

TECTRIL

CODE OF BUSINESS ETHICS AND CONDUCT

Integrity, accountability and trust in every relationship

OUR COMMITMENT. At Tectril, results never justify violating the law, this Code or our values. Everyone acting on our behalf is expected to do what is right, even when no one is watching.

Document	Version	Effective date
Code of Business Ethics and Conduct	Revision 0	July 18, 2026

TECTRIL SOLUÇÕES EM LOGÍSTICA E COMÉRCIO LTDA

Caieiras — São Paulo — Brazil

Document control

Field	Definition
Owner	Tectril Management
Approval	Tectril Management
Management	Person formally appointed for Integrity and Compliance
Review	Annually or following a relevant change in risk, structure or legislation
Classification	Public institutional document
Related documents	Integrity Reporting Channel Policy; Channel Privacy Notice; Records Management Policy; Information Security Policy; Supplier Code of Conduct

Message from Management

Tectril was created to develop solutions in foreign trade, logistics and supply chain with structure, control and responsible execution. The trust of clients, partners, authorities and communities depends not only on what we deliver, but on how we make decisions and conduct each operation.

This Code translates the principles that must guide our relationships. It does not anticipate every possible situation; it establishes clear boundaries, supports responsible decisions and explains where to seek guidance or report a concern.

Everyone acting on behalf of Tectril is responsible for protecting the company's integrity. No commercial target, operational urgency, client request, market practice or superior order authorizes fraud, concealment, bribery, discrimination, document manipulation or any conduct contrary to law and this Code.

1. Purpose

This Code establishes the minimum principles and standards of behavior expected in Tectril's activities and relationships. It seeks to:

- guide ethical and responsible decisions;
- prevent legal, regulatory, contractual and internal violations;
- protect people, assets, information, clients and Tectril's reputation;
- encourage good-faith questions and reports;
- strengthen a culture of integrity, transparency and accountability.

2. Scope

This Code applies, according to the nature of the relationship, to shareholders, directors, leaders, employees, interns, apprentices, temporary workers, consultants, representatives, agents, service providers, suppliers, partners and any person representing Tectril before clients, authorities or the market.

Clients and other third parties are encouraged to respect these principles. Binding obligations will be established in contracts, orders, terms or specific codes applicable to the relationship.

3. Individual and leadership responsibility

Covered persons must know and comply with this Code, policies applicable to their role, contracts and relevant law. When in doubt, they must pause the decision where possible and seek guidance before acting.

Leaders have additional duties to:

- lead by example and align words with actions;
- create an environment where concerns may be raised respectfully;
- never pressure anyone to violate rules or conceal problems;
- forward reports to the Integrity Reporting Channel without conducting an informal investigation;
- prevent and report possible retaliation;
- make consistent, documented and unbiased decisions.

4. Our principles and values

4.1. Faith and purpose

We believe business can be conducted with purpose, responsibility and respect for people. Faith inspires Tectril's origins and journey, without authorizing discrimination, religious imposition or unequal treatment.

4.2. Integrity and honesty

We act truthfully, consistently and responsibly, including when the right decision is more difficult, slower or less profitable.

4.3. Respect for law

We comply with applicable laws and regulations wherever we operate. When local, contractual and internal rules differ, we seek guidance to apply the valid and more protective requirement.

4.4. Transparency and accountability

We maintain clear records, communicate risks and accept responsibility for decisions. Transparency does not mean disclosing confidential information; it means recording and sharing what authorized persons need to know.

4.5. Respect and humanity

We treat people with dignity, fairness and professionalism. We pursue excellence without sacrificing safety, health, respect or fundamental rights.

5. Ethical decision guide

Before acting, ask:

1. Is it legal and consistent with this Code?
2. Do I have authority and sufficient information?
3. Is the decision honest, fair and technically defensible?
4. Is the record complete and accurate?

5. Would I be comfortable if a client, authority or colleague reviewed it?
6. Is there a conflict, favoritism risk or appearance of impropriety?
7. Should I seek guidance first?

PRACTICAL RULE. If the answer is unclear, stop when it is safe to do so, preserve records and seek guidance. Urgency does not remove accountability.

6. Speaking up, seeking guidance and reporting concerns

Covered persons must report in good faith suspected legal, ethical, regulatory, contractual or internal violations. The available methods are:

- a leader or another member of Management, when appropriate;
- the person formally appointed for Integrity and Compliance;
- the Integrity Reporting Channel form on Tectril's official website;
- canaldeetica@tectril.com.br, for identified and confidential reports, questions and guidance.

