An aerial photograph of a multi-lane highway stretching from the bottom left towards the horizon. The sun is low on the horizon to the left, creating a strong golden glow and long shadows. The highway is flanked by dense green trees and vegetation. To the right of the highway, there is a body of water, possibly a lake or a large river, with some small buildings and a road intersection visible in the distance. The sky is filled with soft, white clouds.

Code of Conduct

2025

ecorodovias 

Joint message from the board of directors and executive board

For over 25 years of history, the EcoRodovias Group has been dedicated to the development of infrastructure and mobility of the country, acting based on the following values: sustainability, ethics, collaboration, focus on results and initiative.

To strengthen our integrity practices, we have implemented constant improvements to our **Ethics Program**, the fundamental part of which is this **Code of Conduct**, which we are pleased to share with our employees, third parties and other stakeholders.

Through actions guided by ethics and integrity we will continue our consistent, prosperous and sustainable business trajectory, enabling paths never before imagined.

Complying with applicable legislation and standards is a serious and non-negotiable commitment assumed by Company and all employees and third parties. We count on the commitment and dedication of everyone to ensure that the guidelines of this Code of Conduct are followed and disseminated in our daily activities and any suspicions or violations are reported.

Fabio Trugillo
Chief Planning
and Controls
Officer



Marcello Guidotti
CEO



Marco Antônio Cassou
President of
the Board of
Directors



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Our Code

This Code brings together the purpose and values that we consider essential and non-negotiable in our activities, guiding our strategies and paths towards the future.

Our Code of Conduct (the “Code”), part of the EcoRodovias Group’s Ethics Program – Integrity System (PE-SI) is based primarily on Brazilian legislation, but has also a particular focus on the guidelines of ISO 37001 (Anti-Bribery Management System).

► What is the Code for and who should follow it?

The Code is a reference tool to instruct employees of the companies of the Ecorodovias Group (“Ecorodovias” or the “Company”), third parties and business partners regarding the set of ethical standards and principles to which we must pay attention when exercising our professional responsibilities and interacting with EcoRodovias’ stakeholders.

Just as a map or GPS helps a person reach their destination, our Code provides the appropriate guidance so that you can clarify your doubts about how to act in certain situations, with the indication of appropriate mechanisms so that you can seek advice and/or communicate your concerns, aiming at an integral, transparent and sustainable business performance.

► Roles and Responsibilities

All Ecorodovias employees are responsible for complying with this Code and propagating our culture, to avoid violations of the legislation and our guidelines.

Our leadership are responsible for ensuring compliance with this Code and disseminating it, guiding employees, third parties and other business partners to become familiar with its content.

Please read this Code of Conduct carefully and ensure that it is adhered to by all.

What we expect from our employees and stakeholders:

► That they know and comply with the provisions of this Code.

► Report any violation of the terms of this Code.

► That they become qualified and clarify all doubts about how to act appropriately in certain situations.

Who are EcoRodovias’ collaborators?

All apprentices, interns, employees, administrators, directors, and board members are considered collaborators.

Who are EcoRodovias’ third parties?

All outsourced workers, suppliers, and business partners are considered third parties and are subject to the Code of Conduct for Third Parties, as well as this Code of Conduct insofar as it applies to the relationship established with EcoRodovias.

Our ECO Way of Being

For EcoRodovias to fulfill its purpose of making paths possible that were never imagined, our people work every day with collaboration, ethics, initiative, sustainability, and a focus on results – values that form our culture and translate what Our Eco Way of Being is.



2.1. Purpose and Values

For over 25 years, we have been changing the reality of highways located in several states of the country, bringing innovative solutions, connecting people, and boosting the economy of the regions in which we operate.

Our purpose

Making paths possible that were **never imagined before.**

Our values

COLLABORATION	Synergy and cooperation between our people, teams, and units in search of better solutions. Collaboration requires the exchange of ideas and the willingness to face differences constructively.
ETHICS	Honest, equitable, transparent, and respectful behavior in all our interactions.
FOCUS ON RESULTS	Commitment to excellence, planning, efficiency, and synergy between our businesses in search of sustainable results, without compromising people’s safety.
INITIATIVE	Protagonism and courage to propose innovative and creative solutions, whether in conducting routine tasks or in high-impact projects, generating value in the short and long term.
SUSTAINABILITY	Attitudes that aim at long-term economic growth and responsibility towards safety and the environment, driving the continuous development of our people and society.



2.2. Our commitments

The path of growth of our business has been followed by aligning economic, social, and environmental development.

We take all necessary steps to ensure a safe and reliable infrastructure. We create safety standards and develop related implementation and investment plans. Safety is a top priority in all our business activities. We promote a safety culture through education initiatives and are committed to maintaining a management system that complies with the law.

We are committed to achieving sustainability objectives outlined in strategic pillars, which we call Sustainability Pathways.

Each of the Sustainability Pathways has specific goals aligned with the Sustainable Development Goals (SDGs), proposed by the United Nations (UN).

**Do you already
know EcoRodovias'
Sustainability Pathways?**

Visit our website and stay up to date with the paths we are taking to grow sustainably.

