



ZAGOPE

CODE OF ETHICS AND CONDUCT



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INTRODUCTION

COMPLIANCE WITH THE PRINCIPLES THAT GUIDE THE CULTURE OF ZAGOPE - CONSTRUÇÕES E ENGENHARIA, S.A. AND THE COMPANIES UNDER ITS DIRECT OR INDIRECT CONTROL ("ZAGOPE") ASSUMES THAT OUR COLLABORATORS WILL CONDUCT THEMSELVES IN ACCORDANCE WITH THE PROVISIONS OF THIS CODE OF ETHICS AND CONDUCT ("CODE"), WHILE PRESERVING OUR CORPORATE IDENTITY, WHICH IS THE BASIS FOR ACHIEVING THE EXPECTED RESULTS.

Zagope believes that the preservation and promotion of ethical principles in the markets in which it operates are essential to strengthen the foundations of its growth and ensure its perpetuity. Zagope's reputation is one of its most valuable assets, built through the application of our principles and values, all present in the Zagope culture.

Thus, the principles contained in this Code must be practiced by all collaborators and by all the companies that are part of Zagope, as well as transmitted to our partners, whether clients, suppliers, coparticipants in partnerships or other third parties ("PARTNERS"), in order to ensure the full application of the guidelines contained herein and the creation of a fairer and more efficient business environment in the markets in which we operate.

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COMPLIANCE WITH LAWS AND APPLICATION OF THIS CODE

ZAGOPE IS COMMITTED TO MAINTAINING THE HIGHEST STANDARD OF ETHICAL CONDUCT, WITH STRICT COMPLIANCE WITH THE RULES IN FORCE IN EACH OF THE MARKETS IN WHICH IT OPERATES. ACHIEVING THESE GOALS DEPENDS ON OUR COLLABORATORS AND PARTNERS UNDERSTANDING THE CULTURE, HISTORY, LEGAL AND INSTITUTIONAL ENVIRONMENT INHERENT IN EACH JURISDICTION.

It is essential that all Zagope's collaborators and directors are aware of this Code, undertake to comply with it and observe the practices contained therein, thus preventing the occurrence of legal, ethical or conduct violations that could compromise our integrity and reputation.

Therefore, this Code applies to: **all Zagope collaborators, including advisors, directors, employees, trainees and apprentices ("COLLABORATORS")**.

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

Zagope will only engage with Partners who:

- (i) adopt ethical and conduct integrity practices;
- (ii) comply with the applicable legislation in the development of their activities and achievement of their contractual commitments;
- (iii) maintain appropriate secrecy regarding confidential information that they may acquire as a result of activities carried out for or together with Zagope.

The Ethics Committee shall propose amendments and adaptations to this Code to the Board of Directors in order to ensure continuous maturation and adoption of the most modern practices of ethical conduct.



THE COLLABORATOR SHOULD:

- Know the ZAGOPE Code of Ethics and Conduct and commit to comply with it.
- Comply with the standards and other regulations applicable to their activities.
- Communicate the guidelines to our partners, whether they are clients, suppliers, coparticipants in consortia or other third parties.
- Know and comply with all Policies, Standards and Procedures applicable to their position and duties.

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ETHICAL AND CONDUCT STANDARDS

THE CONDUCT AND RELATIONSHIP BETWEEN COLLABORATORS, AS WELL AS ZAGOPE'S RELATIONSHIP WITH COMPETITORS, PARTNERS AND PUBLIC AGENTS, MUST BE GUIDED BY THE PRINCIPLES CONTAINED HEREIN.

The internal and external public is composed of the people with whom Zagope maintains a professional relationship, whether effective or prospective, always based on the application of the principles and rules of conduct set out in this Code.

3.1

HUMAN RIGHTS AND WORKING ENVIRONMENT

ZAGOPE'S RELATIONSHIP WITH ITS COLLABORATORS AND THE RELATIONSHIP BETWEEN COLLABORATORS MUST BE BASED ON THE PRINCIPLES OF MUTUAL TRUST, RESPECT, AS WELL AS 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 the relationship between Collaborators and between Collaborators and third parties, whether due to race, color, religion, political affiliation, national origin, gender, age, physical condition or any other characteristic. Zagope does not allow campaigns or actions to seek the adhesion of Collaborators related to topics of a political or religious nature in the workplace.

