

# Code of Conduct



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# Introduction

You are receiving the **Soprano Group's Code of Conduct**, a document prepared in accordance with the Laws of the country, focusing on best practices in corporate governance (IBGC – Brazilian Institute of Corporate Governance) and the Anti-Corruption Law, No. 12,846, of August 1, 2013.

Ethical and honest conduct must be the basis of all our actions, and our Code of Conduct expresses our fundamental principles and defines the meaning of integrity. However, it is not expected to cover all everyday situations, so when in doubt, employees should consult with members of the ethics committee or the compliance department.

This code applies to partners, advisors, directors, employees, suppliers, and other stakeholders, as well as their relationships with the organization and with each other. All of these audiences and partners must be familiar with the provisions of this code. Leadership has an obligation to ensure compliance, communicate its content to employees, and serve as an example for the entire organization.

The requirements of this code must be complied with by all employees and serve as a reference for business partners. If you identify, suspect, or are aware of any deviations, violations of requirements, illegal or unethical behavior, you must immediately report it through the appropriate channels. The information will be thoroughly investigated, and depending on the severity of the facts found, appropriate measures will be taken, which may range from guidance and warnings to more severe disciplinary sanctions, in addition to the penalties provided for by law. The assessment will be conducted by the compliance department, ensuring impartiality and compliance with the organization's guidelines.



**Conduct**

It is how audiences connected to the Soprano Group are expected to behave. Having a lawful attitude and acting with respect in your work.

**Ethics**

For the Soprano Group, ethics represents the set of good principles, characteristics, and customs that are applied in the day-to-day running of its businesses and experiences.

**Integrity**

Be polite, ethical, and fair. Comply with external laws and regulations, company policies, and guidelines in all situations and environments.

**Transparency**

For the Soprano Group, transparency means being honest and clear in its decisions, acting sincerely, and sharing information.

**Respect**

Respect means showing consideration for other people's opinions and ways of dealing with issues, without being intolerant or discriminatory.

**Innovation**

Innovation plays a significant role at the Soprano Group. For us, innovating means renewing ourselves, recreating ourselves, doing something different with what we have, and creating something new.

**Ethics Channel**

It is the name given to our communication channel that receives suggestions, criticisms, complaints, and reports involving the Code of Conduct.

**Stakeholders**

These are all of the Soprano Group's stakeholders, from employees to customers, third parties to suppliers, direct or indirect labor.

**Compliance**

Set of actions and precautions adopted by the company to ensure that all activities comply with laws, regulations, and ethical principles. The organization has a Compliance department dedicated to providing guidance, preventing, and addressing potential irregularities.

**Employee**

This is the person who, under a formal employment contract, contributes to making Soprano's day-to-day operations more productive and assertive. Employees are the direct workforce employed on the company's premises.

**Supplier**

Whether offering products or services, a supplier is a legal entity or individual who promotes the necessary demand.

**Client**

These are all individuals or legal entities that purchase or request our products or services.

**ESG**

Is the acronym for Environmental, Social, and Governance, and is the set of standards and best practices that unite these three pillars of development and are linked to the sustainability of the organization.

**Contato Seguro**

A trusted partner that helps keep our workplace safe and fair by receiving and handling complaints confidentially and impartially.



# Leading With Integrity

Dear colleagues,

For over 70 years, Soprano has built its history on solid values, which have made us a benchmark for trust and integrity. We reaffirm this commitment with our Code of Conduct, an essential guide to inform our decisions and relationships both inside and outside the company.

This Code is not just a document: it reflects who we are and how we want to act. It reinforces principles such as ethics, respect, transparency, and responsibility, which should be present in every action, whether in relationships with colleagues, customers, suppliers, the community, or the government.

We live in an increasingly challenging environment, where reputation and credibility are fundamental assets. Therefore, it is the duty of all of us to ensure that our practices are aligned with the laws, internal policies, and values that underpin Soprano. Acting with integrity means protecting our brand, our history, and the future we are building together.

I count on each of you to incorporate this Code into your daily lives, using it as a reference for decisions and conduct. If you have any questions or encounter situations that may compromise our principles, please use the available ethics channels. They exist to ensure a safe, fair, and transparent environment.

Ethics is everyone's responsibility. Together, we continue to strengthen Soprano as a solid, innovative company committed to the well-being of people and society.

