



CODE OF ETHICS AND CONDUCT

INTRODUCTION

This Code establishes the principles that form the Granol DNA, integrates and confers uniqueness to all the establishments of this company.

The values enshrined here, based on healthy and balanced development, must be observed by all employees, without exception, and multiplied in internal and external relations, maintained with customers and suppliers, Granol's partners. Furthermore, the guidelines provided for therein, of a non-business nature, in addition to stimulating the constant search for excellence, represent the ethical commitment defended, without, however, intending to limit the growth of the organization and all those who are part of it.

Finally, this code is not intended to restrict business development. On the contrary, it aims to present the pattern of behavior expected from established business relationships.

DISCLOSURE

The presentation of its terms to Granol employees is the responsibility of both, the members of the Human Resources Department - responsible for the integration of new employees - and the departmental managers - responsible for clarifying doubts and complying with the rules contained herein in all its aspects.

Whenever applicable, the rules of this Code must include contracts and/or documents issued to suppliers and customers, with a version available, in a specific format for this purpose, in the Granol SharePoint Policies, Rules, and Manual directory.

PRINCIPLES

These regulations reflect Granol's commitment and organizational objectives based on social responsibility, valuing its employees, customers, and suppliers, preserving the environment, and contributing to the development of the surrounding communities.

Listed below are the principles of the UN Global Compact, which guide the relations maintained by this organization:

Human rights

1. Respect and support for internationally recognized human rights;
2. Non-participation in actions that promote violations of these rights.

Work

3. Supporting freedom of association and recognizing the right to collective bargaining;
4. Elimination of all forms of forced or compulsory labor;
5. Eradication of all forms of child labor;
6. Encouragement of practices that eliminate discrimination in employment.



Environment

7. Adoption of a preventive, responsible, and proactive approach, to overcoming environmental challenges;
8. Development of initiatives capable of promoting socio-environmental responsibility;
9. Encouraging the development and dissemination of environmentally responsible technologies.

Against corruption

1 O. Combating corruption in all its forms, including extortion and bribery.

1. COMMITMENT TO THE STAKEHOLDERS

1.1) Collaborators

All Granol employees are guaranteed dignified treatment, in a safe and healthy work environment, with opportunities for professional and personal growth.

Respect

Diversity in work relationships must be observed, so that the members of the Granol team must provide, in all their relationships, respectful, cordial, and fair treatment, regardless of individual characteristics and the position held.

Prejudice and Discrimination

No form of discrimination is tolerable, whether based on ethnicity, origin, religion, age group, gender, political or philosophical conviction, nationality, marital status, sexual orientation, physical condition, family economic situation, biotype, health status, or obstetric status.

In the recruitment, selection, and promotion processes, candidates will be evaluated using objective criteria that will only assess their skills and abilities considering the requirements and attributions of the vacancy to be filled, without any type of discrimination.

Harassment and Abuse of Power.

No form of harassment, whether moral, sexual, or otherwise, is tolerated, admitted, or accepted, nor are situations that constitute disrespect, intimidation, or threat in the relationship between employees, regardless of hierarchical levels, accepted. For the purposes set forth herein, harassment is the fact that someone in a privileged position uses this condition to humiliate, disrespect, or embarrass another person.

Employees who consider themselves discriminated, humiliated, or the target of prejudice, abusive practices, or any situation of disrespect and who feel embarrassed to deal with the matter with their hierarchical superior or representatives of the Human Resources department of their unit, must communicate the fact through the ALERT CHANNEL, at their disposal.

It is forbidden to hire relatives or family members up to the third degree in positions in which there is a hierarchical relationship, direct or indirect, or that responds to the same immediate superior, which may generate a conflict of interest.



Child or slave labor

Granol does not admit, nor tolerate/accept any type of use of forced labor or in a condition analogous to slavery, nor does it admit, tolerate, or accept the use of child labor.