Hostility, embarrassment, threats or intrusions into people's private lives, as well as improper insinuations of any kind, whether discriminatory or that may constitute moral or sexual harassment, regardless of the hierarchical level of those involved, will not be admitted under any circumstances.

The same principles described above should be observed when hiring, promoting or determining the remuneration of Collaborators or service providers. Zagope advocates fair, meritocratic performance-based human resources guidelines, making clear the expectations that guide the evaluation and promotion processes.



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



THE COLLABORATOR SHOULD:

- Respect all people.
- Be honest in his/her relationships.
- Cultivate friendly relationships.



THE COLLABORATOR SHOULD NOT:

- Carry out campaigns or actions of a political or religious nature in the workplace.
- Make offensive as well as inappropriate jokes and use "swear words".
- Embarrass, threaten or intrude into the private lives of co-workers.

3.2

PROTECTION AND PROCESSING OF PERSONAL DATA

AS DATA CONTROLLER, ZAGOPE COLLECTS THE PERSONAL DATA STRICTLY NECESSARY AND REQUIRED BY LAW, RELATING TO ITS COLLABORATORS AND PARTNERS, WITHIN THE SCOPE OF THEIR CONTRACTUAL AND COMMERCIAL RELATIONSHIP, WHICH ARE TREATED IN A LAWFUL, TRANSPARENT AND INTEGRAL MANNER, FOR SPECIFIC PURPOSES, GUARANTEEING THEIR PROTECTION AND PRIVACY.

ZAGOPE ensures the rights of the holders of personal data, such as the rights of access, correction, deletion, limitation of processing, data portability, opposition to processing and the right to lodge complaints with the supervisory authority (National Data Protection Commission).

Access to personal data records is limited to collaborators who have appropriate authorization and the clear business need to access them and are kept for as long as strictly necessary to fulfill the purposes for which they are collected, in compliance with the applicable legal and regulatory obligations. Zagope expects all its collaborators and business partners who may carry out any type of processing of personal data to comply with all procedures related to the personal data protection and processing policy implemented at Zagope, as well as with all applicable laws and regulations.

3.3

ENVIRONMENT



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

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

All Collaborators must act responsibly by identifying and preventing environmental risks in the course of their activities, immediately informing those responsible within their respective organizations and the public authorities of any incident that may cause damage to the environment.

Zagope ensures the responsible use of natural resources and encourages its Collaborators and Partners to seek sustainable solutions for their activities, with the least possible impact on the environment.

**THE COLLABORATOR SHOULD:**

- Comply with legal requirements.
- Report any environmental incident or accident to the Environment Manager of his/her Unit.



3.4

SOCIAL RESPONSIBILITY

ZAGOPE IS COMMITTED TO SUPPORTING SOCIAL RESPONSIBILITY ACTIONS AND PROMOTING SUSTAINABLE DEVELOPMENT, WITH RESPECT FOR HUMAN RIGHTS, AND DOES NOT TOLERATE THE USE OF CHILD OR FORCED LABOR AT ANY LEVEL OF ITS ORGANIZATION OR SUPPLY CHAIN.

Projects of recognized reputation and respectability, whether educational, sporting, cultural or philanthropic, as well as sponsorship of activities whose values are compatible with the principles contained herein, are part of Zagope's commitment to social responsibility.



THE COLLABORATOR SHOULD:

- Support social responsibility actions.
- Respect human rights.



THE COLLABORATOR SHOULD NOT:

- Disrespect any person, be it co-workers or communities he/she engages with.
- Use child or forced labor in the workplace.
- Allow child exploitation in workplaces.



3.5

FOCUS ON CLIENTS

THE COMMITMENT TO DELIVER GOOD RESULTS TO CLIENTS IS A FUNDAMENTAL PART OF OUR CULTURE. THUS, IN DEALING WITH CLIENTS, COLLABORATORS MUST CONDUCT THEMSELVES ETHICALLY AND EFFICIENTLY, TRANSMITTING CLEAR AND USEFUL INFORMATION, WITHIN THE PROMISED OR EXPECTED TIMEFRAME, CLEARLY HIGHLIGHTING THE RISK FACTORS INHERENT IN THE PROJECT AND OUTLINING AN APPROPRIATE ACTION STRATEGY, ALWAYS IN LINE WITH THE PRINCIPLES AND STANDARDS OF CONDUCT SET OUT IN THIS CODE.



