

CONFLICT OF INTEREST RULE

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Approver: Statutory Board of Directors

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Review 03

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HISTORY OF CHANGES

Review 00: Initial Issue

Review 01: Revalidated Content

Review 02: Revalidated content and updated to the standard model for the quality area.

Review 03: Revalidated Content

1. OBJECTIVE

Establish guidelines to be observed by individuals in the execution of their activities, always aiming to act with honesty and transparency, in the best interests of the Company, and exempt from any personal or third-party interests.

2. AREAS OF APPLICATION

This Rule applies to all employees and the Executive Board of Tupy S.A. and its subsidiaries, third parties who have a direct or indirect relationship with Tupy, and representatives of the Company ("Individual(s)"). This document complements the Tupy Code of Ethics and Conduct and is bound by the PCT 013 - Anti-Corruption Policy.

3. TRAINING

Employees of Tupy S.A. and its subsidiaries.

4. COMPLEMENTARY DOCUMENTS

NCT 010 - Disciplinary Code.

5. REFERENCE DOCUMENTS

CEC - Code of Ethics and Conduct Tupy.

PCT 013 - Anti-Corruption Policy.

6. TERMS AND DEFINITIONS

Conflict of Interest: It is the conflict between the Interests of the Company and the interests of the

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Individual and happens when personal interests interfere in the performance of professional activities and conflicts with the interests of the Company.

Real Conflict of Interest: Situation in which there is, in fact, a Conflict of Interest.

Potential Conflict of Interest: Situation that can evolve and become a definite Conflict of Interest in the future.

Family Members: Spouse, partner, children, siblings, father, mother, stepfather, stepmother, stepdaughter, stepdaughter, brothers-in-law, grandparents, in-laws, son-in-law, daughter-in-law, grandchildren, uncles, cousins, nephews, of biological origin or not, whose relationship is legally formalized or not.

Close Individuals: People with whom the Individual maintains a loving relationship¹ or who are part of their inner circle of coexistence.

Third Parties: Individuals or companies that maintain direct or indirect business and/or social relationships with the Company (i.e., suppliers, customers, representatives, etc.).

7. DESCRIPTION OF ACTIVITIES

7.1 GENERAL RULES

A Conflict of Interest may be related to a benefit or advantage of the Individuals themselves, family members or close individuals, or even organizations, of which they are part. Additionally, it may involve, financial advantages, or not.

In any of the situations, the Conflict of Interest may weaken trust in the Company or the Individual and, for this reason, must be avoided, or declared, so that it can be dealt with appropriately.

Individuals, when identifying a situation with which they have conflicting interests, shall immediately express their potential or actual Conflict of Interest, through the form contained as Annex I ("Term of Acceptance") of this Rule, to be delivered to HR (HR Business Partner) or to Compliance, or through *sharepoint* (http://intranetnova.tupy.com.br/sites/compliance/Lists/Conflito_Interesse/Meu_Cadastro.aspx), as well as withdraw from discussions and management on the subject and refrain from making any decisions related to the case.

The conflicted individual shall not, under any circumstances, seek to exert its personal influence in relation to the situation in question.

If there is a suspicion of a situation of Conflict of Interest involving another Individual, it is requested that such situation be reported through the reporting channels made available by the

¹ It is considered a loving relationship when there is a personal and affective relationship between individuals, regardless of whether there is a common-law marriage.

Company on the website: www.canalconfidencial.com.br/eticatupy/

7.2 SITUATIONS OF CONFLICT OF INTEREST

Below, we have identified some situations that may generate a Conflict of Interest and, therefore, should be avoided whenever possible, or reported to the Company to adopt the necessary measures:

- Decide on business with companies or any other type of entity owned, managed, or belonging to, Family Members or Close Individuals;
- Act as a partner, director, employee, consultant, supplier, service provider, or agent of a direct or indirect competitor, or an organization that has, or is interested in having, business with Tupy;
- Disclose or misuse information of Tupy or any Tupy partners (customers, suppliers, representatives, etc.), obtained during the exercise of the position, for the benefit of themselves, family members, close individuals, or third parties;
- Request gifts, entertainment, favors, or any type of advantage, financial or not, whether professional or personal, for you, your Family Members or Close Individuals;
- Perform external services or work, paid or not, that may characterize competition or conflict with Tupy's activities and businesses;
- Use Tupy's resources, working hours, equipment, or materials, to perform personal activities that impact the performance of Tupy's work activities or interests;
- Be involved, directly or indirectly, or influence the hiring of commercial entities that employ Family Members or Close Individuals;
- Be directly or indirectly involved in the negotiations, conclusion, management, or administration, of contracts and other transactions with a company in which the Individual, Family Members, or Close Individuals have an interest;
- Be involved in the evaluation of products or services of companies that employ Family Members or Close Individuals;
- Be directly or indirectly involved in the hiring, promotion, or evaluation of a Family Member or Close Individual;
- Maintain a hierarchical relationship, direct or indirect, with a Family Member or Close Individual;
- Misuse Tupy's financial resources, property, and business opportunities, for personal or Third-Party gains, or for purposes contrary to Tupy's business interests;
- Commit any of the harmful acts provided for in Law N°. 12,846/2013 (Anti-Corruption Law) or comparable laws of foreign legal systems.

