



Code of Ethics and Conduct



Dear coworkers,

Correias Mercurio is a company specialized in solutions for conveyor belts, operating with experience in different markets since 1945. Over the years, we have consolidated ourselves as the largest manufacturer of conveyor belts in Latin America and the absolute sectorial leader in Brazil. In our DNA, we carry the mission and commitment to transport riches to build, transform and feed the planet. With two plants in Brazil, in the States of São Paulo and Pará, as well as Distribution Center in the countryside of São Paulo and international offices in Chile, Peru and Mexico, we operate with a global presence in more than 40 segments and in the largest companies and groups such as Mining, Steel, Agribusiness, Logistics, Ports, Construction, among others. We offer a complete portfolio of conveyor belt solutions, from the most common to the most complex and modern, developed exclusively for each client. Our technical and commercial teams are highly specialized and have the experience and know-how found only in those who have worked with absolute seriousness since its foundation.

We are committed to what we do and how we do it, as we want to demonstrate to our customers and other interested parties that our products and solutions are made in the most responsible way possible, with respect for human and labor rights, and in compliance with applicable laws and standards.

When it comes to conducting business with responsibility, stakeholders expectations are constantly evolving. This Code of Ethics and Conduct ensures that we are aligned with the process of growth and portfolio diversity that Mercurio seeks for the future, which draws near.

This Code of Ethics and Conduct is based on our values:

- Act with respect and integrity
- Exceed customer expectations
- Value people and cultural diversity
- Quality and reliability are non-negotiable
- Respect for the environment and life

The principles and standards set out in this Code reflect what we consider to be a responsible business conduct. The Code of Ethics and Conduct is designed to help you make the right decisions for yourself and for Mercurio.

We hope that everyone reads and understands this Code of Ethics and Conduct, thus ensuring that its standards are complied with, as only in this way will we continue to be recognized as the trustworthy company we are.

Acting responsibly, always with integrity, and being a good corporate citizen is not just the right way to act: it is the Mercurio way of being!

Welcome to Mercurio's new Code of Ethics and Conduct!

Board of Directors | Executive Committee



Mercurio



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Words that will be found in this document

Antitrust: These are legal measures to prevent practices that limit competition in the market, such as monopolies and agreements between companies to fix prices, thus promoting a competitive environment that benefits consumers.

Harassment: Exposure of workers to embarrassing, long-lasting or repetitive situations during work; harming the well-being and productivity of those involved.

Help Chain: The Help Chain is a structure made up of leaders to support employees in matters of non-compliance with this Code of Ethics and Conduct. The following are members of the Help Chain:

- Manager above the immediate leader (next level);
- Human Resources;
- Legal;
- Health and Safety;
- Board of Directors.

Compliance: Action of complying with a rule, procedure, regulation, etc., to ensure that the company operates in a legal, ethical and responsible manner.

Conduct: Ethical, professional and responsible behavior of employees, following standards established by the company to ensure a healthy work environment and compliance with laws and regulations.

Compliance: Refers to the moral and behavioral principles and standards that guide the actions and decisions of employees and the company, promoting integrity, responsibility, transparency and respect in all commercial activities and relationships with business partners.

Diligence: The practice of carrying out careful investigations and analyses before making decisions or doing business. This involves research, verification of information and risk assessment to ensure actions are taken responsibly.

Ethics: Moral principles and standards that guide the behavior and decisions of employees and the company, aiming to act fairly, responsibly and transparently in all commercial activities and relationships with interested parties.

Honesty: Characteristic of an honest person, acting with transparency and integrity in all activities and interactions, being truthful and honest in relation to information, business and commercial relationships.

Integrity: Practice of adhering to ethical principles, including honesty, transparency and responsibility, promoting trust and respect among all parties involved.

Retaliation: Retaliation is the act of inhibiting someone from speaking out or taking action against someone who has made a complaint.

1| How to interpret and follow the Code of Conduct

This Code of Ethics and Conduct was created based on Mercurio's values, together with the company's policies and procedures and applicable laws and regulations, forming the basis of what we consider responsible conduct.

