

CODE OF CONDUCT and ETHICS

GRUPO
flexível®





Our way of operating in the Chemical Industry is guided by principles that prioritize respect, ethics and professionalism. Therefore, we have established our Code of Conduct and Ethics.

Our **Code of Conduct and Ethics** defines the guidelines for the company's conduct, applying to all our branches, subsidiaries and all individuals acting on behalf of or for the benefit of the organization. This includes employees, partners, directors, managers, coordinators, interns, young apprentices and any others, whether on a permanent or temporary basis, in their interactions with customers, suppliers and other stakeholders.

Transparency and commitment to excellence are fundamental to the success of our operations. This Code not only outlines expectations, but also serves as a guide to promote integrity in our internal and external relationships.

By signing the Terms of Commitment, each member reaffirms their role in creating a positive and collaborative environment, where relationships are built based on respect for people, mutual trust, appreciation of ideas and shared responsibility. **THIS IS OUR WAY OF BEING!**

We are here to listen to you!

If you have any questions and/or suggestions, please feel free to come and talk to us!

Sincerely,

Grupo Flexível

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1. O GRUPO FLEXÍVEL

Grupo Flexível is a chemical company that specializes in the development of polyurethane technologies. Headquartered in Jaraguá do Sul (Santa Catarina), and with a branch in Extrema (Minas Gerais), the company offers customized solutions for various market segments throughout Brazil, with a special focus on the South and Southeast regions. In addition, the Group also exports to South American countries.

Evo Soluções Termoacústicas, located in São João do Itaperiú (Santa Catarina), is another company that is part of the Group and specializes in the development of isothermal technologies, further expanding the innovation portfolio offered to our customers.

One of the main differential advantages of Grupo Flexível is our ability to develop exclusive and tailor-made solutions in one of the most advanced laboratories in the country in this segment. We also stand out for our agility in delivery and specialized technical assistance at all stages of the process, from design to implementation and after-sales support.

1.1. VISION

Create innovative cultures that strengthen the future of polyurethane.

1.2. MISSION

Formulate limitless possibilities for a better world.

1.3. VALUES

Humanism, Integrity, Flexibility, Sustainability, Authenticity and Efficiency.

2. POLICIES AND PRACTICES

Our activities are guided by practices that value sustainability, social and environmental responsibility, respect for people, in addition to our purpose, mission and values:

2.1. CORPORATE GOVERNANCE

2.1.1. Ethics and Conduct

Our performance towards all of our stakeholders is guided by solid ethical principles, expressed in our values and compliance with the laws and regulations related to our business.

2.1.2. Purposeful Partnerships

External partnerships are based on the purpose of generating a positive impact on people's lives, creating benefits with added value for all parties involved. This includes offering customized and tailored solutions to customers, promoting fair business

relationships with suppliers, and committing to the sustainable development of the communities in which we operate.

2.1.3. Sustainable Innovation

Innovation is an essential part of our DNA. Since it was founded, the company has been standing out by offering solutions that, until then, many companies from other segments preferred not to outsource. Today, Grupo Flexível is also dedicated to developing polyurethane formulations using environmentally sustainable inputs, with the implementation of a pioneering chain of chemical reuse of polyol, the key raw material for polyurethane.

2.2. SOCIAL

2.2.1. Health and Safety

In addition to strictly complying with regulations, we implement various initiatives to ensure a safe work environment and provide benefits that prioritize the health and well-being of our employees. This includes prevention programs, safety training, access to medical care, and the promotion of healthy habits, actions that demonstrate our commitment to creating a work environment that not only meets legal requirements but also values the life and health of our team, contributing to enhanced performance and a positive organizational culture.

2.2.2. Human Development

Grupo Flexível promotes job opportunities for young people who are starting their careers, offering vacancies for apprentices and interns. We also invest in the training and professional development of our employees, with the aim of strengthening their skills and competencies.

2.2.3. Appreciation of People

Providing a welcoming work environment that inspires pride in belonging to the organization, in addition to promoting respect for the people who interact with the company and valuing sports and cultural projects in the communities where we operate are good social practices of Grupo Flexível.

2.3. ENVIRONMENTAL

2.3.1. Decarbonization

To reduce the carbon footprint of our operations, we invest in increasing the use of raw materials from renewable sources, advancing in the diversification of our energy matrix to reduce dependence on fossil fuels, and adopting inputs with less environmental impact.

2.3.2. Operational Efficiency

Reusing materials in the production process and reducing waste generation are actions adopted by the company to minimize the impact of our activities.