2.2.1 Respect for the environment

Our activities are carried out with respect for the environment and in accordance with environmental legislation.

Through our actions and the commitment of our employees, we adopt conduct to comply with applicable environmental legislation and regulations.

All EcoRodovias businesses have an environmental management system, through which we identify and manage our main environmental aspects and impacts. The objective is to avoid and mitigate the negative consequences of our activities on the environment or even offset these impacts.

Regarding climate change, our environmental management system encourages reuse and recycling, eco-efficiency, and the use of renewable energy to reduce greenhouse gas emissions.

2.2.2 Care for the communities where we operate

The relationship with the communities in which we operate is a fundamental premise for our business.

EcoRodovias is present in several regions of the country through the concessions it manages and is committed to generating value for local communities through its operations.

For us, social responsibility means maintaining ethical behavior and driving economic development, improving the quality of life of our employees, their families and the communities surrounding our operations. In this way, we understand that EcoRodovias' work contributes in many ways to the well-being of society.

We are attentive to identifying any adverse impact that our operations may cause in these locations, so we adopt permanent channels of dialogue with these communities, including Indigenous and quilombola peoples, when present, always respecting the full extent of their rights.



2.2.3 Respect to Human rights

We recognize the human rights of all people and are committed to ensuring respectful and healthy working relationships.

EcoRodovias does not tolerate any form of violation of human rights, such as:

- ▶ Child labor
- ▶ Slave labor or labor in conditions analogous to slavery
- ▶ Sexual exploitation of children and adolescents
- ▶ Degrading working conditions
- ▶ Any form of torture, whether physical or psychological
- ▶ Physical aggression
- ▶ Any act of prejudice and/or discrimination
- ▶ Any other situations that may violate human rights

We remain committed to combating these practices in all EcoRodovias businesses, also ensuring that our business partners and third parties act in accordance with these premises.



2.2.4 Diversity, equity, and inclusion

Here at EcoRodovias people are free to be who they are.

At EcoRodovias, we seek initiatives that ensure an inclusive and welcoming environment, valuing individuality in all relationships.

Initiatives such as the Caminho para Todos Program (“A Path for Everyone Program”) reflect our Eco Way of Being, enabling the development of people and promoting diversity, equity, and inclusion.

Daily, our employees have the responsibility to:

- ▶ Treat everyone with respect and dignity always.
- ▶ Do not use offensive language or make inappropriate jokes.
- ▶ Do not behave in an intimidating, threatening or inappropriate manner towards others.
- ▶ Do not act in a prejudiced or discriminatory manner, including in relation to gender identity and sexual orientation, race, ethnicity, culture, religion, nationality, social class, age, physical and intellectual characteristics, or disabilities of any kind.

I am a fair person, and I try to treat everyone equally, but each person has a specific need. What should I do?

Equal treatment of different people can lead to inequality. A bit complicated, isn't it? That is why we have EQUITY, a concept that relates to the sense of justice, that is, the way we act towards a certain person must be based on the recognition of that person's individual characteristics and specific needs.



Learn more in the **Diversity, Equity, and Inclusion (DE&I) Standard and our DE&I Playbook**

2.2.5 Ethics and integrity

We adopt high standards of ethics and transparency, not only with our employees, but with all our stakeholders.

The adoption of ethical principles and transparency in conducting business is essential to preserve EcoRodovias' reputation, boosting its competitiveness and growth.

Due to the nature of the segment in which we operate, relationships with public officials are part of our daily routine. As a way of reducing the risk of irregularities, the Ethics Program – Integrity System consolidates a set of initiatives aimed at promoting a culture of ethics and integrity, in addition to providing mechanisms to prevent, detect and remedy fraud and irregularities within our business.

This program is constantly evolving and, since its creation, has incorporated several improvement measures.

Did you know that EcoRodovias is ISO 37001 certified?

ISO 37001 attests to the effectiveness of controls and the company's commitment to combating corruption and bribery practices.



The ECO Way of conducting our business

We conduct our business with ethics and integrity and take all necessary measures to combat misconduct.



3.1. Fighting corruption

We do not tolerate corruption and bribery.

We understand corruption or bribery as any form of offering or receiving undue advantages, regardless of the form of payment, such as those made in the form of money, gifts, meals, or payment of travel expenses that are contrary to the law.

Our employees are instructed and trained not to offer and/or receive any form of undue advantage regardless of whether it involves public officials or private individuals.

Therefore, it is prohibited:

- ▶ Promising, offering, giving, requesting, or receiving, directly or indirectly, an undue benefit to a public or private agent or to a third party related to them.
- ▶ Attempting to conceal corruption or bribery by using another individual or legal entity to commit illegal acts.
- ▶ Obstructing the investigation or inspection of public bodies, entities, or agents, or intervening in their activities, including when conducted by regulatory agencies and inspection bodies of the national financial system.
- ▶ Financing or paying for, in any way, the practice of illegal acts.
- ▶ Benefiting companies contracted to supply goods and/or services to EcoRodovias in exchange for obtaining undue benefits.