1.1 Our commitment to compliance and integrity

The Code of Ethics and Conduct reflects our continued commitment to applying ethical and compliance business practices throughout the organization, wherever it operates and conducts business on behalf of Mercurio. The Code of Ethics and Conduct creates a foundation to support our efforts to do the right thing and always act with integrity and is designed to help you make the right decisions, on yours and Mercurio's behalf. As an employee, you must follow the standards of the Code of Conduct and always try to exercise judgment, care, and consideration in everything you do on behalf of the company.

This version of the Code of Ethics and Conduct supersedes all previous versions and is approved by the Board of Directors and Executive Committee.

Application of the Code of Ethics and Conduct

As a serious company with a reputation to uphold, we must act in accordance with the laws and regulations of the countries in which we are present.

The Code of Ethics and Conduct is applied, regardless of the plant, to all Mercurio employees, as well as all temporary staff, third parties, interns, apprentices, consultants and others who act on behalf of Mercurio, including members of the Board of Directors and Executive Committee.

1.2 Our responsibility

All employees must contribute to the culture of ethics at Mercurio, understanding the Code of Ethics and Conduct, taking upon themselves the company's commitment to compliance and integrity, avoiding any violations. Therefore, we must avoid acting or encouraging third parties to act in a way that opposes the content described in this Code, even when such deviations, due to circumstances, may appear to be in accordance with the company's interests.

Responsibilities of the employee

As a Mercurio employee, you are expected to conduct all activities with integrity and transparency, demonstrating a commitment to the highest ethical standards in all interactions with customers, business partners and other interested parties. Therefore, each employee has the responsibility to:

- Always act in accordance with the Code of Ethics and Conduct, other regulatory documents, work rules, applicable laws and standards.
- Avoid any activity that may appear unethical or illegal.
- Promptly question and seek guidance when in doubt about the meaning of any aspect of the Code of Ethics and Conduct or when a question of an ethical nature arises.
- Report promptly when there is a suspicion of violation of the Code of Ethics and Conduct, other regulatory document, work rules, laws or regulations via the Help Chain or Reporting Channel.

- Cooperate fully and correctly in internal company investigations.
- Never retaliate against anyone who, in good faith, raises any issue of conduct.
- Participate in Compliance training, also known as Ethics and Conduct, when requested.

Responsibility of all Mercurio Leadership

Our leaders are accountable for their activities and have complementary responsibilities to ensure that activities in their respective work area are:

- Carried out in accordance with the Code of Ethics and Conduct, other regulatory documents, applicable laws and standards.
- Lead by example and be a positive force to inspire employees to follow the Code of Ethics and Conduct and conduct their activities within the company with honesty, transparency and integrity.
- Openly discuss the rules of the Code of Ethics and Conduct with your teams to ensure that everyone understands and can therefore meet the standards established therein.
- Reinforce the importance of ethics and compliance.
- Create a workplace culture of trust, ethics and that encourages compliance, in which employees can feel comfortable expressing their concerns and receiving the necessary support and guidance, in an environment where retaliation is not permitted.
- Promptly address employee concerns about possible violations and promptly take them to the Help Chain.
- Recognize employees who embrace and promote compliance and ethical behavior.

Certifications

All employees must periodically confirm that they have read and understood the content of Mercurio's Code of Ethics and Conduct, committing to comply with the established standards and agreeing to report any violation through the Help Chain or Reporting Channel (see page 18).

1.3 Guidance, communication of concerns and information about possible violations

Mercurio is committed to creating a culture of trust and safety, in which employees feel comfortable asking questions, seeking guidance, communicating concerns and reporting possible violations. Questions and concerns should be received with due seriousness and Mercurio encourages everyone to act in good faith. In the case of a report made, providing concrete information will help us to provide more appropriate follow-up to the case.

We all have a responsibility to speak out immediately when faced with ethical problems or possible violations. Generally, the employee discusses his concerns and directs his/her complaints to his/her immediate superior. However, if, for any reason, the employee does not feel comfortable reporting them to their immediate manager, or if they believe that the manager did not adequately address a particular issue, the employee may take the matter to the Help Chain, as below, or via the Reporting Channel.

