


Number: PL.00.10	MANAGEMENT SYSTEM POLICY	
Revision: 03	Code of Ethics	
Date: 06/02/2025		
Rating: Public		

1. OBJECTIVE

To be a formal and institutional reference for the personal and professional conduct of all the Company's Employees, regardless of the position or function they occupy, in order to become a standard of internal relationship and with their stakeholders: customers, unions, suppliers, service providers, competitors, society and government. To enable ethical behavior based on values incorporated by all, as they are fair and pertinent.

Reduce the subjectivity of personal interpretations of moral and ethical principles. Solidify the Company's values through its permanent practice.

To make the Company's values clear, so that all professionals can understand, respect and practice them.

2. SCOPE

Areas and Companies: Mandatory compliance for all Employees and Managers (Officers and Directors) of green4T Participações S.A. and subsidiaries ("green4T Companies").

3. RESPONSIBILITIES

It is the duty of all members of the Company to comply with and enforce the provisions of this Code, and the Managers of each area are assigned the additional duty to disclose to their team and ensure compliance with it, in their respective areas of work.

4. POLITICS

4.1. TERMS AND EXPRESSIONS USED IN THIS CODE

Conduct – behavior, moral procedure.

Code – a set of rules, laws or norms.


Code of Ethical Conduct – rules that govern the performance of green4T Participações S.A. and subsidiaries ("green4T Companies"), Brazilian and foreign, and define what it expects from its members, including, but not limited to, Employees, suppliers, subcontractors and partners.

Company – a group of companies green4T Participações S.A. and subsidiaries ("green4T Companies").

Employee(s) – any person who performs functions for the Company, regardless of position, function or hierarchical level.

Manager(s) – any person who exercises a management function over a group or team, regardless of position, function or hierarchical level.

4.2. RECIPIENTS OF THIS CODE

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The Code of Ethical Conduct applies to all Employees, Managers and Third Party Intermediaries of the Company and must regulate the relationships that these professionals maintain inside and outside the Company:

1. With the other professionals of the Company;
2. With suppliers, customers, banks, other partners and competitors;
3. With the public power, at all levels;
4. With the local community and society in general.

4.3. VALUES AND PREMISES

The Code of Ethical Conduct is the commitment to the quality of our products and services. Quality that must be understood in its full sense, involving not only what we do, but the way we do it.

This Code of Ethical Conduct is based on the principles of ethics, integrity, transparency, human respect, compliance with all laws and regulations in the countries in which we operate, zero tolerance for fraud and corruption, and responsibility towards the social community and the environment.

It is the duty of all members of the Company to comply with and enforce the provisions of this Code, and the Managers of each area are assigned the additional duty to disclose to their team and ensure compliance with it, in their respective areas of work.

This Code is valid indefinitely. It must be distributed to all members of the Company, who may not claim, under any circumstances, or under any argument, ignorance of the guidelines and principles contained therein, which will also be available via the electronic platform of the green4T Companies.

4.4. RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, PARTNERS AND GOVERNMENT

The Company must always conduct its negotiations with honesty and ethics, both with customers and with suppliers, subcontractors, partners and the Government.


In addition to ensuring the quality of the products and services it offers through its business units, the Company is committed to serving customers always with ethics, efficiency, speed, education and transparency.

The Company, as well as its Employees and subcontractors, is committed to maintaining the confidentiality of information received from Customers and business partners. Trust is one of the bases of the relationship with the market.

Decisions to hire suppliers must be made exclusively by the Procurement team and must be guided by objective criteria that cover all fundamental aspects of the selection, including legal and technical compliance, performance, quality, price and payment terms, deadlines, warranty conditions, risk, after-sales conditions and whatever else is relevant in each case.

The Company must adopt, in its interactions and business practices, in any situation, the highest ethical and integrity standards in business, which includes fully complying with the applicable legislation and the principles and values of the Company, as well as its policies and procedures.

The Company's relationship with authorities, politicians and public agents must be

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guided by professional and correct attitudes. Any form of pressure or solicitation from public agents that does not correspond to this definition must be refuted and immediately communicated to the Company's management.

