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Código de Conduta

Título: CBC TRUST Code of Conduct for third parties

Número e Versão do Documento: Cód_Conduta.0002 - V.3

Fase: Vigente

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Data Criação: 17/10/2023

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Aprovado em: 11/12/2023

Área Emitente: Planejamento Estratégico e Financeiro

Área Relacionada: Planejamento Estratégico e Financeiro

REV	DESCRIPTION OF CHANGES	PREPARATION	APPROVAL	DATE
00	Issue of document	Marcelo Del Bianco	Fabio Mazzaro	07/2021
01	Inclusion of the Code in the Docnix system	Marcelo Del Bianco	Fabio Mazzaro	04/2022
02	Update regarding ISO 37001 certification	Marcelo Del Bianco	Fabio Mazzaro	01/2023
03	Update and review the document text. Adjustment of the value considered as a Gift.	Marcelo Del Bianco	Fabio Mazzaro	10/2023

Summary

- Dear Partner,3
- 1. Introduction4
- 2. Scope.....5
- 3. The CBC TRUST Integrity Program6
- 4. Our Commitment – Combating Corruption and Bribery.....7
- 5. Our Commitment – Combating Trafficking in Arms and Ammunition.....8
- 6. About this Code of Conduct10
- 7. Compliance with laws, rules and regulations.....11
- 8. Our Relationship with Third Parties12
- 9. Relationships of Third Parties with Public Agents.....14
- 10. Conflicts of Interests15
- 11. Freebies, Gifts and Hospitality16
- 12. Social Media, Institutional Image and Communication17
- 13. Confidentiality of Information and Protection of Personal Data18
- 14. Accounting and Documentary Records18
- 15. Quality and Safety of Products and Services19
- 16. Working Condition19
- 17. Commitment to the Environment and Social Responsibility20
- 18. CBC TRUST Committee and Compliance Function21
- 19. Reporting Channel22
- 20. Failure to comply with the Code of Conduct and Penalties.....23
- 21. General requirements.....23
- 22. GLOSSARY24

Dear Partner,

As you know, one of CBC's commitments is to always keep up-to-date and in compliance with current legislation and good practices.

Our Integrity Program is also constantly improving, with updates to our controls, procedures, training and policies, including our CBC Trust Code of Conduct for Third Parties, which was updated again in 2022 and is now in its 2nd edition. The code has been in effect since 2021.

This new version complies with the new Decree 11.129/2022, which regulates the Anti-Corruption Law 12.846/2013. In addition, we reinforced some guidelines related to conducting our business, our anti-corruption and anti-bribery practices and, of course, as we cannot fail to mention, our commitment to combating arms and ammunition trafficking.

In 2023, we were proud to become the first Strategic Defense Company in Brazil to achieve the important ISO 37001 certification - Anti-Bribery Management System, including within its scope the fight against arms and ammunition trafficking. This is a significant milestone in CBC's journey. It represents another major step in our ongoing efforts to enhance our Compliance and Compliance policies and procedures

We rely on our partners to comply with the guidelines of this Code and promote its dissemination to their employees, so that we can always conduct our business in a transparent and respectful manner, free from acts of corruption, discrimination or unethical behavior.

We thank everyone for their commitment to ethics and we count on you and your company so that CBC will always remain a great company, serving the country, our customers and all third parties in a transparent, fair and honest manner.

This Code applies to all Third Parties that relate to us, internally or externally.

Non-compliance with this Code by Third Parties constitutes a violation with CBC, which may result in fines for breach of contract, termination of contracts and even liability for damages.

1. Introduction

We are a strategic defense company, founded in 1926, with a strong presence in the national and international market, whose main product is small caliber ammunition.

