	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 1 / 30</b>

## CODE OF CONDUCT OF FÁBRICA CARIOCA DE CATALISADORES S.A

### I- WHO WE ARE

Fábrica Carioca de Catalisadores S.A. (FCC S.A) is a cutting-edge technology company that creates, produces, and delivers solutions in catalysts and additives for the oil refining industry.

The company brings together the tradition and know-how of two global giants in the oil and petrochemical areas, Petrobras, and Albemarle Corporation, which together have a strong technological scheme for research and development of catalysts and additives and hold the leadership in share in the catalyst market for the oil refining industry in the world, in addition to the leadership in the FCC S.A. catalyst market in South America.

Cutting-edge technology is the constant hallmark of the solutions presented to customers, always with a strategic focus on developing products and services tailored to the needs of refineries.


Process excellence is also a highlight of FCC S.A. We are certified in the three main quality systems: ISO 9001, ISO 14001 and ISO 45001, internationally recognized.

Proximity to the customer is another differentiator for FCC S.A, which continually seeks to reduce distances and strengthen relationships. We work side by side with the client, monitoring the performance of the units, promoting courses and training, managing inventories, identifying and resolving problems in advance, promoting performance improvements and working, as much as possible, to generate gains for clients.

This is FCC S.A: a company focused on customer relationships, presenting innovative solutions to the market.

<b><u>PURPOSE</u></b>	<b><u>VISION</u></b>	<b><u>VALUES</u></b>
We anticipate sustainable solutions that generate value for a changing world.	To be a leader in the market and recognized for providing innovative solutions.	<ul style="list-style-type: none"> <li>• Innovation</li> <li>• Collaboration</li> <li>• Readiness</li> <li>• Integrity</li> <li>• Life</li> </ul>

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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 2 / 30</b>

## **II- APPLICATION OF THE CODE OF CONDUCT**

This manual brings together the guidelines that must be observed in professional action to achieve increasingly higher ethical standards when carrying out activities.

The code of conduct applies to the company's administration, board of directors and workforce (collaborators and employees), as well as to partners and other individuals or legal entities that carry out business or operations with FCC S.A, such as suppliers, customers, distributors, agents, consultants, associates, service providers. Partners must also pay attention to the provisions of the FCC S.A. Code of Conduct.


FCC S.A is convinced that in order to consolidate and develop it must start from precise business objectives and ethical principles that are shared by administrators, employees and partners, such principles being clear in this document and in the Code of Conduct for Partners and will be the subject of training, if necessary.

## **III- PRINCIPLES AND COMMITMENTS OF FCC S.A IN COMPLIANCE WITH LAWS, RULES AND INTERNAL REGULATIONS**

The workforce, partners, as will be seen in their specific document, and other third parties must be committed to:

- 1- Ensure compliance with internal standards, policies and legislation;
- 2- Offer quality products and services aimed at the full satisfaction of its customers and consumers, to maintain lasting relationships with transparent and permanent dialogue;
- 3- Ensure the values, mission, purpose and vision of FCC S.A, maintaining an attitude compatible with its image and reputation and acting in defense of the interests of customers and the company and with the constant search for excellence in its business;
- 4- Preserve privacy, protect and treat with confidentiality personal data and other information pertinent to customers, suppliers, service providers and other partners, obtained as a result of the business relationship;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 3 / 30</b>

- 5- Guide your business decisions by ethics, transparency, integrity, loyalty, impersonality, legality and efficiency, responsibly using your economic and financial resources in the search for increasing levels of competitiveness, excellence and profitability, considering the legitimate interests of all your stakeholders relationship and its commitment to sustainability;


Therefore, the search for the development of FCC S.A must be based on these main principles, with the confidence that actions are guided by the highest ethical standards and strict respect for legality:

- 1- **INTEGRITY:** It is about honesty and probity in carrying out the commitments assumed, with coherence between speech and practice, repudiating all forms of fraud and corruption, with an active stance when faced with situations that are not in accordance with the ethical principles assumed.
- 2- **TRANSPARENCY:** The criteria that guide the decisions and actions of FCC S.A must be understood, transmitted and practiced in a clear, accurate, agile and accessible manner, observing the limits of the right to data protection and confidentiality regarding the company's privileged or strategic information.
- 3- **LEGALITY:** Respect for national legislation and the legislation of the countries where the shareholders of FCC S.A operate and where the company's operations are carried out, as well as the internal rules that regulate the activities of each company, in accordance with Brazilian constitutional principles and the international treaties of which Brazil is a signatory.
- 4- **HUMAN DIGNITY AND RESPECT FOR PEOPLE:** Valuing life and affirming citizenship, respecting physical and moral integrity, as well as the fundamental rights of freedom, privacy and data protection, of all people, individual differences and the diversity of social groups, with equality, equity and justice.
- 5- **SUSTAINABILITY:** Acting with environmental, economic, and social responsibility, in a balanced way, respecting the right to a full life of current generations and contributing to the preservation of future ones.

#### **IV- ORGANIZATIONAL JUSTICE AND DISCIPLINARY MEASURES**

At FCC S.A, there will be no tolerance for any non-compliance with the values and assumptions contained in the Code of Conduct, the Consequences and Disciplinary

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 4 / 30</b>

Measures Policy and other internal policies and procedures of the company and regulatory bodies in our sector of activity.

Any type of non-compliance will be subject to the application of disciplinary measures, which may even culminate in the dismissal of people who work in the company or the breaking of the service provision contract with partners, without prejudice to civil, criminal and administrative proceedings in case of violation of laws or company regulations that oblige FCC S.A to pay compensation, as a result of objective liability provided for by Brazilian anti-corruption legislation and/or due to any other reason.

Refusal to follow a specific instruction from a superior or direct manager who is in breach of this Code of Conduct, the policies or procedures adopted by FCC S.A., will not result in any type of reprisal, retaliation, or disciplinary action.