The Company's philosophy is strict compliance with the legislation and expects the same behavior from its professionals, especially the Brazilian Anti-Corruption Law (Law No. 12,846/2013), the US Foreign Corrupt Practices Act (FCPA) of 1977 and the UK Bribery Act of 2010.

4.5. RELATIONSHIP WITH COMPETITORS

The Company respects its competitors and seeks to surpass them in a healthy way, offering better products and services. Attitudes that may constitute undue advantage, slander or defamation of competitors are not allowed.

4.6. RELATIONSHIP WITH POLITICAL PARTIES

The Company will not restrict the political-partisan activities of its Employees. However, they must always act in a personal capacity and in a way that does not interfere with their professional responsibilities.

It is strictly forbidden to engage in partisan political activities in the workplace and that involve, in any way, the Company's resources.

It is strictly forbidden to broadcast any form of political propaganda on the Company's premises, publications or any other property.

Employees who participate in political activities do so as citizens, and not as representatives of the Company.

4.7. RELATIONSHIP WITH MEDIA OUTLETS

The Company considers the role of the press to be important in shaping the organization's image in the eyes of public opinion and seeks to provide information or respond to requests, when relevant, considering the right not to express itself on issues that go against its interests or to maintain confidentiality about information considered strategic.

Only certain professionals of the Company are authorized to exercise the role of spokespersons to speak on behalf of the Company, as well as to make comments about it to the press or external groups. Such authorization will always be express and in writing.


If you are sought to provide information, write articles or give interviews and statements on behalf of the Company to any communication vehicle, inform your superior or the Marketing area.

4.8. RELATIONSHIP WITH THIRD PARTY INTERMEDIARIES

Intermediaries of the Company include all Business Consultants, Commercial Representatives or others who act on behalf of the Company, whether connected to the government or not.

In addition, any third party engaged, in whole or in part, to obtain business with the government, to obtain a governmental action, or in any lawful manner, to act on behalf of the Company before government authorities, is also included in the definition of an intermediary.

When hiring, remunerating, or working with an intermediary covered by our policies, you must:

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Have a solid and documented basis for trusting the intermediary;
Take the necessary steps to monitor and prevent inappropriate conduct and, where appropriate, train the intermediary;
Respond appropriately to indications of possible inappropriate conduct.
There are four steps you should take to hire a new intermediary or renew an existing agreement/contract:

1. Due diligence – Conduct research of the intermediary's background, reputation, and qualifications.
2. Communicate the Company's rules – Communicate to the intermediary the Company's expectations regarding anti-corruption and obtain its signature on the Code of Ethical Conduct.
3. Contract protections – Document the relationship in a written contract, with standard contractual protections considered mandatory.
4. Danger signs – Check for "danger signs" that may indicate a risk. These include situations where the intermediary:
 - o It appears to be unqualified or understaffed;
 - o It is specified or recommended by a public official;
 - o Requests that your identity remain hidden;
 - o Asks to be paid in cash or in advance or for payments to be made abroad;
 - o Asks the Company to create false/irregular documents;
 - o Requests very high remuneration that is unusual in relation to the value of the services provided;
 - o Asks for reimbursement of disproportionately high expenses compared to usual or undocumented expenses.


The following requirements apply to payments to any intermediary:

1. Payments must be made to the account specified in the intermediary's contract;
2. No payment may be made in cash or by means of bearer documents;
3. No payment may be made to anyone other than the intermediary, at his normal place of work;
4. No payment can be made to an account outside the country in which the intermediary performs the service.

4.9. RELATIONSHIP WITH RELATED PARTIES

Transparency and open communication are fundamental in all relationships of trust, including relationships with related parties.

Related parties of green4T Companies are considered any individuals or legal entities that fit into one of the situations below:

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Holds shares of the Company or may exert significant influence over it.

Either directly or indirectly, controlled by a parent company or is under common control of a shareholder that exercises significant control or influence over the Company.

Be a key person, or their close relative, of the Company, its subsidiary, its parent company or any legal entity that exercises significant influence over the Company.

Is a Company controlled, jointly or individually, by or that is under the significant influence of any person mentioned in the above.

Be a Third Party, whose shareholding interest is held by a controlled Company.

For any reason or circumstance, is in a condition or situation in which there is a well-founded fear that it will not be able to contract under market conditions.