The form permits an identified and confidential report or a report without identification. Email is not anonymous because sender data may permit identification.

Receipt, screening, investigation, conflicts, data protection, evidence preservation and timeframes follow the Integrity Reporting Channel Policy.

NOT AN EMERGENCY CHANNEL. Immediate risk to life, physical integrity or safety must be reported to the competent public emergency services.

7. Confidentiality, good faith and non-retaliation

Report information will only be accessed by persons who need it for case handling. Confidentiality will be protected within applicable legal and operational limits.

Good faith means reporting sincerely based on facts or reasonable concerns, even if an investigation later does not substantiate the matter. An unsubstantiated or inconclusive report is not automatically false.

Retaliation is prohibited against anyone who raises a question or report, refuses potentially improper conduct, participates in an inquiry, preserves evidence or supports another person's legitimate use of the Channel.

Knowingly false reports, fabricated evidence or intentional use of the Channel to harm someone may lead to proportionate measures, provided bad faith is established by objective evidence.

8. Respectful workplace

Tectril does not tolerate moral or sexual harassment, discrimination, intimidation, humiliation, violence or degrading treatment.

Discriminatory decisions or conduct based on race, color, origin, nationality, religion, belief, sex, pregnancy, marital status, age, disability, health condition, sexual orientation, gender identity or expression, legally protected appearance or any other protected characteristic are prohibited.

Jokes, messages, images, gestures, comments or physical contact may be inappropriate even when described as informal. Context, repetition, impact and power relationships must be considered.

9. Health, safety, alcohol, drugs and violence

Everyone must follow health and safety rules, use protective equipment where required, report hazards and stop work in the face of serious and imminent danger under applicable procedures.

Unauthorized weapons, threats, violence, working under the influence of alcohol or illegal drugs, or using substances in a way that impairs safety or performance are prohibited.

10. Conflicts of interest

A conflict exists when personal, family, financial or external interests may influence — or appear to influence — a professional decision. Situations requiring prior disclosure include:

- a relevant financial interest in a supplier, client or competitor;
- hiring, supervising or favoring a relative or close person;
- outside activity that competes with Tectril or impairs the role;
- receiving a personal benefit connected with a business decision;
- using Tectril information or opportunities for personal benefit;
- participating in a negotiation involving an undisclosed interest.

A conflict is not automatically misconduct. Concealing it or participating without proper assessment and treatment is the concern.

11. Anti-corruption, bribery and improper payments

Offering, promising, authorizing, requesting or receiving money, gifts, favors, commissions, advantages, employment, donations or any benefit to influence a decision, obtain an improper advantage or reward improper conduct is prohibited.

This applies to public and private relationships and to representatives, agents, customs brokers, consultants, carriers and partners. Facilitation payments are not allowed.

Where a real and immediate threat affects life or safety, protecting people takes priority; the event must be reported and documented as soon as it is safe. No payment may be recorded under a false, generic or misleading description.

12. Government and public officials

Interactions with public officials require transparency, appropriate authority and complete records. No benefit may be offered to accelerate a license, inspection, customs clearance, payment, contract or public decision.

Public procurement, meetings, inspections, filings and submissions must follow applicable rules. Information provided to authorities must be truthful, complete and submitted by an authorized person.

13. Gifts, hospitality and entertainment

Gifts and hospitality are permitted only when lawful, occasional, modest, transparent, connected with a legitimate business purpose and incapable of influencing a decision.

Cash or equivalents, benefits during pending selection or negotiations, excessive or secret hospitality, requested benefits as a condition of business, and gifts to public officials without prior review and approval are prohibited.

14. Fair competition and market information

Tectril competes independently and fairly. Agreements with competitors regarding prices, margins, clients, territories, bids, volumes, suppliers or commercial terms are prohibited.

Competitor information must be obtained legally and ethically. Trade secrets, confidential documents and privileged information must not be requested through applicants, former employees, suppliers or clients.

15. Clients, suppliers and business partners

Business relationships must be based on competence, quality, price, risk, delivery capacity, integrity and documented criteria. Client commitments must be realistic and authorized. Contracts, proposals, invoices, timelines and performance information must be clear and truthful.

Third-party due diligence will be proportionate to risk and may address reputation, ownership, technical capability, sanctions, conflicts, integrity, security, privacy, labor, tax, customs and environmental matters.

Third parties acting on Tectril's behalf must receive appropriate contractual obligations and risk-based monitoring.

