



COMPLIANCE

ECOGEN CODE OF CONDUCT
AND INTEGRITY MANUAL



A MESSAGE FROM ECOGEN

At Ecogen, we believe that sustainable results only exist when they are built with ethics, safety, respect, and responsibility.

Our work directly impacts customers, industrial operations, communities, partners, and the environment. That is why every decision matters.

This Manual was created to guide how we work, relate to one another, and make decisions in our day-to-day activities. More than a set of rules, it represents the values that sustain the culture of Ecogen and the Mitsui Group.

Read this material carefully, clarify any questions whenever necessary, and use this Manual as support in your professional routine.



WHAT IS THIS MANUAL?

This Manual translates Ecogen's Code of Conduct into simpler, clearer language that is closer to people's daily routines.

Here you will find practical guidance on expected behaviors, situations that require attention, and examples that help turn our values into everyday attitudes.

Our goal is to support ethical decisions, strengthen a respectful environment, and ensure that everyone understands their role in building a culture of integrity, safety, and responsibility.



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WHO DOES THIS MANUAL APPLY TO?

This Manual applies to all employees, business partners, suppliers, and third parties who act on behalf of or in the interest of Ecogen, as well as to all of the company's commercial, contractual, and institutional relationships.

Regardless of position, everyone shares the responsibility of acting with ethics, respect, and transparency.





ETHICS AND COMPLIANCE WITH THE LAW

At Ecogen, acting ethically is part of our work.

We expect everyone to act with honesty, responsibility, and respect for the law, internal rules, and the company's values.

The right decision will not always be the easiest or the fastest. Even so, it must be made.

We also expect everyone to contribute to a culture of integrity by clarifying doubts, reporting inappropriate situations, and seeking guidance whenever necessary.

IN PRACTICE:

Imagine an employee identifies an error in a technical report shortly before it is sent to the client. Even knowing that this may delay delivery, the right thing to do is to correct the information and immediately inform their leadership.

On the other hand, altering records, omitting operational failures, or bypassing procedures to speed up activities will never be acceptable.





RESPECT FOR PEOPLE, HUMAN RIGHTS AND DIVERSITY

Ecogen believes that respectful environments are essential for healthy relationships, innovation, and sustainable growth.

All people must be treated with dignity and respect, regardless of gender, age, race, religion, sexual orientation, nationality, health condition, disability, or any other individual characteristic.

We also do not tolerate practices such as child labor, forced labor, human trafficking, or any form of human exploitation, including within our chain of suppliers and partners.

Respecting people also means respecting cultures, histories, differences, and ways of thinking.

IN PRACTICE:

Offensive jokes, embarrassing nicknames, prejudiced comments, or exclusionary attitudes may seem like "jokes," but they create hostile environments and are not compatible with Ecogen's culture.





WORK ENVIRONMENT AND HARASSMENT

Everyone deserves to work in a safe, healthy, and respectful environment.

Ecogen does not tolerate behaviors that cause embarrassment, fear, humiliation, intimidation, or disrespect.

This includes moral, sexual, psychological, or verbal harassment, abuse of power, bullying, threats, verbal or physical aggression, and any form of retaliation against people who make good-faith reports.

Respect must exist in all settings, including messages, groups, meetings, even online, and social media.

It is also prohibited to carry out professional activities under the effect of alcohol or illegal drugs, as this compromises the safety of people and operations.

IN PRACTICE:

Giving feedback firmly and respectfully is part of leadership. Humiliating employees in front of the team, using offensive irony, or publicly exposing someone is not.

Offensive messages in messaging app groups are also unacceptable.





HEALTH AND SAFETY

At Ecogen, safety comes before any result.

No activity is more important than people's life, physical integrity, and health.

Each professional is responsible not only for their own safety but also for the safety of everyone around them.

For this reason, it is essential to follow established procedures, correctly use protective equipment, stop unsafe activities, and immediately report any risk condition.

IN PRACTICE:

Upon identifying an unsafe condition in the field, the activity must be stopped until the situation is corrected.

Ignoring risks or continuing an unsafe activity to avoid delays will never be acceptable.





CONFLICT OF INTEREST

Professional decisions must always prioritize Ecogen's interests.

