



*CCR Group's Code of Conduct and Ethics*

## **MESSAGE FROM THE CEO**

*CCR Group has been contributing to the development of infrastructure in Brazil for the last 20 years, focusing on building an increasingly solid company and committed to ethics, transparency and responsibility. Therefore, it made important efforts to restructure and strengthen its management and implement a set of initiatives to prepare it for future achievements.*

*The Vice-Presidency of Compliance, Governance and Internal Audit was created, under the direction of Pedro Sutter, as well as the Vice-Presidency of Corporate Management, under the direction of Eduardo de Toledo and, with the support of specialized advisors and the commitment of a team of 15,000 employees, rules, policies and procedures were revised, aimed at even more safety and sustainability to operations.*

*We are renewing our commitment to helping people to move around more comfortably and safely, focused on innovation and ethical responsibility, contributing to a fairer and more sustainable society. You are part of this commitment.*

*Come with us on this journey by reading CCR Group's Code of Ethical Conduct and its guidelines.*

**Leonardo Vianna**  
**CEO of CCR Group**





## **1. INITIAL CONSIDERATIONS**

**1.1.** *CCR Group's Code of Ethics ("Code") aims to establish the values, guidelines, principles and responsibilities by which the managers, directors and employees of CCR S.A. and its Subsidiaries ("CCR Group" or "Company") shall comply with when interacting internally, with society or with any third party when performing their activities.*

**1.2.** *The guidelines established in this Code shall be applied in full and in conjunction with other Company's Policies, in line with the commitment to maintain the highest standard of ethical conduct and comply with the laws and regulations applicable to CCR Group's businesses.*

## **2. CCR GROUP'S VALUES**

**2.1.** *CCR Group believes that the application and defense of ethical principles are essential to strengthen its growth foundations, ensure its perpetuity, providing efficiency and transparency in its activities.*

**2.2.** *Our values are:*

*I. Detachment – the path for people and the Company growth;*

*II. Integrity – the basis for personal and professional relations;*

*III. Audacity – proactive attitude, creativity and obstinacy to seek challenges and overcome limits;*

- IV. Respect – for others, for life and the nature; and*
- V. Autonomy – responsible freedom of action.*

### **3. HUMAN RIGHTS AND WORK ENVIRONMENT**

**3.1.** *CCR Group does not tolerate any form of violation of human rights, such as child, forced and slave labor, disrespect, discrimination, moral and sexual harassment, intimidation, aggression, exploitation or prejudice due to race, religion, political affiliation, nationality, sex, sexual orientation, age or physical condition.*

**3.2.** *CCR Group requires that all relationships and interactions with anyone and in any situation are conducted in a cordial manner, and all opinions shall be respected, as well as the rules that aim to foster a positive work environment.*

**3.3.** *CCR Group does not allow the possession of weapons or illicit drugs on its premises. Alcoholic beverages are also prohibited, except in celebrations authorized according to specific policy.*

### **4. OCCUPATIONAL HEALTH AND SAFETY AND THE ENVIRONMENT**

**4.1.** *The work environment shall follow laws and regulations relating to occupational health and*

*safety, and professionals shall ensure compliance with them. Degrading forms of work or any breach of legal health requirements are not permitted under no circumstances.*

*4.2. All employees shall act responsibly, identifying and preventing health and safety risks, as well as when performing their activities, ensuring the proper use of natural resources and the least possible impact of activities on the environment.*

## **5. CORPORATE SOCIAL RESPONSIBILITY**

*5.1. CCR Group believes in building a stronger and more sustainable society, through practicing and encouraging corporate social responsibility. Therefore, since its foundation, it has structured policies and initiatives for the development of communities located near its operations.*

*5.2. CCR Group's commitment to sustainable, social and economic and cultural development in the regions where it operates, led to the creation of the CCR Institute, which projects have a priority focus on: Culture and Sport, Education and Citizenship, Environment and Road Safety, and Health and Quality of Life.*

## **6. DONATIONS AND SPONSORSHIPS**

- 6.1. Donations and sponsorships made by CCR Group are made in accordance with a specific policy.*
- 6.2. Donations and sponsorships made by the Company follow the principles of ethics, transparency and good faith, always complying with the applicable laws and rules, competences and procedures of CCR Group.*
- 6.3. Every donation and sponsorship shall be made in a way that contributes to the development of communities and society.*

## **7. USE OF THE COMPANY'S ASSETS AND RESOURCES**

- 7.1. CCR Group's assets and resources, such as equipment and corporate communication means, are available for professional use only. The use of these assets and resources for private and personal purposes, which could be of interest to third parties, or incompatible with the Company's services and operations is forbidden.*
- 7.2. All of the Company's assets shall be preserved by everyone, using them carefully and with responsibility, protecting them from loss, damage, misuse or waste. Their access and control shall comply with a specific policy.*

## **8. CONFLICT OF INTERESTS**

**8.1.** *A conflict of interest occurs when the interest of an individual or legal entity interferes or may interfere in the interests of CCR Group, generating a real or potential advantage.*

**8.2.** *CCR Group has a specific and detailed internal regulation on conflict of interests, which provides for permanent controls and monitoring aimed at mitigating and ensuring transparency and impartiality in the decisions and executions of day-to-day activities.*