It is the duty of all employees:

- ▶ Ensure that third parties contracted comply with the guidelines of the Code of Conduct when supplying goods and/or services to EcoRodovias
- ▶ Immediately refuse any offer or request for undue benefits made by a public or private agent.
- ▶ Report to the Ethics Channel or the Compliance team about any situations of which you are aware of involving corruption and bribery practices.

We ensure that our employees, third parties and business partners will not suffer retaliation for refusing to participate in corruption or bribery, even if this results in the loss of business for EcoRodovias.



Find out more in our **Anti-Corruption** and **Anti-Bribery Standard**, available on the EcoRodovias website.

What is the undue benefit?

Any benefit, economic or otherwise, such as money, movable or immovable property, gifts, hospitality, courtesy, services, and favors, made available to a public or private agent in disagreement with the legislation.

3.2 Anti-money laundering and combating the financing of terrorism

We are committed to conduct our business in accordance with legislation.

We carry out our activities in compliance with the legislation applicable to our business, making effort to implement measures to combat money laundering and terrorist financing.

3.3 Interaction with public officials and agencies

We value transparency and integrity in our relationships with public officials and bodies, always in compliance with anti-corruption legislation and our internal rules.

All relationships between employees and public officials must be guided by ethics, integrity, and transparency, valuing clarity and precision in communication.

We adopt all necessary measures to ensure that reports, working papers, information or records that we disclose to public authorities are true and accurate.



Find out more in our **Standard for Interaction with Public Officials**.

3.3.1 Administrative bids and contracts

At EcoRodovias we defend free competition and integrity in all operations.

We prohibit any act that has the objective:

- ▶ Frustrating or defrauding, through adjustment, combination or any other act, the public bidding process, or contract arising therefrom.
- ▶ Preventing, disrupting, or defrauding the performance of any act of public bidding process.
- ▶ Obtaining undue advantage or benefit, fraudulently, from modifications or extensions of contracts entered with the public administration, without authorization by law, in the public bidding notice or in the respective contractual instruments.
- ▶ Manipulating or defrauding the economic-financial balance of contracts entered with the public administration.



3.4 Offering or receiving gifts, presents and hospitality

At EcoRodovias, we have clear and objective rules for offering and receiving gifts, presents and hospitality.

We do not tolerate such practices to influence business decisions or to facilitate improper payments. Our employees must be vigilant in complying with these rules.

Before receiving or offering gifts, presents or hospitality, it is necessary to ensure that the practice does not violate applicable legislation or the internal rules of the third party involved.

We must refuse gifts, presents or hospitality that are in disagreement with applicable legislation, our Compliance guidelines or, even when we are unsure about the regularity of this practice or about the possibility of interpretation that the action is improper or illegal.

Understand how to act in relation to gifts, presents and hospitality:

Gifts

Goods with no commercial value, distributed as a courtesy or advertisement, with the company logo.

How to act?

Offering or receiving gifts is a permitted practice and there is no need to declare them to the Compliance area.

Presents

Goods with commercial value, including invitations to leisure or entertainment events, such as invitations to parties, concerts, sporting events and the like.

How to act?

Offering or receiving presents is a permitted practice provided that: (i) it is exclusively institutional in nature; (ii) it is done sporadically and does not involve a request from either party; (iii) there is no ongoing negotiation of any contract/addendum/purchase order with the third party; (iv) the present is limited to the value defined in the Gifts and Presents Policy and (v) the present is declared to the Compliance area.

Hospitalities

Courses, workshops, seminars, trips or similar related to EcoRodovias.

How to act?

Offering or receiving hospitality is a permitted practice provided that: (i) it is previously approved by the Compliance area and (ii) the hospitality is declared to the Compliance area.

Keep an eye out!

When it comes to gifts, presents or hospitality:

You can

- ▶ Accept food items given as gifts (candy, chocolates, etc.).
- ▶ Receive gifts at events you participate in, such as t-shirts and caps.
- ▶ Receive gifts from EcoRodovias in internal campaigns.

You cannot

- ▶ Receiving money, vouchers, or equivalent items.
- ▶ Attending events whose tickets exceed the limit established in the Gifts and Presents Regulation, without the request being previously submitted and approved by the Compliance area;
- ▶ Receiving presents and hospitality that do not comply with internal regulations.

If it is inconvenient or inappropriate to refuse or return a gift, consult the Compliance team to find out the best course of action.



Find out more in **the Gifts and Presents Policy**.



3.4.1 Gifts for public officials

It is forbidden to give or receive gifts and entertainment to/from public officials, with the exception of meals or other specific events of an institutional nature, provided that they are offered sporadically, limited to the value established in the Gifts and Presents Policy or equivalent value in foreign currency, by a public official, respecting the specific rules of the legislation, of the public body to which the official is linked and the corporate guidelines of EcoRodovias. In such cases, the offer or payment must be declared to the Compliance area.



Find out more **in the Policy on Gifts and Presents and Interactions with Public Officials.**

Do you have questions about how to deal with public officials?

