



# CODE OF ETHICAL CONDUCT

**A. RESPONSIBILITIES:**

Development: EAS Governance, Risk and Compliance Area  
Approval: EAS Board of Director and Board, in October 2023.

**B. REVIEW AND UPDATE:**

The Code of Ethical Conduct is reviewed every two years, and it may be reviewed extraordinarily at any time.

The approved Code of Ethical Conduct replaces the July 2016 Ethics Code.

**C. DISCLOSURE:**

The Code of Ethical Conduct is published on the EAS institutional website, made available internally in online and printed versions.

The Code of Ethical Conduct is published in Portuguese, English and Spanish. If there is any divergence in the text interpretation, the original text written in Portuguese must prevail.

**D. CREDITS:**

Illustrations done by EAS' professional, Oséias Julio Rosa.

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## CHAIRMAN WORD

Disclosing EAS conduct is essential for aligning relationships with stakeholders in our business.

Our conduct is based on solid Values, which are: Safety, Integrity, Excellence and Respect. More than knowing, it is important to live each of these Values, as they must be present in relationships with our co-workers, customers, suppliers, shareholders and the community in general.

We are committed to our performance evolution, we have financial and operational goals to achieve, but we must remember that we will only be successful if we act in accordance with current laws and established regulations and within the safety standards. We are the reference in the Brazilian naval industry and with great responsibility in contributing to the economic growth of the region and the country.

We will do our best and always in accordance with the highest ethical standards, never neglecting the EAS's commitments.

Read the Code of Ethical Conduct. It will help you to proceed correctly. If you have any doubt regarding the application of this code, talk to your immediate leader or other contacts indicated in this document. Don't forget to ask. Remember that when you seek guidance or point out worrisome situations, you are also doing your duty.

I ask you, the employee, to make a personal commitment today to comply with the Code of Ethical Conduct of Estaleiro Atlântico Sul.

Together, we will change our region reality and contribute to the country development, always doing what is right!

**Chairman & CEO – EAS**

## INTRODUCTION

The EAS Code of Ethical Conduct is the reference for the behavior of all employees, regardless of their role or employment status.

We expect EAS employees to comply with this Code in its completeness, along with the other internal procedures of the Company and the requirements established in contracts.

The Code of Ethical Conduct objectives are to highlight the behaviors expected of our employees, helping them to understand the responsibilities they share, in addition to warning them to ethical issues that may arise in all phases of work, ensuring that they are in accordance with the legislation and the Values adopted by the Company.

This document must also guide the behavior and relationships that our employees keep inside and outside the Company, with co-workers, suppliers, customers, the media, public authorities at all levels, the local community and society in general.

# EAS VALUES



## Safety

We adopt high safety standards for our employees and work environment in strict compliance with legal regulations and internal procedures. Our biggest commitment is to life.

## Excellence

We ensure the competitiveness and quality of our products and services. We work daily in search for continuous improvement, changing ideas into value.

## Integrity

We operate in compliance with ethical and legal standards, with transparency in relationships inside or outside the Company.

## Respect

We respect people - our greatest asset - diversity and relationships between persons, the environment and communities.

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## COMMITMENT TO EAS VALUES

EAS Values are **non-negotiable** elements, being crucial for all our activities, as they must be present in the services and products we offer and in the way we meet the expectations of those interested in our business.

We care for the Safety and Health of our professionals, who are our greatest assets.

Truth and Ethics are present in all our relationships. EAS believes that dialogue and integration facilitate the full potential development of each employee.

The Board is based on Work Excellence and Organization, which ensures the professionalism required to achieve results in all actions carried out by Estaleiro Atlântico Sul.

We acknowledge the Human Rights importance and universality, taking care that our activities do not harm them directly or indirectly. Furthermore, we are committed to carrying out our business and keeping our relationships with all stakeholders, in accordance with the country's laws, respecting people, the environment and ethical and moral principles.