## **9. FIGHT AGAINST CORRUPTION**

**9.1.** *CCR Group does not tolerate the practice of illicit or unethical acts, such as payment of bribes, fraud, money laundering, financing of terrorism, cartel, unfair competition, influence peddling, undue favoring, among others, whether in the relationship with the public sector or private relationships.*

**9.2.** *The Company has a Compliance program and the Anti-Corruption and Clean Company Policy to prevent acts of corruption in all its activities, conducting periodic training and disseminating the culture of integrity and transparency among its employees.*



## **10. RELATIONS WITH PUBLIC OFFICIALS**

**10.1.** *CCR Group's relations with the public sector shall be strictly institutional, ethical, transparent and integral, and carried out in an official manner, in accordance with the law.*

**10.2.** *It is expressly forbidden to receive, offer, promise or authorize, directly or through third parties, any undue advantage of any kind, whether in cash, goods or services, from/to public officials, political parties, candidates for public office or any politically exposed persons, in Brazil or abroad, in order to obtain personal benefit or for CCR Group.*

## **11. POLITICAL PARTY CONTRIBUTIONS**

**11.1.** *CCR Group companies are prohibited to receive political party donations.*

## **12. GIFTS, GIVEAWAYS, BUSINESS MEALS, ENTERTAINMENT AND TRAVEL INVITATIONS**

**12.1.** *The offering or receiving from/to third parties of gifts, giveaways, business meals, entertainment or travel invitations is allowed for legitimate business purposes, observing the limits defined in specific internal regulations.*

**12.2.** *It is not allowed to offer and/or receive any cash value.*

**12.3.** *It is strictly forbidden to offer or receive gifts, giveaways, business meals, entertainment and/or travel invitations to or from public officials.*

## **13. CONFIDENTIALITY OF INFORMATION**

**13.1.** *In compliance with Law No. 13,709/2018 (Brazilian General Data Protection Law – LGPD), any information or data that circulates, whether produced or kept in CCR Group's systems or equipment, shall be kept confidential.*

**13.2.** *Anyone who has access to privileged information about CCR Group, which has not yet been publicly disclosed, may not trade securities or shares of the Company or transmit privileged information to third parties, subject to disciplinary measures.*

## **14. RELATIONSHIP WITH THIRD PARTIES AND USERS**

**14.1.** CCR Group's relations with third parties shall be guided by respect, professionalism, transparency and integrity, applying fair, solid and transparent procedures in the selection, approval, qualification, hiring and evaluation processes.

**14.2.** All third parties must be evaluated based on criteria considering technical, legal, economic and suitability aspects, not allowing any kind of favoring and discrimination, according to the internal guidelines provided for in the Company's normative instruments.

**14.3.** CCR Group follows and requires third parties to act in accordance with the guidelines in the Supplier's Code of Conduct and Ethics and comply with the anti-corruption clauses contained in the legal instruments signed with the Company.

**14.4.** CCR Group is committed to providing excellent services and for seeking excellence in the relationship and satisfaction of users. This relationship must be guided by cordiality, courtesy, respect and prompt service.

## **15. FAIR COMPETITION**

**15.1.** *Fair competition is the basic element in all CCR Group's operations. Competitiveness shall be exercised based on ethics and respect.*

**15.2.** *CCR Group does not condone anti-competitive practices, such as cartel agreements, prices combination, industrial espionage or any other illegal action in order to obtain information from its competitors or improper commercial advantages.*

## **16. ACCOUNTING BOOKS AND RECORDS**

**16.1.** *All economic, financial or equity operations involving any CCR Group company shall be properly recorded in the accounting or tax books.*

**16.2.** *All transaction and payment information of CCR Group shall be properly submitted to the responsible areas to be duly verified, justified and recorded in the accounting books.*

**16.3.** *All supporting documentation for transactions shall be filed in accordance with the term stipulated by law.*

## **17. RELATIONSHIP WITH SHAREHOLDERS AND INVESTORS**

**17.1.** CCR Group's relationship with shareholders and investors is guided by corporate governance practices that ensure the ongoing maintenance of its principles of ethical and transparency with its stakeholders. Therefore, the Company focuses on accurate, transparent, timely and objective communication, allowing them to monitor the activities and performance of CCR Group, ensuring compliance with the laws governing publicly held companies.

## **18. LEGAL AND DISCIPLINARY MEASURES**

**18.1.** Disciplinary measures may be applied if employees fail to comply with the rules established in any of the Normative Instruments of CCR Group, whether for violation of the Company's ethical standards or for non-compliance with laws or regulations

**18.2.** Any infringement or suspicious infringement to this Code of Ethics or any illegal or unethical behavior shall be promptly reported to the Compliance Area through CCR Group's Whistleblowing Channel:

<b>CHANNEL</b>	<b>ACCESS</b>
Website	<a href="https://canalconfidencial.com.br/canalconfidencialccr/">https://canalconfidencial.com.br/canalconfidencialccr/</a>
Phone	1 800 245 8549

**18.3.** *The Whistleblowing Channel is managed by a third-party company, independent from CCR Group, which addresses all reports in an impartial and confidential manner. The Whistleblowing Channel also ensures the possibility of receiving anonymous reports, and no acts of retaliation against anyone who makes a report in good faith shall be accepted.*

## **19. DOUBTS**

**19.1.** *Any doubts about this Code may be addressed to the immediate leader of each employee or submitted to CCR's Compliance area, through the following email address: [compliance.equipe@grupoccr.com.br](mailto:compliance.equipe@grupoccr.com.br).*





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