



Code of **Ethics** and **Conduct**

2024

Programa de
**Integridade
e Privacidade** **20
24**

 **CARAMURU**



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1. PRESENTATION

Founded in 1964, Caramuru Alimentos S.A. is Brazil's leading soybean, corn, sunflower and canola processing company. With facilities in the states of Goiás, Paraná, Mato Grosso, São Paulo, Pará and Amama, it is dedicated to the industrialization of grains, the extraction and refining of oils, the export of soybeans, bran, oil, lecithin and soy protein concentrate - SPC, and the production of biodiesel. It operates in the Brazilian market through the premium brand "Sinhá", with a range of products based on soybean, corn, sunflower and canola, serving consumers in several states, manufacturers of pasta, cookies, snacks, cornflakes and others, as well as producing raw materials for other segments such as breweries, mining and the feed industry.

2. PREAMBLE

This Code of Ethics and Conduct ("Code") is part of the Integrity Program of Caramuru Alimentos S.A., being applicable to all its Members, as well as its Brazilian or foreign branches, affiliates and subsidiaries, regardless of location ("Caramuru" or "Company"), including, but not limited to, all its employees, statutory and non-statutory officers, members of the board of directors, members of committees, members of the fiscal council (if applicable), representatives and shareholders, with the main objective of making known to its Members, for future generations, customers, suppliers and the community in general, Caramuru's commitment to effectively implement the concepts and values embodied herein in its business the principles. Capitalized terms not defined herein shall have the meanings ascribed to them in **ANNEX I**.

The Code is a fundamental guideline for daily work, and failure to comply with it may cause significant damage not only to Caramuru, but also to its members, business partners and other stakeholders. Therefore, compliance with the Code of Ethics and Conduct is mandatory for everyone, regardless of their position or level of interaction with Caramuru.

In order to prevent violations, it is essential that each Member of Caramuru adopts the guidelines and contents of the Code of Ethics and Conduct, which must guide all the actions of its members.

Any questions or concerns regarding the Code of Ethics and Conduct may be addressed to the Reporting Channel, a channel made available by Caramuru to Members and Third Parties (as indicated in Section 21 of this Code), to receive reports of noncompliance or violation of this Code and other policies included in the Caramuru Integrity Program.

Questions directed to the Reporting Channel will be forwarded to the Compliance Department and may be submitted on a confidential basis. Members may also contact the Compliance Department and the Compliance Officer in person whenever they deem it necessary.

Caramuru conducts annual training on the Code of Ethics and Conduct, through physical or virtual means, so that Members are informed, updated, reacquainted and committed to its provisions.

3. MISSION

To provide quality food, inputs, biofuels and services, meeting the needs of customers and consumers, generating values for society, suppliers, employees and shareholders.

4. VISION

To be a Business Group recognized for:

- Serving customers and consumers with quality products and services;
- Creating an environment creativity, innovation, and collaborator self-development are stimulated;
- Operating with differentiated commodities;
- Having strong brands in consumer products;
- Making use of strong innovative logistics;
- Having an international presence with structured investments;
- Operating based on the principles of environmental, social and economic sustainability;
- Having processes supported by automation and technological innovations;
- Caring for the occupational health and safety of employees; and
- Maintaining a consistent track record of growth and profitability.

5. VALUES

- Integrity and Ethics;
- Trust and mutual respect;
- Simplicity and transparency in relationships;
- Valuing and developing employees;
- Discipline and professionalism;
- Boldness and creativity;
- Perseverance; and
- Respect for the environment.

6. COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL STANDARDS

No Member, including those in supervisory and management positions, such as managers, officers and members of management, shall engage in or authorize any act that is contrary to this Code or that constitutes a violation of law.

All activities carried out by Caramuru must be conducted in accordance with the principles established in this Code and in strict compliance with all the legal provisions that govern them, regardless of the country in which the companies operate and/or are located, and all Members and Third Parties are responsible for compliance with the legislation and principles of this Code.

The target audience of this Code must also observe the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, as applicable, as well as the local legislation applicable to its activities.

Caramuru undertakes to cooperate fully with the regulatory, self-regulatory and supervisory authorities, responding to the requests addressed to it whenever appropriate, and not engaging in any conduct that prevents the regular exercise of supervision by the competent authorities.

Violations of the law or of this Code have consequences that may lead to the adoption of sanctions against the Members and third parties involved by Caramuru, as provided for in Section 22 of this Code, in addition to the applicable sanctions established by law.

If the Member becomes aware of any conduct that violates this Code or applicable law, it is the Member's responsibility to report the conduct to the Reporting Channel, maintaining anonymity if requested.

7. PROHIBITION OF CORRUPT PRACTICES, MONEY LAUNDERING AND BRIBERY

Caramuru does not tolerate the involvement of its Members or any Third Parties in any criminal practice, whether in Brazil or in any foreign country.

Caramuru is aware of its responsibility to prevent illegal activities, such as money laundering, financing of terrorism and proliferation of weapons of mass destruction, and undertakes to comply with all regulations applicable to its activities.

It is expressly forbidden to give, receive, promise, or offer a bribe, kickback, or any other type of benefit with the objective of promoting or rewarding illicit conduct or conduct that violates internal regulations.

