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INTRODUCTION

PONSI considers Business Ethics to be a fundamental and primary principle.

Every person, regardless of their role within the Company, must commit to ensuring that this value serves as the guiding principle for their conduct and decisions.

The rule is that, inspired by positive moral principles, everyone shall operate in accordance with the fundamental principles of:

- fairness,
- loyalty,
- reliability,
- honesty.

PONSI considers these values to be intangible assets of its own heritage and understands that strict compliance with them constitutes not only a positive moral commitment, but also an essential condition for the continuity and sustainable development of the Company.

To this end, PONSI maintains a Code of Ethics and Conduct which, in accordance with the principles of loyalty and honesty, establishes rules of conduct and general principles to guide the Company's activities.

SCOPE OF APPLICATION OF THE CODE OF ETHICS

PONSI understands that the Code of Ethics must be observed by Management, all Employees and Third Parties acting on behalf of or for the benefit of PONSI, to the extent applicable to their activities.

Appropriate information, prevention and control instruments, and monitoring mechanisms must be established to promote transparency in operations and conduct, with corrective measures being taken whenever necessary.

The functions of monitoring and verifying the implementation of the Code are assigned to PONSI Management, including the Audit Body, where applicable.

PONSI's Code of Ethics must be known by all those with whom PONSI maintains relevant relationships.

The Code must be used as a reference for procedures, policies, guidelines and contractual relationships adopted by the Company.

Each employee and collaborator must inform customers, suppliers and other parties with whom they interact, when relevant, of PONSI's adoption of the Code of Ethics.

Special care must be exercised by those responsible for the Areas, who must ensure the application of the principles set forth in the Code and maintain conduct that serves as an example to their employees.

PREMISES

Ethical conduct and unethical conduct. Strict compliance with:

- Laws,
- Regulations,
- mandatory provisions,
- applicable codes and standards,
- moral rules,
- fairness,
- ethical integrity,
- complete seriousness,

constitutes a continuous and uninterrupted commitment and an obligation for all those subject to PONSI's Terms and must characterize all their conduct.

Every business activity must be conducted within a framework of:

- transparency,
- honesty,
- fairness,
- good faith,
- compliance with the rules protecting competition and free enterprise.

PONSI undertakes to maintain and strengthen a governance system appropriate to the complexity of the circumstances in which it operates and oriented toward sustainable development, risk management and continuous improvement.

In conducting its activities, PONSI considers the principles of quality, compliance, prevention, social responsibility, environmental protection and corporate integrity, observing the applicable legal, contractual and technical requirements, including customer standards and requirements when relevant to the Company's activities.

In all its actions, PONSI is guided by the protection and promotion of human rights and by the principles of equality, respect, solidarity, sustainable development and environmental protection.

PONSI operates with reference to the United Nations Universal Declaration of Human Rights and the fundamental principles of the International Labour Organization (ILO), where applicable.

PONSI repudiates all forms of child labor, forced labor, slavery-like labor, human trafficking and sexual exploitation of children and adolescents, and undertakes to adopt measures to prevent, identify and mitigate such practices in its operations and supply chain.

PONSI recognizes and respects freedom of association, trade union freedom and the right to collective bargaining, in accordance with applicable legislation.

It is unethical to engage in any conduct that conflicts with the principles underlying this Code, even if the person acts in the belief that they are acting for the benefit and in the interest of PONSI.

The adoption of unethical conduct compromises the relationships between PONSI and its partners, employees and collaborators, as well as with institutional, business and financial stakeholders, both public and private. Corrupt practices, illegitimate favors, collusive conduct and requests, either directly or through third parties, for personal or professional advantages for oneself or others are prohibited without exception.

It is strictly prohibited to pay, offer, promise or authorize money or benefits of any kind to third parties, government representatives, public officials or private employees for the purpose of obtaining an undue advantage.

Any person who receives offers of gifts, preferential treatment or hospitality that may affect, or appear to affect, the impartiality of their decisions must reject them and inform their supervisor or use the channels established by PONSI.

Gifts, benefits and hospitality may only be accepted or offered when compatible with PONSI's internal rules, applicable legislation and legitimate business practices, and when they are not intended to influence a decision. Situations involving public officials must comply with even stricter requirements, where applicable.