**Thank you very much for your  
commitment and dedication.**

Cyro Gazola  
Chief Executive Officer – Soprano Group



# The Code

The Soprano Group's actions are based on a commitment to ethical and responsible development in all its relationships. This commitment, reflected in the Values that guide the company, finds in the **Soprano Group's Code of Conduct** a fundamental instrument of guidance and regulation.

This Code represents a set of principles and guidelines that reflect the alignment between our **“way of being”** and our **“way of acting”**. Its purpose is to establish ethical standards and rules of conduct that should guide the relationship between board members, the CEO, leaders, employees, suppliers, customers, and other stakeholders, regardless of their roles or hierarchical levels.

The Soprano Group's presence in domestic and international markets requires conduct based on integrity and transparency. Our reputation and credibility are essential assets for the sustainability of the business. Thus, the principles established here strengthen the image of the Soprano Group as a solid, reliable organization committed to ethics in all its practices.

# Soprano Group's Supporting Pillars

## Mission

Be part of people's lives by promoting well-being and safety, with experiences that surprise them, generating value for everyone through solutions for home and construction.

## Vision

To be a benchmark for reliability in the businesses in which we operate, with sustainable growth and brand recognition in Latin America.

# Purpose

To offer reliable solutions that add more safety and comfort to people's lives.



# Values

## TOGETHER FOR THE CUSTOMER

We work collaboratively and quickly to provide our customers with the best solutions and experiences.

## TRUST IS OUR KEY

We are responsible for creating and constantly improving relationships of trust and partnership between our teams, customers, and suppliers.

## NON-CONFORMITY THAT DRIVES

We enter to win and constantly strive to raise our standards through overcoming challenges and a restless spirit.

## PEOPLE WHO BUILD

We empower our people and teams to build an increasingly stronger and more relevant Soprano together.

## SUSTAINABILITY FOR THE FUTURE

We are committed to the future and base our decisions on sustainability and diversity.

# Committee Structure

The first version of the Soprano Group's Code of Conduct was drafted in May 2007, the year in which the Ethics Committee was created. The current composition of the committees is established as follows:

- **Corporate Committee**, composed of members of the People Committee;
- **Ethics Committee**, composed of the Chief Executive Officer (CEO), Director of People Management and Sustainability, Human Resources Manager, Legal Manager, and Compliance Area.
- **Compliance Area**, ensuring ethical compliance, promoting a culture of integrity, mitigating risks through preventive, educational, and continuous monitoring actions.

## Responsibilities of the Corporate Committee

- I. Define strategic guidelines and institutional policies related to integrity, ethics, and the Whistleblower Channel.
- II. Ensure that the Whistleblower Channel is aligned with organizational principles and values, promoting an ethical culture.
- III. Monitor, at a strategic level, the consolidated reports on complaints, indicators, and trends provided by the Ethics Committee and the Compliance area.
- IV. Deliberate on cases of greater severity, reputational impact, or those involving senior leadership, whenever escalated by the Ethics Committee.
- V. Sponsor institutional awareness campaigns and encourage senior leadership to demonstrate exemplary ethical behavior.

## Responsibilities of the Ethics Committee:

- I. Evaluate and deliberate on **serious cases** involving violations of the Code of Conduct;
- II. Validate disciplinary decisions and measures proposed by the Compliance department in critical situations;
- III. Manage disciplinary actions;
- IV. Ensure impartiality, integrity, and alignment with the organization's values in the most sensitive ethical decisions.
- V. Evaluate the effectiveness of the Whistleblower Channel, including volume, types of reports, response time, and corrective measures taken.

## Responsibilities of the Compliance area

- I.** Update and disseminate the Soprano Group Code of Conduct;
- II.** Ensure the dissemination of the Code of Conduct among stakeholders, aiming at compliance with the code;
- III.** Manage the Ethics Channel;
- IV.** Safeguard the confidentiality of those involved;
- V.** Audit compliance with this code;
- VI.** Investigate reports of violations of this code (in cases of low and medium severity);
- VII.** Monitor legislation that may affect these guidelines;
- VIII.** Resolve doubts about the company's ethical guidelines, providing guidance to interested parties regarding the application of this code, as well as investigating and proposing referrals in cases of violation;
- IX.** Ensure that the Whistleblower Channel operates independently, securely, and impartially, without retaliation.
- X.** Ensure the confidentiality of those involved, in accordance with legal and regulatory principles.