Any offers of gifts, entertainment and hospitality, including gift certificates, travel, lodging, meals, invitations to events and any other benefits and advantages, must not influence decisions of Caramuru and its Members, nor are they used as mechanisms to reward certain decisions, and must also observe the parameters established in the Policy on Donations, Sponsorships, Gifts, Presents and Entertainment.

Facilitation payments or the offering of undue advantages to Public Officials or those of the private sector are inadmissible, including obtaining licenses, authorizations, permits or any other measures of a regulatory, tax or supervisory nature.

All forms of corruption, both public and private, as well as any initiative related to Money Laundering, involving the concealment of values of illicit origin or the attempt to make them appear legitimate, are prohibited.

It is expected that every Caramuru Member will always pay attention to:

- (i) unusual forms or complex patterns of payment;
- (ii) high value payments in kind;
- (iii) unusual transfers to/from countries unrelated to the transaction;
- (iv) customers or suppliers with operations of apparent lack of integrity;
- (v) customers or suppliers who demonstrate behavior that seeks to avoid recording information;
- (vi) transactions involving parties directly or indirectly associated with Money Laundering or tax evasion.

Once the occurrence of any of the above situations has been verified, it is the Member's responsibility to immediately notify the Caramuru Compliance Department, either directly, including via the Compliance Officer, or through the Reporting Channel, ensuring anonymity if requested.

8. CONFLICTS OF INTEREST

Caramuru Members undertake to report any current or future situations that may give rise to conflicts of interest, as agreed under the terms of the Declaration of No Conflict of Interest, contained in **ANNEX III.1** and **III.2** (F.012.005 and F.012.006) to the Code.

Caramuru Members should always avoid situations that may give rise to a conflict of interest, exemplified below.

Situations of conflicts of interest within the scope of the Company's decision-making processes and/or approvals shall be dealt with in accordance with the provisions set forth in the Company's "Policy on Transactions with Related Parties and Conflict of Interest Management" (available on its website), provided that any Member who is in a situation of conflict of interest within the scope of the Company's decision-making processes and/or approvals shall abstain from voting.

8.1 Personal interests competing with the interests of Caramuru

In general, a conflict of interest occurs when the personal interest of a Member competes with the interest of Caramuru, an opportunity in which the Member chooses to privilege their particular interest to obtain, in some way, personal gains or benefits to the detriment of Caramuru, effectively or potentially harming the Company.

Thus, it is forbidden for Members to adopt conduct or make decisions based on personal financial interest that they may have in competitors, suppliers or customers of Caramuru.

To avoid situations of conflict of interest, Members must always inform the Compliance Department of their impediment to any business transactions with companies in which the owners, partners or representatives have a personal relationship with the Member or with people in their family, personal and/or intimate relationships.

Any Member of Caramuru who has a family, personal and/or intimate relationship with a customer, competitor or supplier, must immediately report the fact to the Compliance Department, which will evaluate the existence or non-existence of risks of possible conflict of interest and, if necessary, propose measures to mitigate the risks raised.

Family, personal and/or intimate relationships between Caramuru Members that are hierarchically related directly or indirectly may also give rise to conflicts of interest. For this reason, if a Member is in this situation, they must report the situation immediately to the Compliance Department, to assess the existence or not of risks of possible conflict of interest, considering the Policies, as well as the rules defined by Caramuru for contracting, transfers and promotions of employees.

8.2 External activities

Members of Caramuru undertake not to engage in any paid activity, either independently, for third parties or on behalf of third parties, without first informing the Compliance Department of their intention to do so and waiting for its authorization in this regard. The exercise of independent activities, for or on behalf of third parties, depending on the scope of the activity, may be understood as the act of assuming a paid activity (second job), whether exercising functions as a consultant, director or officer, service provider or any other activity.

It is expressly forbidden for Members to work for competitors, customers or suppliers of Caramuru, with the exception of directors, who must inform the Board of Directors of the intention and the activity to be carried out, pending the approval of the Board, in order to ensure that there is no conflict of interest between the companies.

9. GIFTS, PRESENTS, ENTERTAINMENT AND HOSPITALITY

Gifts, presents, entertainment and hospitality may be accepted or offered provided they are carried out in an appropriate and reasonable manner, never aiming to influence the recipient to make a specific business decision. Those that are lawful, appropriate to the occasion, do not cause any form of embarrassment and are in accordance with good market practice are considered reasonable.

It is up to the Members, before accepting or offering any form of gift, gifts, entertainment or hospitality, to verify the guidelines of Caramuru, provided for in the Policy of Donations, Sponsorships, Gifts, Presents and Entertainment, making sure that the acceptance or offer in question does not characterize, or may seem, under any circumstances, an attempt to bribe or violate this Code, the applicable laws or other Caramuru Policies.

As such, the granting of gifts, presents, entertainment and hospitality should not occur, nor give rise to the impression of having occurred, as a form of exchange of favors between Caramuru and the individual or legal entity, as the case may be.

If a Member of Caramuru is offered a gift, present, entertainment or hospitality that does not comply with the provisions of the Donations, Sponsorships, Gifts, Presents and Entertainment Policy, the Member must respectfully decline the offer, pointing out that the Caramuru Compliance Policies does not allow this practice. Depending on the circumstances, if the Member has difficulty declining the gift, entertainment or hospitality, the Member must notify the Compliance Department, which will analyze the situation and take appropriate action.

