

Message from the CEO

Dear Collaborators,

Transparency, honesty, loyalty, dignity, respect and courtesy with anyone, regardless of hierarchical level, without discrimination of any kind are principles that must guide the actions of all people in the company, whether in internal relations, as well as those established with business partners.

In this way, the ASTA BRASIL Code of Conduct establishes the norms that serve as the basis for our ethical behavior.

This Code defines the way we do business around the world. The Code of Conduct is based on the Integrity Policy established by the Senior Management of the ASTA Group, in view of its operations in the global market.

Recognizing the importance of this Code of Conduct, all ASTA employees must be familiar with its content and other Procedures of our Integrity System (available on the corporate intranet) and fully comply with the applicable requirements in their activities.

This Code does not expect to cover all everyday situations. When in doubt, employees should seek guidance from leaders.

If you identify or suspect situations that go against the guidelines of this Code, you must report your concerns, in good faith, using the relevant channels.

(Ethics Channel 0800 601 8272 or <https://www.0800brasil.com.br/astaetcbrazil>)

We count on your commitment to this Code of Conduct, in order to maintain a solid company based on ethical values.

Marcelo Porsch
ASTA BRASIL CEO

COMPLIANCE WITH LAWS AND INTEGRITY GUIDELINES

It is the duty of all ASTA BRASIL employees to:

- ✓ Fully comply with applicable laws and other regulatory requirements.
- ✓ Respect the diversity of all nature and the personal dignity, privacy and rights of all human beings, therefore, any type of discrimination, racism, moral or sexual harassment is prohibited.
- ✓ Strive to maintain and promote the good reputation of our company.

RELATIONSHIP WITH COMPETITORS (ANTITRUST)

ASTA BRASIL complies with local legislation on competition law (ANTITRUST). Therefore, duties are:

- ✓ Ensure fair competition and not engage in activities or businesses that are harmful to the public administration, society or its business partners.
- ✓ Any relationship with competitors aimed at agreements on prices, production capacities, market sharing, sales territories or production programs and attitudes that harm healthy competition and create restrictions on business with partners is prohibited.
- ✓ Do not obtain and use confidential information from competitors.

RELATIONSHIP WITH SUPPLIERS, SERVICE PROVIDERS AND BUSINESS PARTNERS

Suppliers and business partners will be selected based on fair and appropriate criteria, always striving for fairness and transparency in relations. To this end, every responsible employee or who participates in the contracting undertakes to:

- ✓ Select and contract suppliers, service providers and commercial partners, ensuring the transparency of information and the establishment of objective criteria that promote fair competition.
- ✓ Do not use suppliers, service providers or business partners, under any circumstances, to carry out any activity that goes against the requirements of this Code of Conduct.
- ✓ Not obtain, request or accept any type of personal advantage due to their position in the business relationship.
- ✓ Monitor suppliers, service providers or business partners during the commercial relationship, in order to prevent or detect misconduct that could impact ASTA's business and reputation.

- ✓ Communicate immediately the Manager and the Compliance Sector, when there is the detection or suspicion of any inappropriate conduct by partners

In particular, we directly guide our suppliers and business partners who act in accordance with the laws of the country and integrity guidelines in force in the market.

In this way, all suppliers and commercial partners will receive the specific Code of Conduct and will be contracted according to ASTA's internal procedures.

GIFTS AND HOSPITALITIES, DONATIONS AND SPONSORSHIPS

Gifts and Hospitality, Donations and Sponsorships, aims to establish healthy and honest business relationships that allow the creation of value for both parties. In this way, the company and its representatives undertakes to:

- ✓ Do not offer or give undue advantages, directly or indirectly, to any person or organization. Gifts and Hospitality can only be granted if they are in accordance with a specific procedure and do not give rise to the appearance of impropriety or bad faith.
- ✓ Do not take advantage of your position to demand, accept, seek to obtain, or promise undue advantages.

Donations by the company, or by people on its behalf, will only be made if they are transparent, adhere to the legal rules in force in the country and, at any time, it is possible to justify and prove the reason and destination.

Donations are prohibited:

- ✓ To organizations that represent a risk to our company's reputation, political parties, candidates for public office, and any institution that represents a risk of misapplication of the donated resources.
- ✓ Through deposits in private accounts.
- ✓ For organizations with objectives that are incompatible with our business principles and/or that could harm our company's reputation.

The definition for making donations of any nature will be made upon analysis of compliance criteria previously defined by the Governance Committee.

CONFLICT OF INTERESTS

Conflicts of interest occur when an employee is faced with situations of personal interest that may impair their capacity to fulfill their professional objectives and make impartial decisions. Should be avoided:

- ✓ Mixing personal interests with those of the organization.

- ✓ That personal interests influence business decisions and;
- ✓ That financial or personal considerations may influence judgment when performing job duties and responsibilities.
- ✓ Taking sides, giving opinions or advice in situations where the ability to analyze may be compromised by the direct effect of the outcome of decisions.
- ✓ Informing the immediate superior, through the formal processes, of the existence of a potential conflict of interest.

The hiring of relatives can be considered, as long as they compete on equal terms with other candidates and there is no direct hierarchical relationship.