In partnership with Contato Seguro, an independent, external (outsourced) and completely impartial company, Soprano provides an Ethics Channel for all audiences. With this tool, employees, suppliers, customers, and partners can report conduct that violates this code or that is not in accordance with Soprano's principles. Learn about and contribute to the maintenance of this Code, so that we can maintain an increasingly better and more transparent relationship, always based on ethics.

## Relationship with the Company

The Soprano Group establishes a relationship of mutual respect with all its stakeholders, treats its employees with dignity, and provides a work environment with equal opportunities for professional and personal growth and respect for individual freedom of expression.

## Conflict of Interests

A conflict of interest in the employee-company relationship occurs when an employee uses their influence or commits acts with the intention of benefiting private interests that are contrary to the interests of the company, which may or may not cause damage or loss to the company.

Business transactions must be conducted in accordance with the interests of the Soprano Group.

No Soprano employee may use their position to demand, request, or accept advantages or benefits due to the position they hold or the duties they perform, whether of a personal or professional nature.

Situations that may cause conflict between an employee's responsibilities and their personal interests and values should be avoided and reported.

### **The Soprano Group accepts family relationships among its employees, provided that the following conditions are met:**

- a)** There shall be no direct and/or indirect subordination between them up to the third degree;
- b)** That they do not work in the same sector/area/job with relatives up to the third degree.

It is the duty of employees and management to keep the company informed of any family relationships in the above cases.

The employee must keep the company informed in the event of any equity participation by the employee him/herself, spouse/partner, or first-degree relative(s) in business venture(s) that compete with, provide services to, or act as suppliers or clients of the Soprano Group, in any capacity.

**NOTE:** Family members/relatives are considered to be family members up to the third degree: father, mother, son, daughter, brother, sister, grandfather, grandmother, great-grandfather, great-grandmother, grandson, granddaughter, great-grandson, great-granddaughter, uncle, aunt, and nephew. For the purposes of this code, relatives by affinity are also considered, namely: spouse, partner, son-in-law, daughter-in-law, father-in-law, mother-in-law, stepfather, stepmother, stepchild, and brother-in-law or sister-in-law.

## Privileged and/or Confidential Information

Employees who, due to their position or responsibilities, have access to strategic or confidential information about the Soprano Group that has not yet been publicly disclosed, must maintain absolute confidentiality.

Confidential information is the property of the Soprano Group and must be kept as such. They should not be used for purposes other than those in the interests of the Group's business. Any and all projects relating to new products, machines, tools, processes, among others, are for the exclusive use and property of the Soprano Group.

It is the duty of all employees to ensure the confidentiality of this information, taking extra care with sensitive documents, materials, and data, including avoiding leaving them exposed on desks, in drawers, or in unprotected cabinets.

Professional secrecy must be maintained regarding non-public information relating to reports, statements, accounts, balance sheets, strategic plans, and other activities of the company and third parties with which the Soprano Group has a relationship. The provision of such information will only be permitted with the express authorization of senior management or when required by court order or legal determination.

**NOTE:** Strategic or confidential information is considered to be information that is not accessible to the public and whose disclosure could impact the operations, image, or value of the Soprano Group. Examples include financial results, investment plans, acquisitions or sales, trade secrets, and other sensitive matters.

## Conduct Outside the Company

As a member of the Soprano Group, employees must be mindful of their conduct in public settings, whether in professional circumstances or in their private lives, acting with prudence and diligence, and not exposing the company or their own careers to risk.

Whether indoors or outdoors, participating in training sessions or events, using company materials or in other situations that allow the employee to be identified, their conduct in work situations must be consistent with the Soprano Group's Values and Guidelines, thus contributing to the recognition of its good corporate image.

The use of social media with defamatory content, involving photos and other media, that may defame the image of Soprano Group companies, customers, and suppliers and/or place colleagues in embarrassing situations is prohibited. It is also

prohibited to disclose facts related to the company without the prior and express authorization of the immediate superior.

Employees are expected to behave in accordance with the conduct described in this code.