It is strictly forbidden to offer, promise to give, or authorize to be given, directly or through Third Parties acting on behalf of Caramuru, money or thing of value to a national or foreign Public Official or to Associates of Public Officials, except for things without Commercial Value and gifts, presents or entertainment that do not exceed the amount of R\$ 100.00.

Violation of the above provisions is an infringement of the Caramuru Integrity Program, subject to the adoption of internal and other disciplinary measures provided for in specific legislation applicable to the specific case.

10. DONATIONS AND SPONSORSHIPS

Donations and sponsorships must always be approved by the Executive Board in conjunction with the Compliance Department. In order to make donations or social contributions, Caramuru, through the Compliance Department, will first verify the suitability and reputation of the entity, thereby preventing the contribution from being used for illegal or improper purposes, always in accordance with the Donations, Sponsorships, Gifts and Entertainment Policy.

Donations and Sponsorships are expressly prohibited in connection with partisan political activities under the terms of the Contributions, Sponsorships, Gifts and Entertainment Policy.

Caramuru may make its facilities available to political parties or candidates to present their proposals to its employees, provided that they are equal and in compliance with current electoral legislation.

Donations and sponsorships must have exclusively philanthropic purposes, being linked to the Company's social responsibility, as provided for in the Policy on Donations, Sponsorships, Gifts, Presents and Entertainment.

Caramuru ensures that all contributions and donations are duly recorded in its books.

11. COMPETITION AND ANTITRUST

Caramuru is committed to the principle of free competition, competing ethically and in compliance with antitrust laws.

In any interactions and contacts with competitors, any type of agreements and behaviors for coordinated action are prohibited. As an example, any kind of agreement on pricing, division of customers, markets or regions, production limits and capacity, or coordination of collective refusal is prohibited to enable a more favorable negotiation with certain parties.

Specifically in the case of bids from the Public Administration, Caramuru prohibits any form of bidding manipulation and undertakes to participate in an ethical, legal, transparent and competitive manner in any and all bidding processes.

Legitimate and necessary market information for the business can only be obtained through legal and reputable means, always in compliance with competition laws and in accordance with the prior guidelines of the Caramuru Legal Department. If any breach of a competitive nature is found, it is up to the Member to immediately notify the Compliance Department, including via the Compliance Officer, or file a report through the Reporting Channel, ensuring its anonymity if so requested.

12. RELATIONSHIP WITH THIRD PARTIES

12.1. Relationship with customers

Caramuru's relationship with its customers is based on three essential premises: (i) product quality assurance; (ii) service that is non-discriminatory and in line with the best market standards; (iii) products that comply with the legal requirements of the market for which they are intended.

Caramuru reserves the right to terminate any business relationship if its business interests are not met, or if the operation becomes a violation of the Code, Caramuru's other policies, including the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, if applicable, or applicable Brazilian and/or foreign legislation, implying legal, social or environmental risks.

It is prohibited to make payments or offer benefits to customers to secure potential business or facilitate the sale of products, even if this means losing potential business.

12.2. Relationship with suppliers and service providers

Caramuru selects its suppliers and service providers on the basis of objective criteria based on professionalism and ethics, guided by selective processes that make undue preferential decisions impossible, as established in the Supplier Policy, as well as in the Manual for the Prevention of Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction, where applicable.

The selection of suppliers must be based on pre-established objective criteria such as price and quality. Contracting with suppliers or service providers based on subjective criteria, such as personal affinity, is prohibited.

All commercially sensitive information exchanged with suppliers and service providers in the performance of the contract must be treated as such and must be kept confidential from third parties not involved in the direct business relationship.

Caramuru's suppliers are contractually required to comply with tax, anti-corruption, criminal, competition, labor and environmental legislation, as well as other applicable laws as appropriate, including foreign legislation, and to adopt principles of social responsibility in conducting their business, such as not directly or indirectly exploiting child or slave labor, in strict compliance with current legislation.

Contracts entered into with suppliers and service providers must contain standards that prohibit the practice of unlawful acts, as well as any penalties to be applied in case of non-compliance and infringement.

Caramuru reserves the right to terminate the commercial relationship with suppliers and service providers whenever it is found to be in breach of this Code, the other policies of Caramuru and its Brazilian or foreign branches, affiliates and/or subsidiaries, as applicable, or applicable Brazilian and/or foreign legislation.

It is the responsibility of all Caramuru Members to ensure that their suppliers and service providers respect and comply with this Code, and to immediately report to the Compliance Department (directly, including via the Compliance Officer, or through the reporting channel) any suspected violation or irregularity (ensuring the Member's anonymity if requested).

12.3. Relationship with competitors

The relationship with commercial partners and competitors is an issue that deserves special attention by Members, given the sensitivity of these relationships and the risks of abuse of legal limits.

Therefore, it is worth noting that Caramuru is a competitive company in its market, always striving to outperform its competitors in a fair, honest and ethical manner and within the legal parameters established by the current legislation. Competitive advantages must be achieved solely and exclusively because of their greater efficiency in relation to their competitors.

No Member shall enter into any agreement or commitment, whether formal or informal, including through trade associations and class organizations, that: (i) have the effect of fixing, stabilizing or increasing prices or profit margins or dealing with pricing initiatives or recommendations; (ii) have the effect of reducing production or output of products; and (iii) determine with which suppliers and customers negotiations should not be conducted.

