ZAGOPE

Code of Ethics and Conduct

ZAGOPE - Construções e Engenharia, S.A. is part of the Andrade Gutierrez Group

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1. Introduction

THE ADHERENCE TO THE PRINCIPLES THAT GUIDE THE CULTURE OF ZAGOPE - CONSTRUÇÕES E ENGENHARIA, S.A., AND THE COMPANIES UNDER ITS DIRECT OR INDIRECT CONTROL (“ZAGOPE”), REQUIRES THAT OUR EMPLOYEES CONDUCT THEMSELVES IN COMPLIANCE WITH THIS CODE OF ETHICS AND CONDUCT (“CODE”), WHILE ALSO PRESERVING OUR CORPORATE IDENTITY, WHICH SERVES AS THE FOUNDATION FOR EXCEEDING EXPECTED RESULTS.

Zagope believes that upholding and promoting ethical principles in the markets where it operates is essential to strengthening the foundations of its growth and ensuring its sustainability. Zagope's reputation is one of its most valuable assets, built through the application of our principles and values, all of which are embedded in Zagope's culture.

Thus, the principles outlined in this Code must be practiced by all employees and all companies that comprise Zagope, and they must also be conveyed to our partners—including clients, suppliers, consortium participants, or other third parties (“Partners”)—to ensure the full implementation of the guidelines contained herein and to foster a fairer and more efficient business environment in the markets where we operate.

2. Compliance with Laws and Application Of this code

ZAGOPE IS COMMITTED TO UPHOLDING THE HIGHEST STANDARDS OF ETHICAL CONDUCT, WITH UNWAVERING COMPLIANCE WITH THE REGULATIONS IN FORCE IN EACH OF THE MARKETS WHERE IT OPERATES. ACHIEVING THESE OBJECTIVES DEPENDS ON OUR EMPLOYEES AND PARTNERS UNDERSTANDING THE CULTURE, HISTORY, LEGAL FRAMEWORK, AND INSTITUTIONAL ENVIRONMENT INHERENT TO EACH JURISDICTION.

It is essential that everyone at Zagope, whether administrators or employees, familiarize themselves with this Code, commit to complying with it, and adhere to the practices outlined herein. By doing so, they help prevent legal, ethical, or behavioral violations that could jeopardize our integrity and reputation.

Therefore, this Code applies to all **Zagope employees, including advisors, directors, staff, interns, and trainees ("EMPLOYEES").**

In companies where Zagope shares control with third parties, the application of this Code is always recommended. However, such companies may adopt other codes and policies, provided they are aligned with the rules and principles described herein.

Zagope will only engage with Partners who:

(i) adopt ethical integrity and conduct practices;
(ii) comply with applicable legislation in the development of their activities and fulfillment of their contractual commitments;
(iii) maintain the appropriate confidentiality regarding sensitive information acquired as a result of activities carried out for or in collaboration with Zagope.

The Ethics Committee will be responsible for proposing amendments and adaptations to this Code to the Board of Directors, with the aim of ensuring continuous improvement and the adoption of the most modern ethical conduct practices.

THE EMPLOYEE MUST:

- Familiarize themselves with Zagope's Code of Ethics and Conduct and commit to complying with it;
- Adhere to the rules and regulations applicable to their activities;
- Communicate the guidelines to our partners, including clients, suppliers, consortium participants, and other third parties;
- Be aware of and comply with all policies, standards, and procedures applicable to their role and responsibilities.

3. Ethical and Conduct Standards

THE CONDUCT AND RELATIONSHIPS BETWEEN EMPLOYEES, AS WELL AS ZAGOPE'S RELATIONSHIPS WITH COMPETITORS, PARTNERS, AND PUBLIC OFFICIALS, MUST BE GUIDED BY THE PRINCIPLES OUTLINED HEREIN.

The internal and external public consists of the individuals with whom Zagope maintains a professional relationship, whether current or prospective, always grounded in the application of the principles and conduct rules set forth in this Code.

