

# **CODE OF CONDUCT AND COMPLIANCE**

<b>Code of Conduct and Compliance</b>	<b>Version: III</b>
<b>Approval:</b> Executive Board	<b>Approval Date:</b> 05/15/2023

## 1. WORD FROM THE PRESIDENT

Ambipar Group works to improve its Compliance Program, permanently seeking to achieve the highest standards of integrity, transparency and reliability in all its businesses and relationships.

Based on this motivation, its Code of Conduct was updated to increase the involvement and commitment of all employees in an effort to integrate it more and more into the organization's daily activities.

The Code of Conduct is applicable to all employees, suppliers, administrators, representatives, service providers and other commercial partners of the companies, and must be a parameter for all decisions and actions carried out in the business environment and related, directly or indirectly, to the Ambipar Group companies.

We know that good practices are not limited to the conduct recommended in the Code of Conduct, as we must also strictly adhere to the laws of our country, but it indicates the minimum and non-negotiable standards of behavior that must be observed based on Ambipar Group values and beliefs.

In this sense, we believe that our sustainable growth continues to be linked to the ethical and transparent stance in which we conduct the group's business.

## 2. RELATIONSHIP WITH THE ENVIRONMENT

With a strong presence in the market for integrated environmental solutions and emergency response, commitment and respect for the environment and sustainability are part of the mission and values of Ambipar Group, which has always been sensitive to society's demands regarding ecological concerns that affect the entire planet.

Its trajectory reveals technological evolution in integration with the environment and focus on the search for sustainable environmental solutions.

We base our activities on strict compliance with legislation and environmental standards, seeking to optimize the use of natural resources, sustainable development and the preservation of nature and biodiversity.

We communicate possible environmental damage resulting from incidents or emergencies to the competent authorities, customers and other interested parties, adopting a collaborative approach in forwarding solutions.

## 3. MISSION AND VALUES

Ambipar Group bases its business conduct on strict ethical principles, built with respect for the laws and values that inform and affirm the Group's reputation.

Ambipar's mission, vision and values are:

**MISSION:** Contribute to making companies and society sustainable, preserving the world for future



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generations.

**VISION:** To be recognized as a global reference in integrated environmental solutions.

**VALUES:** Believe, achieve and undertake, basing the Group's business on professionalism, sustainability and transparency.

Ambipar Group's ethical principles and values are:

- Commitment to excellence in its activities and customer satisfaction.
- Correct and transparent relationships with employees, third parties, customers and society in general.
- Commitment to the quality of the work environment, ensuring the physical and moral integrity of its employees.
- Integrity and honesty in conducting its business.
- Prohibition and zero tolerance for acts of corruption.
- Good corporate governance practices, good accounting and management principles and practices, clear, objective and timely communication to its investors and the capital market.
- Respect for people regardless of their hierarchical position, origin, color, ethnicity, culture, age, social level, physical capacity, religion and sexual orientation, and any practice of discrimination is rejected.

#### 4. PURPOSE OF THE CODE OF CONDUCT

The Code of Conduct is an instrument for accomplishment of the Group's values and philosophy. It must be widely disseminated so that its principles are extended and effectively observed on a daily basis by its employees, maintaining coherence and consistency between what is written and what is practiced.

This Code of Conduct has the primary objective of guiding the conduct of all parties involved, in the adoption of good practices in relationships and conducting business, such as:

- Adopt measures and behaviors that ensure compliance with corporate values and business practices and corporate relationships in the daily activities of Group companies and their administrators, managers and employees, in order to ensure responsible and ethical conduct.
- Ensure that the Group's vision and mission are developed in line with the public interest, and that the actions, conduct and attitudes of our employees are perceived as appropriate, correct and inspired by the common good.



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- Direct relationships with shareholders, customers, suppliers, employees, communities in which it operates, competitors, controlled and affiliated companies, the environment and other interested parties, within the highest level of corporate responsibility.
- Contribute to each employee incorporating the organization's values into their individual values.