A conflict of interest exists when personal, family, or financial interests may influence (or appear to influence) decisions made in the professional environment.

Not every conflict implies bad faith. Often, the situation can be resolved with transparency and proper communication.

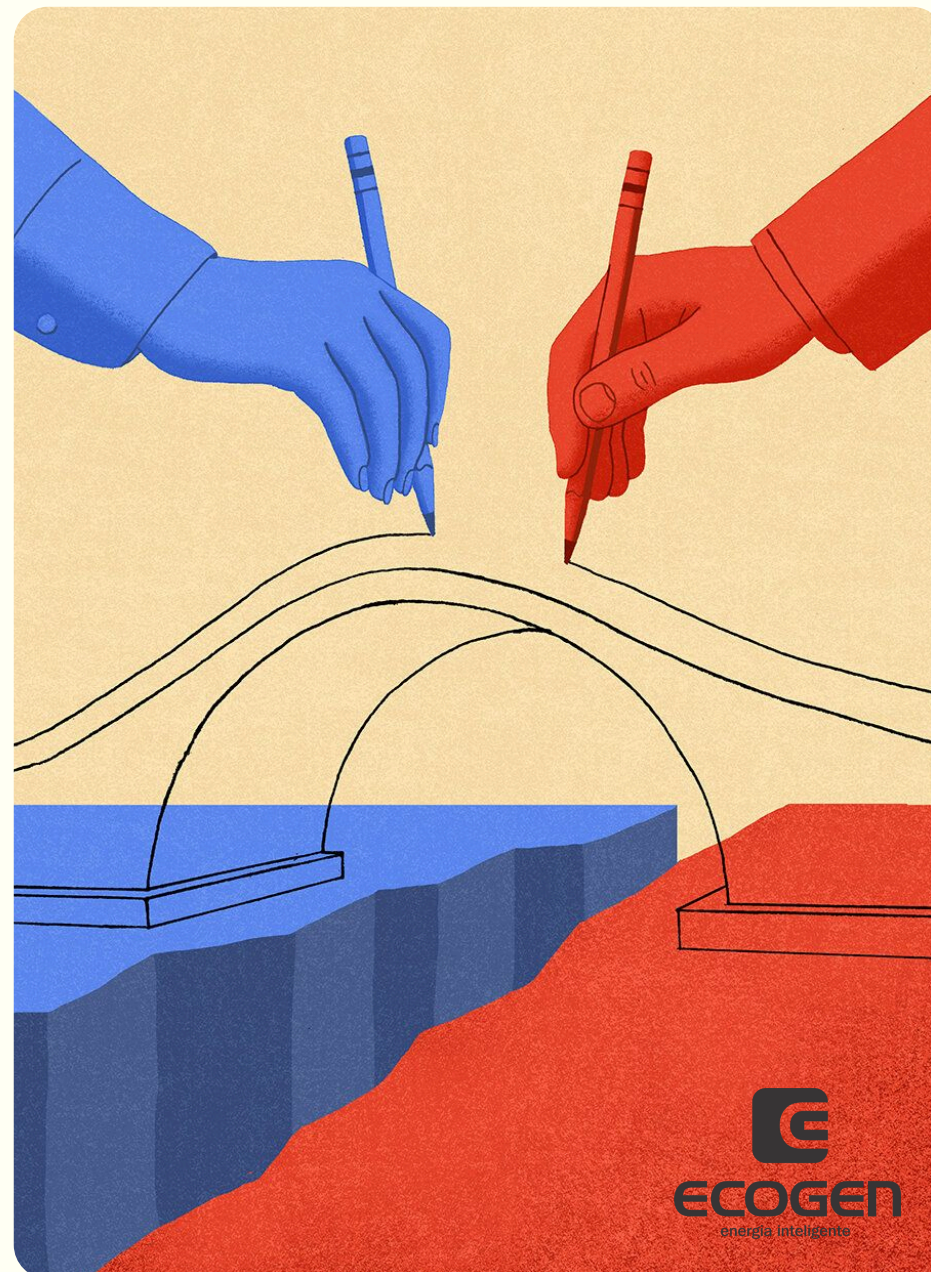
The most important thing is to never hide the situation.

IN PRACTICE:

If an employee is involved in hiring a company belonging to a family member or close friend, this must be reported immediately.