THE COLLABORATOR SHOULD:

- Seek solutions aligned with the client's needs.
- Relate ethically and transparently with the client.



THE COLLABORATOR SHOULD NOT:

- Act in bad faith.
- Lie in negotiations and in the relationship with the Client.

3.6

COMMUNICATION WITH THE MARKET AND THE PRESS

GOOD RELATIONS AND COMMUNICATION WITH THE MARKET AND THE PRESS ARE IMPORTANT FOR CONDUCTING OUR BUSINESS. FOR THIS PURPOSE, LECTURES, CONFERENCES, PRESENTATIONS, INTERVIEWS, PUBLICATIONS, COMMENTS AND ANY OTHER FORM OF COMMUNICATION WITH THE EXTERNAL PUBLIC, IN WHICH THE STRATEGIC OR BUSINESS PLANS, RESULTS, CONCEPTS, THE NAME AND IMAGE OF ZAGOPE ARE EXPOSED, MAY ONLY BE CARRIED OUT WITH THE CONSENT AND GUIDANCE OF THE COMMUNICATION AREA AND THE COMPLIANCE AREA.

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 the prior authorization of the Communication Area.



THE COLLABORATOR SHOULD:

- Request authorization from the Communication area and/or the Compliance area when giving lectures, presentations, interviews or in any other form of communication with the external public.

3.7

SOCIAL MEDIA

ZAGOPE RECOGNIZES THE ROLE T SOCIAL MEDIA CURRENTLY
PLAYS IN COMMUNICATION AND SOCIETY.

Zagope Collaborators must protect confidential information and exercise good judgment when participating in social media. Thus, Zagope and its collaborators undertake to:

- protect the image of the Company;
- observe and comply with the guidelines for the use of social media;
- observe the rules applicable to communications with the market and the press;
- direct any request for information, from any vehicle of information, to the Communication Area.



THE COLLABORATOR SHOULD:

- Identify himself/herself as a ZAGOPE employee in job profiles.
- Disclosure or share content from Zagope's official channels, being allowed do so on his/her personal social media.
- Use his/her personal social media by posting comments about his/her day-to-day work in a positive way.



THE COLLABORATOR SHOULD NOT:

- Disclose confidential information, including financial and/or legal matters, prices, tenders, and other sensitive topics on social media.
- Make comments on social media about information regarding clients, partners, suppliers or co-workers.
- Post photos or videos of co-workers, partners, clients or suppliers without their express permission.
- Speak on behalf of ZAGOPE in any means of communication, including social media, without prior authorization from the Compliance and Communication areas.



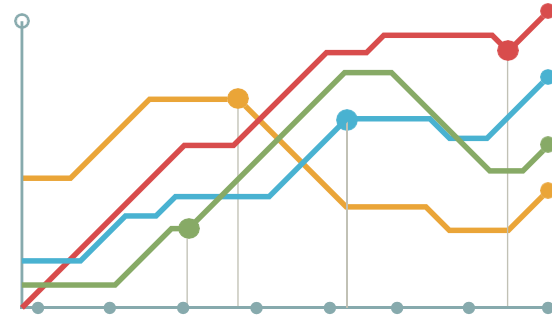
4

ACCOUNTING AND FINANCIAL RECORDS

ZAGOPE WILL KEEP, AT ALL TIMES, A TRANSPARENT, AUTOMATED, UP-TO-DATE AND ACCURATE SYSTEM OF ACCOUNTING AND FINANCIAL BOOKS AND RECORDS, STRICTLY COMPLYING WITH APPLICABLE LEGISLATION AND REGULATORY STANDARDS.

No economic, financial or equity transaction involving any company belonging to Zagope shall be carried out outside the commercial or tax books.

All Collaborators must properly inform the responsible areas of any transactions and payments so that they can be properly cleared, justified and entered into the accounting records from the outset.