## 6. CODE APPLICATION

All employees, suppliers, administrators, representatives, service providers and other commercial partners of the companies must observe the precepts of this Code, being a parameter for all decisions and actions developed in the business environment and related, directly or indirectly, to Ambipar Group companies, within the scope of their functions and competencies, whilst serving the Group, whether in internal or external relations.

This Code applies to the holding company and its controlled and associated companies.

Ignorance of a legal or regulatory obligation cannot be used as a defense against the possible consequences of misconduct, therefore, it is the responsibility of all audiences covered by this document to know and ensure compliance, in addition to this Code, with laws and rules in force and applicable to the professional activities they perform, presenting conduct in line with the highest standards of integrity.

The central element for the proper functioning of this Code is the Conduct Committee, described on pages 8 and 9 of this document.

All Ambipar Group companies must have instruments and tools, when necessary, to ensure compliance with the provisions of this Code.

## 7. INTERNAL AUDIENCE AND WORK ENVIRONMENT

We spend a large part of our lives dedicating ourselves to work. A precious time that must be lived in a healthy environment, inspired by integrity and harmony. An environment free from fear, disorder, intimidation, injustice and distrust. Ambipar Group respects cultural plurality, diversity and believes that everyone is equal.

Therefore, it is essential for the organization and its employees:

- Know and comply with current legislation and regulations, in particular the rules for protecting Ambipar Group's confidential information, combating corruption, in addition to Ambipar Group's internal policies.
- Know, accept and ensure compliance with this Code of Conduct.
- Act with honesty, integrity, respect, loyalty, efficiency, transparency and impartiality with internal and external customers, respecting any individual differences.
- Exercise professional secrecy and keep strategic information to which they have access confidential, as well as material acts or facts that are not disclosed, except when authorized by the



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company, or by legal determination.

- Be committed not to use for their benefit or that of third parties any strategic information they have access to.
- Adopt appropriate stance and presentation for their respective insertion in the work environment and for carrying out their role, in accordance with the guidelines established by Ambipar Group. Do not engage in situations or acts that characterize a conflict of interests, that is, use their influence with the aim of benefiting private interests that oppose the interests of the company, which could cause damage or losses to it.
- Ensure the appropriate use of the Group's assets entrusted to them.
- Use electronic mail and Internet access systems within the moral and ethical principles set out in this Code. Electronic mail is subject to monitoring.
- Treat as confidential all intellectual property information to which they have access as a result of their relationship with Ambipar Group.
- Limit the receipt of gifts in favor of employees to gifts of insignificant value, which do not have any influence on decisions relating to their activities and functions.
- Respect freedom of association with unions, churches, civil society entities and political parties.
- Do not use Ambipar Group's assets and resources for private, political, union or religious matters.
- Refrain from activities or attitudes that conflict with Ambipar Group's objectives and business. In case of doubt, they must always consult their immediate superior or the Conduct Committee.
- If a company that provides services or conducts business with Ambipar Group has a member of their family in its corporate structure or as an employee/collaborator, the immediate superior must be notified about the company's qualification.
- Report to the Conduct Committee any violations of this Code.

## **8. CONDUCT THAT MAY IMPLY IN THE TERMINATION OF THE EMPLOYMENT CONTRACT OR DISRUPTION OF BUSINESS RELATIONSHIP:**

- Acting with rejection motivated by prejudice, violence or having any discriminatory attitude towards people based on sex, ethnicity, race, religion, social class, age, sexual orientation, physical disability or reduced mobility.
- Threatening, blackmailing, giving false testimony, morally or sexually harassing or carrying out any other act contrary to the principles and commitments of this Code.
- Promising or offering bribes, commissions, gifts or advantages of any kind, due to their duties



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within Ambipar Group.

- Obtaining undue advantages arising from the role or position they hold in Ambipar Group companies, through accepting gifts or advantages on behalf of themselves or their family.
- Exposing colleagues and/or subordinates to humiliating and embarrassing situations during the working day and in the performance of their role, contaminating the organizational climate and destabilizing their relationship with the work environment and the Ambipar Group.

Disclosing confidential information, documents or photos, without express authorization from the company and without due support from the company's legal department, including through social media.

