible for overseeing compliance with the LGPD, advising the company on best practices, and assisting data subjects on matters related to privacy and information protection.

These topics are detailed in our **Information Security Policy**, which guides and reinforces our ethical and responsible conduct in data management.

2.14 REPORTING CHANNELS AND PROTECTION AGAINST RETALIATION

SULPLAST encourages employees, suppliers, customers, and other stakeholders to report any conduct that violates applicable laws or the company's Business Ethics and Sustainability Policy. If anyone identifies any actual or potential violation of this policy, internal regulations, or applicable national and international laws, they should immediately report it to:

- Their manager.
- The Human Resources department.
- A member of the Ethics and Personal Data Protection Committee.
- Through SULPLAST's Whistleblowing Channel: https://www.sulplast.com.br.

The Whistleblowing Channel allows the reporting of complaints related to:

- Discrimination, sexual harassment, and moral harassment;
- Conflicts of interest;



- Receipt or offering of inappropriate gifts, presents, or entertainment;
- Fraud, theft, robbery, or losses;
- Corruption, bribery, and irregular dealings with the government;
- Fraudulent financial statements:
- Money laundering;
- Anticompetitive practices;
- Violations of privacy, confidentiality, or intellectual property rights (own or third-party);
- Environmental violations;
- Occupational health and safety issues;
- Deliberate concealment of any of the above matters.

Although the use of the **Whistleblowing Channel** is not mandatory, **SULPLAST** strongly encourages its use. Alternatively, reports may be made through any of the other means mentioned above.

All reports are treated confidentially by a restricted group of individuals. Identification of the whistleblower is recommended to expedite the investigation, but anonymous reports are accepted, secure, and do not hinder the progress of the investigation. Whistleblowers acting in good faith will be protected against any form of retaliation, even if the report is not substantiated.

SULPLAST strongly condemns any form of retaliation, which may occur openly or subtly.

SULPLAST is committed to protecting anyone who, in good faith, makes reports or participates in investigations. If acts of retaliation are identified, they must be immediately reported and, once confirmed, appropriate corrective and disciplinary measures will be applied.

3. LABOR RELATIONS AND WORKING CONDITIONS

People are **SULPLAST's** most important asset. It is thanks to the commitment and dedication of our employees that the company achieves its accomplishments and results.

To ensure adequate working conditions, promoting productivity, efficiency, safety, and well-being, we adopt policies aligned with the values established by the **International Labour Organization** (ILO) and the **Universal Declaration of Human Rights** of the **United Nations** (UN).

SULPLAST is also committed to working with business partners who share these same values and encourages its supply chain to implement similar practices, thereby strengthening an ethical, safe, and inclusive work environment.

Between sections 3.1 and 3.7, we provide a summary of the labor guidelines adopted. While this summary does not fully detail all applicable labor laws or collective agreements, it does not limit or



replace any prerogatives or obligations of **SULPLAST**, even if certain matters are partially or entirely omitted in this document.

3.1 CHILD LABOR

SULPLAST does not use or condone the employment of child labor. Young people under the age of 18 must not work at night, in hazardous conditions, or in activities involving the handling of chemicals, flammable substances, or any other risky situations.

The company recognizes that individuals under 18 may participate in legally approved apprenticeship programs, such as those conducted by the **Centro de Integração Empresa-Escola** (CIEE) or other partnerships authorized by the Brazilian government, provided that all requirements of the **International Labour Organization (ILO)** conventions and applicable national legislation are fully observed.

In accordance with this policy, all **SULPLAST** business partners must prohibit any form of child exploitation in their operations. This includes activities that may be mentally, physically, socially, or morally harmful to children, as well as actions that negatively interfere with their educational development, such as:

- Reduction in school attendance;
- Impairment of performance in assessments;
- Obligation or inducement to premature school dropout.

3.2 MODERN SLAVERY

SULPLAST does not tolerate any form of modern slavery, including practices of servitude, forced labor, bonded or involuntary labor, exploitation of prisoner labor, human trafficking, or any other situations in which individuals are compelled to work against their will through intimidation, threats, detention, or physical and psychological violence.

The submission of employees to degrading conditions, excessive working hours, restrictions on movement, admission fees, retention of personal documents, denial of access to transportation, or any other situations that, individually or collectively, constitute conditions analogous to slavery is also strictly prohibited.

SULPLAST's business partners must likewise prohibit and never benefit from forced or compulsory labor, and must not organize or facilitate the travel of individuals for the purpose of labor exploitation.

Furthermore, it is imperative that all employees and partners fully respect:

- Conventions of the International Labour Organization (ILO);
- Universal Declaration of Human Rights (UN);



Applicable labor legislation.

All employees must have the freedom to terminate their employment with proper notice, leave the premises outside working hours, and enjoy all rights guaranteed by the aforementioned regulations.

3.3 HARASSMENT AND DISCRIMINATION

SULPLAST does not tolerate any form of disrespect, prejudice, or discrimination based on race, religion, creed, color, nationality, ethnicity, sex or sexual orientation, political or other convictions, age, marital status, disability, social origin, pregnancy, maternity, or any other intrinsic condition or personal choice of the individual.

All decisions related to hiring, employment, compensation, benefits, promotion, training, discipline, and termination are based solely on employees' skills, competence, and performance.

Furthermore, **SULPLAST** expressly prohibits all forms of abuse and harassment, whether moral or sexual, manifested physically, verbally, or in writing, ensuring a safe, respectful, and inclusive work environment for all.