12.4. Relationship with the Public Authorities

It is Caramuru's inviolable policy that contacts with public authorities are always guided by compliance with applicable laws, regulations and internal policies of the Company and its subsidiaries, affiliates, branches and/or subsidiaries, Brazilian or foreign, as applicable, prohibiting the practice of acts of corruption, as well as making decisions in a situation of conflict of interest, in accordance with the Public Administration Relations Policy.

Any form of bribery, kickback or favor offered to a public official or related third party to obtain an advantage or influence a decision is prohibited.

Members, as well as any Third Parties representing the Company or acting on its behalf, must act with fairness and correctness in interactions with public

officials, observing the highest standards of conduct in dealings with government representatives. For this reason, Caramuru Members must always comply with applicable laws and regulations when dealing with governmental authorities and must not contact governmental authorities on behalf of the Company, except when specifically authorized to do so by the Company.

In the case of meetings with public officials, the Member representing Caramuru should request that the meeting be inserted, if possible, in the official agenda of the public official in question, and should always attend, if possible, accompanied by another Member. Furthermore, in order to avoid situations in which there may be a possible confrontation between public and private interests, harming the collective interest and affecting the exercise of public duties, it is forbidden for any Member of Caramuru to offer gifts, presents, entertainment and hospitality, including gift certificates, travel, accommodation, meals, invitations to events and any other benefits and advantages to public officials, except for items of no commercial value that do not exceed a value of R\$ 100.00, as provided for in the Policy on Donations, Sponsorships, Gifts, Presents and Entertainment and in the Caramuru Anti-Corruption, Money Laundering and Antitrust Policy.

It is also forbidden to hire, even indirectly, a Public Agent in the exercise of the position or in the period of (06) six months after leaving the position, except for the exceptions provided for in the Policy of Relations with the Public Administration.

The use of inside information provided by a Public Official is expressly prohibited, as is working with Public Officials who have some degree of kinship with Members who have some decision-making authority in business and operations.

Caramuru undertakes to cooperate with the authorities, when applicable, in relation to requests for information and documents, inspections, surveys, compliance with court orders, always in compliance with the provisions of the Policy on the Relationship with the Public Administration.

If a violation of any of the foregoing occurs, the Member must immediately report it to the Compliance Department, either directly via the Compliance Officer or through the Reporting Channel (while ensuring that the Member remains anonymous, if desired).

12.5. Relationship with the press

Caramuru Members can only make communications with the press when authorized by the Communication Department and the Legal Department. It is expressly forbidden for any Member to disclose confidential or false information to the press.

The interaction with the press should be, as a priority, directed to the dissemination of relevant information and the promotion of Caramuru's activities.

Statements should not be made that may tarnish the reputation of Caramuru's competitors, nor assist in the dissemination of rumors. Caramuru rejects any form of misleading advertising.

13. CONFIDENTIAL INFORMATION, PRIVACY AND DATA PROTECTION

The Company and its members have access to confidential information that must be kept confidential. Confidential Information may not be disclosed except in response to legitimate requests from governmental authorities by the Legal Department after appropriate steps have been taken to protect its confidentiality.

The unauthorized use or distribution of Confidential Information for personal or third party benefit is illegal, and may even trigger the application of disciplinary measures as provided for in Section 22 of this Code, as well as the application of sanctions in the criminal, civil and labor spheres.

In turn, Caramuru reserves the right to monitor and access the information generated by its Members and third parties on the Company's equipment and servers, in order to prevent illegal practices such as unfair competition, disclosure of industrial secrets, breach of secrecy and confidentiality, among other behaviors that violate this Code and other Caramuru policies.

Caramuru has a Privacy Program that ensures the privacy, security and protection of personal data of its Members, customers, suppliers, service providers and interested parties in general, collecting, processing and maintaining personal data according to the need for their purposes. Third parties who are authorized to act on behalf of Caramuru must also provide guarantees of compliance with the privacy and protection of personal data of the holders.

13.1. Dissemination of information on social networks

Caramuru Members must act with awareness and attention when disclosing information on social networks (*Facebook, LinkedIn, Twitter, Instagram, WhatsApp, Telegram, TikTok* etc.) regarding their daily work and regarding company matters.

The transmission of Confidential Information on social networks is prohibited as defined in the main section of item 13. Any improper disclosure and/or damage to the business and reputation of Caramuru constitutes a violation of this Code, which will result in the application of sanctions to those responsible, as provided for in Section 22 of this Code.

13.2. Prohibition of insider trading

The use or retransmission of inside information, known as insider trading, for the purchase and sale of shares and securities is prohibited.

Inside information is information that has not yet been publicly disclosed to the market and that could impact and influence the value of a particular financial instrument.

Disclosure of inside information to third parties and trading in securities based on such information are civil and criminal offenses and subject the offender to penalties pursuant to Section 22 of this Code.

14. FISCAL AND TAX OBLIGATIONS

It is part of Caramuru's policy to always be up to date with its legal obligations, including fiscal and tax obligations, complying with all the rules applicable to the products and services offered.

It is the obligation of all Members to respect tax, foreign trade and customs legislation.

Compliance with regulatory guidelines gives the Company greater credibility with the government, financial institutions, business partners and customers.