We are world leaders in this segment due to our commitment to maintaining ethical standards in the conduct of our business. We direct efforts and resources to:

- Offer products that meet the needs of our national and international customers, duly approved and homologated by the competent bodies
- Equip and assist the Armed Forces to fulfill the national defense strategy
- Provide quality products so that state and municipal police can fulfill their duties
- Provide high quality and safe products for police, military, private security agents and civilians, such as: hunters, shooters and collectors

We believe that, in order to meet our objectives, all employees and Third Parties must:

- Comply with legal and regulatory requirements
- Act with integrity and responsibility, always fighting corrupt practices
- Ensure that all adopted practices and controls are also aimed at combating arms and ammunition trafficking

This code establishes ethical behavior and standards in accordance with national and international legislation and CBC's internal regulations.

It is worth mentioning that the choice and maintenance of Third Parties contracted by CBC are not only based exclusively on financial, technical and quality criteria, but also on social, environmental, ethical and compliance with current legislation.

This Code is available for consultation at any time on the main page of the CBC website: www.cbc.com.br.

2. Scope

This Code of Conduct for Third Parties applies to each and every **THIRD-PARTY** that, directly or indirectly, establishes a relationship with CBC, whether nationally or internationally.

THIRD PARTIES are considered: service provider, supplier, representative, intermediary, consultant and business partner, contractor or subcontractor, whether individuals or legal entities, regardless of formal contract or not, including those who use the name of CBC for any purpose or who provides services, supplies materials, interacts with government officials, the government or others.

This Code of Conduct for Third-Parties is applicable throughout the term of its relationship with CBC.

3. The CBC TRUST Integrity Program

This document is part of our CBC Integrity Program, which consists of a set of internal mechanisms and procedures for integrity, auditing, encouraging the reporting of irregularities, effective application of this Code and application of penalties, and whose main objectives are:

- ✓ preventing, detecting and remedying deviations, fraud, irregularities and illegal acts committed by its employees or third parties, against the public administration or business partners, national or foreign;
- ✓ promoting and maintaining a culture of integrity in the organizational environment.

The scope of CBC's Integrity Program has enabled the company to obtain ISO 37001 - Anti-Bribery Management System certification, encompassing the fight against the trafficking of arms and ammunition. This demonstrates the company's commitment not only to combat corruption in accordance with global standards but also arms and ammunition trafficking at the national and international levels.

This achievement was only made possible thanks to every member and partner of CBC, who contributed to creating an environment of integrity and responsibility in the business.

ISO 37001 certification is tangible evidence of CBC's and its partners' dedication and culture to uphold the highest ethical standards in all aspects of operations. It validates our commitment to building and maintaining strong, transparent, and reliable business relationships, and it honors the work that resulted from a robust Integrity Program and Compliance management system, reinforcing CBC's commitment to the value of integrity.



4. Our Commitment – Combating Corruption and Bribery

This Code aims to reinforce the environment of trust and integrity between CBC and its Third Parties, establishing the main guidelines with regard to preventing and combating bribery and corruption.

In this sense, CBC does not admit the participation of its Employees and Third Parties in any act that characterizes corruption, bribery or fraud. We follow the Anti-Corruption and Anti-Bribery Legislation, where it is prohibited to promise, accept or pay any undue advantage that may constitute bribery, whether for Public Agents, individuals, private companies, or third parties related to them, directly or through intermediaries. We advise that Third Parties also follow these guidelines.

CBC, through this Code, its Senior Management and the Compliance Function, establishes its commitment to fighting corruption based on the following guidelines:

- ✓ Prohibit the practice of corruption and bribery (pay or receive), as well as any practice that leads to this understanding, such as offering undue advantage or benefit;
- ✓ Comply with this Code of Conduct and other related Policies;
- ✓ Act in compliance with applicable anti-bribery laws;
- ✓ Encourage concerns raised in good faith to be reported via the Reporting Channel, without fear of reprisals;
- ✓ Prohibit, by its employees and Third Parties, the practice of extortion, fraud, falsification of documents or intentional preparation of incorrect financial transaction statements or any other activity that may constitute corruption or violation of the applicable Anti-Corruption and Anti-Bribery Legislation.
- ✓ Prohibit the fraud of accounting records or entries that do not fully and accurately reflect CBC transactions;
- ✓ Ensure full authority, independence and resources for the Compliance area to deal with any matters related to corruption or bribery;
- ✓ Ensure that any failure to comply with this Code will be subject to the application of disciplinary measures, such as warning, suspension or dismissal;
- ✓ Comply with all requirements of the Anti-Bribery Management System, such as: Regulations, Policies, audits, critical analysis, controls, procedures, risk mapping, among others;
- ✓ Comply with and continuously improve the Anti-Bribery Management System;
- ✓ Provide ongoing communication and training about this Code.