1.2) Customers

Granol undertakes to contribute to the development of its customers and the innovative solutions they develop, respecting their expectations. Information about Granol products and services must be clear and truthful. Technical data, safety, health, and environmental requirements must be properly informed to customers. Each product must strictly comply with the legal requirements of the market intended. It is prohibited to make improper payments to anyone to facilitate the sale of the company products or services, even if this may lead to the loss of business opportunities.

It is the responsibility of each employee to maintain the confidentiality of confidential information passed on to them by their customers and partners due to the employment relationship maintained with Granol, if confidentiality does not imply a violation of any standard of conduct.

1.3) Suppliers

Granol suppliers must be evaluated through clear criteria, and without discrimination the decision-making process must be supported by technical and economic analysis, not allowing favors of any kind.

Granol suppliers undertake to disclose the Values and Principles in this Code of Ethics and Conduct to suppliers and require them to act accordingly.

Granol expects from its suppliers, clarity in the characterization of the products and services delivered, as well as compliance with health, hygiene, safety, and environmental standards.

Granol may terminate a business relationship with suppliers that, among other conducts, do not comply with sanitary, environmental, labor and tax legislation. It is the employee's responsibility to preserve the confidentiality of confidential information passed on to him/her by his/her suppliers, if the confidentiality does not imply the violation of any misconduct.

1.4) Government

Granol respects the legislation and authorities of all levels of government. The provision of information to any municipal, state, or federal public bodies must be done in writing, through a protocol, and with the proper guidance of the relevant Board.

Whenever a demand is presented by a government representative, including inspection processes, the employee must submit it to the Legal Department before any referral. In the event of receipt of court orders, such as, for example, the receipt of "notifications, subpoenas, search warrants, seizure warrants, arrest warrants" the employee must request from the public agent in charge of complying with the order the presentation of the respective credentials and then contact the Legal Department for assistance and guidance on how to proceed, without losing sight of the need for cooperation with such agents.



The submission of information must be accurate and sufficient to clarify the issue, to strictly comply with the applicable rules. The employee must analyze whether the information provided is labeled "confidential" and whether adequate measures have been taken to protect its confidentiality. The Company's Legal Department should be consulted to provide necessary assistance. Granol prohibits making payments, as a bonus, or offering any advantage to public employees or Government authorities to streamline routine services or administrative actions.

The company reserves the right to publicly manifest itself on government policies and decisions that may affect the course of business and the relationship with employees, consumers, or shareholders. This act, however, can only be exercised by a representative authorized by Granol's Board of Directors.

The employee must not use the company name in dealing with personal matters of any nature in their relationship with the government.

1.5) Legally constituted employee representation entities:

Granol respects free association, recognizes union entities as legal representatives of employees, and seeks constant dialogue. Dealings and negotiations with these partners must only be carried out by persons authorized by the company's management.

1.6) Competitors

Granol is guided by the principle of free competition. All market and competitor information, which is legitimate and necessary for the business, must be obtained through transparent and reputable practices, guided by the Company's Values and the Code of Ethics and Conduct, and obtaining it through illegal means is not permitted.

Arrangements that result in arbitrary commercial practices or that characterize an abuse of economic power should not be promoted with competitors. The employee is prohibited from adopting any attitude that harms the image of competitors or business partners of this organization.

1.7) Society and Environment

The protection of the environment is a priority established by Granol, taking precedence over economic or production issues. Granol ensures the responsible use of natural resources and encourages its employees and partners to seek sustainable solutions for their daily activities, with the least possible impact on the environment.

Employees must familiarize themselves with health, safety and environmental protection policies, procedures, and practices, strictly complying with them.

Contracted service providers must comply with all health, safety, and environmental procedures defined in the Partner Manual.

All employees must observe and enforce the rules of medicine and safety at work, identifying and eliminating possible risk situations, also committing to use Personal Protective Equipment indicated by Engineers and Safety Technicians. If any indication of risk is identified, the fact must be promptly informed to the local leadership for the necessary measures.