**NOTE:** The company reserves the right to preserve the integrity of its name on digital platforms, and does not condone or take responsibility for descriptions and nomenclatures of positions/functions or activities that do not correspond to the reality of the facts. In view of this, Soprano advises its employees not to use their employment relationship in conjunction with job titles/functions that are not exactly the same as those officially included in Soprano's internal records.

## Prejudice and Discrimination

The Soprano Group values the importance of diversity in working relationships and the contribution of people. Therefore, everyone should be treated with respect, cordiality, and fairness, regardless of their position or role.

The company condemns any and all manifestations of discrimination or prejudice of any kind, whether based on race, religion, age, gender, political beliefs, nationality, marital status, sexual orientation, physical condition, or any other factor.

In recruitment, selection, and promotion processes, candidates should be evaluated solely on their technical skills to meet the expectations of the position.

## Harassment and Abuse of Power

The Soprano Group does not tolerate any form of harassment, such as sexual, economic, moral, or any other type, nor situations that constitute disrespect, intimidation, or threats in relationships between employees, whether horizontally or vertically downward or upward, regardless of their hierarchical level.

Employees who feel discriminated against, humiliated, or targeted by prejudice, pressure, abusive practices, or disrespect, and who feel uncomfortable addressing the issue with their supervisor, should report the incident to the Ethics Committee using the reporting channels available to them.

Preventing harassment, discrimination, and threats is a matter of respecting individual rights and dignity, which is considered a core value of the Soprano Group.

**NOTE:** Harassment is characterized, among other forms of conduct, by the act of humiliating, disrespecting, or embarrassing someone. Moral harassment occurs when someone is exposed to humiliating situations during the workday. Sexual harassment aims to obtain sexual advantage or favor.

## Use of Alcohol, Drugs, Carrying Weapons, and Selling Goods

It is prohibited to enter the premises of Soprano Group companies with signs of drug or alcohol use, as well as to consume alcoholic beverages during working hours or to perform professional duties while intoxicated or under the influence of illicit chemicals.

The use and possession of illegal drugs is also prohibited, as is remaining in the workplace while under the influence of such substances, which may affect the safety and performance of both the employee and their coworkers.

The use of tobacco and/or electronic cigarettes is not permitted during working hours and/or on company premises.

No weapons of any kind are permitted on company premises, except for professionals working in security for the Soprano Group who are authorized to carry them.

Employees are prohibited from selling or exchanging goods on company premises, as well as selling third-party products.

## Protection of company assets and resources

The assets of the Soprano Group, including physical assets, equipment, facilities, vehicles, and other resources, are intended exclusively for the professional and operational use of the company. Its use for private purposes or by third parties is expressly prohibited, except in specific situations previously authorized by the company.

It is the responsibility of each employee to ensure the conservation, integrity, and proper use of the assets under their care, preventing damage, loss, theft, or any form of misuse, illegal, or unethical use.

Donations, sales, or transfers of any assets belonging to the Soprano Group must be submitted for approval by the Group's Executive Committee.

**The following are considered assets:** machinery, tools, equipment, parts and accessories, furniture, utensils, vehicles, valuables, and other items used in the company's operations.

**Furthermore:**

- The company reserves the right to conduct inspections, including searches of lockers, bags, packages, vehicles, or personal belongings, whenever necessary and on its premises, with the aim of preserving safety, property, and the corporate environment.

*Protecting the company's assets is everyone's duty and reflects a commitment to responsibility, ethics, and respect for the Soprano Group's institutional guidelines.*

## Use of Electronic Information Systems

Electronic systems and IT resources are available to employees exclusively for the proper performance of their duties.

Its use for personal matters is permitted as long as it does not violate internal rules and guidelines or interfere with work progress. The exchange, redemption, storage, or use of obscene, pornographic, violent, discriminatory, racist, defamatory content that disrespects any individual or entity and is contrary to the policies and interests of the Soprano Group is prohibited.

Users in general should not expect privacy when using these systems and resources. For this reason, the Soprano Group may, at its discretion, reserve the right to use, monitor, and audit any information transmitted or stored on these media. This rule covers information written or stored in an electronic system and any other associated media. It also includes information developed technically, acquired by associations, acquisition, license, purchase, or entrusted to the company.

All files and information relating to professional activities created, received, or stored in electronic systems are the property of the Soprano Group and constitute commercial and legal assets. Therefore, in the event of an employee's transfer or termination, any information held by them must be forwarded to their immediate supervisor for storage or disposal.