5. Our Commitment – Combating Trafficking in Arms and Ammunition

CBC complies with national legislation and international treaties to combat arms and ammunition trafficking. We act strictly within the legal framework and are committed to combating national and international trafficking in arms and ammunition.

The assumptions below must be followed by both CBC employees and third parties who may sell our products.

International Operations:

- ✓ Comply with trade prohibitions and restrictions that are part of international economic sanctions and embargoes established by the US Office of Foreign Assets Control (OFAC).
- ✓ Carry out export or import operations only with authorization from the competent bodies, such as: Ministries of Defense and Foreign Affairs, Directorate of Controlled Goods (Army), State Department (US), US ITAR (International Traffic in Arms Regulations), US Export Administration Regulations (EAR) etc as appropriate.
- ✓ Do not carry out operations with countries whose civil situation is in internal conflict and could cause suffering for the local population or are used for unauthorized purposes.

National Operations:

Within the scope of national sales, the regulation and control exercised by the Brazilian Army and the Federal Police materialize the means of combat.

Both CBC and the Third Parties undertake to comply with the guidelines of the current regulations and determinations of these bodies, therefore, CBC undertakes to:

- ✓ Carry out any commercialization, proposals or operations only upon compliance, by the client, with the due legal requirements and with the authorizations of the competent bodies.

General Rules:

- ✓ Not establish or maintain a relationship with customers or intermediaries whose activities cast doubt on the legality or purpose of the operation, ensuring that our products are kept out of reach of unauthorized users
- ✓ Pay attention to whether there are indications that the resources may originate from illegal activities.
- ✓ Third Parties that have products in their facilities undertake, as well as CBC, to maintain adequate physical security, as approved by the competent bodies.

Any illegalities, even if suspected, must be reported on the CBC Reporting Channel.

We rely on the collaboration of our partners in order to increase the effectiveness of our mechanisms for preventing, detecting and responding to possible illegal practices in the ammunition trade, including in terms of investigating and alerting the CBC regarding any information that may raise suspicions regarding the legality or regularity of the actions of customers interested in purchasing our products.

About this Code of Conduct

In most situations, your honesty and personal values will guide your decisions and actions. However, there will be situations where a dilemma will arise.

Therefore, this Code of Conduct has some guidelines that are designed to help you make the right decisions, however, they cannot cover all aspects of ethical conduct, nor every situation or dilemma that you may face in your position.

When you're not sure about the right course of action, always look for the one that shows proper ethical conduct and ask yourself the following:

- 1st. Does your conduct comply with the Laws, is it ethical and does it seem appropriate?
- 2nd. Is your action or decision justifiable in any audit or inspection?
3. Would you feel comfortable talking to your family, manager and co-workers about your action?

If you are in doubt or answer NO to any of these questions, or even have any questions about any aspect of this Code of Conduct, contact our Compliance through our Reporting Channel.

6. Compliance with laws, rules and regulations

Third Parties working with CBC must comply with all applicable rules, laws and regulations in force, including without limitation, laws related to anti-corruption and anti-bribery, competition, business conduct, quality of products or services, privacy and protection data, respect for health, safety, human rights, labor, the environment, local legislation, including tax and tax, not limited to these.

It is strictly forbidden for Third Parties to perform any harmful acts, including facilitation payments against the public administration provided for in Brazilian legislation, especially those contained in Law 12.846/13, and against private agents.