2) CONFLICT OF INTEREST



The conflict of interest in the employee-company relationship occurs when the employees use their influence or commits acts with the intention of benefiting private interests and that are opposed to the interests of the company or that may cause them damages or losses.

For this reason, the employee cannot have economic or financial interests in a competitor, customer, distributor, or supplier, insofar as such interest may influence or appear to influence their actions carried out on behalf of Granol.

Corporate bonds, whether owned or through a spouse or family members, with suppliers or competitors of the company, are also not accepted if the position the employee holds gives him/her the power to influence transactions or allow access to privileged information.

Employees who occupy positions in external entities or have a spouse or family members who also work at Granol, in competitors, suppliers, or customers, must formalize the fact to their immediate leadership, who will assess any conflicts of interest and competition with the schedule of work.

Employees are prohibited from requesting gifts, tips, courtesies, or any other advantages, either for the benefit of themselves, family members, people with close relationships - personal or professional - as well as on behalf of the company.

It is not allowed to use company assets, such as telephones, various devices, materials, or information owned by them, for work outside the activities carried out by Granol.

Employees, who hold a leadership role, are prohibited from influencing or evaluating the job or salary of family members or people in their close relationship.

3) CONDUCT OF MEMBERS

3.1) Privileged information

Employees who, due to duties/function performed, have access to strategic or confidential information of Granol, may not pass them on to third parties during and after the term of this employment contract. The said employee will be responsible for preventing access by anyone to such information, including documents and materials left on his/her desk, drawers, cabinets, as well as in computer network directories, including access passwords.

3.2) Conduct outside the Company

As a member of the Granol team, employees must adopt appropriate conduct, both in the exercise of their professional activity and in situations of their private life, without exposing the company and their career to risk.

When using the organization's goods or vehicles, or even in situations that allow the employee to be linked to Granol, for example, during fairs, courses and training, the employee ensures compliance with the principles and values contained in this code, contributing to the preservation and recognition of the corporate image.

This conduct must be extended to the interaction on social networks by the employee: it is not allowed to create pages, profiles, groups, images, or videos using the company name, except with the proper authorization of the responsible sectors.



3.3) Company Resources

It is the employee's responsibility to ensure the correct and adequate use and application of Granol's assets and resources, such as equipment, materials, systems, software, and vehicles, among others. This set of assets, and financial resources of any nature, data, and information, must be used exclusively in the interest and benefit of the company.

The electronic systems and computer resources made available to employees for the good performance of their duties may only be used after they are aware of and agree with the terms of the Internal Regulations for the Use of Corporate Information Systems, Various Applications, and Internet Access, delivered at the time of integration of the employee.

3.4) Gifts and Invitations

Institutional gifts, if they do not characterize the obtaining of benefits/advantages in any negotiations, may be accepted by employees.

Invitations to events with expenses paid for by customers, suppliers, private entities, or government agencies may only be accepted when there is a real opportunity to develop a commercial contact when they have also been extended to professionals from other companies and with the authorization of the manager.

Nominations, Certifications, Reports, and Objects received as recognition, distinction, homage, or award granted to Granol must be forwarded to the Human Resources Department.

It is forbidden to receive offers in cash for any reason. The employee must inform the entities with which he/she maintains relations on behalf of Granol, the company's rules of conduct regarding the receipt of gifts or presents.

The same criteria mentioned above will be applied by Granol when offering gifts and/or invitations to its partners.

3.5) Political and religious participation

Employees are prohibited from making, on behalf of Granol, any contribution in value, goods, or services to political and religious campaigns or causes, except by resolution of the Board and in accordance with current legislation.

Granol respects the individual employee's right to be involved in civic and religious matters, however, such participation must take place in their free time and at their expense. In this situation, employees must make it clear that the manifestations are their own, not the company's. Granol's resources, space, and image may not be used to serve personal political, partisan, or religious interests.