Furthermore, any attitude that discriminates against people with whom one has professional contact, based on ethnicity, sexual orientation, gender, religion, religious belief, ideology, cultural differences, origin, social class, age, or any disability, will be subject to application disciplinary measures, which may even culminate in the dismissal of the employee or breaking of the service provision contract with partners.

The performance of each employee will be recognized and equal access to existing professional development opportunities will be provided, according to the characteristics, skills, and contributions of each employee.


FCC S.A encourages any non-compliance with the Code of Conduct to be reported via email to [canaldedenuncias@fccsa.com.br](mailto:canaldedenuncias@fccsa.com.br) or on the website [www.fccsa.com.br](http://www.fccsa.com.br) under the Reporting Channel link so that the company can adopt the measures that may be necessary. Confidentiality and anonymity will be guaranteed, and any possibility of retaliation will be ruled out.

#### **V- RESPONSIBILITY OF COLLABORATORS**

People who work at FCC S.A must employ, when carrying out their duties, the same attitude that any diligent person with integrity would employ in their relationships with other people and in managing their own businesses.

It is up to employees to always act in defense of the company's best interests, maintaining confidentiality regarding the company's business and operations, as well as the business and information of customers.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 5 / 30</b>

It is essential that attitudes and behaviors reflect personal and professional integrity and do not put the financial and asset security of the team or FCC S.A. at risk. There must be cooperation from all those responsible for this, with internal or external investigations, when necessary.

As described in the FCC .SA Conflict of Interest Policy and the Related Party Transactions Policy, everyone must carefully evaluate situations that may characterize a conflict between their own interests and those of FCC S.A and/or arising from conduct that is not acceptable from an ethical point of view – even if they do not cause tangible harm to the company. Comments that could affect the image of competitors or contribute to the spread of rumors about them should not be made.

In case of verification of an occurrence that considers possible non-compliance with this Code of Conduct, laws, and regulations, as well as violations of company policies and procedures, the person working at FCC S.A. must, in good faith, and as quickly as possible, notify your superior or the board directly. The complaint can also be sent to the email [canaldedenuncias@fccsa.com.br](mailto:canaldedenuncias@fccsa.com.br) or website [www.fccsa.com.br](http://www.fccsa.com.br) using the Report Channel link. Confidentiality and anonymity will be guaranteed, and any possibility of retaliation will be ruled out.


The participation of the workforce, the Board of Directors and Senior Management in training and initiatives related to ethical and compliance issues is mandatory.

## **VI- MANAGEMENT RESPONSIBILITY**

The leadership will have additional responsibilities, in addition to those listed in the “Responsibility of Collaborators” section, including, but not limited to, the following:

- 1- Provide support and offer guidance on incorporating the Code of Conduct into the daily lives of employees who are part of your sector or team;
- 2- Be the Tone from the top, that is, lead by example, follow and enforce the guidelines contained in this Code of Conduct and other FCC SA policies and inspire your employees to do so by example;
- 3- Introduce a culture of transparency and trust in relation to collaborators who report to leadership.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 6 / 30</b>

- 4- Support and protect the person who works in the company who, in good faith, is acting in the event of reporting non-compliance or worrying occurrences, as well as compel any type of retaliation against someone who has reported, in good faith, some fact worrisome.
- 5- Constantly check the execution with this Code of Conduct and compliance with it, as well as the execution of appropriate training by the team that reports to leadership.

## **VII- ENVIRONMENTAL, SOCIAL AND GOVERNANCE MANAGEMENT (“ESG”)**


FCC S.A adopts ESG criteria throughout its operations to ensure that the business model is sustainable in the future, such as the following:

- 1- Ensure the well-being and safety of employees and other collaborators through a harmonious, respectable, fair, balanced, cohesive and heterogeneous work environment, acting appropriately in the communities in which FCC S.A operates;
- 2- Mitigate the impacts of operations on the environment, focusing on the ethical and sustainable development of our society;
- 3- Conduct business in accordance with the highest ethical and regulatory/legal standards; and
- 4- Meet the “environmental, social and governance” agenda in its hiring and due diligence procedures, including issues related to anti-bribery and anti-corruption, health, and safety, among others, aiming to mitigate possible risks and enhance strategies to mitigate them.

Along these lines, everyone at the FCC must adopt the following commitments::

- 1- Act in accordance with the principle of sustainability, committing to social development, with respect for local cultures, prioritizing the use of renewable natural resources and responsible and efficient use of economic resources, serving current generations and preserving rights of future generations;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 7 / 30</b>

- 2- Ensure that all employees develop socio-environmental awareness and contribute to the preservation of the environment inside and outside the company;
- 3- Act to minimize the socio-environmental impacts of your projects, seeking to re-establish environmental balance in its physical, biological, social and cultural aspects in your area of coexistence;
- 4- Use consciously, rationally, responsibly and sustainably the natural resources essential for the development of your business, respecting biodiversity;
- 5- Promote actions to conserve energy, energy efficiency and combat waste and develop environmental responsibility in the common areas of the enterprises;;
- 6- Incorporate socio-environmental criteria into the company's management processes and in its relationships with business partners and suppliers;

#### **VIII- SOCIAL RESPONSABILITY**

Being a socially responsible company is one of the strategic objectives of FCC S.A. To this end, the organization actively participates in the development of the region where it operates (internal and external public), implementing social responsibility actions.

Its social programs must focus on identifying the real needs of the internal and surrounding population (protecting their culture and vocations), partnering with public bodies, and strengthening the institutional image.


All FCC S.A. socio-environmental responsibility actions are supported by the company's policies.

The participation of the workforce in projects and causes that involve volunteering actions is supported and encouraged by FCC S.A.

Our company does not adopt or support, in its own processes or those of third parties, any type of child labor, forced labor or predatory exploitation of fauna and flora and rejects any form of sexual exploitation of children and adolescents and any type of action and promotional material that encourages this advertising model.

Furthermore, it declares that children and adolescents must grow up free from all forms of neglect, discrimination, exploitation, violence, cruelty and

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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 8 / 30</b>

oppression, encouraging respect for childhood and education for citizenship through internal and external practices of mobilization and awareness of workforce.