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## HOW TO ACT IN DIFFERENT SITUATIONS INVOLVING ETHICAL DILEMMAS

This Code is a support tool for our employees, helping them make decisions in different situations. It should be noted that this Code does not replace the Policies, Standards, Procedures and other internal documents existing in each area of the Company, and it must be used as a guide for the aforementioned documents.

All EAS employees have the right to ask questions or express concerns about workplace behaviors. Many violations of the Code of Ethical Conduct occur due to a lack of information or understanding of expected conduct, or because people want to resolve a situation immediately - and not because of a character flaw or dishonesty. So, if in doubt, ask!

Any violation or suspected violation of the Code must be reported. To this end, the following procedures have been established:

**1.** Any employee who needs help or information regarding the Code must discuss this need with their immediate superior.

**2.** If it is not possible to address the doubt or solve the issue with the immediate superior, the employee may seek advice from the Compliance or Human Resources area.

**3.** Employees or any of the various stakeholders with which EAS interacts can also contact EAS Confidential, via telephone 0800 721 5970, or make their report on the website [www.easconfidencial.com.br](http://www.easconfidencial.com.br) (other information is found in the communication channels, available on the EAS Portal, bulletin boards, folders, etc.).

All suspected violations will be duly investigated and relevant disciplinary measures will be applied, whenever necessary.

When reporting a situation, the employee must always report:

**1.** Where and when the situation took place.

**2.** Who the people involved are.

**3.** Other useful data to follow up the case.

The matter presented will be treated with due confidentiality. The people responsible for clarifying doubts or following up on the reported fact will only reveal the name of the employee with their express permission.

It is important to highlight that it is the duty of whoever reports a Code violation to act in good faith and in strict commitment to the truth, and it is an act of indiscipline and dishonesty to provide any information of a personal nature that involves persecution or that does not represent exactly the reality of the facts.

# **EAS CONDUCT COMMITMENTS**

Acting in accordance with the company Values, following the internal rules and legislation applicable to the Company business, is a basic premise to be observed by all EAS employees, as well as partners who carry out activities on behalf of the Organization.

Therefore, it is worth highlighting the conduct to be practiced by everyone who has any interest in EAS activities.

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## **1- RELATIONSHIP IN THE WORK ENVIRONMENT**

### **1.1 Leadership Role**

Directors, Managers and other leaders play an essential role in building an ethical work environment, focused on encouraging good standards of conduct to be followed by all employees.

All employees, regardless of the position, must respect the company objectives and Values. No one should, nor is authorized to, ask an employee to break the law or disrespect the Company policies and procedures.



## 1.2 Employee responsibility

When carrying out their duties, the employees must comply with and respect the Company notices, policies, rules and procedures.

## 1.3 Commitment to employees

We are committed to the well-being of our employees, as they are the people who put into practice all the beliefs and Values the Company has. We also prioritize fair and transparent management policies that motivate the team, in addition to adopting remuneration compatible with each person responsibilities, in order to promote a respectful, healthy, honest and pleasant work environment.

## 1.4 Conflict of interests

A conflict of interest is considered to be a circumstance in which personal interest (family relationships, friendship, etc.) may affect the employee or service provider to act in disagreement with EAS interests.

Situations of conflict of interest can harm the Company reputation and performance. Thus, the employee or service provider must act with transparency, and this situation must be reported to the Compliance area.

## 1.5 Health and Safety

Preserving the health, physical and mental integrity and life quality of employees and service providers are relevant topics for us.

The Company is always aware of factors that may pose risks to the team performance. Therefore, we adopt procedures to mitigate them, in addition to disseminating quality information to preserve everyone health and safety.

At any time, the employee who feels exposed to factors that could cause harm to his



health and safety in the work environment must stop the activity that gives rise to this risk, in addition to reporting it to their superior so that the appropriate measures can be taken.