It is also necessary to report external activities that could create a conflict with activities carried out at Ecogen, such as consulting work, involvement in competing companies, or side businesses related to the sector.

Whenever in doubt, seek guidance before acting.





CONFIDENTIAL INFORMATION AND DATA PROTECTION

Ecogen's information belongs to the company and must be protected responsibly.

This includes financial information, customer data, contracts, projects, strategies, technical and operational information, and personal data.

This information may not be shared without authorization. It is also not permitted to record photos, videos, or images at Ecogen or client facilities without prior authorization.

The protection of personal data must strictly follow the LGPD (Brazilian General Data Protection Law) and the company's internal policies.

IN PRACTICE:

Sharing internal documents in messaging app groups, forwarding corporate information to personal email accounts, or taking pictures of operational areas without authorization are inappropriate conduct. Always use information only for legitimate work-related purposes.





ANTI-CORRUPTION, BRIBERY AND IMPROPER ADVANTAGES

Ecogen has zero tolerance for corruption.

It is not permitted to offer, promise, solicit, or accept improper advantages to influence decisions or obtain personal or business benefits.

This applies both to relationships with public officials and with private clients, suppliers, and partners.

Gifts, presents, entertainment, and hospitality may only be accepted when they comply with the rules set out in the Gifts and Hospitality Policy and must never generate favoritism or improper influence.

IN PRACTICE:

Accepting trips, high-value gifts, or favors during business negotiations can create a conflict and compromise the impartiality of decisions.

When in doubt, seek guidance before accepting or offering any benefit.





FAIR COMPETITION AND BUSINESS RELATIONS

Ecogen competes ethically, transparently, and responsibly.

Practices that harm free competition are not permitted, such as price fixing, exchanging strategic information with competitors, or manipulating competitive processes and public tenders.

Relationships with suppliers and partners must be conducted with impartiality, transparency, and equal opportunity.

IN PRACTICE:

Sharing business strategies or pricing information with competitors is never acceptable, even in informal conversations. Likewise, hiring decisions must be made based on technical and objective criteria.





USE OF ECOGEN'S RESOURCES AND ASSETS

Ecogen's resources exist for professional purposes and must be used responsibly.

This includes equipment, systems, tools, vehicles, financial resources, corporate email, information, and data.

Everyone must ensure the proper conservation and use of these resources.

IN PRACTICE:

Using corporate equipment to access inappropriate websites, engage in illegal activities, share access credentials, or install unauthorized programs are inappropriate behaviors. It is also important to protect passwords, documents, and corporate information.





FINANCIAL RECORDS AND TRANSPARENCY

Ecogen's records and information must be complete, accurate, and reliable.

There must never be false entries, omitted information, or manipulation of financial, operational, or accounting data.

All employees must cooperate with audits, internal controls, and verification processes.

IN PRACTICE:

Altering information to improve indicators, hiding expenses, or recording incorrect information compromises the company's integrity and can lead to serious consequences.





ENVIRONMENT AND SUSTAINABILITY

Sustainability is Ecogen's core purpose.

Everyone must act with environmental responsibility, using resources consciously, reducing waste, and complying with environmental legislation.

We also encourage practices and technologies that contribute to more sustainable operations.

IN PRACTICE:

Disposing of waste improperly, ignoring leaks, or wasting natural resources are behaviors incompatible with Ecogen's commitments.