The following principles must be adhered to under market conditions:

Competitiveness (prices and conditions of services compatible with those practiced in the market);

Compliance (adherence of the services provided to the contractual terms and responsibilities practiced by the Company, as well as to the appropriate information security controls);

Transparency (adequate reporting of the agreed conditions, as well as their reflections in the Company's financial statements); and

Equity (establishment of mechanisms that prevent discrimination or privileges and practices that ensure the non-use of privileged information or business opportunities for the benefit of individuals or third parties).

The transaction between related parties must be entered into in writing, specifying in the respective instrument its main conditions and characteristics, such as the form of contracting, prices, terms, guarantees and main rights and obligations.

Transactions between related parties are prohibited if:

Do not observe the rules set forth here;

Deals with the granting of loans in favor of the Company's controlling shareholders and related parties;

Is approved without complying with the applicable legislation, bylaws and shareholders' agreement of the Company.

4.10. GIFTS, GIFTS, MEALS AND ENTERTAINMENT

As a general rule, we do not receive and do not offer gifts.

Gift-giving and hospitality (meal, travel, entertainment) is often considered a form of courtesy and is common in the daily business of companies in many countries. However, anti-corruption laws prohibit offering or giving anything of value, including gifts and hospitality to third parties, in order to obtain improper advantages or unreasonably influence the action of an official.

Giving small personal gifts is often part of the local culture. The Company has defined the maximum value of gifts or gifts of up to US\$ 100 (One hundred US dollars) and provided that they do not interfere with the other party's business decision-making.

It is forbidden to receive gifts or gifts, favors or any things of value or utility that may generate even the mere appearance of impropriety of conduct or potential impact on the Company's business decisions.

The receipt by any member of the Company of money for any other goods or services offered by third parties (even if in a raffle or contest) in any context related, directly or indirectly, to their activity in the Company is strictly prohibited, regardless of the amount involved.

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Conducting business over a meal is customary practice around the world.

A meal may be offered to third parties, without prior approval, provided that all of the following have been met:

The amount is equivalent to a normal business meal according to local standards (expensive drinks and refined dishes/delicacies) should be avoided;

In general, the business meal does not include the spouse or other guests of the guest. In exceptional cases, such as spontaneous invitations that occur during unplanned meetings (e.g. at a trade show or congress organised by a third party), people accompanying the guest may be invited if it is considered unacceptable to exclude them;

If the proposed guest has the power to influence government or business decisions, meals should only be offered that are related to a required meeting or activity, within the limits set forth in the expense reimbursement policy and with approval of the meal offering form in accordance with the authority policy;

Invitations to external events (trips, get-togethers, training, relationship events), as well as sponsorship of corporate events for Employees, may only be accepted when in the Company's interest, and must be communicated to the director, for evaluation and informed to the Compliance area;

Donations or sponsorships are not allowed, except if approved in compliance with the authority policy, the Bylaws and the legislation in force.

4.11. RELATIONSHIP AT WORK

Mutual trust and dedication to the Company must guide our relationships with our co-workers. We have a responsibility to ourselves and to the Company to treat each other with respect and dignity.

Successful working relationships are based on trust.

At the Company we pride ourselves on the dedication of our people and the excellence of the results that result from that dedication. Relationships with our co-workers, whether they are our peers, subordinates or superiors, must be conducted as a partnership, in which individual behavior is guided by the primary commitment to the Company's success.

The relationship with those we work with should be like that of members of a winning team. It is the people who work in harmony and focus on a set of common goals that drive our Company forward. For this team relationship to work, each individual needs to fulfill their responsibilities and feel that the others also fulfill theirs. No individual or department should allow their priorities to prevail over the Company's priorities.

The Company will be attentive to the behavior of its Managers.

Managers are obliged, among others, to:

- a) Offer their behavior as a model for all their subordinates and other Company Employees;
- b) Disclose to its subordinates the content of this Code and make them aware of its need and use, thus preventing any Employee or service provider from committing a violation due to lack of information;
- c) Identify Employees who have violated this Code and discuss the matter with the Board of Directors;

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- d) Create a culture that manages compliance with this code and encourage Employees to raise questions and concerns regarding its application.