The possession and/or transfer of drugs or weapons is not permitted in any way in the workplace, being considered a very serious violation, subject to labor and criminal sanctions. During the period comprising working hours and/or work day, it is not permitted to carry out any activity under the influence of alcoholic drinks, illicit drugs and medications not prescribed by the Health department, in such a way as to put the physical integrity of our employees at risk. In addition, the Company, aiming to protect everyone, may carry out tests to measure alcohol or drug consumption.

No employee is allowed to act violently or make threats in the workplace.

## **1.6 Respect, Diversity and Inclusion**

We appreciate diversity and inclusion. Therefore, we respect and promote a work environment that ensures equal opportunities and condemns the practice of any discriminatory and/or persecution act.

The Company exercises equity and keeps an environment where the employees can express their ideas in an atmosphere of respect, mutual trust and honesty.

The practice of prejudice and discrimination based on race, religion, gender, sexual preference, age, physical condition, nationality or other legally protected condition is not permitted under any circumstances.

## **1.7 Harassment**

During all EAS activities, a working environment free from any type of harassment is guaranteed, with any type of discriminatory behavior being unacceptable, in verbal, non-verbal or physical form, whose objective is to disturb, embarrass, intimidate, humiliate or upset any person.

Sexual behavior or insinuations, requests for sexual favors, verbal or physical attitudes of a sexual nature, or display of objects or images with sexual connotations, as well as verbal or physical conduct that disturbs the performance of another employee, or that creates fear or hostility in the work environment are not allowed.

## 1.8 Intimidation acts

Offense and aggression committed by employees on commuting or on company premises or in the exercise of their function, whether against co-workers or stakeholders, such as customers, suppliers, authorities, members of local communities, etc., will be punished in accordance with the legislation and the Company internal rules.

If any employee is the victim of any embarrassment of this type or knows of someone who has experienced this situation, they must notify their immediate superior, or the Compliance Area, or even contact EAS Confidential through the following channels: **Telephone: 0800 721 5970; Website: [www.easconfidencial.com.br](http://www.easconfidencial.com.br).**



## 1.9 Child, slave or forced labor

The practice of child labor, as well as slave or forced labor, is strictly prohibited throughout the business chain involving EAS, extending this rule to relationships with partners who have interests in the activities carried out by the Company.

## 2- EAS RELATIONSHIP WITH STAKEHOLDERS



### 2.1 Relationship with customers

Our customers are treated with respect, honesty, transparency and equality.

The Company products and services are designed, developed and delivered in accordance with a strict quality standard, in order to meet and, whenever possible, exceed the expectations of our customers.

We are committed to repairing potential losses or losses resulting from damage caused by proven liability of the Company, with maximum agility and within feasible deadlines.

### 2.2 Relationship with suppliers

Suppliers are an important part of our business. For this reason, they must be honest in fulfilling the contracts signed with us, as well as in the contracts in which they represent our interests.

All service providers must base their activities on good corporate, anti-cor-

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ruption, labor and environmental practices, and practices that violate the legislation applicable to their activities, as well as internal EAS standards that regulate the processes in which these suppliers participate, are not permitted.

While the obligations stipulated in contracts with EAS last, all service provider companies, as well as their employees, must respect the Values and rules established in this Code and in the Code of Ethical Conduct for Third Parties.

Healthy and safe working conditions are made available to employees of service provider companies, when working in our facilities, reserving the right to manage the company knowledge and information safety.

All purchasing decisions must be based on the best cost/benefit ratio for the EAS, as well as ensuring the Company integrity and mitigating risks that may arise when purchasing goods and services. This activity must be based only on the merit of factors such as legality, price, quality and performance.

### **2.3 Relationship with competition**

We consider that integrity and a good reputation are decisive practices in gaining the trust of our customers.

Our competitiveness is revealed in our negotiation capacity and the quality of our commercial and business management, with zeal for protecting market information and seeking fair competition.

It is extremely necessary that all employees and service providers are committed to acting ethically, without committing any antitrust or competitive unfair conduct.