Caramuru understands that it is essential to keep its tax obligations up to date, and any action by Members or Third Parties with which it relates in order not to comply with the tax obligations related to the Company is expressly prohibited.

15. RESPONSIBILITIES IN THE WORKPLACE

15.1. Occupational health and safety

Caramuru promotes a work environment where the safety and health of its Members are essential for the conduct of its business. For this reason, it is essential that all Members respect the occupational safety guidelines, attending the training offered by the Company.

Therefore, the fundamental rules established for Members are: work safely, taking care of their own protection, the protection of their co-workers and the environment.

It is the role of all Members to immediately report situations of exposure to risks and other inadequate conditions with regard to health, safety and the environment, in order to reduce the number of accidents at work and implement corrective measures.

15.2. Respecting diversity and combating discriminatory and abusive conduct

Caramuru respects and values the diversity and the inclusion of people.

Any discriminatory attitude in the workplace on the basis of religion, race, color, language, origin, age, marital status, nationality, sex, gender, sexual orientation and gender identity, physical, mental or economic condition, philosophical or political beliefs and/or convictions, or any other reason will not be tolerated.

Caramuru does not tolerate any form of harassment, including personal contact, acts or gestures, in writing, electronically or verbally, that is abusive, humiliating or intimidating. All Members are committed to preventing and preventing this type of behavior from occurring, valuing a healthy work environment and ensuring the individual dignity of each individual.

The Member experiencing this situation or witnessing any inappropriate behavior must report the incident to the Reporting Channel, requesting that anonymity be maintained in order to provide the reporting party with absolute confidentiality and to avoid any form of retaliation.

Violation of this provision shall result in dismissal for cause of the offender, without prejudice to the application of other sanctions applicable under applicable law, as provided for in Section 22 of this Code.

15.3. Political, Civic or Religious Activities.

The participation of Members in political, civic or religious activities must be strictly private, not having any relation with Caramuru, and any mention or reference to its name is prohibited.

Moreover, such activities should not compromise or interfere with work responsibilities, nor favor the configuration of situations of conflicts of interest.

15.4. Use of drugs, alcohol and carrying weapons

The use of illicit drugs and the consumption of alcohol during working hours is prohibited, as well as the carrying, use, sale, distribution or any type of exchange of illicit substances in the vicinity of Caramuru.

Weapons, regardless of nature, are not allowed in Caramuru, except for professionals trained and expressly authorized for such.

Caramuru is aware of its responsibility to prevent illegal activities, such as money laundering, financing of terrorism and proliferation of weapons of mass destruction, and undertakes to comply with all regulations applicable to its activities.

16. PRODUCT COMPLIANCE AND SAFETY

Numerous people have daily contact with the products produced by Caramuru, one of its main responsibilities being to eliminate as much as possible any risks, losses and dangers to the health of its customers and consumers.

For this reason, all Caramuru Members must fully comply with legal rules and internal quality standards to prevent products outside the appropriate conditions of consumption from being marketed.

Caramuru counts on the assistance of each of its Members to supervise and report any inaccuracies and failures in the procedures, so that the appropriate measures are taken in a timely manner.

17. INTELLECTUAL PROPERTY AND STRATEGIC INFORMATION

The result of the work of an intellectual nature and the strategic information generated by the Members is the exclusive property of the Company. The Member is responsible for treating confidentially the information on intellectual property and strategies to which it has access as a result of its work, using them carefully and disclosing as provided for in section 13 of this Code.

Intellectual property, trade secrets, trademarks, copyrights, business, research, new product plans, objectives, strategies, records, processes, standards, databases, salary and benefit information, Members' medical information, customer lists, Members' personal data, Third Parties and any unpublished financial or pricing information must be protected as a matter of priority.

Members are required to respect the property rights of other companies and their exclusive information.

18. POLITICAL ACTIVITIES

Caramuru has no party affiliation. It does not engage in party political activities. It is expressly forbidden to use Caramuru's goods, services or other financial resources to support political parties, candidates for public office or public officials, subject to the provisions of Section 10 above.

Caramuru does not allow its Members to offer any contributions to public initiatives, whether inside or outside the work environment and office hours, on behalf of Caramuru.

19. STATUTORY AUDIT COMMITTEE

Caramuru has a Statutory Audit Committee ("Audit Committee"), whose rules of composition and operation are contained in its bylaws, as well as in the Company's bylaws. Its primary functions include: (a) ensuring compliance with this Code within the Company; (b) evaluating and deciding on issues related to corruption and any other matter involving shareholders, officers, the Compliance Department, including the Compliance Officer, and the Company's Internal Audit and Risk and Internal Controls Management, for which an extraordinary meeting of the Audit Committee must be convened; and (c) evaluating and recommending to the Company's management the updating, correction or improvement of this Code, as well as other internal policies, whenever necessary.

20. DUTIES RELATED TO CIVIL SOCIETY

20.1. Health, Safety and Environment

Caramuru is committed to protecting the environment, health and safety, and is committed to complying with all environmental laws and regulations applicable to it.

Caramuru's duties are to provide a safe and healthy work environment for all its Members, avoid harmful impacts on the environment, prevent occupational accidents and reduce waste emissions and the use of toxic material.

All Caramuru Members have the responsibility to follow and promote environmental laws and regulations, as well as respecting the environment regardless of the branch of activity.