- Manager above the immediate leader (next level);
- Human Resources;
- Legal;
- Health and Safety;
- Board of Directors.

Mercurio's Reporting Channel can be used if the employee does not feel comfortable using the options above. Employee concerns can be communicated to the Reporting Channel and the procedure for accessing the channel is described in the final chapter of this code.

Zero tolerance to retaliation

Mercurio will not tolerate retaliation against anyone who speaks out in good faith to ask about something, raise a question, report a possible violation or participate in an internal investigation within the company.

Acting in good faith means you sincerely believe there is a legitimate problem. Retaliation is the act of inhibiting someone from speaking out or taking action against someone who has made a report.

It is considered a violation of the Code of Ethics and Conduct to retaliate against someone who has made a report. On the other hand, malicious and intentionally false information will not be tolerated. Any person who knowingly participates in an act of retaliation or who knowingly makes a false report may be subject to disciplinary measures, including dismissal. If retaliation is suspected in your workplace, it must be reported immediately through the reporting channel or any of the other Help Chain options.

Making ethical decisions

We expect employees to be well informed and to use common sense when making business decisions on behalf of Mercurio. Therefore, when faced with an ethical question, ask yourself the following questions:

- Is my performance within the law?
- Is my performance consistent with Mercurio's Code of Ethics and Conduct and other standards?
- Do I have enough information to make a good decision? If not, have I sought guidance using available resources?
- Would I be comfortable having to justify my attitude to my peers, my manager, my family and friends? ■ Would my attitude have a positive impact on Mercurio's reputation?

If you cannot answer "yes" to all the questions above, or if you are unsure, do not act or make a decision without first receiving guidance to help you make the right decision.

1.4 Violation and accountability

Employees are not allowed to act illegally or unethically, even when it may appear to be for the good of the company, or even if a superior or any other employee directs them to do so.

Violations of the law may be reported to the appropriate Government authorities.

Violations of Mercurio's Code of Ethics and Conduct will not be tolerated. All violations may have serious consequences for the employee and for Mercurio, such as disciplinary measures, including termination of employment contract, criminal lawsuit, high fines, penalties and damage to reputation. Violations may put our relationships with customers, colleagues, regulators and business partners at risk and may result in the loss of our ability to do business.

Handling exceptions

Any request for non-compliance with the terms of the Code of Conduct must be assessed by the Mercurio's Chief Executive Officer and the Board of Directors, in accordance with our values and governance, except in cases related to the Chief Executive Officer him/herself and members of the Executive Committee, who must be examined by the Board of Directors.

“ All employees must contribute to the culture of ethics at Mercurio, understanding Mercurio's Code of Ethics and Conduct, taking upon themselves the company's commitment to the right way of doing things and integrity, applying compliance criteria and avoiding violations. ”



2| Our workplace

This section deals, in particular, with Mercurio as a workplace and its responsibility towards all its employees and the communities in which it operates, as we create and maintain relationships of trust with our colleagues, customers, business partners and local communities where we operate, working responsibly and safely, acting with integrity, treating people with respect and honoring our commitments.

2.1 Human rights and worker rights

Mercurio is committed to respecting and fostering human rights of all people who may be affected by its activities. We respect the fundamental principles enshrined in the UN's Universal Declaration of Human Rights and relevant documents.

Mercurio supports and respects internationally recognized labor rights in the countries in which it operates, including freedom of association and the right to collective bargaining in accordance with national laws and standards. Mercurio repudiates all types of human trafficking and child labor, in addition to not hiring forced or compulsory labor.

2.2 Working conditions, equal opportunities and respect

Diversity and inclusive workplace

A work culture based on diversity and inclusion promotes higher levels of innovation, learning, customer understanding and leaders with intercultural sensitivity, as well as contributing to compliance. Therefore, we bring together employees with a rich variety of profiles, skills, genders and cultures; we recognize and appreciate the fact that each person is unique and valuable and should be respected for their abilities and points of view. Treatment based on respect

In our relationships with each other, we seek to act with openness, honesty and respect. Therefore, it is everyone's responsibility to contribute to a work environment based on trust, transparency, mutual respect and that everyone feels supported.