- Allowing unauthorized people to access the Group's computer systems, either through fraud or through the use of their personal password.
- Installing programs on company computers without authorization from the competent areas of Ambipar Group.
- Compromising the business and proponent character of the organization.
- Performing any task under the influence of alcohol, psychotropic substances, illicit substances or any type of narcotics.
- Playing games of chance and/or selling goods in the workplace.
- Carrying out, within the work environment and working hours, political or religious proselytism, as well as requesting resources from other employee(s) to any candidate, political party or religious institution.
- Using information obtained from shareholders for personal benefit.
- Providing untrue information or official data, without prejudice to other conduct considered serious.

## **9. AMBIPAR GROUP'S COMMITMENTS TO ITS EMPLOYEES:**

- Strictly respect the rules applicable to the relationship maintained, observing the peculiarities and conditions of each country/location.
- Promote working conditions that provide a balance between professional, personal and family life for all employees.
- Ensure safety and health at work, providing all the conditions and equipment necessary for this purpose.



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- Ensure its employees' right to refuse, accepting the suspension of their activities, if there is a situation of serious and imminent risk to their life or physical integrity and/or that of others.
- Respect diversity and combat all forms of prejudice, not accepting any type of discrimination, whether based on race, nationality, sex, sexual orientation, age, religion, social position, opinion, political conviction, function or any other individual differentiating factor.
- Protect confidentiality and prevent retaliation against all those who identify, and report conduct that is not in line with this Code, aiming to preserve rights and protect the neutrality of decisions.

## 10. PERSONNEL HIRING

Ambipar Group seeks to quantitatively and qualitatively meet corporate needs and requirements with professionals with skills and competencies for the profiles required by the functions, objectively and clearly disclosing available vacancies, which can be filled by the internal or external public, applying in the selection process good market practices, always in line with the legal precepts of the location/country.

It is noteworthy that the hiring of personnel, as a rule, is carried out internally, with no hiring by third parties, agencies or specialized companies, guaranteeing the candidate the right to participate in selection processes without paying any fees or expenses, in accordance with ethics and the law.

Any hiring carried out by a specialized company complies with the Company's policy, in particular regarding the prohibition of charging any amounts from the candidate.

## 11. APPRENTICES HIRING

The hiring of minors is expressly prohibited, except when local legislation allows, subject to all legal requirements for their adoption.

In Brazil, employees under the age of 18 (eighteen) are only admitted to the Company's workforce through an Apprenticeship Contract, subject to legal requirements on the subject (Law 10.097/2000). According to current legislation, the hiring of minors under the age of fourteen is expressly prohibited, even in the "apprenticeship" modality.

The apprenticeship contract is mediated by a qualifying institution duly authorized/accredited by the Ministry of Economy/Labour, with its own rules and characteristics, specified by law, which are strictly observed by Ambipar Group.

All documentation presented in the admission process, especially by the apprentice, is verified by the Company and the qualifying institution so that no one under the age of fourteen is hired.

It is expressly prohibited for apprentices to work overtime, work at night and in unhealthy or dangerous environments.

## 12. REMUNERATION AND BENEFITS

The Company seeks to remunerate and grant benefits to its employees in a fair and impartial manner, with no salary differentiation permitted due to color, sex, gender, religion, choice or personal characteristics that are not specifically related to the technical requirements for performing



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the role, observing, in particular, the collective norms and legislation of each location.

### **13. TRAINING**

The Company promotes the training and continuous development of its employees, aligning them with the Company's challenges and needs, aiming to maximize the balance between professional and personal life, informing and providing everyone with access to its policies.

### **14. LABOR AND UNION RELATIONSHIPS**

Ambipar Group recognizes Union Entities as legitimate representatives of its employees, and their activities are respected by the Company.

Ambipar Group's objective is to permanently enable, through ethical and transparent attitudes, a relationship channel with employees and their representative entities.

Employees are guaranteed free association with Trade Union Entities in accordance with the representative category and legal parameters, as well as access by trade union entities to Ambipar Group facilities whenever requested, observing the legal dictates on the subject.