## **IX- RELATIONSHIP WITH CUSTOMERS**

As noted above, FCC S.A is guided by the principle of transparency in the disclosure of information and the characteristics of products and services, as well as in adapting the product or service to customer demand, aiming to better meet their needs; compliance with the laws where it operates, always respecting its commitments. Responses, even if negative, to your requests must be obtained appropriately and within the expected time frame and the team must be courteous and efficient, offering clear, precise and transparent information.

It is not permitted to offer brand loyalty rewards, rebates, gifts (except advertising gifts, with a **maximum value of US\$100 (one hundred US dollars)**), special discounts or other benefits. Sponsorship of customer expenses related to meals, transportation and stays is permitted within the commercial relationship, as established by the company's Commercial Policy.


As described in the section relating to the Hospitality and Gifts Policy, collaborators are strictly prohibited from receiving gifts, payments, loans, or any other advantage, in their name and/or that of members of their family, except promotional gifts that contain the company's identification, with a maximum limit of US\$100 (one hundred US dollars). All gifts that are not considered promotional gifts - or that do not contain the logo of the company offering the gift - must be submitted for approval by the Ethics Committee, regardless of the value. This committee may approve acceptance of the gift by the recipient or forward it to a draw for all people or a specific group.

FCC S.A. is permitted to receive, accept and sponsor actions of a sociocultural and/or other ethical nature, promoted by its actual and potential clients or by FCC S.A. (the company itself), as long as they are internally evaluated by the Ethics Committee and approved by the legal/compliance area.

FCC S.A is subject to Brazilian and international anti-corruption legislation and is aware of its administrative and civil liability in cases of bribery or any undue advantage to start or maintain a business, including facilitation payments (bribes) and money laundering,

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 9 / 30</b>

which do not comply with or be tolerant, under no circumstances, with these illicit practices.

#### **X- RELATIONSHIP WITH SHAREHOLDERS**

The relationship with shareholders must be based on the communication – accurate, transparent, and timely – of information that allows them to monitor the activities and performance of FCC S.A, as well as the search for results that bring positive impacts on its market value.

Subject to legal requirements, all FCC S.A shareholders have extensive information about what may affect investments and debt payments and comply with the rules established in the Shareholders' Agreement.

In the event of an illegal act, it is mandatory to communicate and report to the Presidency of the Board of Directors of FCC S.A. and other responsible areas, in compliance with the requirements set out in the Brazilian Corporation Law.

The Ethics Committee will be responsible for sending to the presidency of the Board of Directors the cases provided for by law (corruption, fraud in tax and accounting books, bid fraud, bribery, etc.) and cases of direct complaints against the FCC S.A. Board, as mentioned in the FCC S.A. Anti-Corruption Policy, Related Party Transactions Policy, Consequence Management Policy and Conflict of Interest Policy.


#### **XI- RELATIONSHIPS WITH PARTNERS**

The selection and contracting of partnerships must be based on technical, professional and ethical criteria, and on the company's needs, and must be conducted through predetermined means, such as competition or price quotation, that guarantee the best cost-benefit ratio.

Partners must be aware of and adhere to the FCC S.A. Code of Conduct with Partners and, if they have a Code of Ethical Conduct, they must demonstrate it to FCC S.A.'s workforce and employees, complying with its internal precepts and external/legal.

#### **XII- RELATIONSHIP WITH FINANCIAL INSTITUTIONS**

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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 <b>FÁBRICA CARIOCA DE CATALISADORES</b>	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 10 / 30</b>

Relationships with financial institutions must occur within legal precepts, ensuring both parties have access to information relevant to the business carried out.


FCC S.A must only provide the data necessary to carry out the financial transactions and information required by the Government.

### **XIII- RELATIONSHIP WITH COLLABORATORS**

FCC S.A.'s commitments to its employees are:

- 1- Provide treatment to the entire workforce based on justice, cordiality and respect;
- 2- Do not allow the adoption of any discriminatory practice based on ethnicity, sexual orientation, gender, religion, religious belief, ideology, cultural differences, origin, social class, age or person with a disability;
- 3- Repudiate any and all forms of discrimination in hiring, remuneration, access to training or internal recognition/awards, promotion, dismissal or retirement;
- 4- Encourage the free expression of ideas, repudiating threats, blackmail, humiliation, intimidation, disqualification or harassment of any nature in work relationships;
- 5- Promote the improvement of the quality of life of its employees, providing well-being, health, hygiene and safety in the work environment;
- 6- Repudiate the practice of ethical, administrative, civil or criminal offenses discovered or perceived within the scope of the FCC's Compliance/conformity/integrity program, as well as handle reports of transgressions thereof and violations of the principles and commitments of this Code of Conduct and the company policies;
- 7- Guarantee your employees access to all functional information that concerns them, and the protection of their personal data obtained, maintained and processed by FCC S.A;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 11 / 30</b>


- 8- Prohibit the carrying of any type of firearm or bladed weapon, except for carrying out legally authorized professional activities, on company premise;
- 9- Not admitting and taking preventive measures to curb – in its own activities, in the activities of partners and in the value chain of FCC S.A – child labor, abuse and sexual exploitation of children and adolescents, work in degrading conditions, as well as analogous to slavery, as well as any form of physical, sexual, moral or psychological violence; and report offenders;
- 10- Encourage participatory management, involving the team in strategic planning and developments, making the company's results available through specific meetings and institutional communication channels, thus allowing a systemic view of the organization;
- 11- Value intellectual production and recognize the merits of the work carried out by its employees, considering their proposals for improving processes, regardless of their hierarchical position;
- 12- Stimulate and encourage everyone to create solutions, take initiative and act proactively, preventing accommodation and conformity;
- 13- Make safe and reliable communication channels available to all employees to receive information, suggestions, queries, criticisms and complaints, preserving effectiveness in reception, management and treatment, confidentiality, non-retaliation against whistleblowers, and the timeliness of responses to complaints, providing institutional guarantees to protect the confidentiality of employees involved in complaints, to preserve rights and protect the neutrality of decisions.