Harassment-free workplace

Mercurio does not tolerate any type of harassment or bullying in its workplace, as everyone has the right to work in an environment free from intimidation and harassment where they can feel comfortable and safe.

In the workplace, harassment can take different forms and be felt differently by people: it can be physical, verbal, sexual or of another nature. We do not tolerate any form of harassment or discrimination, including cases related to gender, race, color, religion and political beliefs, union affiliations, ethnic origin, disability, sexual orientation or marital status, but not limited to these cases. We also do not tolerate any form of physical punishment.

Fostering equal opportunities

Mercurio is committed to offering equal employment opportunities and treating all employees fairly and with respect, ensuring the professional development of its employees. Leaders must only use merit, qualifications, and other professional criteria to make decisions related to employees, such as in cases of recruitment, training, remuneration and promotion. We seek to develop programs and actions that encourage a diverse organization based on the principle of equal opportunities. Furthermore, Mercurio is committed to adopting the principles of non-discrimination.

2.3 Health, Safety, Security and Environment

SAFETY first

We recognize the value of human life above all other considerations and do not compromise our safety. We are committed to providing a safe workplace for all employees, contractors and visitors.

SAFETY by choice, not by chance

Mercurio believes in excellence in Health and Safety, guaranteed by creating a solid and sustainable safety culture, through visible leadership from all our managers, consistent execution of Mercurio's safety standards and procedures and a strong focus on risk prevention (personal and material damage), continuous engagement of the workforce and an honest sense of responsibility for the work environment.

We believe that all accidents, occupational illnesses, and environmental incidents can be avoided.

Mercurio is committed to protecting its employees, its business, and its assets against intentional acts through a culture characterized by the broad support of our employees, learning and continuous improvement.

We are committed to carrying out our activities taking care of life, people's health and the environment. This is achieved by complying with laws and requirements necessary to reduce impacts and risks, protect natural resources, prevent pollution and respect the needs of everyone.

We are committed to promoting innovation and introducing continuous improvement activities, so that our activities and products produce little or no impact on the environment.

Our SAFETY responsibility

It is everyone's responsibility to comply with Safety standards and demonstrate our commitment to zero accidents using PPE. Employees are expected to perform their duties in a safe manner in accordance with applicable requirements. The employee has the right to refuse to perform work in situations that present safety or behavioral failures. The employee has the responsibility to draw the attention of those at risk and report the incident to management, Occupational Health and Safety team or local Human Resources Management. The employee must immediately report any accident or incident that may occur at work that could cause injury or

damage. All Mercurio's employees are responsible for complying with Safety policies and procedures based on our Golden Rules.

2.4 Quality

Our success depends on operational excellence in all our activities.

Quality is stability in production processes, consistency of products, attention to detail, exemplary finishing, willingness to improve and deliver on time to our customers. It is based on these principles that we communicate our commitment and mission to systematically meet agreed specifications and technical criteria of our valued customers.

“Mercurio does not tolerate any type of harassment or bullying in its workplace. Everyone has the right to work in an environment free from intimidation harassment and where they can feel comfortable and safe.”



3| Our business conduct

Our policy is to act in accordance with the laws and regulations in force in the regions where we operate and where we interact with a variety of interested parties, including customers, competitors, suppliers, business partners, representatives, authorities, and local communities. We are committed to interacting ethically and legally with all these groups, always demonstrating integrity in everything we do.

3.1 Fighting corruption and bribery

Mercurio does not tolerate corruption, whether in the private or public sector, and is committed to complying with all laws and regulations in force to fight corruption and bribery.

We prohibit payments of bribes and kickbacks of any nature, whether in dealing with public authorities or people in the private sector. When obtaining or maintaining a business or other advantage in carrying out business the following are strictly forbidden: offer, promise or concession of any object of value or the granting of an undue advantage, whether in the public or private sector, with the aim of influencing such person acting or failing to act within the scope of their duties. This rule applies in all cases, whether the advantage is offered directly or indirectly.

The employee may not, in the exercise of his/her duties at Mercurio or on its behalf, request, accept or receive any undue advantage that may influence his/her decisions.

