

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

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The signature corresponds to the entire document.

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Document No.	Rev. No.	Date of issue	Review Date	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 1 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

ABSTRACT		
SN.	DESCRIPTION	PAGE NO.
1.	INTRODUCTION	3
2.	ETHICS (CORE VALUES)	3
3.	COMPLIANCE WITH LAWS AND REGULATIONS	3
4.	SUSTAINABILITY	3
5.	HUMAN RIGHTS	3
6.	FAIR LABOR PRACTICES AND WORKING CONDITIONS	4
7.	DISCRIMINATION AND HARASSMENT	4
8.	VIOLENCE	4
9.	HEALTH, SAFETY AND ENVIRONMENT	4-5
10.	FAIR COMPETITION AND BUSINESS CONDUCT	5
11.	ANTI-CORRUPTION	5-6
12.	GIFTS AND HOSPITALITY	6
13.	COMMUNITY INVOLVEMENT: POLITICAL PARTICIPATION IN ENTITIES	6
14.	CONFIDENTIALITY, INFORMATION SECURITY, PROPRIETARY INFORMATION	7
15.	ACCOUNTING, TRANSPARENT REPORTING AND FINANCIAL INTEGRITY	7
16.	INTELLECTUAL PROPERTY	7
17.	ACCOUNTING, ACCURATE COMMUNICATION AND FINANCIAL INTEGRITY	7
18.	GOVERNMENT AGENCIES	8
19.	CLASS CATEGORIES	8
20.	ANTI-FRAUD	8
21.	CONFLICTS OF INTEREST	8
22.	PRIVACY AND PROTECTION OF PERSONAL DATA	9
23.	MEDIA & INTERNET	9
24.	MONITORING AND COMPLIANCE	9
25.	WHISTLEBLOWING CHANNEL	10
26.	MANAGEMENT OF THE MANUAL OF CONDUCT	10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

1. INTRODUCTION

This MADEM GROUP CODE OF CONDUCT AND PROFESSIONAL ETHICS represents our ethical commitment and serves as a guide for the proper business conduct of all stakeholders with whom we have relationships.

At MADEM Group, we are committed to conducting our business in a legal, ethical and transparent manner.

This document applies to all employees working for MADEM Group (including directors, managing directors, department heads, team leaders, employees, agencies and subcontractors), customers, suppliers, service providers and all other organizations with whom we have a business relationship.

MADEM Group expects its employees to be impartial and honest in all work-related matters. All employees have the responsibility, in general, to act in good faith and not to do anything that could compromise the trust necessary for the development of their activity.

The success of our company is based on the trust we have earned with our employees, customers and suppliers. We gain credibility by fulfilling our commitment to equity and achieving our goals solely through ethical conduct. All employees are expected to follow this Code in their professional and personal conduct, and to treat everyone with respect, honesty, and fairness.

2. ETHICS (CORE VALUES)

Our core values for MADEM Group are:

Honesty, integrity, trust, respect for others, responsibility and obedience to the law.

3. COMPLIANCE WITH LAWS AND REGULATIONS

Our commitment to integrity begins with compliance with laws, rules and regulations. We understand and comply with the legal requirements and business practices of a legal company. Compliance with the law is the foundation on which MADEM Group's ethical standards are built. Employees of the MADEM Group and all those working on their behalf are required to comply with all applicable laws, rules and regulations of the countries in which we operate. We are committed to fulfilling all valid and binding contracts we enter into and not to abuse our rights.

4. SUSTAINABILITY (People, Profit and Environment)

We are committed to meeting today's needs without compromising future generations. To do this, we combine economic, environmental and social factors in our operations and business decisions.

5. HUMAN RIGHTS

We are committed to respecting the human dignity and rights of every individual and community with whom we interact during our work. We will not cause or contribute in any way to the violation of human rights. Our employees will treat everyone with dignity, respect, and care, and uphold human rights.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 3 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

6. FAIR WORKING CONDITIONS AND PRACTICES

MADEM Group will not tolerate the use of child or forced labor as defined by the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998), nor the exploitation of minors in any of its operations and facilities.