No form of discrimination shall be tolerated, whether on the basis of religion, nationality, philosophical or political belief, family economic status, origin, sex, colour, ethnicity, disability, age, sexual preference, biotype, health status or marital status. Any type of harassment within the Company, especially those of a moral and sexual nature, involving any verbal or physical conduct of humiliation, coercion or threat, is strictly prohibited.

If you are the victim of any embarrassment of this type or know of someone who has gone through this situation, inform your immediate superior, the Managers of the People Management and Development or Compliance area, or use the Company's whistleblowing channel.

When hiring and while there is an employment relationship with the Company, people who have a direct family relationship with other Employee(s) must ensure the absence of conflicts of interest, and any hierarchical relationship between relatives is prohibited.

Child labour is not permitted, whatever its form. Except where local provisions stipulate an upper age limit, no individual under the age fixed for the end of compulsory education or less than 15 years (or 14 years under the rules of Convention No. 138 of the International Labour Organization) may be admitted to work.

With regard to minors authorized to enter the labor market, the Company's management is responsible for providing security and working conditions, schedules and salaries compatible with the respective age level and, as a minimum requirement, in accordance with current local legislation.

No form of forced or involuntary labour is tolerated. This includes servile and slave labor and all forms of labor against the free will or choice of the individual.

The occurrence of any form of protectionism or privilege in the relationship between Manager and subordinates is unacceptable.

In order to avoid situations of favoritism and/or conflict of interest, as well as situations of discomfort with other professionals, a love relationship between leadership/subordination, direct or indirect, is not allowed. It is recommended that professionals with romantic involvement do not work on the same project and Business Unit. Such situations must be reported to the Area Manager or People Management and Development or Compliance Managers.


The privacy and confidentiality of the personal information of the Company's Employees must be respected.

The Company must provide a safe and healthy work environment, so that preventive actions prevail over corrective actions.

The possession of drugs or weapons is not allowed in any way in the workplace, being considered a serious infraction, subject to labor and criminal sanctions.

In compliance with current legislation and the health of Employees, smoking is prohibited in any closed environment of the Company.

The Company does not admit intrusion into the private lives of Employees, inside or outside the work environment. Controls or insertions of any nature will be repudiated. The Company's members may not have economic or financial interests in competitors, customers, partners, suppliers, to the extent that such interest may influence their actions carried out on behalf of the Company.

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It is forbidden for Employees to perform work that is not related to the Company's activities, and the sale of products or services of any kind at the Company's facilities is also prohibited, regardless of whether it is during or outside normal working hours.

It is not allowed to use the Company's assets such as telephones, various devices, materials or information owned by the Company for work outside the activities carried out.


Employees in leadership positions and Administrators are prevented from influencing or evaluating the job position or salary of family members or people in their close relationship.

The approval of expenses of each professional must be made, at least, by his immediate superior.

It is forbidden for any Employee to also hold public office, without first expressly notifying the Managers of the People Management and Development or Compliance area, for prior verification of conflict with the Company's rules.

In the exercise of their duties, the Company's Employees:

- a) They act in accordance with the laws of their country;
- b) They follow the guidelines of the Company's internal policies;
- c) They seek the best overall result for the Company, always maintaining a transparent attitude, respect and collaboration with colleagues, Employee representatives and their stakeholders;
- d) They exercise their functions and authority, with an entrepreneurial spirit and overcoming challenges, aiming at the interests of the Company;
- e) They do not use position, function, activity, facilities, position and influence in order to obtain any favor for themselves or others;
- f) They do not create artificial difficulties in the exercise of their position, with the aim of overvaluing their professional performance;
- g) They exercise their duties effectively, eliminating situations that lead to errors or delays in the provision of services;
- h) Respect intellectual property;
- i) They do not alter or misrepresent the content of any document, information or data;
- j) Promote actions that make it possible to improve internal communication;
- k) They emphasize the integration and development of teamwork;
- l) Promote the involvement of all in the achievement of the Company's strategic objectives;
- m) They act courteously, with availability and attention to all the people with

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whom they relate, respecting individual differences;

- n) In their professional life, they always act loyally with colleagues or managers.
- o) They do not damage the reputation of colleagues or Managers through prejudiced judgments, false testimony, unsubstantiated information or any other subterfuge.
- p) They do not seek to obtain an exchange of favors that appear or may give rise to any type of personal commitment or obligation.
- q) They encourage the expression of ideas, when aligned with the Company's objectives and discussed in their own forums.