### **2.4 Relationship with public authorities**

It is expressly prohibited for any EAS employee to offer or promise, directly or through third parties, payments, sponsorships, gifts, free gifts, donations or benefits to public institutions or agents, political parties or their members and candidates for political office, as well as to family members or equivalents of any of those previously described, with the aim of obtaining benefits for the company.

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There is no tolerance regarding the practice of the conduct mentioned above. Employees who wish to make donations to public agents, political parties or their members and candidates for political office must do so as a citizen, and not as an EAS representative.

Sponsorships or donations may be made, as long as they comply with internal procedures and current legislation.

## **2.5 Relationship with Trade Association and Unions**

We respect the participation of employees in Entities and Associations representing their activity sectors. The active participation of employees in social, cultural or charitable entities having public recognition, carried out on an individual basis, is seen by EAS as an important contribution to society and the country, as long as it does not affect our activities and regular work.

## **2.6 Relationship with society**

EAS positive actions go beyond valuing our employees and partners, as they can also be found in the communities where we operate, promoting development in the social, cultural and environmental spheres.

## **2.7 Relationship with media**

All professional contact with any authority or press organization must be previously authorized by the Corporate Communication sector and/or Board, and no employee is allowed to give any type of interview or consent to take an image of themselves or their workplace, whether in video, photography or other form of visual recording, without prior authorization. We support the responsible use of social media, as we recognize the potential professional, institutional and social benefits of our employees' activities on these media.

Information about the Company, however, should only be published when it is part of his role as an EAS employee or has been prepared by the responsible departments of the Company to be shared freely by any employee.

Responsibility, respect for copyright and privacy must guide the behavior of our employees on social media.

## 3- COMMITMENT TO EAS INTEGRITY

### 3.1 Personal data protection

We collect, process and store personal data to the extent necessary to meet our business purposes. We have internal policies aimed at providing transparency in the processing of personal data, as well as ensuring the information confidentiality and people's privacy. Such policies are constantly reviewed to ensure compliance with laws, regulations and new technologies.

Employee personal information will only be collected and processed for business reasons and whenever this is in accordance with the applicable legislation. The access to employee personal information is limited to those with the legal right to see it, and it is restricted



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to what is necessary to do the work. Professionals who deal with personal and confidential information may be held administratively responsible in the event of inappropriate use of this data.

Regarding service providers who are entitled to act on behalf of EAS, they must provide guarantees of compliance with privacy and personal data protection requirements.

### **3.2 Use of Information, Confidentiality, Trade Secrets and Intellectual Property**

Information is an essential EAS asset and its confidentiality must be observed against the disclosure to unauthorized persons, as well as its integrity must be protected to avoid undue alteration.

Strictly confidential information include, but are not limited to:

- Contracts and agreements – existence and content;**
- Commercial plans and strategies;**
- Technical information related to products, ships, and equipment;**
- Projects and drawings;**
- Employee's confidential information, such as phone number and personal addresses.**

It should be noted that confidentiality obligations apply during every activity performed by the professionals, whether in or outside the company, as well as after leaving EAS.

Regarding intellectual property and trade secrets, these data are formed by everything that is produced at EAS, regardless of whether or not it has a patent or trademark.

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It is the duty of every professional and service provider to ensure the preservation of the Company image and reputation.

### **3.3 Fight against Corruption, Bribery, Money Laundering and Terrorist Financing**

We follow the best market practices regarding fighting against corruption, bribery, money laundering and terrorist financing, by adopting the necessary measures to inhibit illicit activities, as well as to mitigate the risks of their occurrence.

### **3.4 Use of EAS Assets**

We make assets and work resources available in a proper way to the activities carried out, and it is up to the employees to use them correctly and protect them against loss, damage and abuse, always avoiding improper use or waste.