#### **XIV- RELATIONSHIP WITH PEOPLE WHO WORK AT FCC S.A.**

People working at FCC S.A. who are assigned to other companies must comply with the Code of Conduct/Ethics of the organization in which they are allocated, as long as they are more restricted than this Code of Conduct. In the event of a conflict of information, you must always follow the provisions of this Code of Conduct.

Criticisms and suggestions from the workforce are encouraged and well received by the company, without constraints or punishment, as long as they are made with responsibility and transparency, through the channels provided by the organization.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 12 / 30</b>

As defined in the culture of FCC S.A, unintentional mistakes made as a result of well-intentioned attempts to produce improvements or solve problems are not punished, as they help to grow and constitute the basis for the permanent search for excellence. In turn, voluntary errors are not tolerated, as they result from negligence, incompetence, or imprudence, and deserve special attention and rigorous correction.

Union association and strike are recognized by the FCC S.A. as rights of the workforce. However, FCC S.A. does not allow excesses that put the physical and moral integrity of its workforce and assets at risk.

The legal rights and responsible treatment of pregnant employees, collaborators and outsourced staff who are victims of work accidents and people with disabilities are guaranteed.

The workforce must maintain secrecy regarding confidential acts or facts to which they have access and not use them to obtain advantages, for themselves or others, with the capital market, other companies, institutions or even individuals.

Relatives of people who are part of the workforce may be admitted and/or hired by the company, as long as they are evaluated and compete on equal terms with other candidates and do not occupy hierarchically conflicting positions with each other.


FCC S.A.'s workforce is not permitted to use machines, equipment, tools, facilities or other company assets for their own benefit or that of others.

People who work at the company must not offer or accept entertainment or gifts - except promotional gifts that contain the company's identification, with a **maximum limit of US\$100 (one hundred US dollars)** - or perform any type of favors not provided for in efficient conduct of its function.

The FCC S.A workforce is aware that the company is subject to Brazilian and international anti-corruption legislation and must act in line with these regulations, as well as internal integrity guidelines and policies, not getting involved, under any circumstances, in cases of bribery and undue advantages, such as facilitating payments (kickbacks), money laundering or other forms of corruption within the organization, under penalty of suffering applicable legal sanctions and internal punishments.

#### **XV- PSYCHOLOGICAL VIOLENCE, MORAL AND SEXUAL HARASSMENT**

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 13 / 30</b>

Psychological violence is characterized by offensive gestures, words, attitudes or actions, explicit or subtle, disqualifying, discriminating, humiliating and embarrassing, resulting from work relationships, which undermine the person's dignity and are potentially capable of compromising one's professional career, cause damage to their physical and mental integrity, which may lead to deterioration of the work environment.

“Harassment” is understood as impertinent insistence, persecution, suggestion or constant pretense towards someone and/or conduct that causes psychological or physical embarrassment to the person, which can be classified into two types: sexual harassment and moral harassment.


Moral harassment is not to be confused with sexual harassment. Harassment with a sexual connotation can manifest itself as a kind of moral aggravation, which is broader.

Therefore, moral harassment is understood as the deliberate repetition of gestures, words (oral or written) and/or behaviors of a psychological nature, which expose the employee or intern (or group of collaborators or employees) to humiliating and embarrassing situations, capable of causing offense to their personality, dignity or psychological or physical integrity, with the aim of excluding them from their duties or deteriorating the work environment. The habituality of the conduct and the intentionality (the discriminatory purpose) are essential for the characterization of moral harassment.

The most common examples of moral harassment are, and which must be rejected and avoided by everyone in the company:

- 1- Remove functional autonomy from workers or deprive them of access to work tools;
- 2- Withhold useful information for carrying out their tasks or mislead them;
- 3- Systematically challenge all your decisions and criticize your work in an exaggerated or unfair way;
- 4- Deliver, on a permanent basis, a greater number of tasks compared to your colleagues or require the execution of urgent tasks on a permanent basis;
- 5- Assign, on purpose and frequently, tasks that are inferior to or different from their duties;
- 6- Control the frequency and time of using bathrooms;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 14 / 30</b>

- 7- Pressure them not to exercise their statutory or labor rights;
- 8- Difficult or prevent promotions or the exercise of different functions;
- 9- Segregate the person being harassed in the work environment, whether physically or through refusal of communication;
- 10- Verbally attacking, making gestures of contempt, changing the tone of voice or threatening other forms of physical violence;
- 11- Criticize the private life, personal preferences or convictions of the person being harassed;
- 12- Spreading rumors about the worker, seeking to belittle him in the eyes of his superiors, colleagues or subordinates;
- 13- Invading private life with telephone calls;
- 14- Disregard health problems or medical recommendations when distributing tasks;
- 15- Isolate the person being harassed from gatherings, lunches and activities together with other colleagues.

Moral harassment manifests itself in three distinct ways:

- **Vertical**: work relationships marked by differences in hierarchical position. It can be descending (harassment perpetrated by a hierarchical superior) and ascending (harassment perpetrated by a subordinate);
- **Horizontal**: work relationships without hierarchical distinction, that is, between co-workers without a relationship of subordination;
- **Mixed**: consists of the accumulation of vertical and horizontal moral harassment. The person is harassed by hierarchical superiors and co-workers with whom they do not maintain a subordinate relationship.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 15 / 30</b>

In turn, sexual harassment is defined by law (Penal Code, art. 216-A) as the act of *“embarrassing someone, with the intention of obtaining sexual advantage or favor, the agent taking advantage of his status as hierarchical superior or ancestry inherent to the exercise of employment, position or function”*.

In other words, sexual harassment is characterized by embarrassing someone, through words, gestures or actions, with the aim of obtaining sexual advantage or favor, with the harasser taking advantage of his/her status as hierarchical superior or of the ancestry inherent to the exercise of a position, job or function. There is, therefore, a sexual purpose for acts of persecution and harassment. Sexual harassment occurs even if it occurs only once and sexual favors are not provided by the person being harassed.