4.12. RECORD KEEPING AND ACCURATE ACCOUNTING

The Company's tax and accounting books and records must be maintained with reasonable detail and accuracy so that they accurately reflect all transactions.

All control and approval procedures must be followed.

The Company's tax and accounting books and records may not contain false, misleading or artificial information.

4.13. CONFLICT OF INTEREST

In the conduct of professional responsibilities and personal actions, the Company's Members must ensure that there is no conflict or perception of conflict of interest. Conflicts of interest can arise in different forms and are, in general, easily perceived and should be avoided.

Conflicts of interest occur when the private interest of an individual, or the interest of a Close Relative or friend of that individual, interferes, or appears to interfere, with his or her capacity for impartial judgment expected in his or her liability or in the interests of the Company. Conflicts of interest also arise when a Member, or their Close Relative, or Friend, receives inappropriate personal benefits because of their position in the Company.

Although this document does not mention all possible conflict situations, the following situations are common examples of potential conflicts and when it occurs, it should be reported in a specific conflict of interest form, for the People Management and Development and Compliance areas:


Have confidential information that, if used to make decisions, can generate personal advantages.

Acquire, or intend to acquire, shares of Customers, Competitors or suppliers of the Company based on inside information, or provide such information to Third Parties.

Accept an external position, task or responsibility of a personal nature that may affect their performance and productivity in the Company or that assists the activities of competitors.

Accept a position, task or responsibility or receive any type of compensation from a Customer, competitor, supplier or partner of the Company, if this may affect the Company's business relationship with them.

Accept a position, task or responsibility or receive some type of remuneration from a competitor of the Company.

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Directly or indirectly hiring close relatives, friends or former Employees, or influencing another Member to hire them, outside the established principles of competence and potential.

Use the Company's resources to serve private interests.

Possess any personal interests that may conflict or be construed as conflicting with your professional obligations.

4.14. OTHER RESPONSIBILITIES

4.14.1 INSIDER TRADING LIABILITY

It is the obligation of each Employee to safeguard information owned by or relating to the Company.

Confidential information is understood to be that which has not been disclosed or made available to the general public, such as financial and commercial data, strategic plans, new products, marketing campaigns, personal information about Employees, contracts of great importance, expansion plans, financing transactions, substantial changes in management or other developments of the Company.

Disclosure of non-public information to others, including family and friends, is a violation of the Code of Ethical Conduct, and may violate the law. In this sense, the use of e-mails or any other electronic or physical means for information traffic is also prohibited.

Only the Chief Executive Officer or Chief Financial Officer may make information public to the market. Requests made by financial analysts and shareholders should be directed to the Chief Financial Officer.

All matters related to the media, including requests for information and/or interviews, must be sent to the Marketing area.

4.14.2 LIABILITY TO THE COMPANY'S ASSETS

The Company's assets are intended for the use of the Employee, in the exercise of their duties and not for personal use.

The Company's assets include your working time and the product of your work, as well as the Company's equipment, vehicles, computers and programs, information, trademarks and name.

The Employee may not use the Company's assets for his or her personal benefit or for the benefit of anyone other than the Company.


The Employee may not take advantage of any opportunity for personal gain that he discovers due to his or her position in the Company, nor through the use of information or property owned by the Company.

Abuse of the Company's assets may be considered theft, and result in termination of employment or criminal prosecution.

The Employee must have permission from his or her Manager before using any Company asset – including information, work products or brand – outside of his or her responsibilities to the Company.

Before accepting payment for lectures or presentations related to the Company or his/her work in it, the Employee must always obtain the approval of his/her Board of Directors.

The Company's computer systems and equipment are intended for use by the

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Company only. They should never be used for outside business, illegal activities, gambling, or pornography.

Users of the Company's Information Technology resources shall not assume any right to personal privacy or confidentiality when using these resources.

The Company reserves the right to monitor equipment, systems and network activities, including but not limited to email, voicemail, Internet usage and any stored information, in appropriate circumstances and in accordance with applicable laws. In addition, for the maintenance of operations, security, business, legal or regulatory requirements, authorized personnel or third-party service providers will have unrestricted access to information from the Company's Information Technology resources.