Non-compliance with topic 3.1 will be treated as a serious violation and will be subject to disciplinary action. However, you should be relieved from possible sanctions from Mercurio or any company representative for refusing to participate in an action that is or could be perceived as corruption, bribery or facilitation payments.

3.2 Working with business partners

Mercurio's success depends on cooperation with our partners, whether suppliers, customers, contractors, agents, distributors, consultants, strategic partners, and others. We expect our business partners to comply with all current laws and regulations. Suppliers with which Mercurio maintains a direct contractual relationship must

observe the principles and act in accordance with business ethics and anti-corruption measures, as well as in accordance with human rights, working conditions and sustainability. Failure to comply with these criteria may result in termination of the business relationship.

We conduct risk-based integrity due diligence processes to ensure that the reputation, track record and skills of our business partners meet our criteria.

We must, therefore, be cautious when entering into agreements with business partners - suppliers, agents, distributors and dealers - who act on behalf of Mercurio, since Mercurio itself may be held responsible for their actions. For the same reason, we must be vigilant in controlling and supervising such intermediaries throughout their period of engagement. They must follow current laws and regulations and are expected to observe Mercurio's Code of Ethics and Conduct. It is our responsibility to ensure that business partners are aware of our Code of Ethics and Conduct and its standards.

3.3 Facilitation and extortion payments

Facilitation payments, also known as "grease payment", are prohibited and Mercurio employees must never take the initiative or encourage facilitation payments on behalf of the company, public or private sector, whether these payments are made directly or indirectly, through a business partner. If this payment is legally permitted in countries where we operate, the Legal and Human Resources areas must be consulted.

Extortion payments, on the other hand, are those made in the face of imminent threats to the life, safety or health of our personnel or, even, to the integrity of our facilities. Even though these

payments may be of low value or in extreme situations, they should not be made. If any extortion payment is required, it is important that you immediately notify your direct superior or the Human Resources department, or even formalize a report through the Reporting Channel, ensuring that you properly document and record the transaction.

3.4 Gifts, souvenirs and hospitality

We must always adopt common sense, moderation and consider Mercurio's reputation and integrity as the ultimate criteria when we give or accept gifts or signs of hospitality in a business context. We do not offer or accept gifts or other business courtesies such as tokens of hospitality, payment of expenses or other benefits that may influence, or appear to influence, business decisions, our independence and integrity.

It will only be permitted to accept or offer gifts and business courtesies when they are of modest value and infrequently if the place and time are appropriate. Only "institutional" gifts of low value, with the logo or identification of the granting company, should be accepted. The practices of giving and receiving gifts and business courtesies may vary by culture; however, any gift or hospitality offered or received must be in accordance with current laws and with the beneficiary's compliance rules, in addition to being consistent with locally accepted good business practices.

The offering of gifts or entertainment to public servants is limited by law. However, as the legal definition of a public servant can be broadly interpreted and include employees of local authorities and government bodies, great care must be exercised when business courtesies involve such public servants.

Some countries have laws that restrict gifts and hospitality offered to public servants and many government entities also have rules that prohibit their representatives from accepting gifts and hospitality. However, guidance should always be sought from Human Resources or Legal when issues involving gifts and signs of hospitality involve government officials.

Your responsibility is to familiarize yourself with Mercurio's guidelines on gifts, giveaways and hospitality that must be handled in your area of activity.

Consult your manager if you have any questions.

3.5 Philanthropic donations, sponsorships and community investments

Mercurio has included Social Responsibility among its Strategic Pillars and our goal is to make a positive impact on the social and economic development of local communities through our operations, commercial relationships, philanthropic donations and sponsorships.

Philanthropic giving is one-off and consists of occasional support for good causes, in response to the needs and requests of charitable and community organizations, employee requests, or support for external events, including emergency situations.

Sponsorship is a business activity carried out in the community to directly support the company's success, promoting its brand, corporate identity and policies, in partnership with charities and organizations with a community profile. These investments can be aimed at promoting local training, supporting economic development and community sustainability, in addition to promoting human rights, transparency and fighting corruption.