3.1 Human Rights and Workplace Environment

ZAGOPE'S RELATIONSHIP WITH ITS EMPLOYEES AND THE RELATIONSHIP AMONG EMPLOYEES MUST BE BASED ON THE PRINCIPLES OF MUTUAL TRUST, RESPECT, AS WELL AS THE AWARENESS OF THE NEED TO TREAT OTHERS WITH DIGNITY.

Zagope does not tolerate any form of violation of human rights, whether in the form of prejudice, discrimination, or harassment, both in relationships between employees and between employees and third parties, regardless of nationality, color, religion, political affiliation, gender, sexual orientation, age, physical condition, or any other characteristic. Zagope also does not permit campaigns or actions aimed at recruiting employees related to political or religious topics in the workplace.

Hostilities, harassment, threats, or intrusions into individuals' private lives, as well as inappropriate insinuations of any kind, whether discriminatory in nature or that may constitute moral or sexual harassment, regardless of the hierarchical level of those involved, will not be tolerated under any circumstances.

The same principles described above must be observed during the hiring, promotion, or determination of compensation for employees or service providers. Zagope advocates for fair human resources guidelines, based on meritocratic performance, clearly outlining the expectations that guide evaluation and promotion processes.

At Zagope, the work environment must be maintained in compliance with the rules and best practices of social responsibility, as well as occupational health and safety, in accordance with the applicable regulations.

THE EMPLOYEE MUST:

- Respect all individuals;
- Be honest in your relationships;
- Foster friendly relationships.

THE EMPLOYEE MUST NOT:

- Conduct political or religious campaigns or activities in the workplace;
- Make offensive jokes, inappropriate comments, or use profanity;
- Embarrass, threaten, or intrude on the private lives of colleagues.

3.2 Protection and Processing of Personal Data

ZAGOPE, AS THE DATA CONTROLLER, COLLECTS PERSONAL DATA STRICTLY NECESSARY AND REQUIRED BY LAW, PERTAINING TO ITS EMPLOYEES AND PARTNERS, WITHIN THE SCOPE OF ITS CONTRACTUAL AND COMMERCIAL RELATIONSHIPS. THIS DATA IS PROCESSED LAWFULLY, TRANSPARENTLY, AND WITH INTEGRITY FOR SPECIFIC PURPOSES, ENSURING ITS PROTECTION AND PRIVACY.

Zagope ensures the rights of personal data subjects, including the rights of access, rectification, erasure, restriction of processing, data portability, objection to processing, and the right to file complaints with the supervisory authority (National Data Protection Commission).

Access to personal data records is restricted to employees with appropriate authorization and a clear business need to access them. The data is retained only for the time strictly necessary to fulfill the purposes for which it was collected, in compliance with applicable legal and regulatory obligations.

3.3 Environment

RESPECT FOR THE ENVIRONMENT IS A CENTRAL PRINCIPLE IN THE EXECUTION OF ZAGOPE'S ACTIVITIES.

ZAGOPE PROMOTES THE ADOPTION OF INTEGRATED MANAGEMENT SYSTEMS IN ITS UNITS, CERTIFIED FOR QUALITY, ENVIRONMENTAL MANAGEMENT, AND OCCUPATIONAL HEALTH AND SAFETY, IN ACCORDANCE WITH INTERNATIONALLY APPLIED STANDARDS AND NORMS.

All employees must act responsibly by identifying and preventing environmental risks in the course of their activities. They must immediately report any incidents that could harm the environment to the appropriate organizational leaders and public authorities.

Zagope is committed to the responsible use of natural resources and encourages its employees and partners to seek sustainable solutions for their activities, aiming to minimize environmental impact.

THE EMPLOYEE MUST:

- Comply with legal requirements;
- Report any environmental incident or accident to the Environmental Manager of your unit.

3.4 Social Responsibility

ZAGOPE IS COMMITTED TO SUPPORTING SOCIAL RESPONSIBILITY INITIATIVES AND PROMOTING SUSTAINABLE DEVELOPMENT, WITH RESPECT FOR HUMAN RIGHTS, STRICTLY PROHIBITING THE USE OF CHILD LABOR, FORCED LABOR, OR MODERN SLAVERY AT ANY LEVEL OF ITS ORGANIZATION OR SUPPLY CHAIN.