### **15. ANTI-MODERN SLAVERY**

The Company does not admit the practice of any act that could characterize slavery, so that all work is duly remunerated and working conditions comply with the exact terms of the Law.

Likewise, the Company does not maintain commercial relationships/partnerships with companies (clients/suppliers) that do not comply with its express anti-slavery position.

The retention of original documents from employees, as well as unjustified salary reduction, is expressly prohibited, in complete accordance with the Consolidation of Labor Laws and the Federal Constitution.

In the same sense, the Company takes a stand against human trafficking and against any act that impedes the freedom of expression and movement of its employees.

Likewise, Ambipar Group's suppliers and customers must also observe the Group's position on the topic. If the Company's position on the matter is proven to be offended, it may result in the motivated termination of the employment contract or disruption of the commercial partnership of the person responsible for the offense.

### **16. PROHIBITION OF THE PRACTICE OF MORAL HARASSMENT**

Ambipar Group prohibits any type of coercion and verbal and/or physical humiliation, valuing the correct application of disciplinary measures, prioritizing the pedagogical nature of such measures, aiming to avoid the recurrence of the conduct practiced, in accordance with labor legislation.

The application of disciplinary measures, such as verbal and written warnings and suspension, occurs within legal parameters, observing the principle of equality, the gradation of penalties and discretion in the act of communication to the employee.



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The motivated termination of the employment contract is the most severe penalty that can be adopted and is therefore analyzed with caution but applied when the legal requirements are met.

In cases of an offense against the company's Code of Conduct, the incident is forwarded to the Conduct Committee for analysis and guidance on the disciplinary measure to be applied which, depending on the severity of the act, may lead to motivated termination of the employment contract.

Reports or communications of possible irregularities can be made by employees to the Conduct Committee via the email address [canaldeetica@ambipar.com](mailto:canaldeetica@ambipar.com) or anonymously directly on the Ambipar Group website.

The Conduct Committee guarantees the complainant anonymity as well as protection against any retaliation.

## **17. RESPECT FOR DIVERSITY**

The Company prohibits any type of discriminatory act, valuing, in particular, equality and diversity among its employees, having its own policy on the subject, including promoting the inclusion of minority groups.

## **18. QUALITY RELATING TO THE WORK ENVIRONMENT**

Ambipar Group provides its employees with an adequate working environment, observing the Technical Standards on the subject, such as ventilation, lighting, etc. It is the Company's commitment to supply and replace, whenever necessary, individual and collective protection equipment.

The analysis and monitoring of the work environment are carried out by the Company's QHSE department.

## **19. AMBIPAR GROUP'S COMMITMENTS TO ITS SHAREHOLDERS**

- Promote open and direct communication with all shareholders, regardless of their shareholding, providing information to monitor the activities and performance of the Companies, in a transparent manner, enabling decision-making.
- Treat confidential information with complete secrecy, safeguarding the Company's market image.
- Provide support to shareholders in understanding investment proposals, capital increases and other topics that must be evaluated and deliberated by them.
- Ensure that accountability is based on qualitative and quantitative elements, identifying economic, financial, social, environmental and sustainability risks, also committing to the defense, proposal and application of appropriate measures to eliminate or mitigate the risks involved.



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## 20. AMBIPAR GROUP'S COMMITMENTS TO ITS RELATED PARTIES

- Ensure transparency and balance in relationships between Group companies, so that the information transmitted between them is accurate and truthful.
- Allow equal opportunities for all employees.
- Adopt strict and transparent procedures when hiring companies/suppliers that have, directly or indirectly, an ownership or family relationship with Ambipar Group professionals.

## 21. EXTERNAL RELATIONSHIPS

### 21.1 Ambipar Group's commitments to its clients:

- Safeguard sensitive, private or confidential customer information.

Provide services in a safe manner, alerting and proposing preventive measures in situations where the client is exposed to risk.

- Maintain transparent relationships with its customers.