3.4 HEALTH AND SAFETY

With a focus on a culture of prevention, SULPLAST is committed to ensuring a safe and healthy work environment, capable of preventing accidents and occupational diseases, protecting the physical and mental integrity of employees, and preserving the team's productive capacity.

To achieve this, the company:

- 1. Continuously identifies, assesses, and controls health and safety risks, aiming to reduce or eliminate hazards inherent to operations;
- 2. Implements preventive actions to avoid accidents, injuries, and occupational diseases, promoting the proper use of personal protective equipment (PPE) and establishing effective protective measures;
- 3. Complies with all applicable laws and regulations in health, safety, and occupational medicine, as well as standards required by competent authorities and regulatory bodies.

These topics are addressed in more detail in our 'Health and Safety Policy,' which complements and elaborates on the practices described here.



3.5 FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

SULPLAST fully supports the right of its employees to join unions or other organizations of their choice, as well as to participate in collective bargaining to defend their interests. However, the use of the company's resources, assets, or brands for union activities or collective representation is prohibited.

The company does not discriminate in any way against employees who choose to form, join, or not participate in unions or other organizations, ensuring respect for freedom of choice and diversity of opinions in the workplace.

3.6 WORKING HOURS

SULPLAST recognizes the importance of employees maintaining a healthy balance between work, education, family, and leisure.

Working hours and overtime must fully comply with applicable laws and regulations, including rules on wages, working hours, overtime, and benefits. Performing work beyond the hours permitted by law or collective agreements will not be tolerated.

All employees are entitled to at least one continuous 24-hour rest period every seven days, ensuring physical and mental well-being, as well as sustainable productivity in the workplace.

3.7 REMUNERATION

SULPLAST aims to promote the financial and material well-being of its employees by offering compensation and benefits in line with market standards, always in compliance with applicable labor laws and collective agreements.

The company's compensation policy seeks to recognize performance, competence, and dedication, ensuring transparency, equity, and fairness in all decisions related to salaries, benefits, and incentives.

4. CONDUCT OF MANAGEMENT AND OTHER EMPLOYEES

SULPLAST expects its management and employees to act with integrity, honesty, and dignity, respecting the environment, human rights, and applicable laws.



It is essential that everyone promotes equity, diversity, inclusion, and sustainability, not only within the company but also throughout the entire supply chain and in society at large.

Furthermore, the company values commitment to operational efficiency, continuous improvement, and exceeding customer expectations, reinforcing the importance of ethical and professional behavior in all activities.

4.1 CONFLICT OF INTEREST

A conflict of interest occurs when an individual places personal interests above the interests of the company, compromising their impartiality and decision-making ability. Common conflict situations may arise when an employee or a close family member (parents, siblings, spouses, or children):

- 1. Holds an ownership interest in or holds positions in companies that are suppliers, service providers, clients, competitors, or other organizations that do business or seek to do business with SULPLAST, except for personal investments in publicly traded shares;
- 2. Makes business decisions driven by personal interests;
- 3. Receives personal benefits from suppliers, service providers, clients, or competitors, such as gifts, trips, or accommodations;
- 4. Uses the company's assets or positions for personal purposes.

A conflict of interest does not necessarily constitute a violation of the Business Ethics and Sustainability Policy, but failing to report it is considered a breach.

Employees in a real or potential conflict situation must immediately inform the Ethics and Personal Data Protection Committee or use SULPLAST's Ethics and Privacy Channel, abstaining from participating in any decision related to the situation.

Guidelines for Management and Employees:

- Refrain from using privileged information for personal gain or for the benefit of third parties, including business opportunities;
- Protect confidential information during and after employment with the company, in accordance with confidentiality agreements;
- Refrain from the improper use of the company's assets, services, or credits, including industrial and intellectual property rights;
- Respect SULPLAST's industrial and intellectual property in accordance with applicable laws;
- Reject undue or unlawful advantages offered by third parties in relation to the company;



- efuse gifts, presents, and entertainment that are more than nominal in value or that could suggest impropriety, except for promotional materials or invitations to events considered normal business practice;
- Avoid acts or transactions contrary to the interests of the company, including actions that favor personal interests over those of SULPLAST;
- Refrain from participating in competing companies, suppliers, or clients, except for mere ownership of shares without voting rights;
- Inform the Board of Directors about relatives up to the third degree in competing companies, suppliers, or clients, and abstain from making decisions related to these companies;
- Avoid religious or political expressions on company premises;
- Do not engage in external activities involving the provision of services or sales in sectors that compete with SULPLAST during employment.

5. RESPONSIBILITY AND IMPLEMENTATION

SULPLAST is committed to implementing and maintaining this Business Ethics and Sustainability Policy, ensuring its wide dissemination of all employees, suppliers, service providers, and other stakeholders.

The company will monitor and oversee compliance with the established guidelines, taking corrective measures when necessary, ensuring that the principles of ethics, integrity, sustainability, and compliance are fully observed.

The engagement of all stakeholders is essential for the success of this Policy. Therefore, employees, service providers, suppliers, and other partners are encouraged to. Questions, comments, or suggestions regarding this Policy may be directed at:

- Contact the person responsible for the Purchasing department.
- Through **SULPLAST's Ethics and Privacy Channel**, available at https://www.sulplast.com.br.

SULPLAST emphasizes that voluntary and conscious commitment of all involved is essential to maintaining an ethical, safe, sustainable work environment in compliance with applicable national and international laws.