Recognized projects of reputation and respectability, whether educational, sporting, cultural, or philanthropic in nature, as well as sponsorships of activities whose values align with the principles outlined herein, are part of Zagope's commitment to social responsibility.

THE EMPLOYEE MUST:

- Support social responsibility initiatives;
- Respect human rights.

THE EMPLOYEE MUST NOT:

- Desrespeitar quaisquer pessoas, sejam colegas de trabalho ou comunidades com que se relaciona;
- Utilizar trabalho infantil ou forçado nos locais de trabalho;
- Permitir exploração infantil nos locais de trabalho.

3.5 Focus on Customers

THE COMMITMENT TO DELIVERING EXCELLENT RESULTS TO CUSTOMERS IS A FUNDAMENTAL PART OF OUR CULTURE. THEREFORE, IN THEIR INTERACTIONS WITH CUSTOMERS, EMPLOYEES MUST ACT ETHICALLY AND EFFICIENTLY, PROVIDING CLEAR AND USEFUL INFORMATION WITHIN THE PROMISED OR EXPECTED TIMEFRAME, CLEARLY HIGHLIGHTING THE INHERENT RISK FACTORS OF THE PROJECT, AND OUTLINING AN APPROPRIATE ACTION STRATEGY. THIS MUST ALWAYS ALIGN WITH THE PRINCIPLES AND STANDARDS OF CONDUCT SET FORTH IN THIS CODE.

THE EMPLOYEE MUST:

- Seek solutions aligned with the customer's needs;
- Engage with the customer ethically and transparently;
- Provide reliable information in negotiations and interactions with the customer.

THE EMPLOYEE MUST NOT:

- Act in bad faith;
- Provide misleading information in negotiations and interactions with the customer.

3.6 Communication with the Market and the Media

IT IS IMPORTANT FOR THE CONDUCT OF OUR BUSINESS TO MAINTAIN GOOD RELATIONSHIPS AND COMMUNICATION WITH THE MARKET AND THE MEDIA.

FOR THIS, LECTURES, CONFERENCES, PRESENTATIONS, INTERVIEWS, PUBLICATIONS, COMMENTS, AND ANY OTHER FORM OF COMMUNICATION WITH THE EXTERNAL PUBLIC, IN WHICH STRATEGIC OR BUSINESS PLANS, RESULTS, CONCEPTS, THE NAME, AND IMAGE OF ZAGOPE ARE EXPOSED, CAN ONLY BE CARRIED OUT WITH THE CONSENT AND GUIDANCE OF THE COMMUNICATION AND COMPLIANCE DEPARTMENTS.

To ensure the accuracy of the information Zagope provides to the public, no statement, whether written or verbal, online or in the media, will be made on behalf of Zagope without prior authorization from the Communication Department.

THE EMPLOYEE MUST:

- Request authorization from the Communication and/or Compliance department before conducting lectures, presentations, interviews, or any other form of communication with the external public.

3.7 Social Media

ZAGOPE RECOGNIZES THE ROLE THAT SOCIAL MEDIA PLAYS IN COMMUNICATION AND IN SOCIETY TODAY.

Zagope employees must protect confidential information and exercise good judgment when participating on social media. Therefore, Zagope and its employees commit to:

(i) Safeguarding the company's image;
(ii) Adhering to the guidelines for social media use;
(iii) Following the rules applicable to communications with the market and the media;
(iv) Directing any information requests from any media outlet to the Communication Department.

THE EMPLOYEE MUST:

- Identify yourself as an employee of ZAGOPE on professional profiles;
- Share or promote content from Zagope's official channels, doing so on your personal social media network;
- Use your personal social media to share positive comments about your day-to-day work.