COMMUNICATION AND SOCIAL MEDIA

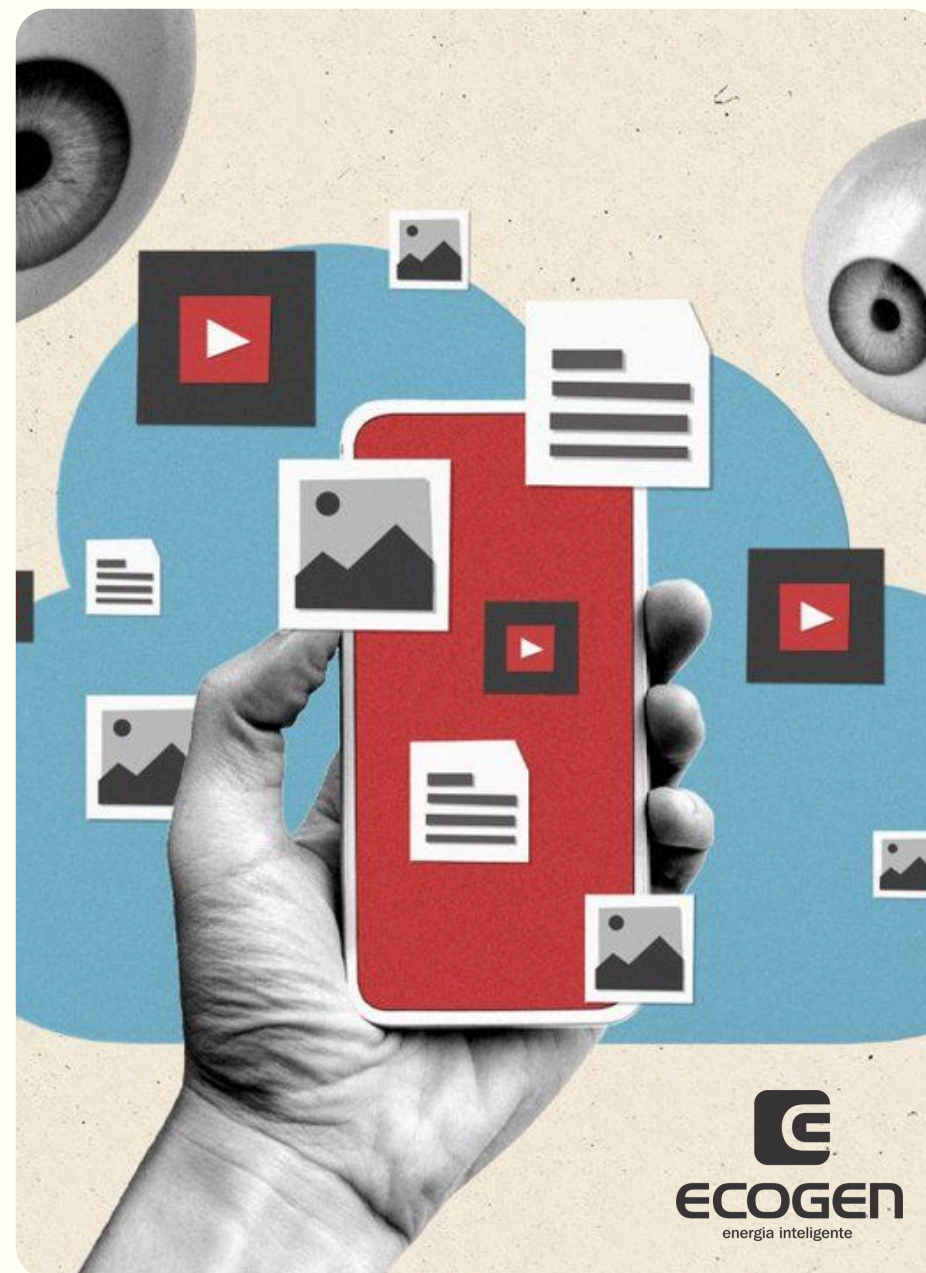
Ecogen's communications must be carried out responsibly and in alignment with the institution.

Only authorized individuals may speak officially on behalf of the company.

On social media, everyone must act with good judgment and responsibility, preserving the image of Ecogen, its clients, and its partners.

IN PRACTICE:

Posting images of operational facilities, clients, internal information, or content that violates legal matters can create risks for the company and for the business.