20.2. Citizenship and Human Rights

Caramuru is committed to good citizenship and ensures its Members a safe and healthy working environment, committing itself not to use child labor, forced labor or labor analogous to slavery.

Respect for human rights will be assured to all individuals who interact with Caramuru, regardless of race, sex, sexual orientation, national origin, ethnicity, language, religion or any other characteristic.

Caramuru promotes and develops actions for the transformation and improvement of social causes in the community in which it operates and encourages volunteerism among its Members.

20.3. Labor Practices

Caramuru faithfully complies with labor legislation and offers fair labor practices, including the prohibition of all forms of discrimination, providing equal access and fair and equal treatment to all Members.

Caramuru guarantees freedom of association, ensures the right of its Members to participate in a collective bargaining agreement, strongly prohibits the practice of forced or slave labor, use of child labor, as well as any type of discriminatory conduct or contrary to human rights.

Caramuru treats all Members and candidates for employment equally. It only considers factors related to the professional criteria necessary for the exercise of the position and the fulfillment of the Company's objectives.

21. REPORTING CHANNEL

It is essential that any Member who is aware of any situation or behavior that represents a conflict or potential conflict in relation to this Code, Caramuru's policies, including the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, as applicable, and/or applicable Brazilian and/or foreign legislation and regulations, report this fact to the Compliance Department, either directly, including via the Compliance Officer, or through the Reporting Channel.

It is important to note that it is the obligation of Members to report violations of the Code of which they are aware, which will be duly investigated and punished (if applicable) in accordance with Section 22 of this Code.

The Reporting Channel is structured to receive reports of non-compliance, violations and situations of conflicts of interest, giving absolute confidentiality to the identity of the reporting party (if you choose this condition). The Reporting Channel is operated independently by a specialized third-party service provider, and each individual has the choice of whether or not to report anonymously.

It is important to note that Caramuru does not tolerate any type of retaliation or persecution against a Member who, in good faith, denounces an illegal conduct or contrary to the provisions of this Code and other Company policies, including the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, as applicable. Caramuru repudiates any form of retaliation against the reporting party and adopts necessary measures to protect them. Retaliation is investigated and may result in disciplinary action.

All reports received by Caramuru are duly investigated by the Compliance Area or by an independent third-party company, depending on the accused, under the terms of Caramuru's Investigation Protocol.

The report made through the Reporting Channel is automatically forwarded to an external and independent entity that, after preliminary analysis and classification, forwards the complaint to the Compliance Department or the independent outsourced company, as the case may be.

The Reporting Channel can be used by both members and third parties and will provide the reporting party with the ability to monitor the progress of the work and investigation in a transparent and accountable manner.

Upon submitting a report, the reporting party will receive a case number that will allow the reporting party to communicate with the Compliance Department to track the progress of the case and provide additional information as necessary. It is important to note that the reporting party may choose to remain anonymous.

The Reporting Channel must be used with responsibility and seriousness, being an important channel for investigating conduct that violates this Code and other Caramuru policies, including the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, as applicable.

The reporting of suspected violations will be made through the Reporting Channel specified below, accessible to Members and Third Parties, and its content should be as complete as possible.

- Website: www.linhaetica.com.br/etica/caramuru; and
- Telephone: 0800 713 0071.
- E-mail: caramuru@linhaetica.com.br
- PO Box: 79518, CEP 04711 -904, São Paulo, SP.

22. INVESTIGATION OF VIOLATIONS AND DISCIPLINARY MEASURES

Investigations of reports and potential irregularities or violations of this Code will be conducted by an independent and qualified team under the direction of the Compliance Department and, whenever possible and necessary, with the assistance of external agents.

Reports or investigations involving members of the Board of Directors, the Executive Board or the Compliance, Internal Audit and Risk Management and Internal Controls

Departments are referred to the Statutory Audit Committee, which evaluates whether to open an investigation and reports its evaluation to the Board of Directors, which decides whether to investigate the report.

The Compliance Department or the independent third party, as appropriate, will assess the seriousness of the alleged violation or irregularity and may form a special investigation committee to investigate potential violations of this Code.

In case of violation of the provisions of this Code or of Caramuru's policies, including the specific internal policies of each Brazilian or foreign branch, affiliate and/or subsidiary, if applicable, the person responsible for the conduct will be penalized with appropriate and proportionate disciplinary measures. Everyone has a duty to report violations or violations of this Code to the Compliance Department, including through the Compliance Officer, ensuring the good conduct of Members and Third Parties in general.

Reports of violation will be promptly investigated and may result in administrative, criminal or civil liability for those involved, in addition to the application of disciplinary measures by Caramuru.

As such, Members and Third Parties who fail to comply with these provisions are subject to the following disciplinary measures applied by the Company, considering the severity of the conduct and eventual recurrence:

- Oral warning;
- Written warning;
- Suspension of up to 30 (thirty) calendar days, when applicable;
- Disruption of the existing relationship between the Company and the offender.

Without prejudice to the disciplinary measures established above, the recommendations made based on the internal investigation may also include (i) complete cessation of the activities object of the investigation, (ii) spontaneous communication of the facts to the competent authorities for possible civil, administrative or criminal liability, and (iii) collection of data and information to subsidize any collaboration with the Public Administration.