The Compliance team has prepared a Guide to Good Practices in Relations with Public Officials so that you are familiar with the specific rules of the agencies with which we interact. If you have any questions, please consult this material!



3.5 Donations and sponsorships

We do not make donations or sponsorships to fund illegal activities.

We develop projects that benefit the communities surrounding our concessions, strengthening issues relevant to sustainable development and EcoRodovias' business strategy.

The donations and sponsorships we make must always comply with the law and our internal rules. Our employees must take all necessary precautions to ensure the transparency and regularity of their actions.

We do not make donations to candidates or political parties!

When we talk about political donations:

You can

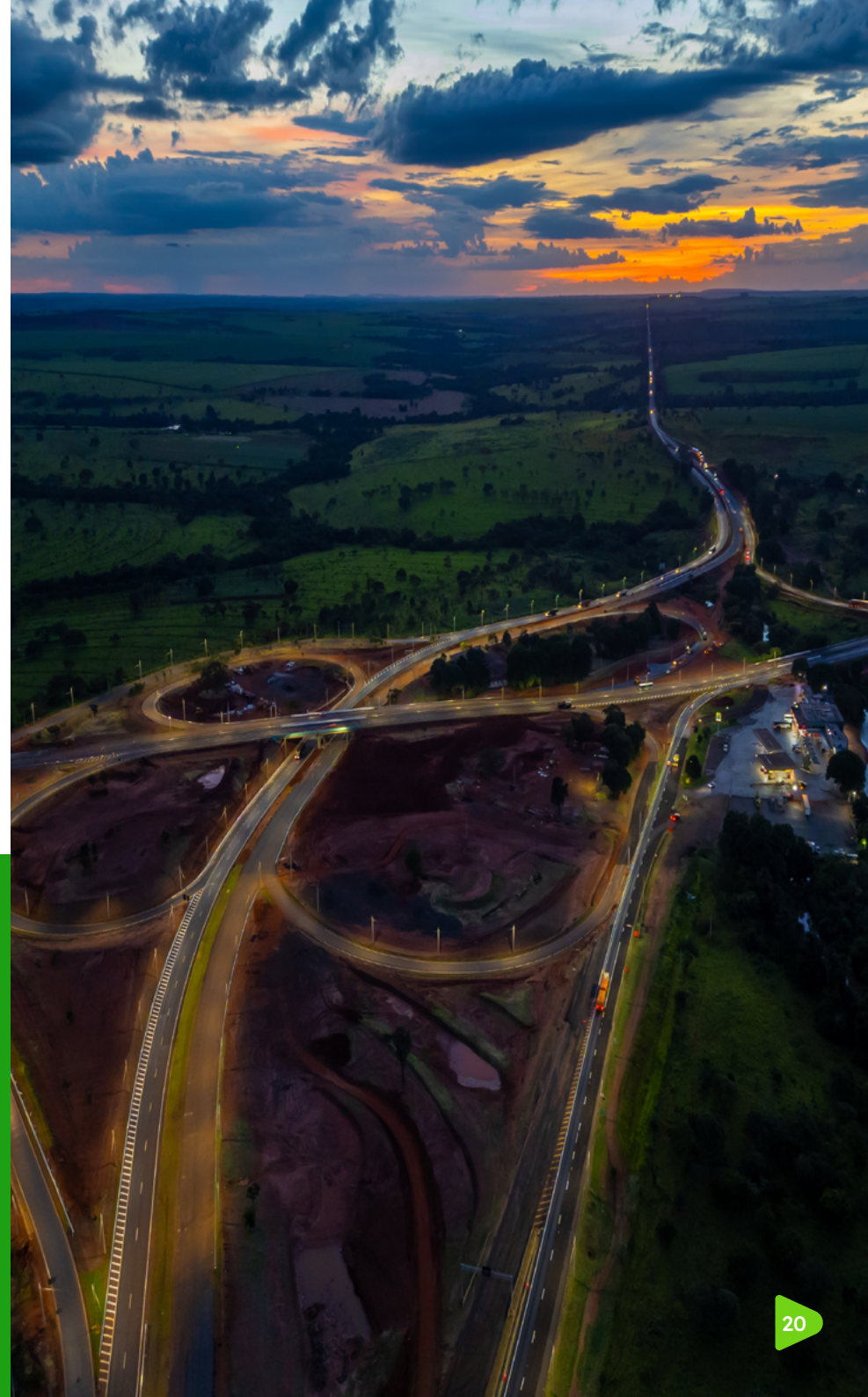
Make electoral donations in your own name.

You cannot

Use EcoRodovias resources, such as equipment and vehicles, to support an electoral campaign.

Request reimbursement of electoral donations made.

Make electoral donations on behalf of EcoRodovias.



Exercise of political rights

We respect the rights of our employees to express opinions, participate in political campaigns, join political parties, and run for public office. In this context, they must not use their position at EcoRodovias or company resources when exercising such rights or to defend ideological agendas of a political or partisan nature.

We also emphasize that any ideological or electoral campaign within the premises of EcoRodovias and its businesses is prohibited, including making or distributing of campaign material related to political or party ideology or election campaigning, regardless of whether the candidate is an employee or an external candidate.