### 21.2 Ambipar Group's commitments to the communities in which its companies are located:

- Encourage an attitude of respect for people, their traditions and values.
- Adopt and maintain a transparent process for defining social actions.
- Respect the interests and needs of the communities in which it operates.
- Collaborate with knowledge and technical information that can bring public benefits.
- Preserve and guarantee the political freedom and expression of collaborators.
- Guide Ambipar Group's relationship with authorities, politicians and public agents on transparent, professional and correct attitudes, and any form of pressure or request from public agents, which does not correspond to this definition, must be immediately rejected and communicated to management from the Company.
- Base the relationship on respect for laws and conventions that deal with fundamental human rights and the protection of sustainability. In all its relationships, Ambipar Group must observe ethical, health and safety standards and respect for human rights and socio-environmental responsibility.



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## 22. AMBIPAR GROUP'S COMMITMENTS TO ITS SUPPLIERS

- Select and hire suppliers and service providers based on strictly legal, technical, quality, cost and punctuality criteria, also observing applicable policies.
- Require an ethical profile in its management practices and social and environmental responsibility, refusing suppliers that use unfair competition practices, child labor, work analogous to slavery or other practices contrary to the principles of this Code, including verifying public certificates regarding compliance with its legal obligations.
- Carry out transparent price taking processes, through comparative and fair practices, such as: bidding, price quotation, reverse auction, etc.

Provide employees of service providers, when working on the premises of Ambipar Group companies, with the same healthy and safe working conditions offered to its employees.

## 23. AMBIPAR GROUP'S COMMITMENTS TO ITS COMPETITORS

Ambipar Group respects free competition and free enterprise, prohibiting any practice that goes against these precepts.

In this way, the Company expressly observes the parameters established by Brazilian legislation, in particular, Law 12.529/2011 (Competition Defense Law) and any and all regulations existing in the countries in which it operates related to this topic.

It is not permitted, within the Ambipar Group, conduct that aims to limit, distort or harm free competition and free enterprise, dominate the relevant market for goods or services, arbitrarily increase profits, abusively exercising a dominant position, engaging in tying in consumer relations, manipulating distribution channels and authorizing the irregular formation of consortiums, therefore, any practice of unfair competition and cartel formation will not be accepted.

Therefore, Ambipar Group is committed to:

- Guide the company's operations based on continuous improvement in the quality of services and technological advances.
- Perpetuate the company in the role of contributing agent to raise the standards of services provided in the markets in which it operates.
- Repudiate actions considered anti-competitive, monopolistic or contrary to good market practices.

## 23. UNFAIR COMPETITION

Ambipar employees and partners cannot carry out professional activities that conflict with the business or compete with the Company during the term of the relationship maintained, subject to the topic of its own policy and any individual commitments assumed with Ambipar.



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External work must be carried out outside working hours, and the employee or partner cannot use Ambipar's assets, information or resources (even if intangible) for such activities.

Even if the relationship between the parties is terminated, the employee or business partner cannot use any privileged information obtained during the period of validity of the relationship with the Company, for any purposes, unless expressly authorized.

## 24. FIGHT AGAINST CORRUPTION

Ambipar Group reinforces its position against the practice of acts of corruption or conduct aimed at personal benefit to the detriment of the company, society or the Government, and it is the responsibility of its employees and all those who have a relationship with the Company to refrain from such practices.

The Company strictly observes the Anti-Corruption Law of the countries in which it operates and ensures compliance with its Integrity/Compliance Program.

To better clarify the topic, Brazilian legislation considers:

- Passive corruption (Art. 317, CP) – “Requesting or receiving, for oneself or for others, directly or indirectly, even outside the function or before assuming it, but because of it, undue advantage, or accepting a promise of such advantage.”
- Active corruption (Art. 333, CP) – “Offering or promising undue advantage to a public official, to encourage them to perform, omit or delay an official act.”
- Fraud (Art. 171, CP): “Obtaining, for oneself or for others, an illicit advantage, to the detriment of another, by inducing or keeping someone in error, through artifice, trick, or any other fraudulent means.”

In order to prevent the occurrence of corrupt practices, the company observes and applies its Risk Management Policy, carries out training and observes the legislation applicable to each country in which it operates, having a specific policy on the topic.