We are committed to promoting equality in our employment practices and to a fair employment and remuneration policy, in compliance with applicable laws. We do not accept the use or hiring of child or slave labor, or any form of forced, compulsory, or debt labor. We condemn all forms of illegal, unfair, and unethical labor practices that exploit the workforce, destroy social security, or act as tax evasion, including, but not limited to, informal and undeclared work or wage withholding.

Our employees must act with integrity and treat their colleagues and others in the workplace with the utmost respect.

7. DISCRIMINATION AND HARASSMENT

The MADEM Group respects diversity. We offer equal employment opportunities and do not tolerate any form of discrimination, harassment or abuse. We do not tolerate direct or indirect discrimination based on characteristics or circumstances irrelevant to the performance of the function, such as gender, marital status, age, national, social or ethnic origin, color, religion, political opinion, disability, sexual orientation, union representation, property, birth, or any other status. Any type of discriminatory behavior, intimidation or victimization is prohibited.

The MADEM Group does not tolerate any type of moral harassment or conduct that affects dignity or generates an intimidating, hostile or offensive environment, regardless of the hierarchical level or that harms the performance of people in the workplace.

Inappropriate conduct such as verbal, gestural or physical sexual proposals or advances, as well as the practice of sexual harassment, are also prohibited and considered.

The distribution or display of offensive, vulgar or derogatory material, including inappropriate photos or drawings, is not permitted. No insults, jokes, defamation, or degrading and undesirable comments may be made about a person's race, ethnicity, religion, sexual orientation, age, appearance, physical or mental disability, or stereotyping, either individually, collectively, personally, or in any media.

8. VIOLENCE

The MADEM Group does not tolerate manifestations of violence, whether verbal, physical, moral, psychological, social or of any other type in the company's facilities and workplaces, as well as in environments outside the company.

9. HEALTH, SAFETY AND ENVIRONMENT

We offer clean, safe, and wholesome working conditions, and we are committed to maintaining a healthy environment to prevent workplace accidents and health injuries that may occur during or as a result of the operation. We are committed to minimizing the impact of our operations on the environment. We strive to reduce the use of finite resources, such as energy and water, and harmful emissions, such as waste production.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 4 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

To ensure information security, competitiveness and preserve people's image and data, the MADEM GROUP recommends that:

Without authorization from the responsible areas of the MADEM Group, it is not allowed to publish or share company information, whether related to the market, processes, programs, systems, strategic plans, technologies, projects, financial data, trends and business results, as they are confidential.

In any communication channel (print or digital), personal publications with offensive, derogatory or defamatory content, or that expose the image of the MADEM Group and its employees, customers and service providers, are not allowed.

All employees must comply with and comply at all times with all relevant health, safety and environmental laws, regulations and standards.

10. FAIR COMPETITION AND BUSINESS CONDUCT

Our relationships with business partners are based on trust and mutual benefits, in compliance with competition legislation. We are committed to ethical and fair competition, selling products and services based on their quality, functionality, and competitive prices. We will make independent pricing and marketing decisions and will not unduly cooperate or coordinate our activities with competitors. We will not offer or solicit improper payments or tips, nor will we participate in or assist in illegal boycotts against specific customers. We are committed to complying with all applicable trade controls, restrictions, sanctions and import and export prohibitions.

We do not tolerate any kind of violation of fairness in any bidding process. We refrain from practices that harm the competition and reputation of our business partners, as well as any conduct that compromises the credibility of our competitors.

We do not withhold malicious, illegal, or improper payments to our partners or allow such practices in our supply chain; We fight against the unethical practice of the "debt chain".

Our team is responsible for ensuring fair business practices during the performance of their duties and for complying with all competition, consumer protection, and ethical and fair marketing regulations. Customers and business partners must be treated fairly and equally, and products and services must be presented in a transparent and accurate manner (ethical and equitable marketing and advertising), disclosing all relevant information.