The Company reserves the right to terminate any user's access to IT resources at any time, with or without prior notice.

4.14.3 RESPONSIBILITY FOR THE USE OF SOFTWARE

The Copyright Law prohibits the installation, copying, sale or distribution of software and its manuals, without a legally constituted license of use, and the product without these characteristics is identified as PIRATED.

The Company is strictly forbidden to use any pirated software within its facilities.

Any demand for software within the Company must be made through the competent sector, and this software must be installed only by trained Employees hired for this assignment.

The use of piracy will represent the characterization of serious misconduct by the Employee, causing the termination of his employment contract for cause.

On a regular basis, the sector that controls the Company's computer system will carry out a survey of the system/software installed in the various equipment in use.

If the existence of pirated software is found in any of the Company's equipment, it will be immediately uninstalled. Once the disciplinary action is identified, it will be applied immediately.

4.15. FRAUD, THEFT, CORRUPTION AND MONEY LAUNDERING


If theft, fraud, acts of corruption, bribery or money laundering are found by any Employee, they must be immediately reported to the Compliance area.

4.15.1 FRAUD

It means false representation with the objective of taking personal advantages to the detriment of the Company's time, resources and property.

Examples:

- a) Misusing sick leave. It means going on sick leave, being in full physical and mental health;
- b) Abusively using the telephone, computers and other equipment for private business;
- c) Habitually carry out private activities, using the Company's facilities and time;
- d) Misuse of the Company's money;

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- e) Remove without authorization, equipment, parts, software, and office supplies.
- f) Use payments for travel expenses, where the purpose was personal use.
- g) Receiving or offering personal advantage to suppliers and customers.
- h) In the event of suspected fraud, an initial investigation will be carried out to ascertain the facts and forward the measures to the Ethics Committee.

4.15.1 THEFTS

It is the misappropriation of assets and resources owned by the Company.

Examples:

- a) Forging or hiding receipts. - Stealing money from the Company or other Employees.
- b) Stealing goods, tools, or other equipment.
- c) Overestimate expenses.
- d) Buy materials for yourself.
- e) Stealing intellectual property or misusing confidential information.
- f) In the event of suspected theft, an initial investigation will be conducted.
- g) If the theft or robbery is confirmed, the Police may be called and, additionally, the Employee will be dismissed for cause.


4.15.3 CORRUPTION

It is the act of dishonestly using one's function, money or other resources, aiming to obtain illegal or immoral advantages for oneself

Active or passive corruption is strictly intolerable, as are extortion, bribery and money laundering.

Examples:

- a) Asking the lawyer or accountant to offer a 'treat' to the tax inspectors so that they 'relieve the inspection;
- b) Payment of an advantage to a public agent, national or foreign, to defend the interests of a Company to close a deal;
- c) Payment of undue advantage to a public employee to speed up the preparation of an analysis document for the release of an export.

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Corruption can occur when dealing with business partners or government officials. Although Law No. 12,846/2013 focuses on government bribery, for the purposes of the Company's Policies, the principles are equally applicable to the private sector. However, because the risks are different, our compliance policies, procedures and controls sometimes make a distinction between these two sectors.

The Company has a firm commitment to strictly comply with the legislation applicable to its operations and the conduct of business, and its members must faithfully comply with this commitment.

In case of suspicion of corruption, a preliminary investigation will be conducted to ascertain facts and follow up on recommendations to the Audit Committee. For questions and more details, see the Anti-Corruption Policy of green4T Companies, on the Intranet.

4.15.4 MONEY LAUNDERING

Money laundering is a process that aims to mask the nature and source of money associated with illegal activity by introducing these values into the local economy by integrating illicit money into the commercial flow in a way that appears to be legitimate or so that its true origin or owner cannot be identified.

The Company's Members must comply with the laws and regulations that deal with money laundering and illegal financing in all countries in which they operate, their facilitation is strictly prohibited in any form or context. Violation of these laws may bring severe civil and criminal penalties to the Company and its Members, individually.

The Company shall only conduct business with reputable Third Parties, including agents, consultants and business partners who are engaged in lawful activities and whose resources are of legitimate origin.