There is a risk associated with philanthropic donations, sponsorships and community investments that may raise allegations of bribery. Such activities, however, are illegal when used to cover up bribery. These can be substantiated and must aim to benefit society and Mercurio. They must also always be carried out in a transparent manner, based on objective criteria, and must be duly recorded, documented, reported and aligned with Mercurio's policies and strategies in the context of community investments, philanthropic donations and sponsorship. The Human Resources area is the ultimate guardian of Social Responsibility and should always be consulted in case of doubts about this topic.

3.6 Political contributions and activities

Financial or other contributions to political parties, their employees or candidates for public office must never be made in the name of Mercurio. However, this does not prevent Mercurio from supporting, through commercial associations, political positions that reflect the company's interests, or prohibit Mercurio employees from participating in political activities as citizens. Still, it must be clear that the positioning of employees does not represent the political position of the company, as an institution.

3.7 Fair competition

We believe in free, fair and open competition. Our policy is to compete in accordance with current laws and business ethics. Therefore, we observe current antitrust and competition laws and treat our competitors based on honesty and impartiality. We seek competitive advantages by offering differentiated products and services, obtained from innovation, research, development, qualification, and not based on unethical and illegal commercial practices. Therefore:

- We do not enter into anti-competitive agreements with competitors, including price fixing, market sharing or bid rigging;
- We do not exchange commercially sensitive information with competitors. It is particularly important to be careful at conferences, industrial fairs, meetings of business associations, or in personal and business relationships where competitors are involved;
- We do not impose illegal restrictions on customers or suppliers;
- We do not abuse any position of power in the market.

3.8 Obtaining information about the competition

Knowing and understanding the competition are important aspects of any business and constitute a vital element for the proper functioning of any competitive market. However, any information about competition must be collected and used in accordance with current laws and good practices (see point 3.7). The information we have about

competitors is collected exclusively from legitimate sources and should never be collected illegally or unethically. When collecting competitive data, you should always keep a record of the information.

3.9 Data protection and privacy

Mercurio observes and follows the rules for processing information and personal data in line with the General Personal Data Protection Act (LGPD), including protection, processing and transfer of personal data of employees and third parties, which apply to the entire company. Therefore, everyone at Mercurio is bound by these rules.

Personal data processed by Mercurio must always be adequately protected and in accordance with current laws and standards regarding the processing of personal data, including with regard to confidentiality criteria and obligations, regardless of whether the information refers to customers, employees or others.

The processing of personal data must be limited to what is necessary for the commercial purposes in question, meeting customer needs or the adequate administration of employees, always in accordance with the current principles for data protection and as prescribed by law.

3.10 Accuracy and integrity of data, records, reports and accounting

Mercurio is committed to the transparency and accuracy of the company's actions, respecting confidentiality and other obligations in force. The company is committed to publishing data in an impartial, clear and understandable manner in its periodic financial reports and other documents required by authorities and agencies, as well as in its other public communications.

To this end, the highest level of precaution must be adopted in the formulation of such materials, with special attention to:

- Compliance with widely accepted accounting principles and Mercurio's internal control structure, with our figures being audited annually

by independent auditors, by an internationally recognized company.

- All Mercurio's accounting records must be maintained and presented in accordance with current laws in each jurisdiction in question, and must not contain false, intentionally incorrect or artificial items. Furthermore, they must accurately and fairly reflect Mercurio's assets, liabilities, income and expenses, in addition to all related transactions or occurrences, which must be fully and exhaustively documented.

- No transaction should be intentionally misclassified into accounts, departments, or periods; and there must be no unrecorded or "off-the-record" assets and liabilities, unless permitted by applicable laws and regulations.

- No information should be hidden from internal or external auditors.

The above also applies to requirements for extra-financial reporting, both internally at Mercurio and for other legal requirements in your jurisdiction, including information from the areas of Health, Safety and Environment, Human Resources or Corporate Governance.

3.11 Commercial compliance and anti-money laundering

Mercurio is committed to observing all national and international commercial restrictions and applicable sanctions and regulations in the countries in which it operates.