The allegation of lack of knowledge of the laws, rules and regulations in general in order to justify a violation thereof is prohibited.

All Third Parties who act on behalf of CBC, or in connection with the Company, are prohibited from giving or offering, payment or delivery of money, gift, service or any other benefit that characterizes an undue advantage, directly or indirectly, including through intermediaries, to any public agent.

It is expressly forbidden for the THIRD-PARTY to make any donation, political or otherwise, on behalf of CBC. CBC does not promote or finance political parties, candidates, their representatives or politically related events.

CBC encourages and supports the filing of a complaint through our Reporting Channel about any act or omission that may constitute a violation of this Code of Conduct for Third Parties or the legislation in force, including the Anti-Corruption Law, committing itself to investigate, punish and/or inform the competent authorities, as rigorously as possible, of any deviations that may be reported.

7. Our Relationship with Third Parties

The relationship and conduct of business between CBC, its Third Parties and the other commercial chain must be based on integrity, ethics, transparency and good faith. These principles and guidelines are set out in this Code of Conduct for Third-Parties.

We expect our Third Parties, like us, to comply with the best market practices and legal requirements for their products and services.

CBC practices free competition, transparency and impartiality in the process of contracting Third Parties. We expect Third Parties to follow these principles as well.

Therefore, it is prohibited to:

- ✓ Offer, solicit or accept any cash incentive, favours, bribes or equivalents, in favor of yourself or third parties, that constitute bribery with the intention of obtaining an Undue Advantage
- ✓ Disclose information on business transactions carried out to people or third parties not related to the process
- ✓ Carry out negotiations with companies that practice forced, slave or child labor, are involved in allegations of corruption/bribery or damage to the environment.

All documents, evidence and other information must be correct, accurate and available for validation by CBC when requested, regardless of the value of the transaction.

In addition, CBC advises and encourages its Third Parties to:

- ✓ Comply with and monitor their value chains in relation to preventing and combating forced or compulsory and/or child labor, pedophilia, discrimination, moral and/or sexual harassment, tax evasion, corruption and money laundering;
- ✓ Have internal policies and/or social inclusion programs, code of conduct, corporate responsibility, environmental management policy or minimization of environmental impacts related to their business, and actions that promote the appreciation of diversity, equity and training for the employment of people with disability and learners;
- ✓ Manage their supply chain, identify critical suppliers from a sustainability point of view and set targets for improving economic, social and environmental indicators with this group of suppliers;
- ✓ Manage economic, social, labor, tax and environmental risks in their supply chain, aiming at business continuity;
- ✓ Encourage internally and its supply chain to hire small and medium-sized local suppliers for economic development;
- ✓ Have and recommend to their suppliers that they have a code of conduct with regard to personal and commercial relationships;
- ✓ Comply with and recommend to their suppliers: on schedule and correct payment of their obligations to their employees, practices aimed at guaranteeing wages that meet the minimum standards of the category

in the region and are sufficient to meet basic needs, and guarantee them health conditions and security provided by law to its employees and outsourced workers. As well as the on schedule and correct payment of its tax, labor and social security obligations.

CBC seeks to hire third parties whose management practices adhere to the precepts of this Code of Conduct for Third-Parties, and its permanent objective is to expand the supply base, without restrictions due to size, size or location, as long as they are able to offer their product or service in accordance with the needs and specifications disclosed and that are capable of supplying from an administrative point of view.

Our third-party base is monitored through due diligence and indicators, which include conduct, administrative, tax, labor and socio-environmental issues, as well as performance and punctuality in supplying and billing.

8. Relationships of Third Parties with Public Agents

In the case of Third Parties representing CBC in the intermediation and negotiations of our products as Public Bodies, both national and international, the relationship must be based on respect, cordiality, honesty, transparency and professionalism.

In interactions with Public Agents, intermediary Third Parties must assume a position of strict compliance with current local laws, such as the Anti-Corruption Law, FCPA, UK Bribery, etc. in addition to this Code of Conduct.