The following are some examples of red flags that help identify possible indications of suspicious activity related to money laundering or terrorist financing:

1. An agent or business partner who is reluctant to provide complete information, who provides suspect, false, or insufficient information, or who wants to evade bookkeeping or reporting requirements.
2. Payments made with monetary instruments that appear to have no identifiable link to a Third Party, or that do not meet market practices.
3. Payments made in cash by a third party or a business partner.
4. Early repayment of a loan made in cash or cash equivalents.
5. Orders, purchases, or payments that are not ordinary or that are inconsistent with the Third-Party's trade or business.
6. Exceptionally complex negotiation structures and payment patterns that do not clearly indicate the purpose of the deal, or have overly favorable terms.
7. Unusual transfers of funds to or from countries unrelated to the transaction or that are not logical to the Third Party.

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8. Transactions involving locations identified as tax havens or areas of known terrorist, drug trafficking, or money laundering activities.
9. Transactions involving shell banks or banks in tax havens, unlicensed money senders or exchange operators, or non-bank financial intermediaries.
10. Inability or difficulty to verify an entity's corporate history or an individual's background and specialty.
11. Negative posts in the media or local business community concerning the integrity or legitimacy of the entity or individual.
12. Structuring transactions in a way that avoids meeting bookkeeping or reporting requirements, such as multiple transactions below the minimum reportable amounts.
13. Requests to transfer money or to reverse deposits to an unknown or unrecognized third party or account.

4.16. CONSEQUENCES OF INAPPROPRIATE CONDUCT

Failure to comply with the items contained in this Code will be treated as a matter of extreme gravity. Depending on the legislation, the following measures may apply:

- a) Formal warning;
- b) Cancellation of variable remuneration;
- c) Transfer to another position;
- d) Resignation.

The disciplinary process may be invoked by the Company's Ethics Committee, depending on the level of the offender and the nature of the violation.


In the interpretation and use of this Code, common sense shall prevail.

In addition, the provisions of this Code do not exempt Employees from adopting expected conducts in a professional environment and that, eventually, are not described herein.

4.17. DOUBTS AND VIOLATIONS

The guidelines of this Code allow for the evaluation of most situations and minimize the subjectivity of personal interpretations of moral and ethical principles, but they do not necessarily detail all the situations that may arise in the day-to-day life of each Employee. Thus, in case of doubts in the application of the guidelines of this Code, your Manager and/or the Managers of the People Management and Development or Compliance area should be consulted.

Employees are expected to comply with these guidelines at all times.

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Date: 06/02/2025		
Rating: Public		

A Member who violates the provisions of this Code, violates the law or any Code or procedure of the Company or allows a Member of his or her team to do so, or who knows of a violation and fails to report it, is subject to appropriate disciplinary action, up to and including dismissal.

Retaliation or any attempt to prevent, obstruct or deter is prohibited

the Company's Members in their efforts to report what they believe to be a violation of the commitment defined herein, which also constitutes grounds for disciplinary action, including dismissal.

Depending on the nature of the violation, the obligation or convenience of reporting the violation to authorities or Third Parties must also be evaluated, which may result in other sanctions.

In case of doubts, consult your immediate superior and always read and consult the code of ethical conduct and other internal policies of our Company, available on the websites of green4T Companies or on the Intranet and use the website, or the telephone +55 (11) 99931-0915 or the E-mail to report a violation: canaldaetica@green4t.com.

4.18. DISCLOSURE / ADVERTISING

All Employees and Managers will receive a copy of this Code, and must formalize this receipt and adherence to its content.

5. REFERENCE DOCUMENTS

IN.

6. RECORDS CONTROL

IN.

7. REVISION HISTORY

Revision	Date	Description of the change	Manager Approved	Approved by Senior Management
00	17/10/2019	Unification of green4t company policies	Eduardo Marini	Vaner Silva
01	03/12/2020	Politics was separated. New sequential numbering.	Vaner Silva	Vaner Silva
02	03/12/2020	Email deletion in 4.17.	Eduardo Rasi	Vaner Silva
03	06/02/2025	Changed contact telephone number in item 4.17.	Priscilla Bragança	Eduardo Marini