Violations of the Anti-Corruption Legislation are considered to be of a very serious nature, adopting a zero tolerance policy. Acts of corruption that remain proven will be punished with the termination of the Member and/or disruption of the relationship with the Third Party.

The other infractions are analyzed on a case-by-case basis. The penalties are applied proportionally to the type of violation and the level of responsibility of those involved.

It is the responsibility of the Statutory Audit Committee, when requested by the Compliance Department, to analyze the disciplinary measures that will be adopted,

which must be fair and compatible with labor rights, also observing the provisions of this Code and the Investigation Protocol.

In cases of potential obstruction of the investigation of irregularities, precautionary measures may also be taken, including the temporary removal of Members who may impede or influence the proper conduct of the investigation.

The disciplinary measures provided for herein are equally applicable to all Members (without distinction of position or hierarchical level), as well as to Third Parties.

If there is a need to involve public authorities to remedy the violations found as a result of internal or external investigations leading to disciplinary action against Members or Third Parties, the Statutory Audit Committee will make such recommendation to the Board of Directors for its decision and will evaluate all elements related to such process.

In all cases, Members may defend themselves against any allegations, thereby ensuring their right to an adversarial proceeding and a full defense

23. GENERAL PROVISIONS

This Code is available on Caramuru's institutional website and intranet to all Members, who assume the responsibility of reading it, attending training and understanding its terms, as well as committing to comply with its provisions.

The effective implementation of the standards and rules of this Code requires compliance with the highest professional standard and compliance with laws, regulations, as well as internal rules and standards of the Company, including the specific policies of each Brazilian or foreign branch, affiliate and/or subsidiary, as applicable.

Caramuru promptly investigates accusations of misconduct in business, while respecting the rights and privacy of all.

Everyone is expected to be familiar with Caramuru's standards and rules and, in case of doubt, to seek guidance from the Compliance Department.

Annexs

ANNEX I TO THE CODE OF ETHICS AND CONDUCT

DEFINITIONS

“Public Administration”: a Brazilian or foreign organization that is generally closely related to state and local governments through Brazilian or foreign government ownership or control.

“Public Official”: anyone who performs a public function, whether in Brazil or any foreign country, temporarily or permanently, with or without remuneration, regardless of the position or the relationship established. This includes but is not limited to: (i) any individual acting in the Executive, Legislative, Judiciary or State or Federal Public Prosecutor’s Office; (ii) any individual acting in public companies, mixed-capital companies, municipalities or public foundations; (iii) any individual acting in a public service concessionaire, such as electricity distribution companies or any educational or health institution; (iv) any candidate for public office or member of a political party; (v) any individual acting in diplomatic representations or in state entities of a foreign country, as well as acting in any company that is controlled by the public power of a foreign country; and (vi) any individual acting in international public organizations, such as the United Nations or the World Trade Organization.

“Compliance Department”: the group of professionals responsible for carrying out activities to identify and measure compliance risks, as well as monitoring and reporting at the level of the Board of Directors (through Caramuru’s Statutory Audit Committee) and the Executive Board. Its performance is based on assumptions and rules approved by the Board of Directors.

“Reporting Channel”: This is the instrument/system for detecting possible irregularities, such as control failures, internal and external fraud, illegal acts and non-compliance with the Code of Ethics and Conduct, the policies of internal procedures and applicable legislation.

“Caramuru” or “Company”: means CARAMURU ALIMENTOS S.A., its Brazilian or foreign branches, affiliates, controlled companies and subsidiaries.

“Code”: means the Caramuru Code of Ethics and Conduct.

“Statutory Audit Committee”: Composed of members approved by the Board of Directors, the Statutory Audit Committee is responsible for overseeing the activities of the Compliance function and deciding on integrity matters, among other duties described in its regulations.

“Competitor(s)”: a company or businessperson that participates in the market with products that are the same or similar to those of its competitors.

“Compliance”: at the corporate level, indicates the act of being in accordance with the internal rules of Caramuru Alimentos S.A. and its Brazilian or foreign branches, affiliates and subsidiaries, as well as all Brazilian and foreign regulations applicable to its business segment.

“Associates of Public Officials”: close persons, friends, spouse or other family member of a Public Official, deriving benefit from that status.

“Report”: also known as a complaint, this is the narration of the facts registered in Caramuru’s Reporting Channel by the person who made the report.

“Family Members”: family members up to the third degree: mother, father, son, brother, grandfather, great-grandfather, grandson, great-grandson, uncle and nephew. Relatives by affinity are also included the spouse, partner, son-in-law, daughter-in-law, father-in-law, stepfather, stepmother, stepson and brother-in-law.

“Financing of Terrorism”: crime committed by any person who, by any means, collaborates in fundraising, with the intention that they be used, or knowing that they will be used in the financing of terrorist activities.

“Competitively Sensitive Information”: in general, competitively sensitive information is specific (e.g., non-aggregated) information that directly relates to the performance of the core activities of economic activities.

“Confidential Information”: includes (i) Company information (e.g., intellectual property, trade secrets, trademarks, copyrights, business, research, new product plans, objectives, strategies, records, processes, standards, databases, customer lists, prices, etc.); (ii) personal information of the Members themselves (e.g., salary and benefit information, medical, financial information, etc.); (iii) information relating to third parties (e.g., suppliers, business partners, service providers and customers, among others); and (iv) information of a strategic, technical, financial and human resources nature. Confidential Information is not considered to be information that has been publicly reported or that is in the public domain.