QUALITY AND CUSTOMER RELATIONS

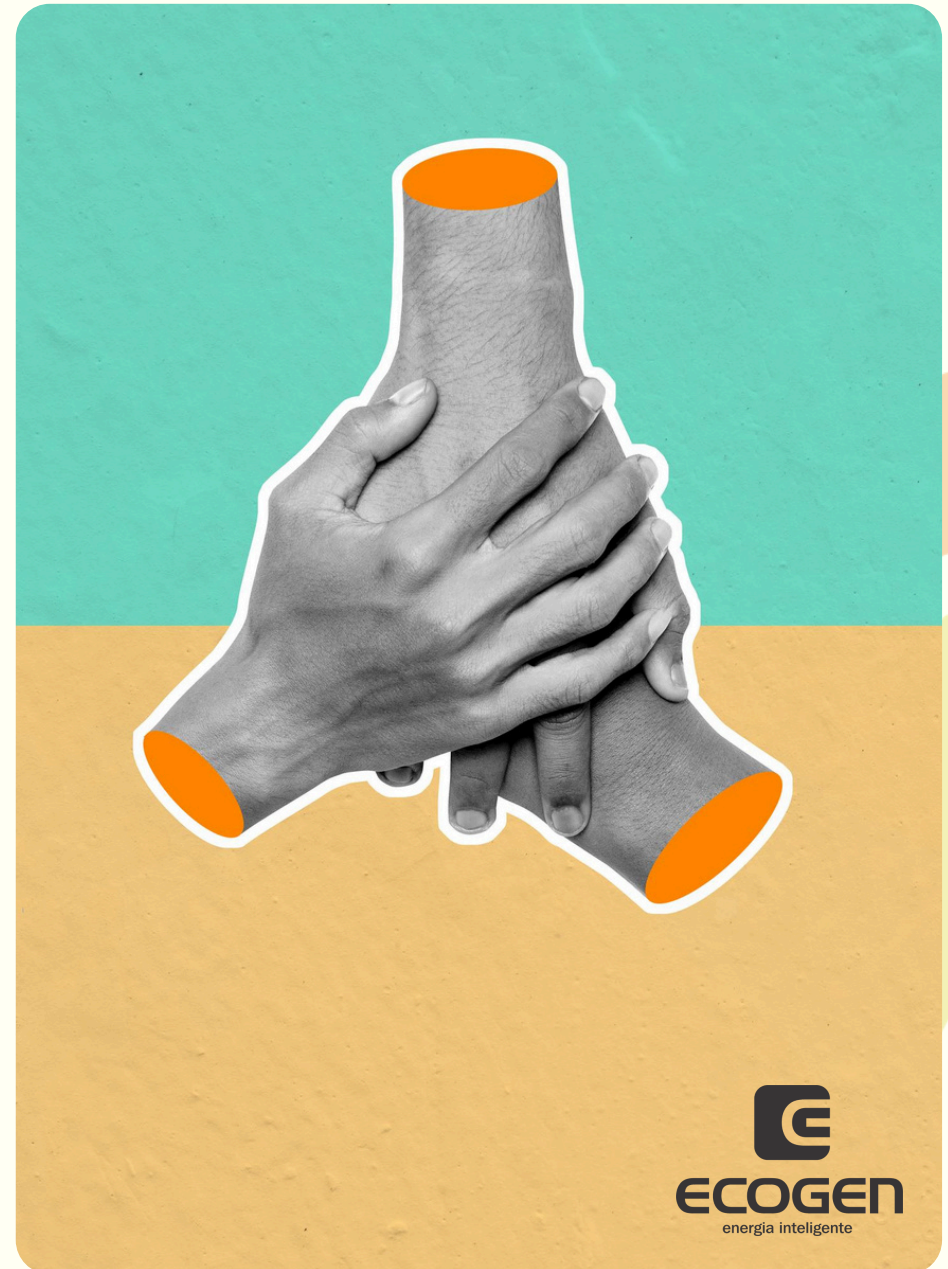
Customer trust is built every day.

For this reason, Ecogen values transparent, responsible relationships based on the quality and safety of the services provided.

Information provided to clients must be clear, accurate, and complete.

IN PRACTICE:

Promising impossible deliveries, omitting technical risks, or providing incomplete information undermines trust and is not aligned with Ecogen's values.





REPORTING CHANNEL



If you know of, suspect, or witness any situation contrary to this Manual, internal policies, or the law, seek guidance or file a report.

Ecogen provides internal channels as well as EthicsPoint, an external, independent, and confidential platform that allows anonymous reporting.

[Link Reporting Channel \(Etichs Point\)](#)

Contact phone number: (21) 2038-4915

No form of retaliation will be tolerated against people who make good-faith reports.



IF IN DOUBT, ASK

Not every day-to-day situation will be simple or covered by this Manual.

When a question arises, seek guidance before acting.

Acting with transparency, responsibility, and respect is part of how we work and build relationships of trust every day.