THE EMPLOYEE MUST NOT:

- Disclose confidential information on your social media, including financial and/or legal matters, prices, proposals, and other sensitive topics;
- Comment on social media about clients, partners, suppliers, or coworkers;
- Post photos or videos of coworkers, partners, clients, or suppliers without their express permission;
- Speak on behalf of ZAGOPE in any media outlet, including social media, without prior authorization from the Compliance and Communication departments.

4 Accounting and Financial Records

ZAGOPE WILL MAINTAIN, AT ALL TIMES, A TRANSPARENT, AUTOMATED, UPDATED, AND ACCURATE SYSTEM OF ACCOUNTING AND FINANCIAL RECORDS, STRICTLY OBSERVING THE APPLICABLE LEGISLATION AND REGULATORY STANDARDS.

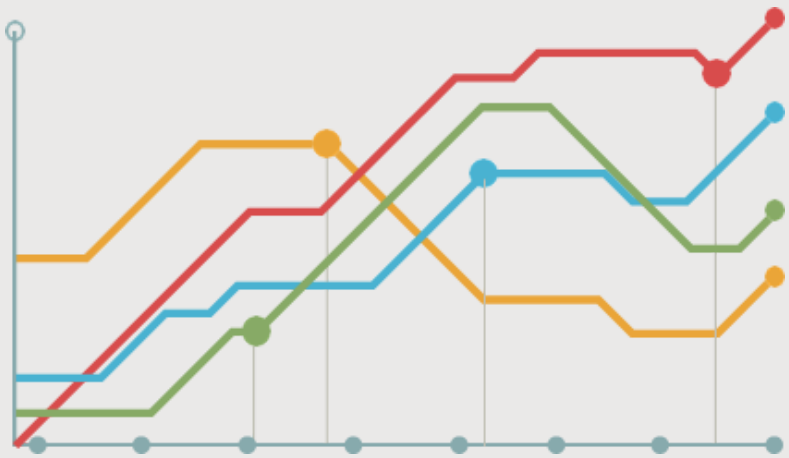
No economic-financial or asset-related transactions involving any company within Zagope will be conducted outside of the commercial or tax books.

All employees must properly inform the responsible departments about any transactions and payments to ensure they are accurately recorded, justified, and entered into the accounting records from the outset.

All supporting documentation for transactions must be kept for a minimum of 10 (ten) years, unless a longer period is required by specific legislation.

THE EMPLOYEE MUST:

- Ensure that accounting and financial records and reports reflect the reality.
- Perform accounting and financial records and controls in accordance with applicable legislation.



5 Conflict of Interests

A CONFLICT OF INTEREST ARISES WHEN AN EMPLOYEE USES THEIR POSITION, ROLE, OR BUSINESS STANDING TO GAIN AN UNDUE ADVANTAGE, EITHER DIRECTLY OR INDIRECTLY, FOR THEMSELVES, IN CONFLICT WITH ZAGOPE'S INTERESTS.

For Zagope, even the mere appearance of a conflict of interest can harm its reputation and business, just as much as an actual conflict. Therefore, it is recommended to avoid situations that may appear to be a conflict of interest, even if no conflict actually exists in the specific case.

THE EMPLOYEE MUST:

- Inform the Compliance department of any familial relationship or close personal connection with Public Agents, Politically Exposed Persons (PEPs), Suppliers, Partners, and/or Clients.

THE EMPLOYEE MUST NOT:

- Develop a parallel or conflicting professional occupation with your position at Zagope.

Employees are prohibited from receiving any type of payment or benefit, including money, gifts, meals, lodging, and entertainment, in violation of Zagope's internal policies.

BY WAY OF EXAMPLE, A CONFLICT OF INTEREST IS PRESUMED IN THE FOLLOWING SITUATIONS:

- Hiring a friend or family member as a supplier under conditions less favorable to Zagope, compared to those practiced in the market by third parties with equivalent capabilities;
- The development, by an employee, of executive professional activities parallel to their position at Zagope.
- Abuse, by any employee, of their position in Zagope companies to obtain personal advantages or benefits for third parties.