3. OUR SHARED COMMITMENTS

At Grupo Flexível, every employee plays an essential role towards our success. We believe that together, with our efforts and values, we can build a stronger and more sustainable work environment. Following the policies and practices that are already part of our daily routine, this Code of Conduct and Ethics guides and strengthens the actions and attitudes expected of all those involved in our relationships, namely:

3.1. CARING FOR THE ENVIRONMENT

We actively promote sustainable attitudes to be adopted by all employees, both in the work environment and in their personal lives. Everyone is encouraged and committed to the following practices: responsible use of production inputs, proper disposal of discarded materials and recycling, as well as the correct disposal of selected waste.

3.2. TOGETHER FOR THE COMMUNITY

Here, we believe that our impact goes beyond business. Therefore, we come together to actively contribute to the community, promoting actions that make a difference in the lives of those around us. Whether through social projects or partnerships with local institutions, we seek to build a more supportive, inclusive and sustainable environment. Each employee is invited to participate, bringing ideas and energy to strengthen this collective commitment. Together, we intensify our positive impact and reaffirm our role in social transformation.

3.3. CARING FOR CORPORATE IMAGE

Our corporate image is one of our most valuable assets, reflecting our credibility with customers, suppliers and the community. Each employee is responsible for preserving this image, prioritizing transparency and veracity in communications, especially in the relationship with the press and social media. In addition to products, we also generate valuable ideas and business information, which must be protected. Therefore, it is essential to:

- **Care for our image** in an ethical and prejudice-free manner.
- **Avoid unauthorized statements** on behalf of the company.
- **Ensure the accuracy of company records and documents.**
- **Keep sensitive information strictly confidential.**
- **Not to discuss confidential information** in public settings or on social media.
- **Care for the image of Grupo Flexível** on social media, avoiding any kind of offensive posts.

By adopting these principles, we reinforce our commitment to the integrity and reputation of Grupo Flexível, creating an environment of trust and mutual respect.

3.4. BUILDING TRANSPARENT AND ETHICAL RELATIONSHIPS

- 3.4.1.** Always be alert to situations that may constitute a conflict of interest, whether real or potential. Such situations may impact your ability to make impartial decisions regarding the company, and it is critical that we always act with transparency and integrity.
- 3.4.2.** Avoid using your position, access to privileged information, or the name of the company for personal benefit or advantage, whether direct or indirect. Our commitment is to ethics and justice, and that includes complying with the standards that govern our work environment.
- 3.4.3.** Do not engage in parallel activities, whether paid or unpaid, that may be concurrent or incompatible with our business. Focus on contributing to our collective success by ensuring that your actions are aligned with the company's goals and values.
- 3.4.4.** Grupo Flexível repudiates any form of corruption. Be aware of situations that may be typical of such behavior. The practice of any such acts shall be subject to disciplinary measures and sanctions in accordance with the applicable laws.
- 3.4.5.** Report any practices contrary to this Code of Conduct and Ethics via the channels made available (in which the confidentiality of the information reported and the identity of the employee is guaranteed).
- 3.4.6.** Practice empathy and evaluate situations, not people. By being fair and strategic in your decisions, and by exercising self-discipline, your commitment turns into meaningful achievements for the whole team.
- 3.4.7.** Avoid selfishness and always be ready to help others. Give and receive feedback constructively, as this strengthens learning and continuous improvement. Recognizing, appreciating and congratulating good results is essential to maintain motivation and team spirit.

3.5. CULTIVATING RESPECT FOR DIVERSITY

- 3.5.1.** Be aware of behaviors that may be considered prejudiced or aggressive (offensive comments, gossip, racism, homophobia, religious intolerance, moral harassment, exclusion, discrimination, humiliation etc.) and actively work to prevent them, because for such situations, we are NOT flexible!

3.5.2. Encourage understanding and mutual respect among employees, promoting a culture of support and solidarity.

3.5.3. Recognize and celebrate the diverse backgrounds, skills and opinions of your team members, contributing to a more harmonious and productive workspace.

3.6. IDEAS IN MOTION

At Grupo Flexível, we are always open to new suggestions and innovations. We believe that exchanging ideas is essential for our growth and for the continuous improvement of our processes. We encourage all employees to share their ideas and explore new possibilities that may add value to our work.

Whether in meetings, through feedback or suggestion platforms, your voice matters! By proposing new ideas and requests, we not only broaden our range of solutions, but also create a collaborative environment in which everyone feels part of the process.