Common examples of sexual harassment are:


- 1- Telling jokes or using expressions with sexual content;
- 2- Unwanted physical contact;
- 3- Request for sexual favors;
- 4- Naughty invitations;
- 5- Pressure to participate in “meetings” and outings;
- 6- Exhibitionism;
- 7- Creation of a pornographic environment;
- 8- Innuendos, explicit or veiled;
- 9- Promises of differentiated treatment;
- 10- Blackmail for job retention or promotion;
- 11- Disturbance and/or offense;
- 12- Threats, veiled or explicit, of reprisals, such as losing your job;
- 13- Unwanted conversations about sex;;

Considering themselves to be the target of prejudice, disrespect, such as sexual harassment, moral harassment or mistreatment, the person who is part of the workforce must seek a solution to the problem from immediate leadership or the Ethics Committee.

#### **XIV- CONFLICTS OF INTEREST**

Transparency is extremely important to resolve conflicts of interest, whether real, potential or observed. The expected conduct in these situations is to abstain from any decision-making process that is combined with any type of conflict.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 16 / 30</b>


According to the FCC S.A. Conflict of Interest Policy, the most typical situations related to conflicts of interest are the following:

- Commercial relationships, as a representative of FCC S.A, with companies in which the employee or administrator, or people with family or personal relationships, have an interest or participation – direct or indirect, without authorization from the hierarchical superior, at the minimum level of manager or equivalent;
- Improperly using FCC S.A.'s financial resources or the company's business opportunities for eminently personal purposes or those of third parties close to this individual, to the detriment of the company's social interests;
- Maintain private, habitual commercial relationships with customers or suppliers and/or give preferential treatment to anyone out of personal interest or feeling;
- Use one's own position, function or information about business and matters of the company or its clients, to influence decisions that may favor their own interests or those of other people close to this agent, providing a particular benefit to them or these favored people;
- Using, in an unauthorized and illicit manner, confidential and privileged information for private purposes and/or for your personal benefit and/or that of your friends and family or other third parties or competitors;
- Participate in external activities that affect your ability to satisfactorily perform your duties as an employee, representative or even as a member of the governing body of FCC S.A;
- Act, without prior authorization, as a workforce of a direct or indirect competitor of FCC S.A or an organization that is interested in doing business with it;
- Using your own position to request favors or personal services from subordinates;
- Hire and/or influence the hiring and/or promote and/or recommend relatives or close people or lead others to recommend such people for suspicious hirings or those rife with fraud or private benefit;

If the employee is involved in any situation that could constitute a conflict of interest (not limited to the examples mentioned above), he or she must contact his/her superior or the human resources and/or legal and/or Compliance area so that the situation can be properly resolved.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 17 / 30</b>

The existence of emotional/marital/friendship relationships between collaborators and/or employees and/or members of the Management Body or Senior Management is not prohibited, if this does not affect the professional performance of these individuals, the company's productivity, and the achievement of your business.

It is the duty of FCC S.A to prevent and avoid all situations, real or potential, generated by the confrontation between public and private interests, which could compromise the company's interests, to avoid harm to its reputation or which could improperly influence, the performance of the respective professional activity. Therefore, the following are the duties of all employees and the workforce at FCC S.A:

- 1- Know and avoid the hypotheses of conflict of interests provided for in current legislation, whether during or after the respective employment and not get involved directly or indirectly in any activity that conflicts with the interests of the company;
- 2- Declare oneself prevented from deciding or carrying out certain activities whenever the respective act is capable of generating a real or potential conflict of interests, as well as exempting oneself from carrying out external activities whose contractors or sponsors have a direct or indirect interest in the decisions affects the performance of the employee's duties;
- 3- Seek impartiality, carrying out your activities in an impartial manner, without using your status as a collaborator or employee to obtain advantages for yourself or third parties;
- 4- Know and comply with the applicable internal and legal rules that deal with the prohibition of nepotism, as well as not nominating, designating or hiring a spouse, partner or relative in a direct or collateral line, by consanguinity or affinity, up to the third degree;
- 5- Do not hire a legal entity whose administrator or partner with management power is a family member of a company employee who performs a role of trust in the organizational unit responsible for the demand or hiring; immediate superior to the company employee who performs a role of trust in the organizational unit responsible for the demand or hiring; and the person holding a position of trust responsible for authorizing the hiring and signing the contract;
- 6- Comply with the rules set out in the Consequences and Disciplinary Measures Policy and the Related Party Transactions Policy of FCC S.A;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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 <b>FÁBRICA CARIOCA DE CATALISADORES</b>	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 18 / 30</b>


- 7- Immediately and formally report the occurrence of any conflict of interest or the appearance of its existence, to the hierarchical superior or to the company's Ombudsman or Ethics Council through the available channels;

In accordance with Law 12813/2013, which provides for the conflict of interests in the exercise of a position or employment of the Federal Executive Branch and subsequent impediments to the exercise of the position or employment, including here, the president, vice-president and director, or equivalent, from mixed capital companies, such as Petrobras, shareholder of FCC S.A., conflict of interests is understood as *“the situation generated by the confrontation between public and private interests, which may compromise the collective interest or influence, in improper manner, the performance of public functions”* (see article 3, I of the aforementioned Law).

Also, according to this regulation, through its article 5, the following situations or acts constitute a conflict of interest in the exercise of a position or employment within the scope of the Federal Executive Branch:

- 1- Disclose or make use of privileged information, for one's own benefit or that of a third party, obtained as a result of the activities carried out;
- 2- Carry out an activity that involves the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the public agent or the collegial body in which they participate;
- 3- Carry out, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or job, considering as such, including the activity carried out in related areas or matters;
- 4- Act, even informally, as an attorney, consultant, advisor or intermediary for private interests in bodies or entities of direct or indirect public administration of any of the Powers of the Union, the States, the Federal District and the Municipalities;
- 5- Carrying out an act for the benefit of the interest of a legal entity in which the public agent, his or her spouse, partner or relatives, blood or similar, in a direct or collateral line, up to the third degree, participate, and which may benefit from it or influence its management acts;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 19 / 30</b>

6- Receive a gift from anyone who has an interest in the decision of the public agent or the collegial body in which he or she participates outside the limits and conditions established by regulation;

7- Provide services, even if occasional, to a company whose activity is controlled, supervised or regulated by the entity to which the public agent is linked.