Employees must safeguard Zagope's material and intellectual property, using corporate equipment and communication tools only for professional activities and in accordance with internal policies, avoiding waste and the misuse of resources, equipment, or services for personal purposes or activities that are incompatible with Zagope's interests.

When finalizing transactions with third parties in which their family members are partners with significant stakes or executives, employees must obtain prior written authorization from the Compliance Department.

6 Confidentiality of Privileged Information

MANY TYPES OF INFORMATION ARE CONFIDENTIAL AND, FOR THIS REASON, CANNOT BE DISCLOSED, EITHER DUE TO APPLICABLE LEGISLATION OR COMMITMENTS MADE WITH THIRD PARTIES.

All information and data that circulate, are produced, or are maintained in systems or equipment owned by Zagope are its exclusive property, regardless of the employee who created them. The rights over know-how, industrial property, and the duty of confidentiality must be respected even after employees have left Zagope.

All employees with access to privileged information are required to maintain confidentiality regarding such data and are automatically prohibited from trading any securities issued by Zagope companies or any other entities involved in the transaction giving rise to the information, prior to its official disclosure.

Privileged information is considered to be any information that could significantly influence:

(i) the price of securities of a publicly traded company;
(ii) the decision of investors to buy, sell, or hold those securities;
(iii) the decision of investors to exercise any rights inherent to holding securities issued by the company or linked to them;
(iv) information that is confidential due to contractual obligations or any strategic information, including those that may affect Zagope's competitiveness in competitive processes.

Only employees who are formally authorized may make public statements to provide information, always observing confidentiality duties when applicable. Information that is publicly disclosed must be transparent, clear, and complete, taking into account the timing of the disclosure and aiming to serve the best interests of the companies or individuals involved.

THE EMPLOYEE MUST:

- When authorized, disclose only transparent and truthful information.
- Maintain confidentiality of sensitive information, in accordance with applicable legislation and established commitments.

THE EMPLOYEE MUST NOT:

- Share confidential information from Zagope or partner companies;
- Discuss confidential matters in public places;
- Use Zagope's information and content for personal matters or those of third parties without proper authorization.

7 Relationship with the Public Authorities

IT IS EXPRESSLY PROHIBITED FOR ANY EMPLOYEE TO OFFER, PROMISE, AUTHORIZE, OR PROVIDE DIRECTLY OR THROUGH THIRD PARTIES, ANY UNDUE ADVANTAGE OF ANY KIND, WHETHER IN MONEY OR ANY GOODS OR SERVICES OF VALUE, TO PUBLIC AGENTS, POLITICAL PARTIES AND THEIR MEMBERS, OR ANY CANDIDATES FOR PUBLIC OFFICE, WHETHER NATIONAL OR FOREIGN, AS WELL AS TO REPRESENTATIVES, FAMILY MEMBERS, OR EQUIVALENTS OF SUCH INDIVIDUALS, WITH THE INTENT OF OBTAINING PERSONAL BENEFIT OR BENEFIT FOR ZAGOPE.

Regarding the offering of gifts to public agents, only gifts with no commercial value or those given as a courtesy, for promotional purposes, regular publicity, special events, or holidays, are allowed. These gifts must be distributed in a broad manner, without being targeted at specific bodies or authorities, and must always comply with the applicable regulations and policies of the respective counterpart.

Political donations by any company of ANDRADE GUTIERREZ and ZAGOPE are prohibited. Employees may make donations with their own resources, provided that they comply with applicable legislation, without any involvement or affiliation with Zagope.

Employeeszhave complete freedom to exercise their political rights; however, they must:

(i) Preserve Zagope from any association with political party positions; and
(ii) Disassociate themselves from Zagope prior to their candidacy for public office, whether elected or appointed.

THE EMPLOYEE MUST:

- Report to the Compliance department any cases of granting gifts, presents, entertainment, or hospitality to Public Agents, in accordance with internal guidelines;
- Safeguard Zagope from any association with particular political party positions;
- Disassociate from Zagope prior to candidacy for political office;
- Consult the Ethics Committee for any doubts regarding relationships with Public Agents.