The password for accessing the systems is for personal use only and may not be transferred or disclosed to third parties, even to a coworker, manager, or superior.

No software or programs may be copied or installed on company computers without prior authorization from the company's Information and Communication Technology department.

The proper use of electronic information systems in Group companies is detailed in the Corporate Information and Communication Technology Policies.

**The use of cell phones and other personal electronic devices** (such as headphones, cameras, and entertainment devices) must follow the guidelines of the Internal Regulations and is only permitted during breaks. This measure applies to all areas of the company and aims to ensure a safer, more productive, and focused work environment.

The use of job/function nomenclature other than that officially registered in the internal system with the Center for People Excellence is prohibited. The ban covers any communication or access platform, including corporate email signatures. If you have any questions about the correct nomenclature for your position, please contact the People Excellence Center or your immediate manager.

## General Data Protection Law – LGPD

The Soprano Group ensures information security and the conscious use of data, as well as the protection of each person's fundamental rights to freedom and privacy. Therefore, in accordance with Law No. 13,709/18 - General Data Protection Law (LGPD), all activities of the Soprano Group must process personal data in good faith, observing the purpose for which this data is intended and the need for such processing.

## Sale of Company Products to Employees

The sale of company products to employees should preferably be carried out via the Soprano online store, an internal sales program that grants exclusive benefits to employees.

## Relationships with Business Partners and Competitors

All market and competitor information that is legitimate and necessary for the development of the Soprano Group's business must be obtained exclusively through ethical, legal, and transparent means. The use of illegal or morally unacceptable methods to access confidential information is expressly prohibited.

Employees are prohibited from engaging in any behavior that could defame, slander, or damage the image of competitors, business partners, or any other organizations in the market. The Soprano Group's actions must always reflect respect for free competition and the integrity of business relationships.

The company's business practices must be aligned with applicable laws, institutional values, and the principles established in this Code of Conduct. It is the responsibility of all employees to be familiar with, respect, and ensure compliance with these guidelines.

It is prohibited to establish understandings, agreements, or any type of collaboration with competitors for the purpose of abusing economic power, restricting the market, or engaging in any anti-competitive practice.

When dealing with matters related to the company's business, one must adopt a neutral, discreet, and responsible attitude. The use of electronic devices, such as cell phones, laptops, or other digital media, should be done with the utmost care, avoiding situations that could expose or compromise strategic company information.

## Money Laundering

Soprano is committed to promoting integrity in the public and private business environment and operates in full compliance with applicable legislation. Employees are expressly prohibited from promoting or engaging in any activity that could be characterized as money laundering, corruption, or fraud.

Therefore, any type of conduct that could be construed as fraud, including bribery, money laundering, or insider trading, is unacceptable at all levels of the company.

## Accounting and tax records

It is the employee's responsibility to ensure that Soprano's accounting documents and records, created by them or under their responsibility, are complete, accurate, honestly reflect each transaction or expense, and are generated in a timely manner and in accordance with applicable accounting rules and standards.

All Soprano transactions and operations must be supported by accurate and timely documentation, with all taxes duly collected and recorded in accordance with applicable legislation, maintaining accuracy and strict fidelity to the nature of the operation.

No payment shall be approved or made with the intention or knowledge that it will be used, in whole or in part, for any purpose other than that described in the payment supporting document.

## Health and Safety

In addition to external regulatory requirements, the Soprano Group has health and safety rules aimed at maintaining a safe working environment. The company will continuously conduct training with employees so that they are familiar with their routines and take responsibility for them.

The company understands that each employee has an individual responsibility for safety. Employees must familiarize themselves with health, safety, and environmental policies, procedures, and practices and comply with them strictly.

Everyone is expected to carefully observe the work environment, identifying potential risk situations. If any evidence is identified, the fact must be reported to local leadership and those involved must be alerted. This behavior will be considered a demonstration of commitment to security issues.



# Relationships with Co-Workers

Establishing an appropriate level of rapport within companies allows for greater interaction between people, co-workers, and internal and external customers. This relationship reflects a high-quality work environment with a high level of motivation and enthusiasm.

