



**HODDS**  
METAIS VERDES







# CODE OF CONDUCT





# SUMMARY

## COMMITMENTS

4

## RESPONSIBILITIES

5

## ESG: ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE

6

## RESPECT FOR DIVERSITY

8

## BUSINESS ETHICS

9





# COMMITMENTS

HODDS embraces an unwavering commitment to ethics, integrity and full transparency in all its operations. This commitment drives continuous improvements in its compliance and governance systems, with the mission of raising practice standards in institutions across Brazil and around the world.

To achieve these goals, HODDS has established some fundamental guiding principles:

- Contribute individually and collectively to the necessary changes in markets and environments where there may be inducement to misconduct.
- Be aware that misconduct, whether by action, omission, or complacency, harms society, violates the law and damages the image of the entire HODDS.
- Adopt ethical, honest and transparent principles in relationships with both public and private agents.
- Relentlessly eradicate corruption in all its forms, including extortion and bribery.
- Ensure transparency in information about HODDS, which must be accurate, comprehensive, accessible, and disclosed on a regular basis.
- Guarantee, within HODDS and throughout its value chain, the practice of the Compliance System, always updated with the best references.
- Firmly and decisively reject any business opportunities that contradict this unwavering commitment.
- Incorporate performance evaluations regarding Compliance System adherence into the Action Programs of all members.
- Strongly reject the excuse of cultural or commercial practices as justification for inappropriate conduct.
- Maintain the conviction that this commitment will keep us on the path of survival, growth, and longevity.

However, HODDS recognizes that adherence to ethical principles, integrity and transparency goes beyond mere statements. It begins at the highest level of leadership — the HODDS Board of Directors — and extends to every employee. This requires building a comprehensive system that includes the continuous development and updating of company guidelines to ensure their effective application, along with ongoing training and awareness for all employees, focusing on prevention rather than reaction.

It is essential that these principles are embraced with determination, responsibility and without concessions, exceptions, or waivers. Only by maintaining a robust Compliance System can the company achieve its goals and fulfill its corporate purpose in an exemplary manner.





# RESPONSIBILITIES

This Code of Ethics, established by the HODDS Board of Directors, sets forth the principles by which all members, at every level, must conduct their activities in the context of their daily work and the execution of the Company's operations.

All members must internalize and firmly commit to fully adhering to the HODDS Code of Ethics, understanding that any deviation from these principles — whether by action, omission, or complacency — harms society, potentially violates laws and tarnishes the image and reputation of HODDS.

To guide its business and achieve success in alignment with the principles of this Code, the Company has established Guidance Documents, support materials, training programs and other directives covering topics such as the Anti-Corruption Policy, Conflicts of Interest, Related Parties, Recruitment and Identification Processes, Disciplinary Measures, Corporate Courtesies, and other related areas. These resources are readily accessible to all members through the Company's intranet portals.

Each member is personally responsible for studying, understanding and complying with the Company's Guidance Materials, including participating in mandatory training programs established by the Company and ensuring strict adherence to applicable legislation. Additionally, leaders are responsible for ensuring that the members under their supervision understand the relevant laws and the Company's Guidance Materials and that they act in alignment with HODDS' standards of ethics, integrity, and transparency. Beyond compliance, all members are encouraged to uphold the highest standards of ethical and personal conduct while fulfilling their assigned duties and responsibilities. Any member who disregards these norms and restrictions is acting outside the scope of their role, responsibilities, or function.

All leaders must continuously encourage their team members to report potential violations through the Ethics Channel. The Company is firmly committed to providing timely and appropriate responses to all potential concerns, conducting investigations confidentially and in full compliance with applicable laws. HODDS strongly condemns any form of retaliation against those who report violations in good faith. Failure to comply with the Code of Ethics and local laws may result in disciplinary measures, including termination. Nothing in the Company's Guidance Materials, including this Code, prohibits members from reporting any legal violations or unlawful conduct to the appropriate regulatory authorities.

Furthermore, HODDS members are also encouraged to support their colleagues, business partners and any individuals affected by our activities or products in reporting suspicions or allegations of potential legal infractions or violations of our Code. We expect our business partners to adopt equivalent principles and proactively support their implementation whenever necessary.





# ESG: ENVIRONMENTAL, SOCIAL AND CORPORATE GOVERNANCE

HODDS is firmly committed to following a set of standards and best practices aimed at being a socially conscious, sustainable, and well-managed company. We are determined to be an example of sustainability and corporate responsibility, leading by example and promoting positive change in the world.

Our company is committed to achieving carbon neutrality by setting annual targets for reducing carbon emissions and investing in clean energy sources. In addition, we strive to minimize the use of natural resources and reduce waste across all our operations. The preservation and restoration of biodiversity are also part of our commitment, with partnerships established with environmental organizations to achieve this goal.