Every THIRD-PARTY must communicate with Public Agents in a clear, direct and honest manner, using appropriate, formal and respectful language, avoiding expressions that allow dubious interpretations or that may distort the truth, using official and appropriate means, such as corporate email addresses.

If, during the performance of regular activities on behalf of CBC, Public Agents make requests for an Undue Advantage or something that appears to be undue, the THIRD-PARTY must immediately report the situation to the CBC Compliance area or to the Reporting Channel, which will be confidential and will not suffer retaliation, even if this results in the loss of business.

9. Conflicts of Interests

It is considered a conflict of interest when the **THIRD-PARTY** allows or appears to allow its personal, private interests or the interests of family members, relatives or others to affect its ability to perform its work objectively, impartially and effectively, compromising, improperly, the negotiation and relationship with CBC.

Configure conflict of interest:

- Disclose or make use of privileged information, for their own benefit or that of third parties, obtained as a result of activities carried out in the third-party company;
- Try, even if informally, to co-opt CBC Employees to obtain advantages within the third-party company;
- Practice an illegal or fraudulent act for the benefit of CBC Employees, directly or indirectly through an intermediary, with the purpose of influencing their decisions in relation to the third-party company;
- Harassing, embarrassing or offering gifts or other benefits to CBC employees, in order to gain advantage in their decisions or that are outside the limits and conditions established in this Code of Conduct.
- Relationships of kinship or friendship with a CBC employee where it may suggest undue favoritism.
- Have a second job or provide a service that may come into conflict with the interests of CBC

The **THIRD-PARTY** must act in a way to prevent and prevent possible conflicts of interest.

If the **THIRD-PARTY** has, or even may have or practice, a conflict of interest as described above, it may not participate in negotiations or any discussions relating to the parties.

You must pre-notify the CBC as soon as possible of any type of conflict of interest.

10. Freebies, Gifts and Hospitality

The relationship between CBC and its Third Parties, as well as these with its clients and other partners with which it maintains commercial relations, must be based on transparency and ethics.

Under no circumstances should CBC or its Third-Party representative give, offer, promise, receive, enable, pay or authorize gifts, gifts and entertainment to a public agent, CBC employee or other private party, with the aim of obtaining an advantage or illicit benefit for any of the parties.

FREEBIES AND OTHER ALLOWABLE BENEFITS

We advise that the THIRD PARTY offers promotional items under the following conditions:

- ✓ They have no commercial value or are of modest value (We suggest, as a reference, a value of up to R\$ 150.00), to be distributed with the purpose of promoting the company.
- ✓ Are within normal courtesy market standards;
- ✓ They are permitted under applicable laws;

CBC acknowledges that its employees may accept gifts with no commercial value or with a market value of up to R\$ 150.00 (one hundred and fifty Brazilian reais) or the equivalent in foreign currency, with a minimum recurrence period of 12 months

GIFTS AND HOSPITALITIES

The **THIRD-PARTY** must not, directly or indirectly, accept, solicit or offer any *gifts, hospitality or other benefits that might*:

- ✓ Compromising or that may appear to compromise its integrity or objectivity in carrying out its duties and responsibilities to society;
- ✓ Characterize or even be interpreted as an attempt to bribe or influence, as a form of payment for a particular negotiation;
- ✓ Violate a law or regulation.

The **THIRD-PARTY** may invite a CBC Employee to participate in widely attended meetings or events related to their functions at CBC, if, in general, the same treatment is offered to all participants and if participation is offered to several organizations.

We advise that the receiving and offering of any gift, present, or hospitality to the same beneficiary should only occur again after a minimum period of 12 months.

The CBC has a Gifts, Presents, and Hospitality Policy outlining all guidelines related to the topic.

11. Social Media, Institutional Image and Communication

CBC's credibility, image and reputation were earned over time due to the efforts and dedication of our professionals and third parties, supported by CBC's principles and values. Therefore, we must preserve this valuable equity.