The situations listed above are only illustrative, since it is impossible to predict all the situations that

may involve a Conflict of Interest. Whenever there are doubts regarding the subject, the Compliance area should be consulted.

7.3 INTERNAL INVESTIGATIONS AND SANCTIONS

All cases of Conflict of Interest, actual or potential, declared or reported, will be evaluated, and dealt with. The Individual who violates this Rule will be subject to disciplinary action, which may culminate in the termination of an employment or commercial contract, as the case may be, without prejudice for Tupy to be able to take any legal measures it deems necessary.

Disciplinary measures to employees are provided for in the Tupy Disciplinary Code.

7.4 DUTIES AND RESPONSIBILITIES

7.4.1 Individuals

- a. Immediately declare to HR (HR Business Partner) or to the Compliance Department, any situation of conflict of interest in which they are involved, whether real or potential, even if not provided for in this Rule, through the Term of Acceptance;
- b. Keep the Term of Acceptance up to date, in the absence of declaration, it is presumed that there is no conflict;
- c. Report any suspected Conflict of Interest involving a Third Party;
- d. Stop any action under your responsibility that may result in any real or potential Conflict of Interest.

If an undeclared conflict is later confirmed, disciplinary measures may be applied.

7.4.2 Managers

- a. Ensure that your team is aware of the rules set out in this document in order to avoid misconduct within the scope of your responsibilities;
- b. Whenever there is a situation of real or potential Conflict of Interest in your area, declare or guide a team to declare the situation to HR (HR Business Partner) or the Compliance Department, through the Term of Acceptance;
- c. Guide your team to keep the Term of Acceptance up to date;
- d. Implement the necessary measures to remove the situation of Conflict of Interest;
- e. Evaluate the application of disciplinary measures to team members who do not comply with this Rule.

7.4.3 Compliance

- a. Clarify any questions related to the subject of Conflict of Interest and this Rule;
- b. Establish the necessary procedures for the implementation of this Rule;
- c. Annually communicate the rules laid down in this Rule to employees, in order to instruct them to declare any real or potential situations of Conflict of Interest;
- d. Promote trainings related to this Rule;
- e. Provide guidance on how to deal with cases of Conflict of Interest, real or potential, whenever requested;
- f. Keep a record of cases of Conflict of Interest that come to its awareness, as well as how they were dealt with;
- g. Review this Rule whenever necessary.

The Compliance Department may request support in the evaluation and treatment of real or potential situations of Conflict of Interest.

7.4.4 Human Resources

- a. Report any situations of Conflict of Interest, real or potential, that come to its attention, to the Compliance Department;
- b. Request new employees, during the Institutional Integration Program, to fill out the Term of Acceptance;
- c. Forward to the Compliance Department, by e-mail, the Terms of Acceptance that indicate a Conflict of Interest, real or potential;
- d. File the Terms of Acceptance in the employee's physical folder.

7.5 FINAL PROVISIONS

All other written procedures must comply with the previously mentioned guidelines. Any questions or controversies should be resolved by the Compliance Department through the e-mail: compliance@tupy.com.br

This Rule may be amended at any time, subject to the needs identified by the areas involved and with approval by the Statutory Board.

8. SYMBOLS AND ABBREVIATIONS

Not applicable.

9. ANNEXES

Annex I



DECLARATION OF CONFLICT OF INTEREST

I _____, bearer of ID N° _____
and DRT N° _____, with attention to the contents of the Conflict of Interest Rule, declare:

Do you have any relatives or other close people that work at Tupy?

NO YES

(If the answer is yes, please mention your relationship with the person, full name, position, and area in which he/she works):

Do you have any relatives or close people who work at, or for, a Tupy supplier, service provider, partner, customer, or competitor?

NO YES

(If the answer is yes, please mention your relationship with the person, full name, position, area, and company where he/she works):

Do you have any relatives or close people who work at any government/public body or that occupy a political position?

NO YES

(If the answer is yes, please mention your relationship with the person, full name, position, and government/public body where he/she works):

Do you have another job, or do you perform any other type of work activity, outside of Tupy?

NO YES

(If the answer is yes, please describe the job or work performed and, if linked to another legal entity, the name of the company):

I declare that the above answers are true and I undertake to: (i) keep this statement updated indicating any changes in relation to the information provided herein; and (ii) comply with the provisions of the Company's Conflict of Interest Rule (NCT – 020). I am notified that in case of omission of information or false declaration, I will be subject to the penalties contained in the Tupy Code of Ethics and Conduct and the Disciplinary Code.

Signature: _____

Date: ___/___/_____