Individuals equated with public agents, whether national or foreign, include candidates for public office; individuals in diplomatic positions and in international organizations; employees of companies directly or indirectly controlled by public entities, whether national or foreign; and private companies that are concessionaires or licensees of public services.

THE EMPLOYEE MUST NOT:

- Offer, promise, authorize, or give any undue advantage to Public Agents or individuals related to them;
- Offer gifts, presents, or meals exceeding €150 (one hundred fifty euros) or the equivalent in local currency;
- Offer entertainment and hospitality to Public Agents for tourism purposes;
- Contribute any resources to acts that may be considered harmful to direct or indirect public administration, either national or foreign;
- Use intermediaries to conceal or disguise actions harmful to direct or indirect public administration, either national or foreign;
- Fraudulently manipulate or illegally interfere with public tenders and bidding processes;
- Interfere with or hinder oversight or investigation by any public authorities.

8 Respect for Competition Laws

THE COMPANIES THAT ARE PART OF ZAGOPE AND THEIR RESPECTIVE EMPLOYEES MUST ALWAYS ACT INDEPENDENTLY IN RELATION TO THEIR COMPETITORS, WHETHER IN THE PRIVATE SECTOR OR IN NEGOTIATIONS INVOLVING DIRECT OR INDIRECT PUBLIC ADMINISTRATION.

Zagope and its employees must comply with competition laws, and any actions aimed at limiting, distorting, or otherwise harming free competition, arbitrarily increasing profits, or abusing a dominant position are strictly prohibited.

In their dealings with competitors, employees must adhere to competition laws and are strictly prohibited from making any agreements or exchanging commercially sensitive confidential information (such as price, costs, margins, commercial or investment plans) with competitors, as well as any understandings or agreements, whether explicit or implicit, that could directly or indirectly influence price setting, adjustments, discounts, production quotas, sales conditions, market or customer division, or other measures that could limit or restrict free competition in the market.

Any practices that could be considered unfair competition are also prohibited.

The formation of associative contracts, consortia, or partnerships in general with competitors is allowed, provided that the provisions of the applicable competition laws are strictly observed.

THE EMPLOYEE MUST:

- Negotiate in good faith, observing the current legislation and internal guidelines.
- Refuse to receive confidential information about competitors.

THE EMPLOYEE MUST NOT:

- Agree, collude, manipulate, or adjust with a competitor, in any form, on price, division of market segments, or shares.
- Harm or defraud, through arrangement, collusion, or any other means, the competitive nature of public or private competitive procedures.
- Prevent, disrupt, or defraud the execution of any act within a competitive procedure.

9 Composition of the Ethics Committee

THE ETHICS COMMITTEE IS COMPOSED OF A MINIMUM OF 3 (THREE) AND A MAXIMUM OF 9 (NINE) MEMBERS, ELECTED BY THE BOARD OF DIRECTORS OR BY THE GENERAL ASSEMBLY (IN THE CASE OF A COMPANY WITHOUT A BOARD OF DIRECTORS), CHOSEN FROM PROFESSIONALS WITH IMPECCABLE REPUTATIONS. THE ELECTION OF A MEMBER OF ZAGOPE'S BOARD OF DIRECTORS AS A MEMBER OF THE ETHICS COMMITTEES OF CONTROLLED COMPANIES IS PROHIBITED. THE ETHICS COMMITTEES MUST SELECT THEIR COORDINATORS FROM AMONG THEIR MEMBERS.

The Ethics Committee will be responsible for:
(i) Monitoring and improving the company's conduct policies;
(ii) Training, raising awareness, disseminating, and enforcing ethical conduct rules among Zagope employees;
(iii) Clarifying employees' doubts regarding the internal guidelines of the Compliance Program and other Zagope guidelines related to the Code;
(iv) Supervising the work of other departments or conducting investigations into any violations of the Code;
(v) Implementing and maintaining communication channels, ensuring anonymity is preserved;
(vi) Leading any investigations that may be conducted within any of Zagope's companies to investigate potential illegal acts that violate the provisions of this Code;
(vii) Recommending to the Board of Directors or the General Shareholders' Meeting (in the case of a company without a Board of Directors) the application of appropriate penalties and reporting directly and periodically to the Board of Directors or the General Shareholders' Meeting (in the case of a company without a Board of Directors) on matters related to the achievement and development of its responsibilities.