ACCOUNTING, MANAGEMENT AND CONTROLS

ASTA is fully engaged in fighting any and all practices of corruption, bribery, fraud of any kind, and other illicit activities. In this way the responsible employees commit themselves to:

- ✓ Thus, our company's documents and accounting records, created by you or under your responsibility, are complete, accurate, honestly reflect each transaction or expense and are generated in due time and in accordance with accounting and tax rules and regulations.
- ✓ Do not practice facilitation of illegal payments to third party agents in order to secure or accelerate the obtaining of routine services or extraordinary needs.
- ✓ Do not promote or engage in any activity that could be characterized as money laundering.
- ✓ Communicate immediately to Management and Compliance if any non-compliance is identified in its processes or in those of which you're aware of.
- ✓ Ensure the availability at any time of information, reports and compliance records of administrative and financial processes with due transparency, provided that the information security criteria are safeguarded.

PROCESSING OF INFORMATION AND OTHER ASSETS

In managing its activities, the company may need to produce, collect, process and even transfer information from employees and third parties in general. All these activities are always carried out in accordance with current legislation with predetermined limits in contracts or terms between the parties. Especially when it comes to Personal Data, all processing will be in accordance with the General Data Protection Law - LGPD.

Furthermore, it is the obligation of each employee to handle information and other assets responsibly and carefully and to protect them from loss, damage, misuse, theft, fraud or destruction. For a better understanding, the following are considered company assets: building facilities, furniture, cars, machines, equipment, technologies, information, IT resources, engineering projects, internal communications and others.

To this end, all employees undertakes to:

- ✓ Use company assets in accordance with established concession rules.
- ✓ Not to make video or audio recordings or copies and photos of any nature, which are related in any way with the company or its customers, without the consent of the immediate superior.
- ✓ Ensure the security of information and conscious use of the data at its disposal, so as not to infringe the rights of companies and of each individual.
- ✓ Handle personal data only when necessary and only for legitimate, clear and predetermined purposes, in accordance with the General Data Protection Law.
- ✓ Do not access information for which you do not have proper authorization.
- ✓ Maintain confidentiality with respect to internal business matters that have not become public knowledge. Similar treatment must be given to any information, whether from ASTA, customers or suppliers, where secrecy is required. Do not use such information for personal purposes. These obligations will continue to apply even after the termination of employment.

All employees will be asked to sign an information confidentiality agreement.

RELATIONSHIP WITH PUBLIC AUTHORITIES AND POLITICAL PARTIES

ASTA and its representatives will conduct all their relationships with public bodies in a transparent and ethical manner, promoting honest and constructive engagement. Thus, all practices involving public bodies are based on the guidelines of this Code of Conduct.

It is neither the objective nor the interest of our company to have relationships of any kind with political parties. Employees who participate in political activities are recommended to:

- ✓ Always act in a personal manner and in a way that does not interfere with your professional responsibilities.
- ✓ That such activities do not occur in the work environment, nor involve company resources, materials, or equipment.
- ✓ Do not use any company identification, whether logo, brand, uniform, or even quotation of the name, when exercising political activities

SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

ASTA works relentlessly to build and maintain a good framework for Social and Environmental Responsibility. In this way, the company requests that each employee be ready in:

- ✓ Contribute to the protection of the environment and the preservation of its resources.
- ✓ Be constantly aware of workplace safety and occupational health, both for your own benefit and for your colleagues.
- ✓ Do not generate or transmit information that incites racial prejudice, the promotion of violence or other criminal acts or sexually offensive content.
- ✓ To be a multiplier of the good social and environmental practices promoted by the company, contributing to its maintenance and improvement over time.
- ✓ Comply with all environmental, occupational health and safety regulations.

ASTA further undertakes not to use, directly or indirectly and under any circumstances, child labor, analogous to slavery, in degrading conditions or under any condition that harms human dignity.

Situations of deviation from any of the principles mentioned above will not be tolerated and will receive appropriate treatment in light of current legislation, whether committed by employees or other parties with which the company relates.

RESPECT FOR DIVERSITY, EQUAL TREATMENT BETWEEN PEOPLE.

It is the duty of all ASTA Brasil's employees to respect diversity. Therefore, no type of prejudice or discrimination can be tolerated. The company values and encourages equal treatment between people and is committed to working permanently to maintain working conditions that respect human dignity.

The organization values a good work environment and harmonious relationships between people. In this way, all employees are instructed to avoid any form of harassment. Everyone must repudiate and denounce such situations and ASTA Brasil provides communication channels for this. No form of harassment will be tolerated and in case of detection, all appropriate measures will be taken.

COMPLIANCE WITH THE CODE OF CONDUCT

By being part of this team, each employee, from their selection process, is already evaluated for their adherence to the ethical principles present in the organization. In this way, everyone must undertake to comply with the ASTA Group Code of Conduct and other applicable procedures.

CODE OF CONDUCT

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It is the Leadership's responsibility to promote an environment propitious to the compliance with this Code, based on transparency, frankness, professionalism, politeness, respect, and fairness. Being accessible and willing to engage in frank and constructive dialog, providing precise instructions, challenging and achievable goals, monitoring compliance with company guidelines, compliance with laws and Code of Conduct requirements.

All employees are evaluated on their performance against all functional and behavioral aspects to define the principles of meritocracy.

The companies keep communication channels available for all relationship publics. For special attention to issues related to this Code of Conduct, there is an ethics channel available 24 hours a day, accessible to anyone, and which guarantees the confidentiality of the information. The company encourages its use to report any situation contrary to the guidelines cited in the body of this document. It also reiterates that under no circumstances will allow any kind of retaliation against those who makes a report.

This Code of Conduct is widely disseminated to all levels of the organization, thus promoting an environment guided by ethics and integrity.