Find out more in the **Donations and Sponsorships Policy**.

Did you know?

All donation and sponsorship requests must be submitted for analysis by the Compliance team.



3.6 Conflicts of interest

We do not make decisions that have any personal interest, and we do not use our positions to obtain advantages.

We have a duty to prevent personal interests from interfering in decisions made at EcoRodovias. Our decisions must be impartial and directed towards the best interests of EcoRodovias.

We are committed to identifying potential conflicts of interest and dealing with them. Therefore, if you believe that a situation of this type may exist in the exercise of your activities, report it to the Ethics Channel or consult the Compliance team.

What is a conflict of interest?

Conflicts of interest occur when a personal interest or that of a third party (a close relationship or family member, for example) interferes or appears to interfere in the employee's decision-making, to the detriment of EcoRodovias' interests.

Situations that may represent a conflict of interest:

- ▶ External professional activities.
- ▶ Relationships or kinship with public officials.
- ▶ Recommendation of suppliers or people, who have some kind of kinship or friendship with our employees, to provide goods and services to EcoRodovias.

All situations mentioned must be reported to the Compliance team.



Find out more in **the Conflict-of-Interest Policy.**

3.7 Relationship with shareholders, investors and regulatory agencies

We ensure the accuracy and transparency of our accounting records and communications to the market.

Our relationship with shareholders, investors, risk agencies and regulatory bodies is always based on professional management and complete, accurate, transparent, and timely communication of our activities.

Our employees are instructed to collaborate with external auditors, granting prompt access to all information and documents necessary for the audit processes. Any conduct that influences, constrains, manipulates, or induces auditors to make mistakes is prohibited, under penalty of liability.



3.8 Relationship with competitors and participation in associations

We prohibit any actions that violate competition laws and we exercise caution when interacting with Competitors, either individually or through Associations.

We guide our conduct with the aim of ensuring free competition and providing better solutions to our customers and users.

EcoRodovias' Competition Defense Policy provides specific guidelines regarding relationships with our competitors, sharing confidential information, abuse of power and use of appropriate language.

The association of entities is important for establishing forms of mutual cooperation and discussing a common public agenda related to infrastructure and mobility, our areas of activity.

However, it is necessary for employees to observe the Competition Law when interacting with competitors and to adopt the same precautions regarding the sharing of confidential information when participating in meetings in these forums.

What can be discussed at association meetings?

As a rule, at association meetings, we authorize the discussion of issues that affect EcoRodovias' business sector, if they are compatible with the entity's bylaws and aim to achieve common business objectives and are permitted by current legislation.

Examples of topics include discussions on draft laws and regulations, as well as the interpretation of legal issues.

What to do if an inappropriate topic arises?

We recommend that you withdraw from the agenda and report the incident to the Compliance team as soon as possible.



Find out more in our **Competition Defense Policy**.

3.9 Relationship with business partners and third parties

Our relationship with business partners and third parties is based on legal, ethical, and fair practices.

The processes for selecting and hiring business partners and third parties are always guided by technical and objective criteria, in compliance with our internal standards and applicable legislation, especially anti-corruption legislation.

We do not tolerate fraud in the hiring processes for business partners and third parties.

We prioritize business relationships with business partners and third parties that maintain a good reputation in the market and that demonstrate a commitment to quality, integrity, ethics and sustainability, factors that are essential for long-term success.

We encourage our business partners and third parties to promptly raise any concerns they become aware of regarding violations of the Code, internal standards of EcoRodovias, or legislation.

Code of Conduct for Third Parties

We have a Code of Conduct for Third Parties that aims to reinforce EcoRodovias' guidelines and expectations regarding the actions of these stakeholders in the relationship and provision of services to EcoRodovias. The document is available on the EcoRodovias website.



3.10 Provision of services to our users

We are committed to the quality of our services and the safety of all users of our highways.

Ensuring the quality of the service provided, with a focus on road safety and the satisfaction of our users, is vital to EcoRodovias' reputation.

Our service is based on respect, courtesy, and efficiency, seeking to provide clear and accurate information to our users.

To this end, we provide permanent communication channels to meet your demands, with a focus on continuous improvement of the services we provide.

Keep an eye out!

Do not accept tips

We do not allow the receipt of tips or cash for services rendered. If this happens, the money must be handed over to management, who must report the Compliance team, requesting guidance.



The ECO Way of taking care of our employees

At EcoRodovias we strive to create a healthy, safe, and inclusive work environment where everyone can develop and thrive.



4.1. How we take care of health And safety at work

Safety is care! We are committed to taking care of the health and safety of our employees.

At EcoRodovias, we adopt the best health and safety practices at work and ensure that all our activities comply, at the very least, with the applicable legislation in the locations where we operate.

Our health and safety programs aim to ensure physical, mental, and psychosocial health in our operations and work environment, as well as to improve the quality of life of our employees and their dependents.