The ethical principles set forth in this Code are significant for preventing violations and constitute an essential element of PONSI's preventive control system.

1. PRINCIPLES

a) Non-Discrimination

In decisions affecting relationships with its external and internal stakeholders, PONSI avoids any discrimination based on age, sex, sexual orientation, health condition, ethnic group, nationality, political opinions, religious beliefs or any other condition protected by applicable law.

b) Compliance with Rules

Within the scope of their professional activities, PONSI's Management, employees, officers and collaborators must carefully comply with applicable legislation, this Code of Ethics, Company procedures, internal regulations and, where applicable, professional rules. Under no circumstances may the pursuit of the Company's interests justify conduct that violates such rules.

c) Conflicts of Interest

In carrying out any activity in the Company's interest, situations in which the people involved have a conflict of interest must be avoided, disclosed and promptly resolved

A conflict of interest exists when an employee, collaborator or officer has a personal, family, financial or professional interest that may interfere, or appear to interfere, with decision-making on behalf of PONSI, or when they obtain or attempt to obtain a personal advantage as a result of an activity carried out in the Company's interest.

Violation of these principles may subject the person responsible to the measures provided for in this Code and under applicable law.

d) Confidentiality

PONSI ensures the confidentiality of the information in its possession and prevents unauthorized access, use or disclosure of confidential data, except where expressly authorized and in compliance with applicable legislation.

The Company's employees, officers and collaborators must maintain the utmost confidentiality, including outside working hours, in order to protect technical, financial, legal, administrative, commercial and personnel-management knowledge and information.

All persons who, as a result of their management, control or service duties, become aware of confidential and relevant information must not misuse such information or privileges.

e) Value of Human Resources

PONSI's employees and collaborators are an indispensable factor in the Company's existence and success. The dedication and professionalism of Management, employees and collaborators are key values and conditions for pursuing PONSI's objectives.

For this reason, PONSI protects:

- the value of human resources, with the aim of improving and expanding the experience and knowledge base of every employee and collaborator;
- working conditions, protecting the physical and moral integrity of every worker and respecting their dignity.

Maintaining a peaceful and stimulating work environment that respects everyone's needs is one of PONSI's fundamental principles, as is promoting personal and professional growth and opportunities based on skills, professionalism and merit.

PONSI undertakes to develop the capabilities and skills of Management, employees and collaborators so that everyone's creativity, responsibility and energy have room to contribute to the Company's objectives.

PONSI promotes initiatives designed to disseminate knowledge and a culture of integrity throughout its organization.

PONSI ensures an appropriate training and awareness program regarding matters related to the Code of Ethics and Conduct, including, where relevant, integrity, quality, safety, environment, privacy and relationships with third parties.

PONSI also undertakes, in compliance with applicable legislation, to provide all workers with equal employment opportunities so that everyone may receive fair treatment in terms of employment conditions and compensation, based on merit, competence and job requirements, without discrimination.

Any conduct constituting physical or psychological violence, harassment or retaliation is always prohibited, without exception.

f) Fairness in Employee Relations

PONSI ensures that, in hierarchical relationships with employees, there are no situations in which the exercise of authority is detrimental to the employee's dignity and professionalism. The Company makes its organizational decisions while protecting the professional value of its employees.

g) Personal Integrity

PONSI undertakes to protect the physical and moral integrity of its employees and collaborators, ensuring working conditions that respect individual dignity and promoting safety and hygiene in the workplace.

2. ETHICS IN THE ACTIVITIES OF CORPORATE BODIES AND COMPANY ORGANIZATION

2.1. Activities of Corporate Bodies

The activities of PONSI's corporate bodies are characterized by full compliance with the rules set forth in the Articles of Association, applicable legislation, this Code and the responsibilities defined by the Company.

Those responsible for management must promote a culture of integrity, quality, safety, environmental responsibility and respect for people, ensuring that decisions are made and resources are used responsibly and traceably.

2.2. Audit Body

PONSI Management is responsible for verifying the uniform application of this Code of Ethics, as well as compliance by every employee, collaborator and all those who cooperate in pursuing the Company's objectives.