As provided for in the Conflict of Interest Policy of FCC S.A, all individuals or legal entities acting on behalf of our company may incur, after due consideration by the ethics committee or other body responsible for this case, one or more cases that constitute conflicts of interest, they will be subject to disciplinary measures such as termination of the employment contract or the contract signed between FCC S.A. and the aforementioned company/legal entity, without prejudice to legal action for civil, administrative or criminal liability.

#### **XIV.1- NEPOTISM**

As mentioned in the Guide of Conduct of shareholder Petrobras, nepotism is *“the favoring of kinship ties in work or employment relationships”*.


Nepotism practices privilege kinship ties to the detriment of the assessment of merit, occurring when the appointment, designation or hiring occurs under the influence of occupants of a role of trust linked by family ties (in a direct or collateral line, by consanguinity or affinity up to the third degree) to those appointed, designated or hired.

Therefore, it is prohibited, from now on, to appoint, designate or hire a spouse, partner or relative in a direct or collateral line, by consanguinity or affinity, up to the third degree, or a legal entity whose administrator or partner with power management is a family member of a company employee who performs a position of trust or their superior in the organizational unit responsible for the demand or hiring; and occupying a position of trust responsible for authorizing hiring and signing one or more contracts.

Cross nepotism is also prohibited, that is, the making of reciprocal appointments or designations between the company's organizational units or between the companies that make up FCC S.A.

#### **XV- RELATIONSHIP WITH SUPPLIERS**

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 20 / 30</b>


The following are the duties of FCC S.A, in relation to its national and international suppliers and service providers:

- 1- Select and hire them based on legal, technical, quality, cost and punctuality criteria, requiring in these contractual relationships, commitments to ethics, corporate integrity, and sustainability in the economic, social and environmental pillars;
- 2- Treat them with respect, cordiality and transparency, in accordance with the principles of this Code and other company policies;
- 3- Do not provide any favor or paid service to them, in accordance with the provisions of the Integrity Program (Compliance) and company policies;
- 4- Refuse practices of unfair competition, child labor, abuse and sexual exploitation of children and adolescents, forced labor or work in degrading conditions, as well as any and all forms of physical, sexual, moral or psychological violence and other practices contrary to the principles of this Ethical Conduct and Integrity Code, the Integrity Program (Compliance) and company policies, including in the production chain of its suppliers and reporting violators;
- 5- Do not participate in any type of negotiation that may result in personal or third-party advantages or benefits, which characterize a real or apparent conflict of interest for employees involved, of either party, in accordance with the provisions of the Integrity Program (Compliance) and in the policies of the FCC S.A;
- 6- Discourage contractual provisions that violate or minimize the dignity, quality of life and social well-being of third-party employees.

**XVI- RELATIONSHIP WITH NATIONAL OR FOREIGN PUBLIC POWER**

FCC S.A is subject to Brazilian and international anti-corruption legislation, such as the New Administrative Improbability Law, the Anti-Corruption Legislation (Law 12846/2013 and new Decree 11,129/2022), State-Owned Law (Law 13,303/2016, as a of its shareholders is Petrobras: a mixed capital company) and other national and international laws such as the FCPA and legal entity criminal liability laws and Latin

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 21 / 30</b>

American civil and/or administrative laws, aiming to guarantee its ethical and transparent relationship with public bodies, public or government-controlled companies, maintain their accounting documents in a manner that provides reasonable assurance that their transactions are recorded accurately.

In its relationship with national and international public agents, the company does not admit corruption in any form, accepting legal liability (administrative and civil), carried out by responsible control bodies in Brazil and abroad, in proven cases of bribery or undue advantages that characterize an unlawful act, committing to repair the damage caused.

Furthermore, it also recognizes the administrative and civil liability of people in the organization involved in these acts, punishing these people with the measures described in the organization's internal policies.

In relationships with national and international public agents, all people working for the organization must comply with legal regulations and FCC S.A guidelines for cases involving the possibility of fraud or illicit transactions with "things of value", including the offer of travel , gifts, giveaways, entertainment, prizes, facilitating payments (bribes), contributions to charitable causes, sponsorships, money laundering, acquisitions and fraud and/or fraudulent registrations.


**XVII- ANTI-CORRUPTION POLICY**

FCC S.A is absolutely committed to promoting integrity in the public and private business environment, acting in full respect of applicable national and international legislation, mainly the Corporate Anti-Corruption Law (Brazil), the FCPA – Foreign Corrupt Practices Act (USA), and SOX - Sarbanes-Oxley Law (USA), in addition to Latin American civil and/or administrative laws and legal entity criminal liability laws, among other legal standards in the fight against corruption, and is therefore a signatory of combat initiatives corruption both in Brazil and abroad.

Corruption is defined by Transparency International<sup>1</sup> (TI) as *“abuse of entrusted power for private gain”*.

<sup>1</sup> International non-governmental organization founded in March 1993 that fights for a world in which governments, companies, civil society and other people are free from corruption. This organization has an international secretariat in Berlin (Germany), in addition to 100 sections spread around the world, including in Brazil.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 22 / 30</b>

An advantage is considered undue if it can influence or be perceived as a way to influence or perceive influence of the person's ability to make business decisions.

Furthermore, it is understood that both receiving and giving undue advantage will be treated in the same way, considering that they constitute forms of corruption. Therefore, accepting or offering, directly or indirectly, favors or gifts (except gifts with the company logo, invitations to fairs or shows for promotional purposes, with a maximum value equivalent to **one hundred US dollars**) of a personal nature, which result from a relationship with the FCC S.A and that may influence decisions, facilitate business or benefit others, will be attitudes reprimanded by FCC S.A.