3.7. COMMITMENT AND COLLECTIVE SUCCESS

Here, we believe that passion for work is the driving force that leads us to achieve great results. Motivate yourself and believe in the importance of your contribution; when we do what we love, success becomes a natural consequence. In addition, commitment to goals, deadlines, results, and self-development is essential for collective growth. Each individual effort adds up to the achievement of the team's objectives. And last but not least, sincerity is the key: owning up to our mistakes and working to correct them not only strengthens our integrity but also creates an environment of trust and continuous learning.

3.8. SAFE AND HEALTHY ENVIRONMENT

It is essential that all employees strive to maintain a healthy and safe workplace, avoiding behaviors that may endanger their own integrity and that of others. Examples of behaviors to avoid include:

- **Smoking in prohibited places:** Respect signs and restrictions on tobacco use, smoking only in designated and appropriate areas. Smoking is strictly forbidden on the factory premises.
- **Consumption of prohibited substances:** It is strictly forbidden to consume alcohol or drugs in the workplace, as well as to carry weapons.
- **Showing up for work under the influence:** Employees should not show up for work while intoxicated or under the influence of substances that compromise their ability to perform their duties safely.
- **Wearing protective equipment:** Always wear personal protective equipment (PPE) provided by the company, especially in areas that require specific safety measures.
- **Report risk situations:** Immediately report any unsafe behavior, risk situation or irregularity to the company management, contributing to collective safety.

3.9. CARING FOR THE COMPANY'S ASSETS AND RESOURCES

3.9.1. It is essential that all employees care for the company's assets, using the facilities, equipment and materials responsibly. This includes preventing damages, loss or waste, and ensuring that resources are used exclusively for work-related activities. The use of the company's assets for personal, illicit or unethical purposes is strictly prohibited.

3.9.2. The company's electronic communication resources, such as e-mails and messengers, must be used for professional purposes only. It is important to maintain an environment of respect and ethics in communication, avoiding: offensive or defamatory content and inappropriate personal messages.

3.10. FLEX DRESS CODE – PERSONAL PRESENTATION AND CLOTHES

Although we have no formal rules for dressing at Grupo Flexível, it is important to find a balance between personal preferences and the corporate environment, always considering the schedule of the day, therefore:

- We encourage all employees to opt for clothes that reflect a professional environment, avoiding pieces with excessively low necklines or too short. This helps to maintain a reputable image that is suitable for our workplace.
- While we appreciate a relaxed atmosphere at work, we request that soccer team shirts be avoided as they may not be according to the professional tone we aim for.
- In order to ensure a harmonious and inclusive work environment, we request that politically themed clothing be avoided. This ensures that all employees feel comfortable and respected, regardless of their personal opinions.
- In areas where the use of uniform is required, we ask that everyone comply with this guideline, contributing to the safety and identity of our organization.

Remember that your clothing choices may impact people's perception of you and the company. Opting for a more neutral and professional style can facilitate more positive and productive interactions.

3.11. VALUABLE CONNECTIONS: HOW TO INTERACT WITH CUSTOMERS AND SUPPLIERS

- 3.11.1. Treat customers and suppliers with ethics, respect, cordiality, attention and agility, ensuring effectiveness and proactivity in meeting their needs.
- 3.11.2. When dealing with customers and suppliers, treat every one of them impartially and without any bias, regardless of the business volume they have with the company.
- 3.11.3. Make sure that the interests of customers and suppliers are satisfied, by assisting them in problem solving and forwarding their requests and complaints to the responsible areas with efficiency and agility.
- 3.11.4. Meet the agreed deadlines.
- 3.11.5. Protect the confidentiality of sensitive information provided by customers and suppliers.
- 3.11.6. Share information about our products, services, and social and environmental actions in a clear and truthful manner.
- 3.11.7. Maintain the established and desired standard for products, which is our warranty certificate of quality, sustainability and innovation.
- 3.11.8. Always be open to criticism and suggestions, continuously seeking to improve the quality and efficiency of our products, services and customer support.
- 3.11.9. Establish relationships free of favoritism or bias.
- 3.11.10. Do not request and/or accept any type of gifts, benefits or advantages or any kind and nature from suppliers and customers, such as, for example, gifts of any value, financial compensation, goods, leisure trips, or any other services. In case it is not possible to refuse the gift, it must be forwarded or handed in to the Human Resources Department, which will be responsible for its destination.
- 3.11.11. When acting on behalf of the company, signing contracts and other documents, only do it if you are granted such attribution and/or power to legally represent the company.