11. ANTI-CORRUPTION

We condemn and do not tolerate any form of corruption. It is prohibited to offer, promise, give, ask, solicit or accept, directly or indirectly, any undue advantage or benefit to obtain, maintain or facilitate, in any way, a business. An undue advantage or benefit may include cash, any cash equivalent (e.g., gift card),

gift, credit, discount, travel, personal advantage, accommodation or services. We do not allow facilitation payments (or "bribes") to public officials or private companies to secure or expedite routine actions. Corruption also encompasses abuse of function or position, when someone creates the false impression that they are unduly influencing a decision-maker.

Corruption, whether to obtain or maintain advantages in the conduct of business, is considered

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 5 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

serious conduct. Similarly, accepting or allowing another person to accept bribes is also considered serious misconduct. Our colleagues shall be held accountable for all benefits received in the performance of their duties and shall not offer or receive bribes, or otherwise act corruptly.

The MADEM Group observes and strictly complies with all applicable regulations and legislation against illegal practices, the fight against bribery and corruption. The Company, directly or indirectly, does not receive, offer, donate, pay, promise or authorize payment in cash or in any other financial means that constitutes a conflict of interest, illegal conduct and corruption under the laws of Brazil and any other country. Likewise, it does not hire employees or maintain relationships with professionals, whether natural or legal persons, involved in criminal activities, corruption, money laundering, drug trafficking and/or terrorism.

12. GIFTS AND HOSPITALITY

We will avoid any action that creates the perception that favorable treatment has been sought, received or granted in exchange for personal gain.

Complimentary or business benefits include gifts, gratuities, meals, beverages, entertainment, or other benefits offered by individuals or companies with whom we do business or may do business. We will not grant or accept such benefits that constitute, or could reasonably be perceived as unfair business incentives that violate any legal, regulatory or policy that cause embarrassment. Our employees will never be able to use funds or personal resources to accomplish anything that cannot be done with our resources.

We may accept and offer occasional gifts and hospitality that are customary and in accordance with reasonable ethical market practices, provided that they are not excessive, frequent, do not reflect a pattern of frequent acceptance, and do not give the appearance of an attempt to influence business decisions. Only trivial and low-value gifts can be accepted. All other gifts should be politely declined or, if received by mail, returned to the giver. If repayment is not possible, the donation must go to the charities or the community. It is the responsibility of the person who offers, provides, receives, or accepts the gift to decide whether it is appropriate.

The receipt of gifts and gifts must denote an impartial character, without interfering in the company's relations and decision-making with its customers and suppliers. To do this, the common sense of the beneficiary is paramount when receiving them. It is forbidden for employees of the MADEM Group to receive monetary amounts offered by suppliers, third parties and service providers.

13. COMMUNITY INVOLVEMENT: POLITICAL PARTICIPATION IN ENTITIES

The Group option is individual. The MADEM Group recognizes that every citizen has the right to run for political office, as long as they do so in a personal sphere. The company is awarded

the right to maintain a neutral position and encourages the same fairness among employees in the workplace. This means that the working hours, as well as the resources, name, brand or any other asset of the company owned by MADEM, should not be used for political-partisan demonstrations.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 6 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

14. SAFETY, SECURITY, AND PROPER USE OF COMPANY ASSETS

We are responsible for the safety, security, and economical use of the company's resources. Our resources, including time, materials, equipment, and information, are provided solely for lawful business use. Occasional personal use is allowed, as long as it is legal, does not affect professional performance or alter the organizational climate.

All employees must follow appropriate security measures and treat the company's assets, whether tangible or intangible, with respect, and must not misuse or neglect assets.

15. CONFIDENTIALITY, INFORMATION SECURITY, PROPRIETARY INFORMATION

We are committed to the confidentiality, integrity, and accessibility of business information. We have put appropriate security measures in place and our staff must respect this commitment. Confidential information includes all non-public information that may be harmful to the company, its customers, or business partners if disclosed to unauthorized third parties. All employees must treat this information as confidential. This also means that no one may trade securities while possessing non-public information or provide non-public information to third parties that may affect the securities. All standards that ensure information security must be strictly adhered to.