The Audit Body, or the function formally designated by PONSI, must serve as the reference point for monitoring compliance, identifying deviations and proposing improvement actions, while respecting the responsibilities defined in the Company's management system.

3. ETHICS IN RELATIONS WITH THIRD PARTIES

3.1. Public Authorities and Institutions

PONSI actively and fully cooperates with the Authorities, providing truthful, complete, accurate and traceable information whenever legally required.

All PONSI employees, as well as external collaborators whose actions may be attributable to PONSI, must act correctly, transparently and in a traceable manner in their dealings with Public Administration. It is strictly prohibited to make, induce or facilitate any false statements to an Authority.

3.2. Gifts and Benefits

In relationships with employees of Public Institutions, Public Officials and Representatives of Public Services, Company officers, auditors, employees and collaborators are strictly prohibited from giving, offering, promising or authorizing money or any undue benefit.

This prohibition applies both where the conduct is carried out exclusively in the interest of the person acting and where its purpose is to unlawfully provide any advantage to the Company.

Officers, auditors, employees and collaborators must not accept offers, services, gifts or benefits that may affect, or appear to affect, the actions to be taken in performing their duties. The above provisions may not be circumvented through the use of third parties.

3.3. Philanthropic Activities

Philanthropic activities are consistent with PONSI's vision and its commitment to sustainable development.

Accordingly, PONSI may promote or support nonprofit activities that demonstrate the Company's commitment to helping meet the needs of the Communities in which it operates and of which it forms part, provided that internal rules, integrity criteria, transparency and applicable legislation are observed.

3.4. Economic Relations with Political Organizations and Labor Unions

PONSI does not make direct or indirect contributions, in any form, to political parties, movements, committees, political organizations or candidates when prohibited by applicable legislation or the Company's internal rules.

PONSI refrains from taking any initiatives that may constitute, directly or indirectly, forms of unlawful pressure on political or labor representatives, political organizations or labor unions.

Nothing in this Code prevents the legitimate exercise of individual rights to political or trade union participation, provided that such participation is undertaken personally, without improper use of PONSI's resources, facilities, information or representation and in compliance with applicable legislation.

3.5. Relationships with Customers and Suppliers

PONSI pursues the Company's success in the markets by offering quality products under competitive conditions and in compliance with all regulations protecting fair competition.

When selecting its suppliers, in addition to economic benefits, PONSI considers the technical and financial capabilities of contractors, overall reliability, quality, compliance with applicable requirements and, where relevant, aspects related to integrity, human rights, health and safety, and environmental responsibility.

PONSI and its employees and collaborators undertake to establish in advance the procedures and measures necessary to ensure efficiency, impartiality, transparency and traceability in the procurement process, including proportionate third-party risk assessment.

3.6. Expenses During Customer Visits

In accordance with the principles of business ethics, it is expressly prohibited to offer customers any benefit during their visits to PONSI for the purpose of obtaining an undue advantage for the Company.

Gifts or hospitality that may compromise impartiality are not permitted. Entertainment and representation expenses must be legitimate, reasonable, previously authorized where applicable, properly recorded and compatible with PONSI's internal rules.

PONSI's procedures concerning representation expenses serve as an additional safeguard in managing expenses and costs, both during travel by PONSI personnel and during customer visits to PONSI.

3.7. Competition and Antitrust

PONSI and its collaborators must comply with the principles and rules of free competition and must not violate competition and antitrust legislation.

Participation in agreements, arrangements or practices whose purpose or effect is to improperly restrict competition is prohibited, including arrangements relating to prices, commercial terms, market or customer allocation, and improper exchange of competitively sensitive information.

4. ETHICS IN EMPLOYEE RELATIONS

4.1. Personnel Selection

The assessment of personnel to be hired is conducted, as indicated in the Company's specific regulations, according to the alignment of candidates' profiles with the Company's needs, ensuring equal opportunities for all interested parties.

The information requested is strictly related to verification of the aspects required by the professional profile and the legitimate needs of the position, while respecting privacy, data protection and applicable legislation.