We care for and respect the rights of Third Parties, especially the freedom exercised on social networks in relation to commercial posts, different positions, as well as their private life or that of their representatives.

Third Parties must not act or speak on behalf of CBC, present themselves as CBC or express any opinion attributable to CBC, this includes discussions on external social networks, corporate or business forums and other social communication vehicles, except when expressly authorized by CBC to do so.

Manifestations associated with CBC activities can be monitored, in order to identify any derogatory comments or that may appear to make use of information that is not public and may even lead to legal actions and questions.

CBC directs Third Parties to avoid disrespectful, unprofessional, harassing, defamatory, discriminatory, prohibited and untruthful activities, both on social media platforms and in other media. We count on everyone's common sense so that something that could be interpreted as:

- ✓ discriminatory opinion;
- ✓ hate speech, which incites hostility or violence against a person or group because of race, ethnicity, age, gender, affective-sexual orientation, disability, religion, political opinion, national or social origin, economic position, birth or any other personal characteristic;
- ✓ crime against the honor of persons or companies;
- ✓ apology for crimes or any other type of practice of violence.

12. Confidentiality of Information and Protection of Personal Data

The **THIRD-PARTY** must maintain the confidentiality and secrecy of any and all CBC information that it may have access to, such as documents, projects and any materials filed and registered in any way, whether originals or copies, in any form (graphic, electronic or any other way), protecting them and not disclosing them to third parties. The use of the image, name or brands of **CBC** is not allowed, except if previously and formally authorized for exclusive use in the development of its professional activity. When necessary, they will follow the brand usage guidelines.

Information relating to contracts or commercial terms of purchase/sale must be treated confidentially, always respecting the intellectual property rights of CBC and Third Parties while carrying out the contracted activities.

Confidentiality must also be maintained regarding business plans, financial information, properties, methods of operation, marketing information or plans, price lists, accounting records, operations and memos, subject to legal obligations and norms that regulate transparency within CBC.

CBC may collect personal information from third parties in the context of its operations. We adopt technical and organizational measures to protect the personal data of holders against accidental or unlawful destruction, loss, alteration, communication or dissemination or unauthorized access, in addition to ensuring that our environment (whether physical or logical) used for the processing of personal data is structured in order to meet the security requirements, the standards of good practices and governance and the general principles set forth in the General Data Protection Law and other applicable regulatory standards. Insofar as the **THIRD-PARTY** also has access to any personal data in the context of its function, it is also obliged to comply with privacy and data protection laws.

13. Accounting and Documentary Records

CBC expects that the **THIRD-PARTY**'s accounting records, necessary operating licenses and other legal documents strictly observe the applicable rules and laws, ensuring the necessary transparency to operate and generate reliable records and reports.

14. Quality and Safety of Products and Services

Products and services must be offered to CBC with quality, in accordance with the applicable national and international standards, and respecting the standards negotiated and defined in the purchasing processes and contracts.

It must be ensured that:

- ✓ The goods and supplies used by its professionals during the provision of services at CBC are in perfect conditions of use and functioning, in accordance with national and international safety standards;
- ✓ The contracted services must be provided by duly qualified and trained labor to provide the service, and to identify risks and prevent accidents at work.

In case the THIRD-PARTY is the holder of CBC products, these must be packaged while maintaining the standards of quality, security and integrity of our product.

15. Working Condition

Like CBC, **THIRD PARTIES** must provide their employees and subcontractors with safe and healthy working conditions. It is important that **THIRD PARTIES** carry out regular reviews of the health and safety conditions in their facilities/equipment and that they take relevant corrective actions, when ergonomic, physical, biological, chemical and accident risks are presented.