We respect the property rights of others. We will not acquire or attempt to acquire trade secrets or other confidential or proprietary information through improper means. We will not engage in the unauthorized use, copying, distribution, or alteration of software or other protected intellectual property.

16. INTELLECTUAL PROPERTY

Intellectual Property includes a variety of assets: trademarks, industrial designs, domain names, copyrights, innovations, inventions, processes, products, projects, prototypes, ideas, financial, commercial, market information or any other non-material activity carried out in the MADEM Group or contracted by it. All property rights related to intellectual property assets that may be created, directly or indirectly, by employees, temporary workers, interns and apprentices of the MADEM Group, even if their functions are not related to the development of research or inventions, are the exclusive property of MADEM. The company can use them in whole or in part, with or without modifications, and require their registration with the competent official bodies both in Brazil and abroad.

17. ACCOUNTING, ACCURATE COMMUNICATION AND FINANCIAL INTEGRITY

Our books, records, accounts and financial statements must be maintained in appropriate detail and truthfully and accurately reflect our operations. We condemn all forms of money laundering and are therefore committed to doing business with partners involved in legal business activities, with funds from legal sources.

We are committed to fair taxation and the avoidance of all tax evasion practices, including not issuing receipts or justifying false expense invoices.

All employees must follow accounting procedures, ensure that business transactions are properly recorded and documented, and ensure that all information disclosed in financial reports is complete, honest, accurate, timely, and understandable. No employee should improperly influence, manipulate, or cheat any audit.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 7 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

18. GOVERNMENT AGENCIES

The MADEM Group complies with all laws in force in Brazil and in the countries where it operates, supporting an open and constructive dialogue and promoting improvements in the governmental sphere. In inspections and audits of any kind, employees responsible for the service are instructed to cooperate with public officials. The attention devoted to this issue is also manifested in a firm ethical stance, which limits the granting of any advantage or privilege. Employees and third parties may not accept, suggest, promise or imply to any category of public agent any type of assistance (financial or otherwise), payment of tips, prizes, commissions, donations, gifts or personal advantages.

19. CLASS CATEGORIES

The MADEM Group respects free association, recognizes trade unions as the legal representatives of employees and seeks constant dialogue on labor or trade union issues.

20. ANTI-FRAUD

Fraud—the act or intent to deceive, steal, cheat, or lie—is unethical and, in most cases, criminal. Fraud in all its forms (including, for example, filing false expense reports; falsifying or altering financial documents or certificates; misappropriating assets or misusing company assets; and inserting any false financial or non-financial information into records or management statements).

21. CONFLICTS OF INTEREST

Our decisions will be based on objective and fair assessments, avoiding the possibility of any undue influence. A "conflict of interest" exists when an employee's personal interest (which may be linked, for example, to friends, family, customers, competitors, suppliers, contractors, etc.) interferes or may interfere with the best interests of the MADEM Group. Determining whether a conflict of interest exists is not always easy; Therefore, anyone with questions about conflicts of interest should check with management.

Conflicts of interest may arise.

- Be an employee (you or a close family member) or have an economic relationship with a customer, competitor, supplier, or contractor, current or potential;
- Hiring or supervising family members or closely related individuals;
- Acting as a member of the board of directors of another company or organization;
- Possess or have a substantial interest in a customer, competitor, supplier, or contractor;
- Have a personal interest, financial interest, or potential personal benefit in any business transaction.

If colleagues have personal relationships, it is up to the senior employee involved to inform their manager to confirm that there is no conflict of interest or that a conflict of interest may arise.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 8 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

22. PRIVACY AND PROTECTION OF PERSONAL DATA

We respect the privacy of individuals and recognize the need for customers, employees, and others to be assured that their personal data is processed appropriately and for lawful business purposes. We are committed to complying with all personal data protection laws. We collect and store only the necessary personal information and properly inform data subjects about these activities. We have implemented appropriate security measures to ensure the confidentiality, integrity, and availability of personal information.