## 25. AMBIPAR GROUP'S COMMITMENTS TO THE ENVIRONMENT:

- Guide all activities in strict compliance with legislation and environmental standards, seeking to optimize the use of natural resources.
- Sustainable development, preservation of nature and biodiversity. We will delve deeper into this subject in its own topic.
- Communicate possible environmental damage resulting from emergencies to the competent authorities, customers and other interested parties, adopting a collaborative approach in forwarding solutions.



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## 26. SUSTAINABLE DEVELOPMENT

Ambipar is committed to working to PRESERVE and REGENERATE Planet A, because there is no Planet B. Our objective, therefore, is to strengthen partnerships with agents of transformation who feel part of this ecosystem, helping us to guarantee respect, care and protection, which generates ecologically viable attitudes for the preservation of life on the planet.

Alignment with the 2030 Agenda, based on the sustainable development goals (SDGs), reinforces work with environmental, social and governance aspects, while engagement with stakeholders takes us to conscious capitalism, where value generation goes beyond shareholders and seeks positive impacts on the environment, society and the global market.

## 27. RELATIONSHIP WITH SOCIAL MEDIA

What we say, send by email, write on blogs, post, repost or share on various social networks can reach millions of people in a short space of time.

Even though social media are personal pages, depending on the context and references, the Company we are part of may, in some way, be involved in topics covered in the individual context and which necessarily do not reflect the Company's position on the topic, causing an undermining in its reputation.

For this reason, Ambipar created its own Policy, in order to guide its employees and partners about what is acceptable or not by the Company and the precautions that must be adopted in order to prevent posts on social networks from reflecting negatively on the Company and in the relationship maintained with Ambipar, in particular, given the ethical and moral standards defended by the Company.

## 28. OCCUPATIONAL QUALITY AND SAFETY

Ambipar is committed to providing a safe working environment in suitable conditions for professional practice, adequately providing personal protective equipment (PPE), ensuring that everyone understands the importance of this equipment and its correct use.

Employees, in turn, undertake to strictly follow all instructions and training that may be provided by Ambipar on the subject, also being aware of the right to refuse in the event of being asked to carry out an activity that puts their health/physical integrity or that of third parties at risk.

Safety in the workplace is everyone's commitment and any inconsistency must be reported to Ambipar management/Occupational Quality and Safety department so that measures can be adopted.

## 29. CONFLICT OF INTERESTS

Conflict of interest is the situation generated by the confrontation between private interests or those of third parties outside the Company and its interests.



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When identifying a situation that constitutes a conflict of interest, the employee or business partner must immediately report the occurrence to their superior or through the ethics channel.

Ambipar, in order to clarify the topic and standardize its internal processes and procedures, may maintain its own policy on the topic, establishing that under no circumstances will a relationship that characterizes this conflict be permitted.

### **30. CONFIDENTIALITY**

The preservation of the confidentiality of all data, information, documents and materials, of any nature and type, of the companies that make up the Ambipar Group (its Subsidiaries and affiliates and/or its contracting party and/or contractors) that are made available or obtained on the exercise of functions or activities carried out for Ambipar or on its behalf, which are considered confidential, with employees and partners being responsible for strict compliance with this provision, is also addressed in its own policy.

### **31. HUMAN RIGHTS**

We believe that respect, literacy on the subject and the promotion of Human Rights are fundamental to the development of our business and society in general.

Ambipar, through its Code of Conduct and other Corporate Policies, establishes the rules of behavior expected of all professionals, providing training on the topic.

Respect for Human Rights is a central pillar of the Company's activities and failure to observe it is considered a very serious offense capable of terminating any kind of relationship with the Company.

### **32. POLITICAL RELATIONSHIPS**

Ambipar Group may participate in the discussion of public policies related to the activities it develops and other topics of interest relevant to society, provided that its Executive Board so decides, and that such support is provided in strict compliance with current legislation.

Ambipar Group will not make financial contributions to political parties or political campaigns.

### **33. DONATIONS**

Donations will be assessed and carried out in compliance with the express prohibitions contained in this Code, as well as the highest standard of transparency, integrity and legality.