4) INSTITUTIONAL COMMUNICATION

4.1) Advertising Market

All advertising by Granol must be truthful and free from discrimination or prejudice and must be in line with the values established herein and previously authorized by the competent board.



Granol's marketing initiatives are characterized by respecting current legislation, ethics, and local and international reference standards. The company condemns misleading advertising.

4.2) Press and Social Media

Granol adopts an objective and clear position in the disclosure of its information and seeks to satisfy the interests of the parties involved.

Contacts with the press are authorized exclusively to spokespersons designated by the Board. Therefore, unauthorized employees are prohibited from contacting the press on behalf of Granol.

If employees receive any contact from advertising services, such as advertisements in newspapers, magazines or any other media should direct to the Board. The creation and dissemination of non-corporate profiles are strictly prohibited (private accounts), of information belonging to the Granol in any media (Facebook, YouTube, Instagram, LinkedIn, among others).

The relationship with the press must privilege the disclosure of relevant facts and the promotion of the company's business. The highlight should, whenever possible, be directed to Granol's activities.

4.3) External Presentations and Participations

In external presentations about the company or participation in seminars, lectures, fairs, or other events, the confidentiality of confidential information about the company must be strictly respected. The theme and content to be presented must be validated by the employee's management and board.

The development and manufacture of communication materials on behalf of Granol is prohibited, such as graphic materials, brochures, banners, advertisements, catalogs, banners, or any type of product that is characterized as communication material, as well as partnerships or exhibitions at fairs, events, seminars, and conferences without the follow-up and approval of the employee's leadership and the Board of Directors.

5) ACCOUNTING RECORDS, CONTRACTS AND FINANCIAL MANAGEMENT

5.1) Accounting records

The company's activities are managed by SAP systems, with strict control of accounting, tax, social security, HR, customers, and suppliers' records. Hierarchically below the Board, the Corporate Managers work, supported, and monitored by the Department of Processes and the Internal Audit Department, with the participation of the External Audit, to ensure that the legislation is always strictly complied with, and the processes are safe and optimized in management and costs, continually updating best practices.

5.2) Contracts

The commitments assumed by Granol must be written, respecting the clarity of the communications, leaving no room for doubtful interpretations. Whenever the main text mentions an annex, this must be initialed when signing the original contract. Every contract must be reviewed by the Legal Department or use a standard template previously developed by this department.



All commitments and corresponding payments must be authorized by two attorneys and supported by legal documentation.

Any type of irregular financial agreement with customers or suppliers, such as over- or under-invoicing, is not allowed.

5.3) Financial management

Granol does not accept or support any initiative related to "money laundering", understood as a process made to hide or legitimize illegal financial resources, such as:

- Unusual forms or complex payment patterns;
- Unusual transfers to/from countries unrelated to the transaction;
- Customers with operations that appear to have little integrity;
- Clients seeking to avoid reporting requirements;
- Transactions involving locations formerly associated with "money laundering" or tax evasion.

Any indication of a doubtful situation must be communicated to the direct manager or using the ALERT CHANNEL.

6) INTELLECTUAL PROPERTY

Intellectual property is a strategic asset for Granol. It includes patents, registered trademarks, know-how, technical data and process, and market information, among other items that could benefit competitors if the information reached their knowledge.

The result of the work of an intellectual nature and strategic information generated in the company, as well as the rights arising from the idealization and/or execution of any technical work, invention, test, or project developed, is the exclusive property of Granol.

The employee is responsible for handling confidential information about intellectual property and other information that he or she may have access to because of their work, using them carefully. Disclosure of this information is not permitted without the express authorization of the company's Board of Directors.

7) GENERAL PERSONAL DATA PROTECTION LAW - GPDPL

The General Data Protection Law aims to regulate the processing of personal data of individuals, guaranteeing fundamental rights related to the protection of freedom, privacy, and intimacy of individuals and allowing holders of personal data more transparency and control over the collection and use of your data.