Trade restrictions are related to the export or import of goods, technology, software, services or trade with countries, entities or people. Mercurio will not do business with people and organizations that are associated with drugs, trafficking, terrorism or other criminal activities.

Money laundering promotes criminal activity and consists of converting the proceeds of crime into legitimate currency or other assets.

Mercurio is committed to taking the necessary steps to prevent and detect any form of illegal payment and to prevent the company from being used by third parties for money laundering.

You must seek guidance from your direct manager or formalize a report through the Reporting Channel in all cases related to commercial compliance and money laundering prevention measures.

3.12 Intellectual Property

We observe the laws and regulations in force regarding the rights and protection of the intellectual property owned by Mercurio and third parties, including patents, trademarks, copyrights and commercial secrecy.

3.13 External communication

Mercurio's reputation in the markets in which it operates is strongly influenced by its ability to communicate consistently and professionally with external agents, including the media. Mercurio's Marketing area must be consulted whenever requests of this nature arise. If these requests arrive through external lawyers or public bodies, they must be forwarded to the Legal department. Therefore, Mercurio must observe the principle of honesty and be receptive when dealing with interested parties outside of Mercurio and with society in general.

In order to ensure a coherent business profile, only the following people are authorized to speak to the media on behalf of Mercurio, without prior consultation with the Marketing area, responsible for the company's External Communication:

- Marketing area manager;
- CEO of Mercurio;
- Factory manager or people designated by them to speak about their areas of responsibility to local media outlets;
- Chairman of the Board.

3.13.1 Confidentiality of information, activities and posture on Social Networks on the Internet and External Communication

Personal profiles and accounts on social networks, such as LinkedIn, Facebook, X, Instagram, TikTok, among others, not limited to these, have an individual and personal nature, and the user is responsible for managing them.

Therefore, Mercurio employees can have profiles on social networks and platforms, paying attention to the fact that every Mercurio employee must protect confidential and internal strategic information linked to the company, as well as documents, projects, inventions, systems and processes to which they have access, not disclosing them under any circumstances on social networks or any other platforms.

Confidential information is information of any nature related to Mercurio or its business and activities, including information and documents of a strategic, technical, operational, financial, administrative, patrimonial, legal, accounting, commercial nature, computer programs, systems documentation and source code, provided, before or after the signing of an Employment Contract.

That said, the activity and behavior of Mercurio employees on Social Networks or any other means of communication must observe and comply with the "Statement of Responsibility: Guide to Conduct on Social Networks", document that is made available and signed by the employee in the hiring documentation.

Any questions about this topic or other topics related to Mercurio's External Communication should be addressed to the company's Marketing area.



“Mercurio must observe the principle of honesty and be receptive when dealing with interested parties outside of Mercurio and with society in general.”

4| Our personal conduct

Our success depends on each of us doing what is right. Therefore, the conduct of business and our conduct in general are expected to be based on interpersonal respect, with customers, suppliers, business partners and others. Such conduct includes having sensitivity and respect for cultural differences and traditions.

4.1 Conflicts of interest

A conflict of interest occurs whenever there is a competing personal interest that may interfere with the ability to make objective decisions and act in the best interests of Mercurio.

It is not permitted to seek or obtain an undue advantage over Mercurio - directly or indirectly - for oneself, family, relatives or friends. The employee is not permitted to take part in or seek to influence any decision that may generate or be perceived as a conflict of interest, arising from a situation in which the employee, or someone close to him/her, may have an economic or other interest in the outcome of such a decision.

The employee must avoid having any personal participation, direct or indirect, in any business or undertaking, if this compromises or could be interpreted as compromising his/her duties at Mercurio. If the employee is in such a situation, they must immediately inform their manager. Everyone must use common sense to avoid situations that could generate conflict or undermine the trust that others place in us.

Mercurio trusts its employees to maintain the highest standards of integrity and to seek guidance when necessary.

Before undertaking any activity that could be perceived as promoting the interests of a competitor, client or supplier by exposing Mercurio's image, the employee must consult and obtain approval from their immediate manager, the Help Chain or the Reporting Channel. There are several ways to resolve a conflict of interest, the most important thing is to be transparent and speak openly to ensure the matter is handled appropriately.