16. Records, accounting and reports

Physical and digital records must accurately reflect the nature, amount, date, parties and purpose of each transaction. It is prohibited to:

- create false, incomplete or misleading documents;
- maintain unrecorded funds, commitments, assets or liabilities;
- misclassify or mistime a transaction to alter results;
- approve costs without evidence or services without proof;
- conceal errors, differences, exceptions, contingencies or relevant risks;
- destroy or alter records connected with an audit, investigation or proceeding.

Errors must be reported and corrected traceably, preserving history where required.

17. Tectril assets, resources and systems

Funds, facilities, equipment, vehicles, software, access credentials, brands and work time must be used for authorized professional purposes. Limited personal use is only acceptable when lawful, safe, moderate and without undue cost or interference.

Credentials are individual and must not be shared. Suspected loss, theft, fraud, intrusion, leakage or misuse must be reported immediately.

18. Confidential information and information security

Commercial, operational, technical, tax, customs, financial, personal and strategic information must be accessed, shared and stored according to need and sensitivity.

Unauthorized disclosure, unapproved storage of sensitive content, disclosure of credentials, intentional disregard of security alerts and use of workplace information for personal benefit are prohibited. Confidentiality duties continue after the relationship with Tectril ends.

19. Privacy and personal data protection

Personal data will be processed for legitimate, specific purposes consistent with applicable law, including Brazil's General Data Protection Law — LGPD.

Collection must be limited to what is necessary. Access controls, data quality, retention periods and incident reporting must be respected. Sensitive personal data requires enhanced protection.

Consent is not the only legal basis and should not be requested where another basis is appropriate. Data subject requests, sharing questions and incidents must be referred to the designated privacy contact.

20. Artificial intelligence and automated technologies

AI use must be authorized, secure, transparent and subject to human review proportionate to risk. It is prohibited to:

- enter confidential information or personal data into an unapproved tool;
- use AI output without checking accuracy, sources, bias and suitability;
- permit a relevant automated decision without required oversight;
- create deceptive, discriminatory, illegal or copyright-infringing content;
- present AI-generated content as confirmed evidence without validation.

Responsibility remains with the person and Tectril, not the tool.

21. Intellectual property, copyright and brands

Copyright, software licenses, trademarks, patents, trade secrets and third-party rights must be respected. Materials, methods, documents, systems and content developed for Tectril must be protected and used according to applicable contracts and authority.

Tectril brands may only be reproduced in approved materials. Registering a confusing domain, profile, trademark or visual identity, or misappropriating a company asset, is prohibited.

22. Counterfeit products and supply chain integrity

Tectril will not knowingly purchase, transport, store or supply counterfeit, adulterated, stolen or unlawfully sourced goods.

Doubtful authenticity, inconsistent documentation, incompatible pricing, unclear origin, broken seals or serial-number discrepancies must be stopped and assessed before the operation continues.

23. Foreign trade, customs, tax and transportation

International operations must comply with applicable customs, tax, regulatory, foreign exchange, documentation, security and transport requirements. Persons involved must:

- ensure accurate classification, description, origin, valuation and documentation;
- validate licenses, permits and restrictions before execution;
- preserve traceability of goods, assets, parts and serial numbers;
- not split, reclassify, undervalue or structure transactions to evade controls;
- report discrepancies, delays, damage, loss and irregularities;
- ensure carriers and operators meet relevant requirements;
- maintain evidence of approval, execution and closure.

A client, supplier or intermediary request never authorizes false descriptions, incorrect values, incomplete documents or omitted required information.

24. Sanctions, embargoes, boycotts and trade controls

Before a transaction, Tectril may assess parties, countries, products, banks, carriers, end use and end users according to risk.

Circumventing sanctions, embargoes, export controls, destination restrictions or applicable lists is prohibited. Requests involving boycott participation, commercial discrimination or omission of information must be reviewed before response or execution.

25. Records management and retention

Documents must be retained for the applicable legal, regulatory, contractual or internal period and protected from loss, alteration and unauthorized access.

Where an investigation, dispute, audit, inspection or judicial, administrative or arbitral proceeding exists, disposal of related documents must be suspended until formally released.

Early destruction, concealment, version alteration, backdating or creation of a misleading substitute record is prohibited.

26. Human rights, labor and value chain

Tectril respects human rights and does not tolerate illegal child labor, forced labor, human trafficking, servitude, degrading conditions or improper retention of documents.