We foster an inclusive work environment that respects diversity in gender, ethnicity, age, sexual orientation, and cultural background. We have set diversity and inclusion targets and adopted policies to ensure equal opportunities for everyone. We actively contribute to the communities in which we operate through corporate social responsibility programs, donations, and employee volunteer initiatives. Furthermore, we promote employee well-being by ensuring safe and healthy working conditions, supporting work-life balance, and providing opportunities for professional growth and development.

We adopt transparent governance practices, including the disclosure of financial and operational information, ESG reports, and open communication with stakeholders. We are committed to adhering to the highest ethical standards, fighting corruption, bribery, and any other form of unethical behavior across all our operations. Our Board of Directors is composed of independent and experienced members who act in the best interests of the company and all stakeholders.

HODDS is unconditionally committed to complying with all relevant laws and regulations, as well as industry standards related to health and safety. This means the company maintains a firm commitment to ensuring the safety of its employees in the workplace, while also preventing environmental pollution and minimizing the social impact on the communities affected by its operations.

Leaders are responsible for taking reasonable and necessary measures to ensure compliance in these areas. Employees must be fully aware of the requirements related to environmental protection, workplace safety, their own health, the health of their colleagues, and the well-being of anyone else impacted by HODDS' business activities.





In the event of incidents related to health, safety, or the environment involving HODDS, its suppliers, or clients, any employee who becomes aware of such events is required to promptly notify their respective leader in writing. Leaders, in turn, must immediately report in writing to the HODDS leaders responsible for the work performed and/or for environmental, health, and workplace safety, as applicable.

The consumption of alcoholic beverages and drugs on company premises is strictly prohibited, as is the entry of individuals under the influence of substances that may impair their behavior and, consequently, the safety and activities of others. Likewise, the sale or exchange of goods or services for personal interest within HODDS facilities is strictly forbidden.

Employees must not obstruct the entry or hinder the work of inspectors or auditors on HODDS premises. Should any employee become aware of an unannounced inspection or audit, they are required to immediately notify their leader and the Legal Department in writing. Leaders are responsible for ensuring that such inspections or audits are properly supervised by appropriate personnel.





## RESPECT FOR DIVERSITY

Ethical principles, integrity, and transparency are fundamental pillars that do not allow for any form of harassment or discrimination—a stance that HODDS upholds uncompromisingly. Every team member is responsible for maintaining an inclusive work environment where everyone feels welcome and that is entirely free from harassment, discrimination, or any inappropriate conduct.

Employees must interact with courtesy and respect when engaging with other team members and stakeholders involved in the Company's business activities. Embracing diversity is a means to foster collaboration, creativity, and continuous innovation. HODDS advocates for and reinforces equality, without distinction based on gender identity, sexual orientation, religion, race, culture, nationality, social class, age, or physical characteristics.

Regarding hiring and promotion practices, HODDS is committed to providing equal opportunities to all qualified individuals. The Company strives to build a team that reflects the diversity of the populations within the communities where it operates.

All employees must be treated with fairness and equity, regardless of their differences, and must not tolerate any form of discrimination. It is strictly prohibited for leaders or anyone in a position of authority to request personal favors or services from other employees or to abuse their power or authority in any way that could lead to actions conflicting with applicable laws and regulations. Furthermore, intrusion into individuals' privacy, whether in the workplace or outside of it, is not tolerated.

HODDS is mindful of human rights as established in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. The Company also fully supports all internationally recognized human rights, including, but not limited to, those stated therein.

HODDS strictly prohibits all forms of discrimination and harassment among its members. If an employee believes they have been a victim of discrimination or harassment, or witnesses such behavior, it is their duty to report the incident through the Ethics Channel.





## BUSINESS ETHICS

HODDS is committed to conducting business with unwavering adherence to ethics, integrity, and transparency, strictly in compliance with applicable laws. The company enforces a strict policy of operating in accordance with all relevant anti-corruption laws, firmly prohibiting its employees and third parties from engaging in any form of corruption, regardless of the context.

No member of the HODDS team or any third party is authorized to offer, promise, pay, or authorize the payment of money or any other type of advantage to public officials or other parties, directly or indirectly, with the intention of corruptly influencing their actions, decisions, or violating their official duties. It is also prohibited to solicit or accept money or valuable benefits with the purpose of improperly influencing the recipient's judgment or conduct.

These improper payments are not limited to cash and include gifts, entertainment, meals, travel, contributions, services, business opportunities, employment, investment, unpaid use of services, charitable donations, political contributions, assistance to family and friends, and any other benefit or advantage. HODDS strictly prohibits all types of facilitation payments, which are small payments made to public officials to expedite or secure the performance of existing duties or obligations.

Additionally, the company and its employees must not engage in extortion, fraud, document falsification, intentional preparation of inaccurate financial statements, or any activity that could constitute corruption or violate applicable anti-corruption laws.

HODDS reinforces its prohibition against any form of improper payments, whether to or from any person, at any time, or for any reason, in connection with work for the company. Bribery is an unacceptable practice and will not be tolerated in any aspect of HODDS operations.