In order to establish effective and comprehensive control, the Board of Directors of ZAGOPE - CONSTRUÇÕES E ENGENHARIA, S.A. may recommend the creation of additional ethics committees within any controlled company of Zagope (the "ETHICS COMMITTEES OF CONTROLLED COMPANIES"). The provisions contained in this Code shall apply in full to all Ethics Committees of the Controlled Companies.

The regularly established Ethics Committee of the Controlled Company will have the autonomy to apply all the rules and policies outlined in this Code. The members of this committee must communicate any violations of the principles outlined here to the Ethics Committee of ZAGOPE, as well as any punitive, mitigating, or corrective measures that may have been adopted.

10 Non-compliance with the Code of Ethics and Conduct

ANY VIOLATION FROM THE DATE OF APPROVAL OF THIS CODE AND THE CREATION OF THE ETHICS COMMITTEE MUST BE PROMPTLY COMMUNICATED TO THE ETHICS COMMITTEE THROUGH ANY COMMUNICATION CHANNELS THAT MAY BE IMPLEMENTED. THE ETHICS COMMITTEE MUST TAKE APPROPRIATE MEASURES, INCLUDING COMMUNICATION WITH THE RELEVANT PUBLIC AUTHORITIES, IF APPLICABLE.

The employee, especially in an executive position such as a board member, director, superintendent, or manager, who allows anyone linked to this Code to violate any of its principles or rules, may be held accountable for the violation.

No retaliation will be allowed against those who, in good faith and with a serious basis, report any act that involves or may involve a violation of the Code.

In cases of violation of the Code, the Ethics Committee will recommend the application of penalties or disciplinary measures, in accordance with applicable legislation and internal guidelines, including:

- Verbal or written warning;
- Temporary suspension of the employment contract;
- Termination of the employment contract.

The violation of the duties set forth in this Code, without prejudice to the legal consequences mentioned, may result in disciplinary or criminal liability related to acts of corruption and related offenses, in accordance with the penalties for corruption crimes and related offenses set out in Decree-Law No. 48/1995, of March 15, as amended by Law No. 15/2024, of January 29, currently in force.

11 Communication Channels

WHEN POSSIBLE, EMPLOYEES SHOULD DISCUSS THEIR DOUBTS AND REPORTS OF POSSIBLE VIOLATIONS OF THE PRINCIPLES CONTAINED IN THIS CODE WITH THEIR MANAGERS. INTERNAL DISCUSSIONS CONTRIBUTE TO THE CONTINUOUS IMPROVEMENT OF ZAGOPE'S COMPLIANCE PROGRAM.

THE EMPLOYEE MUST:

- Always report if you suspect or witness any violation of the Code of Ethics and Conduct.

THE EMPLOYEE MUST NOT:

- Report incorrect or false information through the communication channels.

Any doubts regarding the interpretation or omission of matters addressed in this Code should be resolved by the Ethics Committee where such doubt or omission has arisen.

Employees may use the communication channels, which will ensure complete anonymity, to resolve any doubts or report any violations of this Code to the Ethics Committee.

PHONE

Portugal: 800 180 757

Angola: +244 226 434 505

INTERNET

https://www.zagope.pt/sustentabilidade/#fale-connosco
https://www.canalconfidencial.com.br/eticaag/

COMMITMENT TERM

I hereby declare that:a) I have received, read, and understood the Zagope Code of Ethics and Conduct; b) I fully agree with the rules and guidelines contained therein; c) I commit to fully complying with them.

EMPLOYEE/PARTNER

NAME: _____

EMPLOYEE NUMBER: _____

NIF (PARTNER): _____

SIGNATURE: _____

DATE: ___ / ___ / _____

ZAGOPE