Granol adopts technical and organizational measures to protect the personal data of holders against accidental or unlawful destruction, loss, alteration, communication or dissemination or unauthorized access, in addition to ensuring that the environment (whether physical or logical) used by Granol for the processing of personal data are structured in such a way as to meet the security requirements, the standards of good practices and governance and the general principles provided for in the GPDPL and other applicable regulatory standards.



In this context, both employees, administrators, members of the Board of Directors and contractors, who act directly or indirectly in the interest or benefit of Granol, must strictly follow the company's Policies, Rules, and Procedures designed to ensure that the use of personal data must be carried out based on the principles of purpose, adequacy, necessity, free access, transparency, security, and accountability, and must also comply with the following rules:

- a) the conditions of the organization;
- b) the operating regime;
- c) the procedures, including complaints and requests from holders of personal data;
- d) safety standards;
- e) technical standards;
- f) the specific obligations for the various parties involved in the processing of personal data;
- g) educational actions;
- h) the internal supervisory and risk mitigation mechanisms; and
- i) other aspects related to the processing of personal data.

With these measures, Granol reaffirms its commitment to complying with the GDPR, contributing to the strengthening of the protection of the privacy of the holder of personal data; freedom of expression, information, opinion, and communication; the inviolability of intimacy, honor and image, and economic and technological development.

8) INFORMATION SECURITY

Our information or that which is in our custody is considered confidential and must be protected according to its need for confidentiality and criticality. We consider confidential and sensitive the personal data of our employees, suppliers, customers, and partners and other critical and strategic information about Granol.

Access to this information is authorized only for those who need to know it due to their professional activity in the company.

Our employees have the duty to protect and maintain the confidentiality of the information they have access to due to their professional activities in the company, and they must not use them or disclose them improperly, even after the termination of their contractual relationship with us.

Any information made available to suppliers is confidential and cannot be used for their own benefit or third parties, except with our express authorization.

Granol owns all information or results arising from the professional activities of our employees, which have been developed with the use of our resources, which have been the subject of a contract authorizing the transfer of these to the ownership of Granol or whatever the law determines.



9) INTERNAL AUDIT AND ALERT CHANNEL

Internal Audit is guided by the principles of Risk Audit and is responsible for ALERT CHANNEL - 0800 701 7779, <http://www.granol.com.br/Contato#canal-alerta-ouvidoria> or e-mail: canal.alerta@granol.com.br - made available to the public, ensuring confidential contact to report any suspicion of misconduct, fraud, theft, robbery, or any irregularities or acts harmful to the company and third parties, whether directly related or not.

Any suspicion must be communicated to ALERT CHANNEL so that analyzes and investigations can take place through the appropriate channels of the company. All investigations of suspected misconduct must be conducted by Granol's Internal Audit.

The exemption in handling the questions and the confidentiality of the identity of those involved are guaranteed in all situations. The service respects anonymity if the person so wishes. Any complaint is promptly taken for investigation and the conclusions are forwarded to the Board and Managers of the relevant areas and legal measures are taken, when applicable.

1 O) CLARIFICATIONS AND COMPLAINTS

Interpretation doubts, unforeseen cases, and allegations of non-compliance with this Code of Ethics and Conduct must be presented to the manager or forwarded to the HR of your unit.

In situations where the matter may cause embarrassment because it involves the immediate manager, the employees may send their questions or contribution using the ALERT CHANNEL.

Complaints of fraud, misappropriation, bribery in acts, or commercial transactions involving employees, suppliers, contractors, and business partners must be accompanied, whenever possible, by concrete facts and data. All reports received by Granol will be treated confidentially. No retaliation against the employee will be accepted for reporting in good faith. If the employee suffers retaliation of any nature, he/she must immediately inform the HR of his/her unit and/or the ALERT CHANNEL.