

Code of Conduct for Suppliers		
Código MAN-CPC-0003	Rev. 1.0	Folha 1/4

Code of Conduct for Suppliers

Ascenty – Compliance

Region – Global

Revision 1.0 | 11/27/2025

Approved by:

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Public Document

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1. Introduction

This Code of Conduct sets the standard expected by Ascenty from its suppliers in terms of environmental, ethical, social and governance practices. Ascenty's commitment to sustainability is a fundamental part of the operation and, therefore, it seeks partners who share this vision.

2. Legal and Ethical Compliance

All suppliers must comply with all applicable laws, regulations and standards, both domestic and international. They are expected to conduct their business ethically, without resorting to corrupt practices, bribery, or any form of unethical behavior.

2.1. Additional Ethical and Legal Practices

Anti-Bribery and Anti-Corruption Practices

Suppliers must prohibit any form of bribery, improper advantage or payment to influence decisions. It is forbidden to offer, promise or grant anything of value to public or private agents with the aim of obtaining undue benefit. All interactions must follow applicable anti-corruption laws (Brazilian Anti-Corruption Law, FCPA, UK Bribery Act, among others).

Interaction with Public Agents

Any contact with government authorities must be conducted transparently, ethically and in compliance with the law. It is forbidden to conceal information, offer gifts or hospitality that may characterize favoritism. Requests from public agencies must be formally handled and registered with our internal team.

Conflict of Interest

Suppliers must immediately declare any situation that may generate a conflict of interest, such as personal, financial or commercial relationships that may influence decisions. Failure to provide this information may result in disciplinary action and termination of contract.

Fair Competition

Suppliers must respect the rules of fair competition, avoiding practices such as cartel formation, price fixing, exchange of sensitive information between competitors, or any conduct that violates antitrust laws.

3. Environmental Practices

Suppliers should strive to:

- Minimize the environmental impact of its operations by adopting practices that reduce greenhouse gas emissions, water consumption, and waste generation.
- Implement circular economy, recycling and reuse of materials initiatives.
- Promote the conservation of natural resources and biodiversity.
- Continuously seek improvements in its environmental practices and work towards obtaining recognized certifications, such as ISO 14001.

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4. Human Rights and Working Conditions

Suppliers must:

- Respect the human rights of all its employees, ensuring safe and healthy working conditions.
- Prohibit child labor, forced labor and any form of discrimination.
- Provide fair remuneration and ensure that working hours comply with legal standards.
- Guarantee freedom of association and the right to collective bargaining.

5. Governance Practices

Suppliers must:

- Maintain transparency in its governance operations and practices.
- Implement internal control systems to ensure compliance with this Code of Conduct.
- Provide accurate and truthful information about its environmental, social and governance practices when requested.
- Encourage the adoption of sustainable practices in their own supply chains.

6. Monitoring and Evaluation

Our commitment to sustainability includes continuous evaluation of our suppliers. We reserve the right to conduct audits or request additional information to ensure compliance with this Code of Conduct. Suppliers who do not comply with the established requirements may be disqualified as trading partners.

7. Continuous Improvement

We recognize that sustainability is an ongoing journey. We encourage our suppliers to continuously seek improvements in their practices and to collaborate with us on initiatives that promote sustainability throughout the value chain.

8. Whistleblowing Channel

You must make reports in good faith

Reporting the facts internally is essential for the Company's success, in addition to being the expected and valued conduct. Ascenty's Supplier may report any illegal, unethical behavior or misconduct that it is aware of or involved in. When making a report, specific details and supporting documentation should be included, where possible, in order to allow for proper investigation of the reported conduct. Vague, non-specific, or unsupported allegations are more difficult to address and can be dismissed for lack of foundation.

The Whistleblowing Channel is managed by a third-party company independent of Ascenty, which guarantees confidentiality and, if desired, anonymity in the report of suspected unethical, illegal or inappropriate behavior. The contact phone number of the Whistleblowing Channel works free of charge 24 hours a day, 7 days a week, or access the website. The information for accessing the Whistleblowing Channel is as follows:

0800 300 4729 (Brazil)
800 099 1550 (Mexico)
800 914 018 (Chile)

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800 518 9245 (Colombia)
www.ascenty.com/compliance

If you choose to make an anonymous report, anonymity will be preserved as much as possible as permitted by applicable law.

All complaints will be kept confidential and will be handled appropriately

The confidentiality of the reported complaints and complaints will be maintained to the maximum, but in a manner compatible with the needs of conducting an adequate investigation and in accordance with the law. You may want to identify yourself to facilitate our investigation. However, you can make the complaint or complaint anonymously through the existing channels.

The Compliance Department will handle the complaint. Compliance will report all illegal and unethical conduct in violation of this Code to the Ethics Committee, which, as the case may be, may report to the Investor Compliance Committee.

Ascenty prohibits retaliation against any person who reports in good faith suspected violations of this Code or any law or regulation

No reprisal or retaliation shall be taken against any person who has made a report or claim in good faith and with reasonable belief that violation of this Code or any other law or regulation has occurred, is occurring or will occur; however, making a report does not absolve you (if you are involved) or anyone else for violating or suspected violation of this Code.

The Company reserves the right to apply disciplinary action if you make a report providing false information or make an accusation that you know to be false. This does not mean that the information you provide must be correct, but it does mean that you must reasonably believe that the information is true and demonstrates at least one possibility of violation of this Code. If you believe that you have been treated unfairly or are suffering reprisals or retaliation after your report, you should file your report through the Whistleblowing Channel or in person to an employee of the Compliance Department.

Legal and Disciplinary Measures for Violations of this Code

We reserve the right to take the appropriate legal and disciplinary measures for violations of this Code. This may even result in early termination of the contract maintained with Ascenty and, as the case may be, legal proceedings may be initiated against you and/or your company.

9. Conclusion

We are committed to building lasting partnerships with suppliers who share our commitment to sustainability. This Code of Conduct is a reflection of the values we consider essential to the future of our business and the planet.

10. Revision History

Rev.	Date	Review Description	Prepared by	Reviewed by	Approved by
1.0	11/27/2025	Initial Issue	Ceres Andrade	Flavia Rodrigues	Evandro Spadari