When in relationships with administrators and employees in the public sector, standards of honesty and integrity must be observed in all contacts, in order to demonstrate the transparency of FCC S.A. in its operations, always avoiding conduct that may appear inappropriate.


It is noteworthy that people who work at FCC S.A. have the right and responsibility to receive guidance on these issues related to anti-corruption practices, when they verify that these are necessary through their immediate leadership, whether through training or through communication channels.

As stated in the FCC S.A Anti-Corruption Policy and the Brazilian Anti-Corruption Law - Law 12846/2013 - which deals with the administrative and civil liability of legal entities (companies) for the practice of acts of corruption against the public administration, national or foreign, and complies with the international pact signed by Brazil, these are the main practices prohibited in our country:

- 1- Promising, offering or giving, directly or indirectly, an undue advantage to a public agent, or a third person related to him/her;
- 2- Proven to finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in this Law;
- 3- Proven to use an interposed natural or legal person to hide or dissimulate their real interests or the identity of the beneficiaries of the acts carried out;
- 4- Regarding tenders and contracts:

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<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 23 / 30</b>

- a) frustrate or defraud, through adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
- b) prevent, disrupt or defraud the performance of any public bidding procedure;
- c) remove or seek to remove a bidder, through fraud or offering an advantage of any kind;
- d) defrauding a public tender or contract arising therefrom;
- e) fraudulently or irregularly create a legal entity to participate in public bidding or enter into an administrative contract;
- f) fraudulently obtain an undue advantage or benefit from modifications or extensions of contracts signed with the public administration, without authorization by law, in the act calling for public bidding or in the respective contractual instruments; or
- g) manipulate or defraud the economic-financial balance of contracts signed with the public administration;


5- Hinder investigation or inspection activities of public bodies, entities or agents, or intervene in their activities, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

With regard to the FCPA (Foreign Corrupt Practices Act), in general terms, it strictly prohibits the payment of bribes to representatives of foreign governments for the purpose of obtaining, retaining or directing a business. For other legal prohibitions arising from anti-corruption laws in South America, please consult the company's Anti-Corruption Policy.

**XVIII- HOSPITALITY AND GIFTS POLICY**

Having met the criteria established in (i) FCC S.A. Commercial Policy, focusing on the values of promotional gifts, (ii) Travel Policy, especially with regard to the values of meals with the presence of customers and in (iii) Policy of Conflicts of interest and, also in accordance with the Conduct Guide of Petrobras, shareholder of FCC S.A, the company's workforce, the members of its management body and the Board of Directors

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 24 / 30</b>

must observe the restrictions of legislation and the aforementioned internal regulations when faced with an opportunity to receive or offer gifts, giveaways or hospitality.

Therefore, the Director, member of Senior Management or even an individual who makes up the company's workforce is prohibited from:

- 1- Accept, offer or give gifts, of any kind and in any situation, from or to an individual or legal entity, except due to ties of kinship or friendship and provided that the cost is borne by the offeror himself, or when offered by foreign authorities , in protocol cases;
- 2- Accept, offer or give gifts or hospitality in exchange for any favor to the offeror, yourself or third parties (individual or legal entity);

In this sense, prior formal approval from the manager or immediate superior is necessary whenever offering hospitality to third parties who maintain any commercial or institutional relationship with FCC S.A. If necessary, any gifts or hospitality, received in violation of the guidelines in this guide or internal regulations, to their respective senders.


#### **XIX- PREVENTION OF CRIMES AND MEASURES TO PREVENT MONEY LAUNDERING AND FINANCING TERRORISM.**

FCC S.A maintains a firm commitment to the prevention of crimes, and especially to the Prevention of Money Laundering and Terrorist Financing. Its policies reflect our values and compliance with laws 9613/1998, 12683/2012 and following, being in strict compliance with their rules, aiming not only to maintain our image and reputation, but also to avoid incurring the sanctions and penalties imposed by these laws, such as a monetary fine of up to BRL 20,000,000.00 (twenty million reais) or a fine not exceeding twice the money laundering operation discovered, twice the actual profit obtained or that would presumably be obtained by carrying out the operation, without prejudice to revocation or suspension of authorization to carry out activities, operations or functioning of certain entities, as well as temporary disqualification, for a period of up to ten years, to exercise the position of administrator of one or more financial institutions.

Therefore, everyone at FCC S.A, as well as its partners, service providers, suppliers and other third parties, undertake, from now on, to fully cooperate and collaborate with the different official bodies responsible for the Prevention of Money Laundering and the financing of Terrorism.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--



	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 25 / 30</b>

## **XX- FRAUD**

Fraud is an intentional act or omission, with the intention of harming or deceiving someone else's property or circumventing procedures in bad faith, in a deceptive manner or other unfair means. Their repelled behaviors are:

- 1- Failure to report violations of FCC S.A. procedures, laws and regulations of the sector in which it operates;
- 2- Any form of corruption, including payments to facilitators;
- 3- Manipulation of statements and activities or financial;
- 4- Diversion of assets or funds;
- 5- Using equipment and other company resources for private, unauthorized purposes;
- 6- Tax evasion;
- 7- Use for private purposes or pass on to other people technologies, methodologies, know-how and other information owned by FCC S.A. or developed or obtained by it;

## **XXI- INFORMATION SECURITY AND CONFIDENTIALITY**


All members of the Board, Senior Management and the Workforce are responsible for maintaining the confidentiality of confidential information obtained as a result of their activities, positions or functions, and must ensure that it is not exposed and/or shared with other unauthorized professionals, partners or any other audience.

Except for information duly classified as public, all other information must be treated with due confidentiality and in accordance with the relevant legislation, and cannot be used to obtain advantages, for oneself or for others, even if it does not cause direct harm to the company.