The THIRD-PARTY must respect the current labor laws related to:

- ✓ **Child Labor:** Do not employ and/or do not use child labor, as well as not hire and/or maintain relationships with companies that use, exploit and/or by any means or form employ child labor;
- ✓ **Forced Labor:** Do not employ and/or do not use child labor, as well as not hire and/or maintain relationships with companies that use, exploit and/or by any means or form employ child labor;
- ✓ **Hours of Work and Salary:** Observe applicable laws, rules and standards regarding working hours, including overtime. THIRD-PARTY employees must receive wages that are in accordance with the floor of the specific category, respecting the minimum determined by the Government;
- ✓ **Collection of charges and fulfillment of obligations:** All THIRD PARTIES must be in good standing with their labor and social obligations and up to date with the ancillary obligations inherent to the employment relationship with their employees.

16. Commitment to the Environment and Social Responsibility

CBC expects that, in the development of activities, the THIRD-PARTY will adopt sustainability practices in its operations, aiming to ensure that its business model is sustainable in the future. These include, among others:

- ✓ guarantee the respect, well-being and safety of its employees;
- ✓ act appropriately and collaboratively in the communities in which it operates;
- ✓ mitigate the impacts of its operations on the environment; and
- ✓ conduct business in accordance with the highest ethical, behavioral and legal standards.

17. CBC TRUST Committee and Compliance Function

The CBC Trust Committee is responsible for all aspects related to the management of this Code of Conduct for Third-Parties.

All cases of non-compliance with this Code, eventual exceptions and reports sent through the CBC Reporting Channel, will be evaluated by the Compliance area and, if necessary, will be submitted to the CBC TRUST Committee.

This Committee is composed of permanent members, appointed by the President of the CBC, and any persons involved may be invited to participate in the meetings.

This Committee also periodically reviews and approves this Code and other related documents and is ultimately responsible for controlling its compliance.

With regard to the Compliance Department, it is ensured that its Function is attributed to the person who has independence, competence, position and authority to exercise it, with immediate report to the Presidency of CBC and direct access to the Controlling Shareholder and Senior Management, having as one of its main commitments, the continuous improvement of the CBC Integrity Program and Anti-Bribery Management System.

18. Reporting Channel

The CBC Reporting Channel is the means of communication through which partners, employees, among others, can report any acts or suspicions of acts of bribery, corruption, fraud, violation of legislation or other situations and conduct that violate the CBC Code of Conduct for Third Parties.

Any THIRD-PARTY who becomes aware of any violation above **MUST** report the facts through the CBC Reporting Channel, through the following means:

- Website: <https://contatoseguro.com.br/cbc> to access the form; or
- Telephone: 0800 601 8667. Available 7 days a week, 24 hours a day.

The channel is operated by a specialized and independent external company, guaranteeing that all complaints will be delivered. In addition, the report may be handled anonymously or identified as you choose. We will always communicate with you through the aforementioned website, maintaining your anonymity if applicable. The matter you report must be true, consistent and substantiated.

All reports will be investigated appropriately by the Compliance area and the areas involved, and the measures will be taken in accordance with the veracity, circumstances and applicable laws. If applicable, the incident will be submitted to the CBC Trust Committee for assessment and action.

Both the link to access the Reporting Channel and this Code of Conduct for Third Parties are available on our website (www.cbc.com.br) for consultation at any time.

Prohibition of retaliation

CBC does not tolerate any type of retaliation, punishment or threat against whistleblowers who ask a question, register or show a concern or, in good faith, report any possibly inappropriate behavior (except when the individual participated in the violation) or, for refusing to participate in bribery/corruption, even if such refusal could result in the loss of business for CBC.

We remind you that harassment and intimidation at work are strictly prohibited.

However, we warn of the disciplinary and legal consequences for cases of untrue accusations or providing false information.

19. Failure to comply with the Code of Conduct and Penalties

CBC considers integrity, honesty, transparency and trust to be essential elements of our activity. Any **THIRD-PARTY** governed by this Code of Conduct who fails to comply with it will be subject to penalties, such as: **formal warning; application of contractual fine; contract termination; inclusion in the restricted list.**

The imposition of sanctions will always be carefully evaluated, observing the principles of reasonableness and proportionality, in addition to the provisions set forth in the legislation and in this Code of Conduct. Failure to comply with the Code of Conduct may also result in the adoption of civil or criminal proceedings, which may result in considerable sanctions.