Learn about the security concepts that we consider fundamental:

- ▶ Safety is care
- ▶ You must take care of yourself
- ▶ You can take care of each other
- ▶ You can allow yourself to be taken care of
- ▶ You are the one most responsible for your safety
- ▶ All accidents can be avoided

In the field of workplace safety, we are committed to creating an increasingly strong culture, focusing on a behavioral approach and active care, disseminating procedures and precautions that we must take daily. In this sense, we encourage Internal Accident Prevention Committees (CIPA), health and safety committees in the units, in addition to developing differentiated activities during Internal Workplace Accident Prevention Weeks (SIPAT).

In relation to psychological safety, we promote a psychologically safe environment for people, in which it is possible to share ideas, doubts and perspectives without fear of suffering any form of exposure or judgment.

Psychological safety in practice

Safety in belonging:

we accept people as they are and value diversity.

Safety in learning:

we have the freedom to ask questions and experiment.

Safety in contributing:

we encourage everyone to contribute ideas and actions.

Safety in challenging:

we have the freedom to suggest and implement changes.

Do you know the Rules for Life?

It is essential that everyone knows and follows this set of guidelines to prevent accidents and preserve people's health and physical integrity. Safety is a priority for EcoRodovias. Any risky situation at work must be reported to management.

4.2 How we fight moral and sexual harassment

We repudiate any form of moral and sexual harassment in our activities.

Our employees must treat each other with respect and courtesy and are responsible for providing a healthy work environment. No form of harassment is tolerated.

If our employees or stakeholders suffer any type of harassment or witness any discriminatory behavior, they can formalize a report to their managers, the Compliance team or the Ethics Channel.

What is moral harassment?

Abusive conduct committed by one or more people against a person, in a repetitive and prolonged manner, to coerce, humiliate, disrespect, or embarrass them.

What is sexual harassment?

When someone in a privileged position uses that condition to coerce or offer benefits to a person to obtain sexual advantage or favor.



4.3 How we fight discrimination

At EcoRodovias we encourage diversity and seek to promote an equitable and inclusive environment for everyone.

We do not tolerate any type of discrimination, humiliation, intimidation, hostility and embarrassment in our work environment, whether based on race, social level, nationality, religion, age, retirement, disability, marital status, gender, sexual orientation, medical condition or any type of leave, pregnancy, union membership, political affiliation or other characteristics that may generate some type of exposure.

Be an ally and actively work to build a safe and healthy work environment for everyone!

But what is discrimination?

Discrimination involves concrete behaviors and practices that result in unequal, unfair or offensive treatment towards a specific person or group.

4.4. Use of alcohol and drugs

We do not allow the consumption of alcohol and drugs or being under the influence of them during your working hours.

The use of alcohol and drugs can pose serious risks to people's health and safety, as well as impairing their ability to perform their work.

The consumption of alcohol on specific occasions, such as end-of-year events, business lunches or similar, must be previously agreed upon and must not impair or influence professional performance, decisions or pose risks to one's physical integrity or that of third parties.



The ECO Way to treat our assets and information

v



5.1 Our reputation

We believe that communication is essential to establish trusting relationships and build a positive reputation.

All of us, EcoRodovias employees, are responsible for preserving the image and reputation of our company.

5.1.1 use of name and brand

We do not speak on behalf of EcoRodovias, much less to disclose any information that is not yet public or that should be managed by our spokespersons and official channels. In addition, employees, third parties and business partners must ask the Communications team for permission to use the logos and brand assets externally.

5.1.2 Relationship with the press

We maintain an independent and respectful attitude, always guided by professionalism and ethics. We disclose consistent information aligned with our principles and internal standards. Our employees, third parties and business partners cannot make public statements to the press without the support and consent of the Communications team.

5.1.3 Participation in lectures, seminars or academic works

All lectures, seminars or academic papers related to EcoRodovias require prior approval from the manager responsible and must be reported to the Communications team.

Payment of expenses related to the participation of public officials in events promoted or sponsored by EcoRodovias is permitted if the legislation and EcoRodovias guidelines are respected. All actions in this regard must be previously approved by the Compliance team.

5.1.4 Use of social media

We expect our employees, third parties and business partners to be extremely careful with their statements, ensuring that any posts and comments on social networks reflect only their individual opinions, without any link to EcoRodovias.





Keep an eye out! **On social media...**

You can

- ▶ Share, like and comment on content published on EcoRodovias' official external channels
- ▶ Publicize your participation in internal and external events
- ▶ Publish your participation in specific EcoRodovias projects if the subject is public

You cannot

- ▶ Defend EcoRodovias
- ▶ Publish any type of content that violates the rules of this Code of Conduct
- ▶ Disclose confidential matters or matters that have not yet been disclosed by the company
- ▶ Share internal communications
- ▶ Publish false information (fake news)

5.2 How we protect personal data

We know and comply with the legal requirements and specific guidelines of EcoRodovias regarding data protection.

We make every effort to protect the personal data of everyone who interacts with EcoRodovias, in accordance with the legislation.

To this end, we establish guidelines and rules to help employees incorporate attitudes into their work routine, such as:

- ▶ Only use or access personal data that is strictly necessary for the performance of your role
- ▶ Share personal data only with authorized suppliers and partners
- ▶ Immediately notify the Privacy and Data Protection team of any event, incident of leak or inappropriate use of personal data that is under the responsibility of EcoRodovias.