“Members”: all employees, statutory and non-statutory officers, members of the Board of Directors, members of committees, members of the Fiscal Council (if applicable), representatives and shareholders of Caramuru Alimentos S.A., its Brazilian and foreign branches, affiliates and subsidiaries, or any other person or entity acting for or on behalf of these entities.

“Intergrain”: Intergrain Company S.A., a wholly-owned subsidiary of Caramuru Alimentos S.A.

“Money Laundering”: act of concealing or failing to disclose the nature, source, location, disposition, movement, or ownership of property, rights, and values derived directly or indirectly from past crimes.

“Anti-Corruption Legislation”: means any applicable laws against bribery and anti-corruption, foreign or domestic, together with its implementing rules and regulations, as amended from time to time, including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”), the UK Bribery Act 2010 (“UKBA”), laws and regulations proposed to implement the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the Uruguayan laws numbers 19.574/2017, 19.484/2017, 19.749/2019, and regulatory decrees, in particular Decree no. 379/018 and Resolution no. 016/2014, as well as the following Brazilian legal acts: Federal Law no. 12.846/2013 (provides for strict administrative and civil liability of legal entities for the practice of acts against the Public Administration, national or foreign); Federal Decree No. 11.129/2022 (regulates Law No. 12.846/2013), Brazilian Penal Code; Federal Decree No. 5.687/2006 (United Nations Convention against Corruption); Federal Law no. 8.429/92 (provides for acts of Administrative Misconduct); Federal Law no. 9.613/98, as amended by Law no. 12.683/2012 (provides for crimes of “laundering” or concealment of assets, rights and values).

“Antitrust Legislation”: related to Law no. 12.529/2011 (provides for the repression of violations against the economic order)

“Foreign legislation”: legislation of any country in which Caramuru Alimentos S.A. has a branch, affiliate, subsidiary and/or any form of representation is subject to the incidence of local legislation.

“Bribery Legislation”: is related to art. 333 of Decree No. 2.848/1940.

“Anything of Value”: includes but is not limited to gifts, gift certificates, shares, meals, tickets, lodging, entertainment (such as tickets and event invitations), vehicle use, political contributions, donations and sponsorships.

“No Commercial Value”: are gifts or presents distributed as a courtesy, advertising, usual disclosure, on the occasion of special events or commemorative dates, offered without destination directed to specific public bodies or authorities.

“Third Parties”: any natural or legal person, with the exception of the Members, with whom Caramuru Alimentos S.A., its branches, affiliates or subsidiaries have a relationship or who act on their behalf, in their interest or for their benefit, including, but not limited to, service providers, suppliers, consultants, customers, business partners, distributors, resellers, freight forwarders, partners in joint ventures.

ANNEX II TO THE CODE OF ETHICS AND CONDUCT COMMITMENT AGREEMENT

Through this Commitment Agreement, I declare that (i) I have fully read the Caramuru Code of Ethics and Conduct, and its respective Annex I; and (ii) I agree with all its provisions and (iii) I will make all the necessary efforts to comply with them.

_____, DE _____ DE _____.

PLACE

DATE

NAME

TITLE

SIGNATURE

ANNEX III.1 TO THE CODE OF ETHICS AND CONDUCT

DECLARATION OF NO CONFLICT OF INTEREST

Legal Entity

(Return duly completed and signed)

I, the undersigned _____
representative of the company (_____
Corporate Name/CNPJ _____)

I declare that said company and/or its representatives:

- a)** are not affected by any conflict of interest under this contract. A conflict of interest may result, for example, from economic interests, political or national affinities, family or emotional relationships or any other relevant connection or commonality of interest;
- b)** shall immediately inform Caramuru, which will forward any situation that may constitute or give rise to a conflict of interest to the Compliance Department;
- c)** have not made and will not make any kind of proposal that may give rise to benefits under this contract;
- d)** have not granted, sought or attempted to obtain or accepted any advantage, financial or otherwise, for or from any person, which constitutes an illegal practice or involves corruption, direct or indirect, to the extent that it is an incentive or a reward for the award of such a contract.

Issued on _____ , _____ , _____

Representative's name
Corporate Name
CNPJ No.

Note: If possible, place the identifying stamp of the issuing legal entity.

ANNEX III.2 TO THE CODE OF ETHICS AND CONDUCT

DECLARATION OF NO CONFLICT OF INTEREST

Individual

(Return duly completed and signed)

I the undersigned _____
declare that:

- a)** I have no personal interest that competes with Caramuru's interests. A conflict of interest may result, for example, from economic interests, political or national affinities, family or emotional relationships or any other relevant connection or commonality of interest;
- b)** I will immediately inform the Compliance Department, including through the Compliance Officer, of any situation that may constitute or raise a conflict of interest;
- c)** I have no family, personal and intimate relationship with a Caramuru Member to whom I am directly or indirectly hierarchically related;
- d)** I have not granted, sought, attempted to obtain, or accepted any advantages, financial or otherwise, to or from any persons, which constitute an illegal practice or involve corruption, direct or indirect, insofar as they are an inducement or a reward relating to the award of said contract.

Issued on _____ , _____ , _____

(signature preceded by declaration)