CBC reserves the right to take any action or disciplinary measure against the THIRD-PARTY that engages in conduct considered immoral, unethical or illegal, whether or not this represents a breach of the Code of Conduct or is related to the company's activity. CBC may take such measures if, at its sole discretion, it considers that your conduct constitutes any reputational risk or any other type of harm to the company.

20. General requirements

In addition to the topics and standards mentioned in this Code, situations that are not described in this document may occur, where you must exercise your ethical conduct before doing so. In case of doubt about your decision, you can consult the CBC, through your commercial contact at the company, the CBC Legal Department, the Compliance area or the CBC Trust Reporting Channel.

The THIRD-PARTY declares that it has had access to the CBC Code of Conduct for Third-Parties, available on the CBC website (cbc.com.br), is aware of its content and undertakes to follow the guidelines stipulated therein, as an integral part of this Agreement.

21. GLOSSARY

Public Administration: All Public Bodies linked to the national federal, state or municipal power or foreign official entities, including independent ones, as well as those public law entities linked to indirect Public Administration, such as autonomous bodies, public foundations, public schools and universities, public research institutes, public hospitals, public companies, government-controlled companies and regulatory agencies.

Public Agent: Any person who occupies a position, job or public function, appointed or elected, even if temporarily and without remuneration.

Unlawful Acts: Mean going against ethical principles in order to obtain any advantage, be it financial or otherwise. It is an act prohibited by laws or rules.

Senior Management: person or group of people who direct and control CBC at the highest level.

Corruption: the act of requesting or receiving, for oneself or for others, directly or indirectly, an Undue Advantage related to the performance of a Public Agent seeking any benefit for CBC, for oneself or for third parties, as well as the acts of offering it, promising it, authorizing or giving it, or even accepting a promise of such an advantage. One of the most common forms of corruption is bribery.

Bribery: Offering, promising, giving, accepting or soliciting an Improper Advantage of any amount (which may be financial or non-financial) directly or indirectly, and regardless of location, in violation of applicable laws as an inducement or reward to a person acting or failing to act in relation to the performance of its obligations. Bribery is one of the means by which Corruption is practiced.

Undue Advantage: any benefit, economic or otherwise, such as cash, movable and immovable property, gifts, hospitality, courtesies, services or favors, made available to a Public Agent or private individual contrary to legislation.

Business Partner: external party with which CBC has, or plans to establish, some form of business relationship (clients, suppliers, intermediary agents, service providers, third parties, commercial representatives, among others).

Anti-Corruption and Anti-Bribery Legislation: includes any and all applicable Anti-Corruption and Anti-Bribery Legislation, including, but not limited to, the Anti-Corruption Law (Law 12.846/2013), which provide for the objective administrative and civil liability of legal entities for the practice of acts of corruption against public administration, national or foreign, its regulatory decree (Federal Decree No. 11.129/2022), the Brazilian Penal Code, the Law of Administrative Improbity (Law No. and Law 14.133/2021).

Integrity Program: set of internal integrity policies, mechanisms and procedures, auditing and incentives to report irregularities and the effective application of codes of conduct, policies and guidelines, with the aim of: preventing, detecting and remedying deviations, fraud, irregularities and unlawful acts committed against public administration, national or foreign; and foster and maintain a culture of integrity in the organizational environment.

Anti-Bribery Management System: set of elements of CBC that establish policies, objectives and processes that aim to curb the practice of corruption and bribery, reinforcing the environment of trust and integrity in the CBC.

Public Body: It refers to (i) any legislative, executive, judicial, or military department, agency, or office of government; (ii) government owned or controlled companies; (iii) public international organizations; or (iv) other politically exposed entities. Examples of Public Bodies are the Ministry of Transport, Ports and Civil Aviation, Infraero and Treasury Departments.

Trafficking in Arms and Ammunition: illegal commercialization, without proper authorization from the competent bodies, or uncontrolled sale of war weapons.