Donations cannot be offered, promised or granted with the aim of obtaining an inappropriate advantage or with the intention of influencing the action of any person, be it a public agent, supplier, third party, or others.

Donations for social purposes can occur in different ways, such as financial contributions, volunteering, sports, leisure, professional projects, among others.

It is expressly prohibited to make donations to non-profit organizations that have a history of involvement with corruption or fraud, as well as, for organizations managed, directly or indirectly, by politically exposed people or public agents, whose activities are related to Ambipar Group.



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Ambipar Group may make donations for the purpose of establishing institutional relationships, whether through cooperation, partnership or support to cultural, scientific, educational and public entities, as long as they are in accordance with the Company's strategic objectives and values, observing the rules established in its own Policy.

### **34. SPONSORSHIPS**

Ambipar Group may sponsor entities and projects with the aim of promoting and reinforcing awareness of its brand, and strengthening communication with its customers, suppliers and society, subject to the rules established in its own Policy.

### **35. RECEIVING FREEBIES, GIFTS AND HOSPITALITIES**

It is permitted to receive or offer freebies of a promotional nature, which have a modest value, limited to 50.00 BRL (fifty Brazilian reais) or equivalent value in another currency.

The following items are considered freebies: calendars, pens, or other small-scale items that bear the logo of the supplier/partner company.

Any good that does not have any of these characteristics should not be received or offered.

We do not accept or offer freebies in cash, through family members or third parties related to the team or that could be interpreted as a way of affecting the recipient's impartial criteria, to favor negotiations.

Items with a value above 50.00 (fifty Brazilian reais) constitute a gift and can only be received or offered after approval by the Ethics Committee. In the event of refusal, the return of the item must be documented with subsequent sending of the Return Letter to the Ethics Committee.

The offering or receiving of gifts or hospitality from public agents is expressly prohibited.

As for hospitality, it can only be offered or received after approval by the Conduct Committee. Hospitality is understood as: meals, modest entertainment and travel benefits.

### **36. OMBUDSMAN**

The Ombudsman Channel aims to listen to customers, suppliers, partners and employees. Through it, it is possible to make compliments, complaints, suggestions and criticisms of services provided or products sold.

Contact with the ombudsman can be made via email [ouvidoria@ambipar.com](mailto:ouvidoria@ambipar.com)

### **37. CONDUCT COMMITTEE**

The Conduct Committee is responsible for defining and disclosing the values and ethical principles



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that guide the professional conduct of Ambipar Group and its employees. This Committee is responsible for evaluating occurrences of violations of the established principles, determining the most appropriate corrective action and reducing the subjectivity of personal interpretations of moral and ethical principles.

The Committee will disclose the content of this Code to all interested parties, encouraging them to respect the ethical principles and fulfill the commitment to conduct defined therein. Furthermore, it will guarantee the confidentiality of the information received and ensure that responses to complaints are sent.

The members of the Conduct Committee are responsible for applying and legitimizing this Code. The Committee will meet regularly to review this Code, as well as to quantitatively and qualitatively evaluate the occurrences analyzed during the period, seeking continuous improvement. The cases will be analyzed in extraordinary meetings, specifically scheduled for the analysis of the complaints received, and their recommendations or determinations will be forwarded for due implementation in the appropriate instance of the company involved.

The Code, its updates and changes must be widely disseminated to all employees and made available in an electronic version.

The workflow of the Compliance Area and Conduct Committee will be described in its own regulations, which will provide specific provisions for possible conflicts of interest involving its members, members of senior management and the Board.

Any ideas and suggestions for improving the Code of Conduct and other mechanisms included in the Ambipar Group Compliance/Integrity Program are welcome and can be sent to email [canaldeetica@ambipar.com](mailto:canaldeetica@ambipar.com)

## **38. MANAGEMENT OF THE CODE OF CONDUCT**

### **38.1. Approval:**

This Code of Conduct and its amendments must be approved by the Executive Board.

### **38.2. Management:**

The management and application of this Code is the responsibility of the Conduct Committee, responsible, within Ambipar Group and other controlled companies, for evaluating its use and relevance, promoting its updating and improvement, when applicable. The review of this Code must be carried out at least every two years, or whenever deemed necessary, through coordination by the Committee.