Our assets are intended for corporate use. All employees and service providers who use the company assets must protect and use these resources responsibly, aware that time itself, if incorrectly used or wasted, affects individual and collective performance adversely

### **3.5 Free gifts, Gifts and Courtesies**

We have an internal policy for receiving and/or offering free gifts, gifts and hospitality, which must be observed by all our employees. It is worth noting that we do not accept the receipt and/or offering gifts, free gifts or hospitality that may generate improper perceptions about business decisions or undue advantages.



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## 4- EAS COMMITMENT TO SUSTAINABLE DEVELOPMENT

We work focused on contributing positively to economic, social and environmental changes, so that our initiatives and actions seek to:

- Produce wealth responsibly, preserving natural resources and caring for people impacted by our business;
- Act with integrity, ethics and transparency in our relationships;
- Manage business risks related to sustainability processes;
- Disseminate knowledge and encourage sustainable actions throughout our value chain;
- Encourage the exercise and knowledge of responsible socio-environmental practices among the employees.

In this way, all businesses developed by the Company consider the environmental, social and economic responsibility guidelines.

**Environmental Responsibility** – We use natural resources consciously and responsibly, developing innovations and improvements in our processes, aiming to contribute to the mitigation of negative environmental risks. Furthermore, we comply with the applicable laws and regulations, adopting the best environmental management practices.

**Social Responsibility** – Respect for human beings is one of the Values that guide our business.

We operate beyond our facilities, cultivating a close and collaborative relationship with the surrounding community, culminating in the local development and development of the citizens impacted by our activities.

**Economic responsibility** – We provide clear and consistent economic and financial reports, ensuring compliance with accounting and corporate laws.

Furthermore, we seek efficiency and productivity, by managing our risks associated with business, providing fair remuneration compatible with the capital invested by shareholders.

We consider the falsification of records to be a serious offense against the Code of Ethical Conduct, a fact that, once established, will result in the employment contract termination and any applicable administrative and legal procedures.



# ETHICS COMMITTEE

The implementation and supervision of EAS Code of Ethical Conduct is the Ethics Committee responsibility, which is responsible for solving doubts regarding the interpretation of this guide and solving omissions.

**Disciplinary Measures** - Employees who are proven to be in breach of or do not observe the guidelines set out in this Code of Ethical Conduct will be subject to the relevant disciplinary measures, taking into account the conduct severity and possible recurrence of the act.

According to the assessment and severity level of the offending act, the application of "Guidance" to the employee may be considered, becoming subject to disciplinary or administrative punishment in case of recurrence. The following are classified as disciplinary measures:

- ➡ **a) Verbal warning;**
- ➡ **b) Written warning;**
- ➡ **c) Suspension;**
- ➡ **d) Dismissal.**

# **DOUBTS ABOUT THE CODE OF ETHICAL CONDUCT**

For information and if you have any doubt about this Code, contact the Compliance Area.

To report situations of non-compliance with the Code of Ethical Conduct or internal laws and regulations, we request you to contact EAS Confidential, through the following channels:

**Telephone: 0800 721 5970**

**Website: [www.easconfidencial.com.br](http://www.easconfidencial.com.br)**

**In cases of complaints, we ensure absolute confidentiality for the complainant and discretion in conducting the investigation.**



## **DECLARATION OF AWARENESS, ACCEPTANCE AND COMMITMENT TO THE CODE OF ETHICAL CONDUCT OF ESTALEIRO ATLÂNTICO SUL.**

**I declare on this date that:**

1. I have received, read and understood the Code of Ethical Conduct guidelines of Estaleiro Atlântico Sul..
2. I agree to inform the Company immediately through the Compliance and/or EAS Confidential area of any situation that violates the Code guidelines and/or other regulatory instruments that complement it.

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Registration: \_\_\_\_\_

Area: \_\_\_\_\_

Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Signature: \_\_\_\_\_



## **CODE OF ETHICAL CONDUCT**

**EAS Confidential**

**Telephone: 0800 721 5970**

**[www.easconfidencial.com.br](http://www.easconfidencial.com.br)**