For this to happen, interpersonal relationships must be based on ethics, respect, trust, harmony, and transparency. People, regardless of their hierarchical level, must be treated with respect and dignity, and their physical and moral integrity must be preserved. Everyone should avoid exposing others to embarrassing and demeaning situations. We encourage freedom of thought, based on respect, understanding, and the creation of an environment of continuous evolution.

The Soprano Group values synergy between areas, cooperation between employees from all Units, and knowledge sharing as a means of learning and disseminating best practices, subject to the confidentiality criteria set forth in the item: **Privileged and/or Confidential Information.**



# Customer Relationships

Customers are one of a company's most valuable assets. The Soprano Group embraces respect and ethics to build customer loyalty and be recognized as a solid and reliable Group. These characteristics are also decisive when it comes to attracting customers. Therefore, professionalism must be maintained, fulfilling what was agreed with the client in an agile and effective manner.

Feedback on your requests is important, even if a solution to the problem or criticism has not yet been found. It is essential to show interest in the customer, providing satisfaction and always being available to listen to them.

The Soprano Group is committed to contributing to the process of creating value for its customers by meeting their expectations and developing innovative solutions. Customer requirements and expectations must be considered, and all those that are established must be strictly complied with.

The Soprano Group does not discriminate against customers based on origin, economic status, or location. However, it reserves the right to terminate any business relationship whenever its interests are not being served or when the relationship poses a legal, financial, social, or environmental risk.

Information about our products and services must always be clear and accurate. Technical data, in particular safety, health, and environmental requirements, must be disclosed to customers. Each product must strictly comply with the legal requirements of the market for which it is intended.

Employees must ensure the confidentiality of all information obtained in their dealings with customers, using it exclusively for professional purposes and within authorized limits. It is expressly prohibited to share, disclose, or misuse strategic, commercial, technical, or any other sensitive information, except where formally authorized or legally required. Failure to comply with this guideline may result in disciplinary action, in addition to possible legal sanctions.

A close-up photograph of a person's hand holding a large quantity of small, blue, granular material. The granules are piled in the palm and some are falling away. The background is blurred, showing more of the same material. The image is framed by a thin yellow line on the left and top, and a thin teal line on the right and bottom.

# Supplier Relationships

Adhering to our values extends to how we interact with customers, suppliers, competitors, and our distribution channels. We demonstrate our commitment to honesty and excellence whenever we represent our company or interact with others.

Our suppliers and distribution channels must comply with all applicable laws and act ethically wherever they do business. Because their behavior reflects on us and can impact our reputation, we maintain high standards for how they conduct business. We require that suppliers and those who sell our products demonstrate integrity and quality in their operations. It is especially important that they protect human rights, health and safety, and the environment. We expect them to behave in accordance with the law and in an ethical manner.

To build a good partnership, it is important that we adopt actions and behaviors that are consistent with our values. Therefore, if an employee has any family relationship with a supplier, they must inform their immediate superior. It is important to avoid potential **conflicts of interest** in order to ensure transparency in the relationship.

Soprano Group suppliers must be evaluated using clear and non-discriminatory criteria. Every decision must be technically and economically sound, with no favoritism of any kind permitted, treating them as independent businesses and acting with integrity in relationships.

Employees must not request, accept, or offer gifts, gratuities, commissions, or any economic advantages from suppliers, business partners, or any third parties that could compromise their impartiality, influence decisions, or generate conflicts of interest. Exceptions apply only to institutional gifts of a promotional nature, valued at up to two hundred Reais (R\$ 200.00), and which do not imply any expectation of consideration in return.

Suppliers must be familiar with the Soprano Group's values and act in accordance with the principles of this Code of Conduct. The hiring of companies owned or managed by former employees must be handled with the necessary care so as not to expose the Soprano Group to labor risks.

The Soprano Group may terminate a business relationship with a supplier whenever there is damage to its interests or disregard for legal, tax, environmental, and occupational health and safety issues.

Employees are responsible for maintaining the confidentiality of sensitive information provided to them by their suppliers.



# Relationships with the Government and Society

The company strives for transparency in its relationships with all its stakeholders, operating in accordance with current legislation. Its relationship with the community is based on respect for local culture, promoting integration with society, stimulating quality of life, and economic and social development.

## Child and/or Slave Labor

The Soprano Group operates in compliance with labor laws and with respect for the communities in which it operates. Therefore, it does not adopt or tolerate the use of child labor, slave labor, or similar conditions, applying this guideline both in its internal operations and in its relationships with suppliers and business partners.