All supporting documentation for transactions must be kept for at least 10 (ten) years, if a longer period is not required by specific legislation.



THE COLLABORATOR SHOULD:

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

5

CONFLICT OF INTEREST

THERE IS A CONFLICT OF INTEREST WHEN A COLLABORATOR USES HIS/HER JOB, FUNCTION OR BUSINESS POSITION TO OBTAIN AN UNDUE ADVANTAGE, DIRECTLY OR INDIRECTLY FOR HIMSELF/HERSELF, IN CONFLICT WITH ZAGOPE'S INTERESTS.

For Zagope, the mere appearance of a conflict of interest can cause as much damage to its reputation and business as an actual situation. It is therefore advisable to avoid situations that may appear to be a conflict of interest, even if such a conflict does not arise in the specific case.



THE COLLABORATOR SHOULD:

- Communicate to the Compliance area the kinship or close relationship with Public Agents, Politically Exposed Persons (PEP), Suppliers, Partners and/or Clients.



THE COLLABORATOR SHOULD NOT:

Develop an occupation that is parallel or conflicting with his/her position at Zagope.

Collaborators are prohibited from receiving any type of payment or advantage, including cash, 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 supplier under less favorable conditions for Zagope, when compared to those practiced in the market by third parties with equivalent capacity;
- Abuse, by any Collaborator, of their position in Zagope companies to obtain personal advantages or advantages for third parties.
- Development, by a Collaborator, of executive professional activities that are parallel to his/her position at Zagope.

Collaborators must protect Zagope's material and intellectual assets, using corporate equipment and means of communication only for professional activities and in accordance with internal rules, avoiding waste and diversion of resources, equipment or services for personal purposes or purposes that deemed incompatible with Zagope's interests.

When finalizing transactions with third parties in which their family members act as partners with a relevant stake or as executives, Collaborators must obtain prior written authorization from the Compliance Area.



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CONFIDENTIALITY OF INSIDE INFORMATION

THERE IS A LOT OF INFORMATION THAT IS CONFIDENTIAL AND CANNOT BE DISCLOSED, THUS, CANNOT BE DISCLOSED, EITHER BECAUSE OF APPLICABLE LEGISLATION OR BECAUSE OF COMMITMENTS MADE TO THIRD PARTIES.

All information and data circulating, produced or maintained on systems or equipment owned by Zagope are its exclusive property, regardless of the Collaborator who designed them. The rights over know-how and industrial property and the duty of confidentiality must be respected even after the Collaborators have left Zagope.

All Collaborators who have access to inside information must keep such data confidential and are automatically prohibited from negotiating any securities issued by Zagope companies or by any other companies involved in the transaction giving rise to such information, prior to its official disclosure.

Inside information is any information which may have a significant influence on the situations below:

- (i) in the listing of securities of a public company;
- (ii) in the decision of investors to buy, sell or hold those securities;
- (iii) in the decision of investors to exercise any rights inherent in the status of holder of securities issued by the company or referenced to them;
- (iv) information that is confidential under contractual obligation or;
- (v) any information of a strategic nature, including that that may affect Zagope's competitiveness in tender processes.

Only formally authorized Collaborators may speak publicly to provide information, always observing the duties of confidentiality, where applicable. Information that is publicly disclosed must be transparent, clear, and complete, considering the timing of the information and the best interests of the companies or persons involved.



THE COLLABORATOR SHOULD:

- Disclose, when authorized, only transparent and truthful information.
- Maintain confidentiality of sensitive information, considering the applicable legislation and commitments entered into.



THE COLLABORATOR SHOULD NOT:

- Share confidential information of Zagope or of partner companies.
- Talk about confidential matters in public places.
- Use Zagope information and content for private or third party matters without proper authorization.