Our staff must comply with legal requirements, implement practices that comply with the law, and follow related procedures to ensure the lawfulness of personal data processing and processing activities.

23. MEDIA & INTERNET

Access to landlines and mobile phones, the Internet, as well as the use of Tramontina's e-mails, software, hardware, equipment and other assets must be restricted to professional activity, in compliance with the guidelines established in the Regulations for the Use of the Internet, the Intranet and E-mail.

The data produced and maintained in the equipment and information systems are the exclusive property of MADEM.

Employees, temporary workers, interns and trainees should be aware that the company has access to internet records, email and information stored on computers, as well as the use of mobile and landline telephone resources.

Employees and service providers must maintain the confidentiality of company information, even after the contract binding the parties is terminated. Employees terminated from the MADEM Group may not record, copy or carry copies of documents, emails, information, processes or procedures to which they had access.

24. MONITORING AND COMPLIANCE

MADEM Group is available to clarify any doubts at any time and will not tolerate punishment or retaliation against those who report misconduct in good faith.

Managers and leaders have an even greater responsibility to demonstrate, including through their actions, the importance of this Code. They are responsible for promptly addressing any ethical issues or concerns that arise. Employees must cooperate in investigations into possible or suspected misconduct.

Failure to comply with this Code is considered inappropriate conduct that may warrant disciplinary action, including termination of the employment contract or other contractual modality, where necessary.

We are committed to striving to apply our values and standards throughout the value chain of our suppliers, subcontractors, service providers and business partners.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 9 of 10

MADEM GROUP CODE OF CONDUCT AND BUSINESS ETHICS

25. WHISTLEBLOWING CHANNEL

The Whistleblowing Channel is a space to identify any irregularity that may occur in the MADEM Group. This is a means of connection between the company and its audiences, allowing shareholders, directors, employees, temporary workers, interns, trainees, customers, suppliers, service providers, and representatives to file complaints related to the company's services, behaviors, and practices.

The Whistleblowing Channel reinforces the culture of trust, commitment and transparency that exists in the MADEM Group, expressing the values that refer to people, ethics and honest relationships. In this way, it ensures a transparent and welcoming environment for everyone.

We guarantee an environment of protection against any form of harmful action (retaliation) to those who, in good faith, report the practice of irregularities. Therefore, this channel is confidential, impartial, and available to internal and external audiences related to the MADEM Group.

Complaints can be submitted anonymously through our official channel in www.madem.com.br/contato, fill out the form by selecting the subject, entering your message and sending it.

All information will be received by the company, with a guarantee of anonymity; upon receipt, the information will be sent to the MADEM Group Ethics Committee for appropriate treatment and sent to the areas responsible for the research.

26. MANAGEMENT OF THE MANUAL OF CONDUCT

Leaders have the responsibility to ensure that the information in this Manual of Conduct is understood and to manage manifestations of non-compliance with the principles and values of this organization.

Whenever cases of non-compliance with the guidelines described in this Handbook are identified, they should be reported to the Whistleblower Channel so that they can receive appropriate treatment.

Guidelines applied to misconduct can be educational, corrective, warning, and even termination, depending on the severity of the situation.

The deliberation of cases is the responsibility of the Ethics Committee, which guarantees confidential conduct, preserving the identity of the demonstrator and the transmission of the information received.

Violations of this Manual of Conduct will be subject to internal disciplinary action and/or sanctions under applicable law.

It is up to each person to communicate formally through the Whistleblowing Channel whenever they become aware of a possible violation of the terms of this Manual of Conduct. All complaints received will be treated with confidentiality and secrecy, except for those where there is a legal obligation to inform government authorities.

Document No.	Rev. No.	Date of issue	Date Reviewed	Page No.
MR/COCBE/01	02	31-Mar-2024	18-Mar-2026	Page 10 of 10