## Political Participation

The company maintains good relations with government entities and representatives, dealing with matters of interest to the organization in an impartial manner, without any political or partisan connotations.

Employees are prohibited from making any contributions in cash, goods, or services to political campaigns or causes on behalf of the Soprano Group, except by resolution of the board. This contribution will be made in accordance with current legislation.

The Soprano Group respects the individual right of employees to engage in civic affairs and participate in the political process. However, such participation must occur in their free time and at their own expense, on a personal basis, and not in the workplace or involving company resources, equipment, or materials. In this situation, the employee must make it clear that the statements are their own and not those of the company.

The resources, space, and image of the Soprano Group cannot be used to serve political, personal, or partisan interests.

## Agreements with the Government

Agreements with the government on behalf of the company will be coordinated exclusively by the CEO and Officers.

Employees of the organization are expressly prohibited from participating in contracts and bids with the Government:

- Prior agreements or arrangements with competitors, which aim to defraud the competitive nature of the bidding procedure established by No. Law 8,666/93 and other applicable rules;

- Fraudulently conducting any bidding process or resulting contract, including practices aimed at unlawfully removing competitors, including by offering any kind of advantage;

- Hindering the investigative or supervisory activities of public agencies, entities, or officials, or interfering in their actions.

- Offering financial benefits or advantages to obtain success in any supply to public agencies.



# Relationship with Trade Unions

The Soprano Group respects freedom of association, recognizes trade unions as the legal representatives of employees, and seeks constant dialogue. Negotiations and dialogue with these entities should only be conducted by formally authorized persons.



# Relationship with the Environment

In its productive activities, the Soprano Group promotes the rational use of resources and environmental preservation, based on the concept of sustainable development.

There is a constant search for improvements in processes related to the environment: reduction of waste, development of recyclable packaging, projects to improve quality of life, with a clean and healthy environment.

The Soprano Group seeks to reduce, minimize, or eliminate the generation of waste and/or the release of potentially hazardous materials into the environment, avoiding adverse impacts on the health and safety of its employees and the community.

The Soprano Group follows a corporate culture where environmental aspects are a priority in all its decisions. All Soprano Group's operations must comply with applicable environmental laws and regulations.

# Transactions with Related Parties

Employees must ensure transparency, integrity, and balance in relations between Group companies, ensuring that all information shared is accurate, complete, and truthful.

Potential conflicts of interest involving executives, board members, and shareholders must be identified, monitored, and mitigated, preventing the misuse of the organization's assets and, especially, abuses in transactions with related parties.

Such transactions must occur under conditions equivalent to market conditions, considering terms, rates, guarantees, and other parameters, and be clearly and adequately reflected in corporate reports.

Transactions with related parties must comply with defined policies and be unequivocally beneficial to the company.

Managers must ensure that benefits to the company are optimized, seeking conditions that are equal to or better than market conditions, adjusted for the risk factors involved.

Employees are prohibited from obtaining income from participation in a company or work of any nature in which the company, its shareholders, and its holdings are directly or indirectly involved.

Situations not explicitly covered in this code that may lead to potential conflicts of interest should be reported to immediate supervisors for guidance.



# Your Responsibilities

The Ethics Committee is responsible for deliberating on cases, ensuring confidentiality, preserving the identity of the complainant, and forwarding the information received.

Violations of this code will be subject to disciplinary measures and/or penalties based on applicable legislation, including termination of employment, without prejudice to applicable legal liabilities.

It is the employee's duty to formally report any possible violation of the terms of this code to their immediate superior or through the ethics channel.

All reports received will be treated confidentially and privately, except for those where there is a legal obligation to inform government authorities.

## AS A SOPRANO EMPLOYEE, YOU MUST:

- Read, understand, and respect the Code of Conduct;
- Ask for help when you are unsure whether your decision or action is ethical or legal;
- Participate in training and other educational activities focused on ethics;
- Understand that you have an obligation to promptly report any activity that, in your judgment, would violate the Code of Conduct;
- Respect and comply with the Soprano Group's internal rules and policies;
- Cooperate with Soprano representatives who are conducting internal investigations;
- Affirm your responsibility to comply with the Code of Conduct when asked to do so.