7 RELATIONSHIP WITH PUBLIC AUTHORITIES

IT IS EXPRESSLY FORBIDDEN FOR ANY COLLABORATOR TO OFFER, PROMISE, AUTHORIZE, OR GIVE DIRECTLY OR THROUGH THIRD PARTIES, ANY UNDUE ADVANTAGE OF ANY NATURE, WHETHER IN CASH OR ANY VALUABLE GOOD OR SERVICE, TO PUBLIC AGENTES, POLITICAL PARTIES AND THEIR MEMBERS, OR TO ANY CANDIDATES FOR PUBLIC OFFICE, NATIONAL OR FOREIGN, AS WELL AS TO REPRESENTATIVES AND FAMILY MEMBERS OR THE LIKE OF ANY SUCH PERSONS, IN ORDER TO OBTAIN PERSONAL BENEFIT OR BENEFIT FOR ZAGOPE.

As for the offering of promotional gifts to public agents, only gifts with no commercial value or distributed as a courtesy, advertising, customary disclosure, on the occasion of special events or commemorative dates, offered in a diffuse manner and, therefore, without a specific targeting of specific bodies or authorities are allowed, always respecting the regulations and policies applicable to the respective counterpart.

Political donations by any ANDRADE GUTIERREZ and ZAGOPE company are prohibited. Collaborators can make donations with their own resources, provided that the applicable legislation is observed, without any involvement and link from Zagope.

Collaborators are free to exercise their political rights, but must:

- (i) preserve Zagope from any link to party-political positions; and
- (ii) resign from Zagope prior to standing for public office, elective or appointed.



THE COLLABORATOR SHOULD:

- Communicate to the Compliance area the cases of granting of promotional gifts, presents, entertainment or hospitality to Public Agents, according to internal guidelines.
- Protect Zagope from any link to particular party-political positions.
- Resign from Zagope prior to standing for political offices.
- Consult the Ethics Committee in any doubt regarding the relationship with Public Agents.

Any candidates for public office, persons in diplomatic positions and in international organizations, employees of companies controlled, directly or indirectly, by public entities, national or foreign, private companies that are concessionaires or permit holders of public services are equated to public agents, national or foreign.



THE COLLABORATOR SHOULD NOT:

- Offer, promise, authorize or give any undue advantage to Public Agents or persons related to them.
- Offer promotional gifts, presents or meals that exceed €150 (one hundred and fifty euros) or the equivalent in local currency.
- Offer entertainment and hospitality to Public Agents for tourism purposes.
- Contribute with any resources to the practice of acts that may be considered harmful to the direct or indirect public administration, national or foreign.
- Use an intermediary to conceal or disguise acts harmful to the direct or indirect public administration, national or foreign.
- In any way defraud, manipulate or unlawfully interfere in public tenders and bids.
- Interfere with or hinder the supervision or investigation by any public bodies.

COMPLIANCE WITH ANTITRUST RULES

ZAGOPE'S MEMBER COMPANIES AND THEIR RESPECTIVE COLLABORATORS MUST ALWAYS ACT INDEPENDENTLY OF THEIR COMPETITORS, WHETHER IN THE PRIVATE SECTOR OR IN NEGOTIATIONS INVOLVING THE PUBLIC ADMINISTRATION, DIRECT OR INDIRECT.

Zagope and its collaborators must comply with the antitrust rules, and any acts aimed at limiting, distorting or in any way harming free competition, arbitrarily increasing profits or abusing a dominant position are prohibited.

In the relationship with their competitors, Collaborators must be aware of antitrust rules, and any agreements and/or exchanges of confidential commercially sensitive information (ex. prices, costs, margins, commercial or investment plans) with competitors are strictly prohibited, as well as any explicit understandings and/or agreements between competitors that may give rise to or influence, directly or indirectly, the setting of prices, readjustments, discounts,

production quotas and/or sales conditions, division of markets or clients, among other measures that may limit or restrict in any way free competition in the market.

Any practices that may constitute unfair competition are also prohibited. The constitution with competitors of associative contracts, consortia or partnerships in general are allowed, and the provisions contained in the current antitrust laws must be observed.



THE COLLABORATOR SHOULD:

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



THE COLLABORATOR SHOULD NOT:

- Agree, arrange, manipulate or adjust with the competitor, in any way, price, division of parts or segments of a market.
- Harm or defraud, by means of an arrangement, adjustment or any other form, the competitive nature of the public or private competitive procedure.
- Prevent, disturb or defraud the performance of any act of competitive procedure.