The procurement of goods and services must be carried out with the objective of obtaining the greatest competitive advantage for PONSI, while also considering equal opportunities for suppliers and ensuring transparency and traceability in the selection process.

Within the limits of the information available and legally permitted, PONSI adopts appropriate measures to prevent any favoritism, nepotism or other forms of preferential treatment during the personnel selection and hiring process.

4.2. Establishment of the Employment Relationship

Personnel are hired under employment contracts in the forms established by law and the collective bargaining agreement in force. Any irregular employment arrangements are prohibited.

Before establishing the employment relationship, each employee receives appropriate information regarding the regulatory content, responsibilities and conditions of the relationship, so that acceptance of the position is based on an effective understanding of the role.

4.3. Personnel Management

PONSI avoids any form of discrimination against its employees.

Within personnel management processes, decisions are based on the alignment of employee profiles with the Company's needs, as well as on considerations of merit, competence, performance and job requirements.

4.4. Health and Safety and Environmental Protection

PONSI undertakes to protect the health and safety of its workers, particularly through preventive measures, in compliance with applicable legislation and the requirements applicable to its management system.

All PONSI personnel must actively contribute to maintaining a high standard of safety within the Company, avoiding unlawful conduct or actions that may be dangerous and reporting any violations, incidents, unsafe conditions or risk situations.

All PONSI personnel must contribute to promoting and maintaining a climate of mutual respect in the workplace.

Being under the influence of alcoholic beverages, drugs or substances with similar effects during working activities is incompatible with safety requirements and the responsible performance of activities. The possession, consumption, offering or distribution of drugs or substances with similar effects while performing work and in the workplace is prohibited, subject to applicable legislation.

Smoking is strictly prohibited in the workplace, subject to the areas and conditions established by legislation and internal rules.

4.5. Privacy Protection

Employee privacy is protected through the adoption of appropriate measures and safeguards for the processing and retention of information, in compliance with applicable legislation and internal rules.

Any processing of personal information without a legitimate purpose, legal basis or applicable authorization is prohibited. Access to personal data must occur only to the extent necessary for the performance of activities and responsibilities.

4.6. Personal Integrity and Protection

PONSI undertakes to protect the physical and moral integrity of employees and to ensure their right to working conditions that respect personal dignity.

For this reason, the Company protects workers against acts of psychological and physical violence and combats any oppressive attitude or behavior or any actions that may be detrimental to an individual, their beliefs or personal characteristics.

PONSI requires that, in internal and external working relationships, there be no conduct that may be characterized as bullying, psychological harassment or other forms of coercion, all of which are prohibited.

All forms of violence or sexual harassment, or any form of violence related to personal and cultural differences, are prohibited. Examples of such situations include:

- making any decision affecting the recipient's professional life conditional upon the acceptance of favors of a sexual nature;
- inducing collaborators to provide sexual favors through the influence of one's position;
- proposing private interpersonal relationships despite a clearly expressed lack of acceptance;
- making offensive references to physical or psychological disabilities or impairments, or to forms of cultural diversity, sexual orientation or religion.

5. ETHICS IN EMPLOYEE AND COLLABORATOR RELATIONS WITH THE COMPANY

In addition to the obligations and provisions established by applicable legislation and current individual and collective agreements, each employee and collaborator must avoid any conduct that may conflict with the Company's ethics, as identified in this Code, and that may negatively affect PONSI's reputation or legitimate interests.

PONSI seeks to reduce the environmental impacts of its activities by complying with applicable environmental legislation, preventing pollution, promoting the responsible use of resources, and encouraging the identification and reporting of environmental risks and incidents.

6. INFORMATION MANAGEMENT

PONSI's information is accessible only to authorized personnel and is protected against unauthorized disclosure, alteration, loss or misuse. Only persons expressly authorized by the Company may access internal information and must comply with the Company's Operating Instructions.

Records, documents and data must be complete, accurate, legible and traceable and must be retained for the period established by applicable requirements. Falsification, concealment, improper alteration or unauthorized destruction of records is prohibited, including quality, inspection, testing, certification, financial, environmental or safety records.

7. CONFLICT OF INTEREST

Each employee and collaborator must avoid any situation in which a conflict of interest may arise and must refrain from obtaining any personal benefit from a business opportunity of which they became aware while carrying out their activities.