The Conduct Committee must guide and monitor the actions necessary for its disclosure and dissemination, in addition to judging cases of violation of this Code, forwarding reports to the Executive Board. In addition, it must deliberate on doubts regarding its interpretation, when requested. The members of the Conduct Committee must be appointed by the Ambipar Group Executive Board.

The composition of the Committee and the form of contact with its members must be widely and



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formally disclosed, ensuring that all interested parties are aware.

### **38.3. Trainings:**

Ambipar Group will conduct, at least once a year, mandatory training and other initiatives for all workers to qualify and raise awareness about the conduct, principles and rules established in this Code and other Group's standards and policies.

Ambipar Group also provides training through subtitled videos on the topic available on its YouTube channel, in addition to the use of other resources and platforms, including 'gamified', making training accessible/understandable to the public.

### **38.4. Doubts and violation situations:**

The provisions of this document make it possible to evaluate most situations, but do not necessarily detail all the problems that may arise during the daily activities of companies. Therefore, doubts may arise about what the most correct conduct to adopt should be. The immediate superior must be notified whenever there is doubt or knowledge of facts that violate or may violate the provisions of this Code.

When, for any reason, it is not possible or convenient to communicate to your immediate superior, or when this has already occurred without effect, contact must be made directly with the Conduct Committee, through the Ambipar Group Ethics Channel, via email: [canaldeetica@ambipar.com](mailto:canaldeetica@ambipar.com), or via [www.ambipar.com/denuncias](http://www.ambipar.com/denuncias)

The Group's Ethics Channel is open to receive internal and external complaints regarding non-compliance with the Code, policies, legislation and regulations applicable to the Group's activities. The Ethics Channel will be widely disseminated to the internal and external public, via intranet, website and/or specific document.

Ambipar Group's Ethics Channel is managed internally, ensuring the secrecy and confidentiality of contact and reporting, when requested, and no form of reprisal or retaliation is permitted for anyone who reports suspected violations of this Code.

Any reprisal or retaliation against a complainant in good faith constitutes an express violation of Ambipar's Code of Conduct & Compliance and must be promptly reported to the Group's Ethics Channel.

Once reprisal or retaliation is proven, the offender will be subject to the disciplinary measures of this Code and may therefore have their employment contract or any partnership maintained with the Group terminated for good reason.

### **38.5. Consequences of violation and disciplinary measures:**

Failure to comply with the principles and precepts of this Code by employees exposes the offender to disciplinary actions that may lead to the application of disciplinary measures (such as (i) oral and written warning; (ii) suspension; (iii) dismissal; (iv) legal measures related to compensation for damages), without prejudice to civil and criminal responsibilities arising from applicable legal provisions.

Failure to comply with the principles and precepts of this Code by suppliers/partners/service providers



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may result in the justified termination of the existing contract between the parties.

### **38.6. Forecast for Hiring Independent Compliance**

The possibility of hiring independent compliance is expressly provided for in the event of analysis and investigation of a complex situation or one involving members of the Conduct Committee or the Executive Board.

## **39. FINAL CONSIDERATIONS**

The implementation of this Code is based on the relationship of mutual trust, cooperation and solidarity existing between all interested parties, and everyone is expected to act in an integrated and coherent manner when conducting their relationships and business with different interest groups, ensuring coordination for common success.



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## **RESPONSIBILITY AND COMMITMENT AGREEMENT**

São Paulo,                   , 20           .

Name:

ID Number:

Company:

Registration Number:

I declare, for all due purposes, that I am aware of all the conditions and information contained in the Ambipar Group Code of Conduct, and that I have been instructed by HR, my immediate superior or contractor to read it carefully, respect it and comply with it faithfully in full, always checking future updates available on the Company's Intranet.

In case of total or partial non-compliance with the established rules and/or any of the obligations presented in the Code of Conduct, disciplinary sanctions, including dismissal, may be generated. For service providers/partners, failure to comply with the rules contained in this Code may result in the termination of the existing contract between the parties.

**Signature of the employee/partner/supplier**



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