## AS A SOPRANO MANAGER, YOU MUST:

- Lead by example, both in words and actions;
- Comply with and enforce all principles of this Code, as well as observe internal policies and procedures;
- Promote open, honest, and two-way communication with your employees, encouraging them to ask questions and discuss concerns about ethical issues, and inform them when an issue has been resolved;
- Act immediately when identifying violations of this Code and take preventive, detection, and remedial measures for any failure or misconduct, communicating with the compliance area;
- Recognize and support any employee who comes forward to discuss an issue or report a potential violation, and ensure that they are not subject to retaliation for doing so; by communicating with the Compliance department;
- Ensure that action plans to address compliance risks are implemented quickly.



# Getting Help!

Good ethical decisions are not always obvious. The answers are not always obvious or easy. What happens if you are faced with a difficult choice? To help you make your decision, we suggest that you reread the Code of Conduct and then ask yourself three questions. If the answer is “No” to any of these questions, rethink your conduct.

- **Would I feel comfortable explaining my actions to my supervisor?**
- **Would I be proud to tell my family and friends what I did?**
- **Would I feel comfortable if my actions were reported in the press?**

If you are still unsure, discuss the matter with your supervisor. Usually, he or she is your best resource and is most familiar with your daily responsibilities. If you do not feel comfortable discussing the matter with your supervisor, or if you raise a concern and the issue is not resolved, here are some other resources available to you:

- **Another manager in your organization or sector**
- **Human Resources**
- **Compliance**
- **Contato Seguro**

## Complaints may be made in the following ways:

- 1) **Direct phone number: 0800 601 8676**
- 2) **Via the website: [www.contatoseguro.com.br/soprano](http://www.contatoseguro.com.br/soprano)**
- 3) **Via the Contato Seguro app**

## NO RETALIATION!

Soprano will not permit retaliation or disciplinary action against any employee who, in good faith, raises a concern, provides information, or assists in the investigation of information.

Any employee who retaliates against another employee for providing information or assisting in the investigation will be subject to disciplinary action, including termination of employment.

If you believe you have been retaliated against for providing information or assisting with an ethics investigation, contact your supervisor or Human Resources immediately. Any employee who maliciously uses the ethics channel to provide false information will be subject to disciplinary measures, including termination of employment.

# Consequences for violating the Code of Conduct

Employees who fail to comply with the Code of Conduct will be subject to disciplinary measures, including termination of employment.

Mild Cases: Written warning

Moderate Cases: Disciplinary suspension from work

Serious cases: dismissal with cause (Article 482, CLT).

## These are violations:

- Failure to comply with the provisions of the code
- Acting against the Code;
- Asking others to violate the Code;
- Failure to cooperate in investigations conducted by Soprano representatives;
- Retaliating against an employee who reported a violation or suspected violation in good faith, or who assisted in an ethics investigation;
- Conceal or fail to report any activity that, in your judgment, violates the Code of Conduct;
- Management pressure or commercial requirements do not exempt anyone from complying with the Code of Conduct.

## When in doubt, what should you do?

**If an employee is unsure about engaging in a certain type of conduct, they should ask themselves:**

- Is this in line with the company's Code of Conduct?
- Is this ethical?
- Is this act legal?
- Is this conduct impartial and honest?
- Will it reflect well on me and the company?
- Would I like to read about this in the newspaper?
- Would I advise my children to act this way?

Employees should not refrain from speaking up when faced with these situations of doubt. If the answer is "No" to any of these questions, this conduct should not be adopted.



## General Provisions

Each employee will receive a copy of this code, declaring in writing that they understand, accept, respect, and will disclose the information contained herein. Updated versions of this code can be provided to contributors. The most recent version of the Code of Conduct is available at [soprano.com.br](http://soprano.com.br) and on the Soprano Intranet.

This code is reviewed every two years.

**Current revision January 2026**

Revision June 2023

Revision August 2021

## Commitment Agreement

All Directors, the CEO, managers, employees, and suppliers of the Soprano Group are responsible for knowing, accepting, respecting, and disseminating the information contained in this Code of Conduct, in addition to ensuring strict compliance with its provisions. They should also remain vigilant in preventing and detecting violations of this Code of Conduct, reporting any violations to the Ethics Committee.



We are one Soprano