9 COMPOSITION OF THE ETHICS COMMITTEE

THE ETHICS COMMITTEE IS COMPOSED OF AT LEAST 3 (THREE) AND AT MOST 9 (NINE) MEMBERS, ELECTED BY THE BOARD OF DIRECTORS OR BY THE GENERAL MEETING (IN THE CASE OF A COMPANY THAT DOES NOT HAVE A BOARD OF DIRECTORS), CHOSEN FROM AMONG PROFESSIONALS OF UNBLEMISHED REPUTATION. THE ELECTION OF A FULL MEMBER OF ZAGOPE'S BOARD OF DIRECTORS TO SERVE ON THE ETHICS COMMITTEES OF CONTROLLED COMPANIES IS PROHIBITED. THE ETHICS COMMITTEES SHOULD CHOOSE THEIR COORDINATORS FROM AMONG THEIR MEMBERS.

The Ethics Committee will be responsible for:

- (i) monitoring and improving business conduct policies;
- (ii) training, awareness-raising, disseminating and applying the rules of ethical conduct among Zagope's members;
- (iii) clarifying doubts of Collaborators about the internal guidelines of the Compliance Program and other Zagope guidelines related to the Code;
- (iv) supervising the work of other sectors or conducting investigations into any breach of the Code;
- (v) implementing and maintaining communication channels, taking care to preserve anonymity;
- (vi) conducting any investigations that may be carried out in any of Zagope's companies, with a view to investigating any illicit acts practiced in violation of the provisions of this Code;
- (vii) recommending to the Board of Directors or to the General Shareholders' Meeting (in the case of a company that does not have a Board of Directors), the application of applicable penalties and;

(viii) reporting directly and periodically to the Board of Directors or to the General Shareholders' Meeting (in the case of a company that does not have a Board of Directors), on matters related to the achievement and development of the activities within its competence.

In order to establish effective and comprehensive control, the Board of Directors of ZAGOPE - CONSTRUÇÕES E ENGENHARIA, S.A. may recommend the creation of other ethics committees within the scope of any controlled company of Zagope (the "SUBSIDIARIES' ETHICS COMMITTEES"). The provisions contained in this Code shall apply in full to each and every Ethics Committee of the Subsidiary.

The regularly installed Ethics Committee of the Subsidiary shall have the autonomy to apply all the rules and policies provided for in this Code, and its members shall report to the ZAGOPE Ethics Committee all violations of the precepts contained herein, as well as any punitive, mitigating or remedial measures adopted.

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NONCOMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

AS OF THE DATE OF APPROVAL OF THIS CODE AND CREATION OF THE ETHICS COMMITTEE, ANY VIOLATION SHALL BE PROMPTLY REPORTED TO THE ETHICS COMMITTEE THROUGH ANY OF THE COMMUNICATION CHANNELS THAT MAY BE IMPLEMENTED. THE ETHICS COMMITTEE SHALL TAKE THE APPROPRIATE MEASURES, INCLUDING REPORTING TO THE COMPETENT PUBLIC AUTHORITIES, IF APPLICABLE.

The Collaborator, especially in an executive position of board member, director, superintendent or manager who allows any person bound by this Code to violate any of its principles or rules may be subject to liability for the violation.

No retaliation will be allowed to those who, in good faith and on serious grounds, report any act that is or may be in violation of the Code.



In cases where a violation of the Code is found, 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

11

COMMUNICATION CHANNELS

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

Any doubts as to the interpretation or omission of matters dealt with in this Code shall be resolved by the Ethics Committee in which such doubt or omission has arisen.

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



THE COLLABORATOR SHOULD:

- Report whenever he/she suspects or witnesses a violation of the Code of Ethics and Conduct.



TELEPHONE: Portugal: 800 180 757
Brazil: 0800 7210766



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



THE COLLABORATOR SHOULD NOT:

- Report incorrect or untrue facts on communication channels.



TERM OF COMMITMENT

I hereby declare that: a) I have received, read and understood **Zagope's Code of Ethics and Conduct**; b) I fully agree with the rules and guidelines contained therein; c) I undertake to comply with them in full.

Collaborator (...)

Partner (...)

NAME: _____

Collaborator No.: _____

TIN (partner) : _____

Signature: _____

Date: ____ / ____



ZAGOPE