Any actual, potential or apparent conflict must be promptly reported to management or through the channel established by PONSI for evaluation and the adoption of appropriate measures, such as recusal from the decision, replacement of the person responsible or another form of control.

8. METHODS FOR IMPLEMENTING THE CODE OF ETHICS

8.1. Dissemination and Communication of the Code of Ethics

PONSI undertakes to disseminate its Code of Ethics using the available means of communication and opportunities, such as Company information meetings, onboarding and training.

Employees, officers, auditors and collaborators must have access to the Code, understand its content and comply with its provisions.

In all cases, the Code must be available through the internal channels established by PONSI. Everyone, particularly Management and those responsible for the Areas, is responsible for including the content of the Code in training programs and referring to it in applicable procedures and policies.

8.2. Updating and Reviewing the Code of Ethics

Management may support the review and updating of the Code of Ethics whenever necessary, taking into consideration legislative changes, customer requirements, organizational changes, identified risks, audit results, incidents and opportunities for improvement.

8.3. Monitoring Compliance with the Code of Ethics

PONSI undertakes to promote an appropriate internal control system aimed at ensuring compliance with laws, the Code of Ethics and applicable policies and procedures.

The Audit Body, or the formally designated function, shall be responsible for monitoring compliance with the regulations set forth in this Code, while respecting the responsibilities established by PONSI.

This Body must also serve as a reference point for employees and for anyone who may identify a failure of compliance or conduct contrary to the Code.

The responsible function must meet periodically, as established by PONSI, to verify compliance with internal rules, assess trends and monitor corrective and preventive actions.

8.4. Reporting Any Violation of the Code of Ethics

All persons involved must promptly and confidentially report any suspected or actual violation of the Code of Ethics to their supervisors or through the channels established by PONSI, including the email address ponsi@ponsi.com.br, where applicable.

Whenever possible, the report must be made in sufficient detail, including the information available to enable assessment of the facts. PONSI undertakes to handle reports confidentially, in compliance with applicable legislation, and to adopt measures to prevent retaliation against anyone who, in good faith, uses the reporting channels.

PONSI also provides an independent and anonymous reporting channel through the following link: www.teztor.com.br/canal.

9. CONTRACTUAL VALUE OF THE CODE OF ETHICS AND SANCTIONS

Compliance with the rules of the Code of Ethics must be regarded as an essential part of the contractual obligations of all people working with PONSI, to the extent permitted by applicable legislation and contractual instruments.

PONSI may adopt disciplinary measures against any person whose conduct does not comply with the Code of Ethics, in accordance with applicable legislation, contracts and internal rules, including, in the most serious cases, termination of the contract, without prejudice to any other legally applicable measures.

Any violation of the Principles of this Code of Ethics by key suppliers must be notified to them by the Company and may entitle the Company to suspend or discontinue the suppliers' services or terminate ongoing relationships, in accordance with contractual provisions and applicable legislation.

10. NEW RECRUITMENT AND CONFLICT OF INTEREST

PONSI must assess situations involving the recruitment or engagement of employees and former employees of suppliers and customers where there is a risk of improper use of knowledge, confidential information, relationships or advantages obtained as a result of their previous position, as well as situations that may compromise fair competition or give rise to a conflict of interest.

The hiring or engagement of professionals is not prohibited, but must comply with applicable legislation, the protection of confidential information, valid non-compete obligations, and internal integrity and conflict-of-interest criteria.

Failure to comply with the Code of Ethics and applicable internal rules may result in specific sanctions against those responsible, in accordance with applicable legislation and contracts.

11. DISSEMINAÇÃO DA ÉTICA

Training plans and internal communications will be carried out annually or at shorter intervals, if necessary, and will cover not only employees but also Management and, where relevant, collaborators and third parties are exposed to risks related to PONSI's activities.

PONSI will seek to monitor the effectiveness of dissemination activities through participation records, assessments, communications, handling of questions and other indicators established within the management system.

The implementation of this Code must be continuously improved based on risks, audit results, reports, incidents, legislative changes and identified opportunities.