Suppliers and partners must respect applicable labor, association, health and safety, compensation and working-time rules. Relevant value-chain risks must be assessed and addressed.

27. Environment and responsible use of resources

Tectril seeks to prevent environmental impacts, reduce waste and comply with requirements applicable to waste, packaging, controlled products, transport and facilities.

Environmental information must be truthful and supportable. Misleading environmental claims, concealed incidents and manipulated indicators are prohibited.

28. Political activity, donations and institutional neutrality

Personal political activity must be conducted individually, outside working time and without unauthorized use of Tectril resources, brand or representation.

No one may suggest that a personal opinion or donation represents the company. Political contributions in Tectril's name may only occur when lawful, formally approved and transparently recorded.

Donations and sponsorships require a legitimate purpose, verified beneficiary, proper approval and records and may not be used for improper advantage.

29. Investigations and cooperation

Persons participating in an investigation must cooperate in good faith, answer truthfully, preserve records and maintain confidentiality.

Interfering with interviews, directing a false account, pressuring witnesses, concealing evidence or conducting an unauthorized parallel investigation is prohibited.

Investigations must respect impartiality, necessity, data protection, individual rights and conflict rules in the Integrity Reporting Channel Policy.

30. Consequences and corrective action

Depending on seriousness, relationship and applicable law, violations may result in guidance, training, control improvements, warning, suspension, interim removal, termination, recovery of losses and notice to authorities.

Measures must be proportionate, consistent, documented and decided by a non-conflicted person. Interim measures do not represent a premature finding of responsibility.

31. Training, communication and review

The Code will be communicated to relevant audiences and proportionately integrated into onboarding, contracting, training and risk assessment.

Persons in critical roles may receive specific training on anti-corruption, foreign trade, personal data, security, competition, records and public officials. Effectiveness will be assessed through indicators, reports, audits, incidents, corrective actions and risk changes. The Code will be reviewed at least annually.

32. Approval and acknowledgment

This Code takes effect upon approval by Tectril Management. The official version will be maintained in a controlled institutional repository and published on the official website where appropriate.

Acknowledgment confirms receipt, understanding and commitment to comply, seek guidance and raise concerns in good faith.

Responsibility	Name/Position	Date	Signature
Preparation			

Responsibility	Name/Position	Date	Signature
Legal/LGPD review			
Approval			

Appendix I — Acknowledgment and commitment

I declare that I have received and accessed this Code; understand my duty to comply with law, the Code and applicable policies; know how to seek guidance and use the Integrity Reporting Channel; understand good-faith non-retaliation protection; will disclose conflicts and possible violations; and will cooperate with legitimate training and investigations.

Name: _____

ID: _____

Company/Position: _____

Place and date: _____

Signature: _____

Appendix II — Glossary

Term	Definition
Public official	A person exercising a public function, even temporarily or without compensation, and other persons treated as such by applicable law.
Good faith	Sincere communication based on facts or reasonable concern, even if later unsubstantiated.
Integrity Reporting Channel	Official method for questions and reports of possible violations, governed by a separate policy.
Conflict of interest	A situation in which personal interest may influence or appear to influence a professional decision.
Personal data	Information related to an identified or identifiable natural person.
Sensitive personal data	Data receiving enhanced legal protection, such as health, biometrics, religion or racial origin.
Due diligence	Proportionate assessment of legal, reputational, technical, financial and integrity risks.
Confidential information	Non-public information protected against unauthorized use or disclosure.
Retaliation	Harmful action motivated by a good-faith question, report or cooperation.
Third party	An external person or organization providing services, representing, supplying or doing business with Tectril.

Legal and good-practice references

- BRAZIL. Law No. 12,846/2013 — Brazilian Anti-Corruption Law.
- BRAZIL. Decree No. 11,129/2022 — regulation of the Anti-Corruption Law and integrity-program parameters.
- BRAZIL. Law No. 13,709/2018 — Brazilian General Data Protection Law — LGPD, as amended.
- OFFICE OF THE COMPTROLLER GENERAL OF BRAZIL (CGU). Integrity Program: Guidelines for Private Companies, Volume II, 2024.
- ABNT NBR ISO 37001 — Anti-bribery management systems, as a good-practice reference where applicable.
- ABNT NBR ISO 37002 — Whistleblowing management systems, as a good-practice reference where applicable.

VALIDATION NOTE. This institutional revision should be reviewed by legal and data protection professionals before formal approval, particularly regarding employment relations, legal bases, retention, sanctions, international trade and configuration of the Integrity Reporting Channel.