3.12. ROMANTIC RELATIONSHIPS IN THE WORKPLACE

At Grupo Flexível, we understand that the work environment is naturally a place of coexistence where friendships and even romantic bonds can arise. These relationships, however, must always respect the principles of ethics, professionalism, and harmony in the corporate environment. Therefore, we strongly advise that:

- Respecting other people's boundaries and wishes is essential. If you are interested in maintaining a romantic relationship with another colleague, mutual consent must always be clear. Repetitive or insistent approaches, which generate discomfort, are not acceptable.
- Conversations and exchanging messages outside the workplace are something personal, but if they impact negatively on the company's environment, such as situations of exposure, embarrassment or conflict, they can be analyzed internally, always based on respect and preservation of the professional environment.
- Relationships should not interfere with professional activities. Therefore, demonstrations of affection should be avoided during working hours. It is also important to ensure that there is no favoritism, conflicts of interests or retaliation due to personal ties, nor compromise the image of the Company.
- Private situations, such as breakups or personal conflicts, should be treated with maturity and discretion, without affecting coexistence with other colleagues. Comments, jokes, or public exposures about the relationship should also be avoided.
- When a romantic relationship involves hierarchy (e.g., leaders and subordinates), the Company may evaluate possible adjustments in the organizational structure, always with the aim of maintaining transparency and impartiality in professional decisions.

4. INTEGRITY COMMITTEE

Grupo Flexível maintains a permanent Integrity Committee, which is composed of the Human Resources Manager and the Legal Manager, having the following responsibilities:

- Review this Code of Conduct and Ethics;
- Receive reports about violations of this Code;
- Ensure confidentiality of the information received;
- Analyze and evaluate violations of this Code, by checking the facts reported and providing support for decision making;
- Forward to the Board of Directors and the CEO the most serious cases of violations of the Code of Conduct and Ethics;
- Publicize this Code of Conduct and Ethics, which will be handed out to all employees during onboarding and made available on the company website and other communication channels;
- Answer questions and providing further information to employees regarding this Code.

5. VIOLATION OF THE CODE OF CONDUCT AND ETHICS

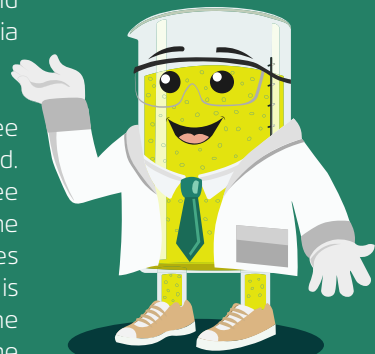
Anyone who is aware of any conduct or activities contrary to the principles established herein must immediately report the fact to their immediate supervisor or submit a complaint to the Integrity Committee.

All information and/or complaints received by the Committee will be treated as confidential, that is, the identity of the informer will not be disclosed. The violation of any conduct or practice contained in this Code will be penalized upon evaluation by the Integrity Committee, as well as will be subject to the applicable Brazilian laws in force

6. COMMUNICATION AND REPORTING CHANNEL

Communications, reports, complaints, compliments, and suggestions may be submitted to the Integrity Committee via e-mail to conduta@grupoflexivel.com.br.

It is important to emphasize that, if anonymous, the Committee will not be able to give feedback about the situation reported. If the person reporting provides identification, the Committee will guarantee confidentiality. If necessary, it will be up to the Integrity Committee to take the statements of the parties involved, examine the documentation and whatever else is necessary and, based on the facts ascertained, determine whether or not there was a violation of this Code. If so, the Committee, together with the Board of Directors and CEO, if necessary, will determine the applicable penalties.



7. REVIEWS

This Code of Conduct and Ethics shall be reviewed every 3 (three) years or at any time, in the event of new facts, by the Integrity Committee, upon deliberation and approval of the Board of Directors and the CEO.

8. CONCLUSION

In our daily routine, we may face situations and conducts that are not directly addressed by this Code, arising questions about how we should act. In such circumstances, please review this Code and assess whether there is any type of conflict. If necessary, reflect on the following questions:

- Is the action I am considering legal?
- Is this attitude impartial and honest?
- Can this decision be questioned in the future?
- How will I feel after taking this action?
- How would this be portrayed in the newspaper headlines?
- What would I advise my children to do in such a situation?
- How would I feel if my family, friends and neighbors knew about it?

This Code of Conduct and Ethics reflects our commitment to integrity, transparency and respect in all our interactions. Cultivating a collaborative environment, where empathy and commitment are valued is **OUR WAY OF BEING** at Grupo Flexível!

By following these principles, we not only strengthen our reputation but also contribute to a healthy and inspiring workspace. Together, we will continue on the path of success, promoting excellence and the well-being of our employees and partners.

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