Find out more in the **Data Protection Regulation**.

5.3 Use of Ecorodovias systems and equipment

We take care of our assets and information to protect employees and EcoRodovias.

Our employees must take care of and ensure the efficient use of the equipment that EcoRodovias provides, such as computers, cell phones, vehicles, etc.



5.4 Taking care of our equipment

Our equipment contains a lot of information about EcoRodovias, so our employees must:

- ▶ Avoid using it in public places
- ▶ Prioritize using it within the company or in controlled locations with minimum security requirements, such as the employee's home
- ▶ Lock the equipment whenever they are away from it
- ▶ Use it primarily for professional matters
- ▶ Do not share passwords or leave them written down in an easily accessible place

It is unacceptable to use EcoRodovias' systems or communication channels to access, store or spread rumors, pornography, political propaganda, discriminatory content, or content that is contrary to our principles, values, and legislation.

What to do in case of loss, damage, theft, or robbery of equipment?

Report the incident to your managers and the Facilities and Information Technology teams. Also request that a police report be filed.

5.5 Intellectual property

Our ideas and creations are valuable!

Our data, records, and information need protection. All of this is important and belongs to EcoRodovias. It is essential that we treat these assets with care, in accordance with the employment contract and the legislation.

If you have any questions, please contact the Corporate Legal team.



5.6 Processing of confidential information

We do not share confidential information or use it for our own benefit.

We ensure company information is correctly managed based on appropriate internal procedures. For this reason, never disclose confidential or privileged information to third parties without first checking with your manager, such as financial results, potential investments, market strategies, etc.

We prepare regular financial and non-financial reports in accordance with applicable laws and internal procedures. We follow rules to ensure accurate, complete, and transparent accounting, so that every transaction is properly recorded, approved, verifiable, legal, consistent, and appropriate.

Some information is not always officially known by the market and, therefore, cannot be used or disclosed without express authorization from EcoRodovias, especially when it enables its own benefit or that of third parties.

In some cases, the sharing of confidential information must be preceded by the signing of a confidentiality agreement between the parties involved.

To maintain a safe environment, devices may be monitored by EcoRodovias and must be used in accordance with internal procedures and legislation.

What is unacceptable in the handling of information?

- ▶ Disclose privileged information that may affect the value of EcoRodovias shares, with a view to benefiting oneself or third parties
- ▶ Use for private purposes or pass on to third parties: technologies, methodologies, know-how or information owned by EcoRodovias without prior authorization

What precautions should be taken with corporate information, whether confidential or not?

- ▶ Pay attention to conversations, the environment, and the people around you: check whether what is being said can be disclosed
- ▶ Do not store information on your equipment's local disks or on personal storage media: use network disks and cloud spaces approved by the company
- ▶ Discuss with the Information Security and Privacy & Data Protection team on new projects involving corporate data and sensitive personal data to safeguard data protection and legal compliance from the outset

How to raise concerns

We immediately report violations or suspected violations of the Code of Conduct.



6.1 Ethics channel

We are committed to fostering an environment where everyone feels safe reporting misconduct.

The Ethics Channel is a secure tool for our employees, third parties and other stakeholders to report violations of the Code of Conduct.