FCC S.A is concerned with information security, strictly observing the LGPD, which details the practices to be adopted by all our employees and partners, including but not limited to the following:

- User accounts for accessing FCC S.A. systems or internal networks are personal and non-transferable and cannot be shared with other people;
- Access passwords must be kept confidential and held only by those responsible for the accounts;

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 26 / 30</b>


- Access to any website through FCC S.A. equipment is restricted to activities necessary for the proper performance of its operations. The company reserves the right, without prior notice, to block and monitor the use of the internet by employees or partners;
- Inappropriate use of the internet is strictly prohibited.

FCC S.A seeks to communicate in a transparent manner with its stakeholders, providing objective and accurate information and to this end, it tries to preserve the information contained in documents and communications in a true, accurate and compatible manner with the Information Security Guidelines of the company.

Additionally, to preserve information security, the FCC requires:

- 1- Do not disclose, pass on or comment on privileged information, that is, strategic information relating to relevant acts or facts with economic or financial repercussions, not yet made public;
- 2- Respect professional secrecy, as well as keep secret the personal information of any other member of FCC S.A. to which they have access due to their position, function and/or activity carried out, except in situations provided for by law;
- 3- Comply with the company's information security standards and guidelines for the preparation, handling, reproduction, dissemination, storage, transport, transmission and disposal of information and business documents, complying with the levels of protection and classification of information established in internal regulations;
- 4- Observe security protocols related to the use of Information Technology systems and equipment, do not share passwords, nor allow unauthorized access to these systems;
- 5- Immediately report to your superior any disappearance or suspected loss of information and/or equipment containing personal or privileged information;
- 6- Do not alter or destroy original documents of probative value, keeping them on file for the periods defined by law;
- 7- Observe the requirements for safeguarding privacy and protecting personal data when there is a need to transfer them to third parties, ensuring that the recipient

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 27 / 30</b>

is expressly obliged, by contractual means, to implement data protection policies;

- 8- Use corporate information exclusively to carry out their respective professional activities.

## **XXII- ETHICS COMMITTEE**

The Ethics Committee is made up of directors and two people from the management group chosen by the FCC S.A. Board of Directors.

The Ethics Committee is responsible for ensuring fairness in business relations, monitoring, investigating, and dealing with cases of violations. The applicable punishments for identified violations will follow the sanctions provided for in the relevant legislation and the organization's guidelines.

If any member of the Ethics Committee is involved in a complaint, they will not be able to participate in the investigation process and definition of sanctions.


The Ethics Committee will be responsible for sending cases provided for by law (corruption, tax and accounting book fraud, bid fraud, bribery, etc.) and cases of direct complaints against the FCC Board to the presidency of the Board of Directors. S.A. In this case, the Directors will not participate in the complaint investigation process.

## **XXIII- CODE OF CONDUCT MANAGEMENT**

From the publication of this Code, its management will be the responsibility of the People and Culture Management with support from the legal/Compliance area and the Ethics Committee, which is responsible for the diligence and constant updating and adaptation of this Code of Conduct.

It is the responsibility of the Ethics Committee to analyze cases of violation of this Code of Conduct, current legislation or internal policies of the organization in more serious incidents and to deliberate on questions regarding the interpretation of the texts contained in these guidelines.

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 28 / 30</b>

It is the responsibility of FCC S.A. to train the workforce in its Ethics and Conduct guidelines, in the internal policies, standards and procedures relevant to each process and in the legislation related to its activities.

It is the commitment of people working on behalf of FCC S.A. to apply all these guidelines and laws, under penalty of committing an illicit and/or unethical act, consequently suffering the resulting legal sanctions and/or internal punishment and following the Policy of Consequences and Disciplinary Measures of the Company, as well as the Conflict of Interest and Related Party Transactions Policy.

#### **XXIV- REPORTING CHANNEL**

Reports of cases of violation or suspected conduct and/or illegal act that come to your attention can be made through the Reporting Channel.

Correspondence to Fábrica Carioca de Catalisadores S.A. – Rua Nelson da Silva, 663, Distrito Industrial de Santa Cruz, Rio de Janeiro – RJ – CEP 23565-160, care of the Ethics Committee FCC S.A.

E-mail: [canaldedenuncias@fccsa.com.br](mailto:canaldedenuncias@fccsa.com.br)

Site: [www.fccsa.com.br](http://www.fccsa.com.br), Reporting Channel link

Call 0800-9400158. Free call from anywhere in Brazil, Monday to Friday, from 8am to 6pm.


Confidentiality and anonymity will be guaranteed and any possibility of retaliation will be ruled out.

Its general structure and operation are well outlined in our company's Anti-Corruption Policy, which should be consulted in case of doubts from our workforce, partners, service providers, suppliers and other third parties..

#### **RELATED DOCUMENTS**


- Conflict of Interest Policy
- Commercial Policy
- Anti-Corruption Policy
- Related Party Transactions Policy

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 29 / 30</b>

- Consequence Management and Disciplinary Measures Policy
- Travel Policy
- Social Responsibility Policy
- Donation and Sponsorship Policies
- Petrobras Conduct Guide

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
--------------------------------------	--	--

 <b>FÁBRICA CARIOCA DE CATALISADORES</b>	<b>Code of Conduct</b>	
	<b>PS714.4-006</b>	<b>Revision: 01</b>
	<b>Date: -</b>	<b>Page: 30 / 30</b>

**AGREEMENT OF SCIENCE AND DECLARATION OF ADHERENCE TO THE CODE OF CONDUCT**

I declare to have read and understood this document, on this date, committing to fully adopt it during the execution of my duties, in all its terms, conditions and ethical principles, as well as to maintain the confidentiality of any and all information received in the development of my activities, including after the termination of my relationship with FCC S.A.

I further declare that in case of doubt or knowledge of violations of this Code, I will immediately inform the Integrity Committee, directly or through the Ethics Channel.

Name:

Employee  
Registration:

Collaborator  
CPF  
CNPJ/ MF

Date:

Signature:

<b>Prepared by:</b> Catia Pereira	<b>Consensus by:</b> Paulo Saturnino; Luiz Santos	<b>Approved by:</b> Schlosser; Cid Carvalho
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