4.2 Use of company properties and assets

It is the responsibility of all Mercurio employees and their representatives to care for the assets, properties and records of Mercurio and its customers, suppliers and other business partners. The company's tangible assets include physical equipment and facilities, computer systems, computers, mobile phones, files, documents, inventory, materials and properties. Its intangible assets are patents, trademarks, copyrights, intellectual properties, technical knowledge, confidential information, reputation and brand equity.

We all have a responsibility to use Mercurio's assets with caution, as well as to use common sense to ensure that they are managed and protected appropriately and that they are not stolen, misused or wasted. The use of materials, financial and non-financial assets, removal or lending of company assets for purposes that are not directly related to the company's activity is prohibited without the prior authorization of an authorized representative.

Information about Mercurio's business may only be stored on computers, mobile devices, systems and tools approved or managed by the company, which are the property of the company and must only be used by Mercurio's employees or contractors.

4.3 Substance abuse and personal conduct

Mercurio is a drug-free workplace, and employees are not permitted, under any circumstances, to be under the influence of toxic substances, including alcohol, while working at the company. The employee must refrain from using or encouraging others to use toxic substances that may have a negative impact on

the reputation of Mercurio or any of its business partners.

Mercurio strictly prohibits the purchase of sexual services when on missions or business trips. Furthermore, the employee must not visit establishments or participate in activities that may place Mercurio in an unfavorable situation.

4.4 Confidentiality

We are committed to protecting and not misusing any and all confidential information in our possession, regardless of whether the information belongs to Mercurio or its business partners. Confidential information may include intellectual property, information relating to people, commercial conditions, technical or contractual matters and other types of information protected by law.

Please note that the employee's responsibility for confidentiality continues even after the employment contract or contractual relationship with Mercurio has ended.

Any Mercurio business information that is not general knowledge or work experience acquired by the employee during their work at the company must be considered confidential and treated as such.

The employee is responsible for protecting the confidential information he holds and, to this end, must:

- Use confidential information only when authorized and only for legitimate business purposes;
- Do not share confidential information from Mercurio or its business partners with friends, family members or former Mercurio colleagues;
- Do not discuss or share confidential information in public places where third parties can overhear it;
- Do not work with documents containing confidential information (on paper or in electronic format) in public spaces or on unsecured networks, where third parties can see them;
- Ensure confidentiality agreements are used when necessary;

- Only store confidential information in areas with encryption and access control, granting access only if necessary for the business, such as in the case of specific tasks related to it;

- Identify documents as "confidential" whenever appropriate.

4.5 Privileged information

Privileged information is all information that is not in the public domain, received or obtained through your work at Mercurio or in any other way that, if in the public domain, could influence the company's financial instruments. The employee must refrain from making transactions or offering guidance regarding transactions in financial instruments based on privileged information, whether the employee is formally registered as a person holding privileged information or not. Privileged information must be treated as confidential and with due caution to prevent unauthorized persons from gaining access to it.



Reporting Channel

One more communication tool.

Reporting Channel

Questions about the contents described here or its understanding must be formally forwarded to your superior and/or Human Resources area.



Situations of non-compliance with this code must be reported on our Reporting Channel website, through the link below:

www.canalintegro.com.br/correiasmercurio

It is also possible to access the Reporting Channel via phone number: 0800 580 3218. The reception of facts will be conducted by an independent company, in an impartial and impersonal manner.

Code Awareness

I hereby declare that I am aware, have read and understood the content of this Code of Ethics and Conduct, which details Mercurio's values and management policies.

I understand that I have a commitment to the company to communicate any concerns, inappropriate conduct or suspicion that are not in accordance with the laws, values, policies or the company's Code of Ethics and Conduct, reporting them to my immediate manager, HR or through the Reporting Channel mentioned above.

I am aware of my responsibility to comply with and communicate actions or facts contrary to the guidelines stated here.

NAME: _____

RECORD: _____ DATE: ____ / ____ / ____

SIGNATURE: _____



Code of Ethics and Conduct
April 2024