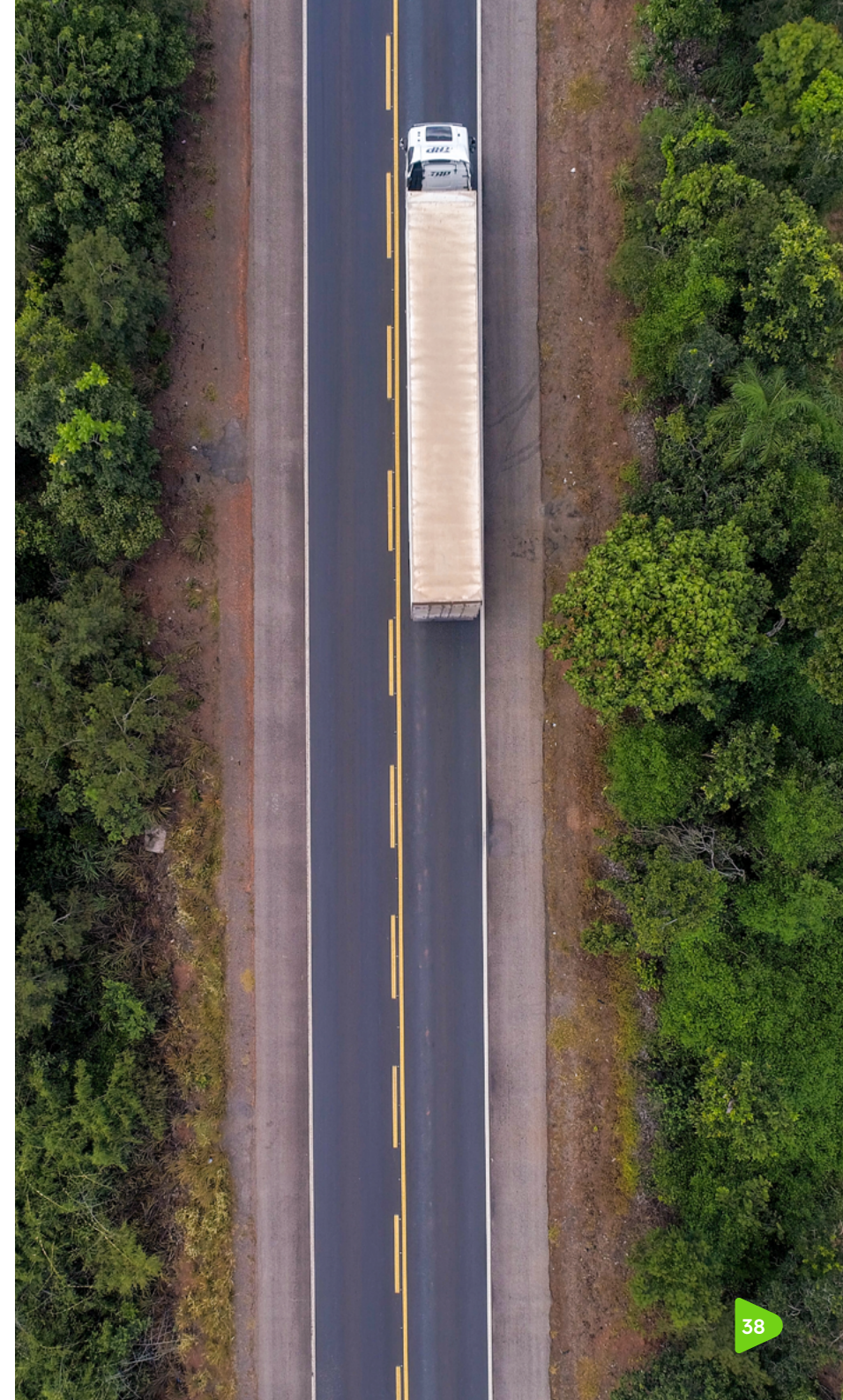
Reports are received and managed by a third-party company, preserving the confidentiality of the information reported and transparency regarding the negotiations, which are subsequently shared only with the people responsible for the investigations at EcoRodovias.

When making your report, provide as much information as possible about what happened!

Remember:

- ▶ What happened?
- ▶ Who was involved?
- ▶ Where did it occur?
- ▶ When did it occur?
- ▶ How did the event occur?
- ▶ Were there witnesses?

If you have evidence, be sure to attach it to your report.



How do file a report on the Ethics Channel?

You can communicate your concern orally or in writing, identified or anonymously.

We guarantee that there will be no retaliation, reprisal, threat, or harassment against those who register reports in good faith on the Ethics Channel or who are considering doing so.

If anyone believes they have suffered retaliation or any of the above as a result of a report submitted to the Ethics Channel, please notify the Compliance team immediately.

To report a violation or suspected violation, please access our Ethics Channel, available in Portuguese and English, 24 hours a day, 7 days a week.



Keep an eye out! Know the correct place to report irregularities:

What can be treated directly with other areas

- ▶ Specific behaviors that do not cause embarrassment
- ▶ Relationship conflicts
- ▶ Work schedule
- ▶ Questions related to the Human Resources area

What should be reported on the Ethics Channel

- ▶ Adulteration or manipulation of data/results
- ▶ Physical aggression or threat
- ▶ Moral or sexual harassment
- ▶ Conflicts of interest
- ▶ Corruption, bribery, or undue Advantage
- ▶ Discrimination
- ▶ Fraud, theft, robbery, misappropriation, or any crime

Site

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E-mail

Canalde.Etica@ecorodovias.com.br

Telephone Whatsapp

0800 025 8841

In Person

EcoRodovias Concessões e Serviços, Rodovias dos Imigrantes, km 28,5 s/n, cep 09845-000, São Bernardo do Campo/SP

6.2 Consequences of violation of the code of conduct

Any misconduct brings negative consequences to society and harms the reputation of EcoRodovias.

Violation of this Code constitutes a violation of the duties of the employment contract and may lead to the opening of proceedings to investigate irregularities, subjecting employees responsible for misconduct to the application of disciplinary measures.

Certain violations of this Code may also constitute a violation of the law, which may generate consequences even outside EcoRodovias.

Remember!
When in doubt: stop, think, ask!

If you have any questions regarding a specific situation, conduct or guidance to be followed, contact the Compliance team.



The Code Of Conduct Management

The EcoRodovias Board of Directors has approved this Code and its revisions.

This Code of Conduct shall be reviewed whenever new relevant risks are identified.

All employees must complete training on the Code and ensure that they have read, understood, and agree to comply with the provisions of this Code, by formalizing a declaration.

This training should be carried out as the Code is updated, in order to ensure that employees understand the conduct expected of them as EcoRodovias employees.

If you have any questions, speak to the Compliance team in an open and transparent manner until the question is resolved.

São Paulo, July 30, 2025.

