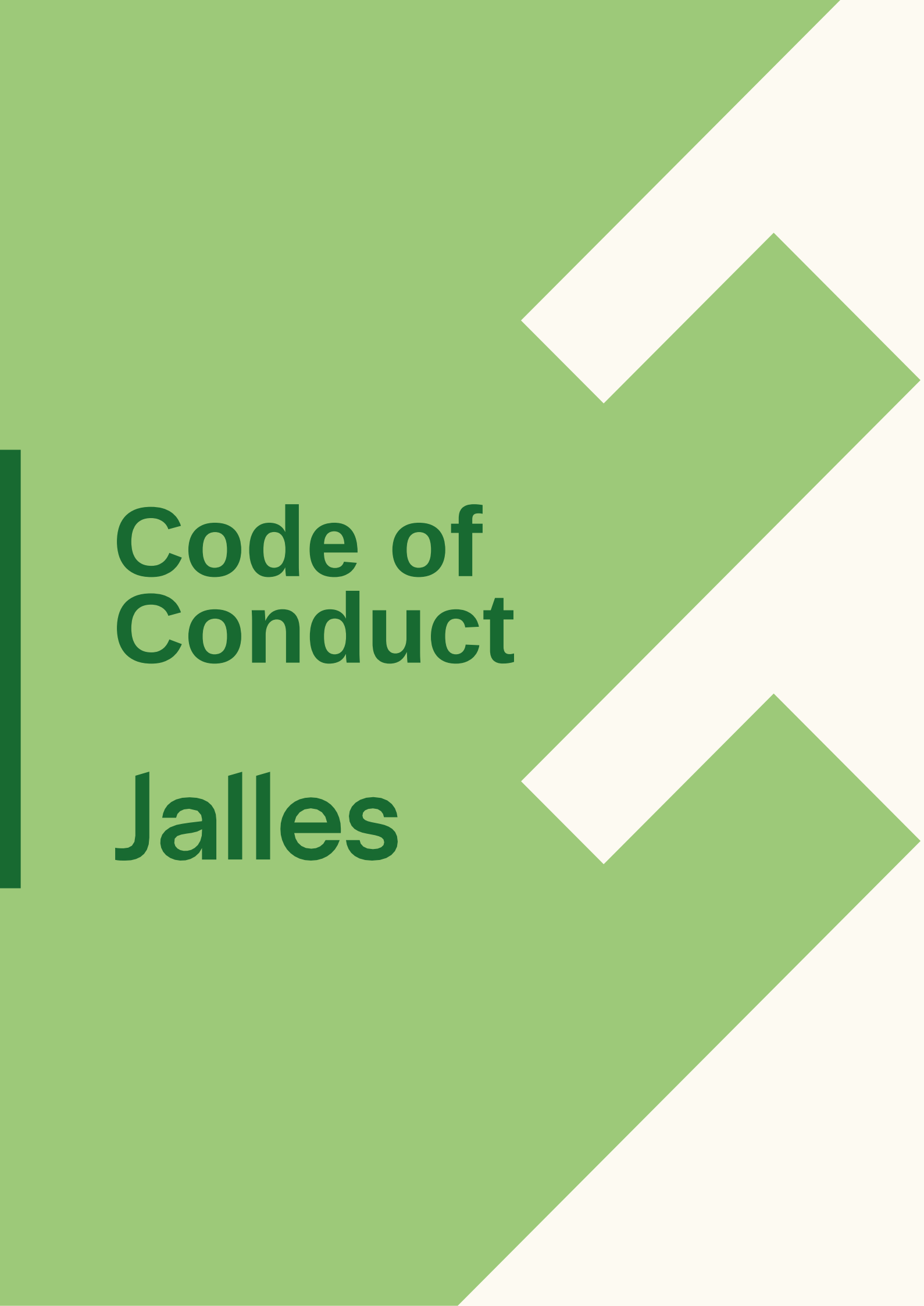




Code of Conduct

Jalles

You are receiving the Jalles Code of Business Conduct, which gathers the principles that must be observed in the relationship of its Collaborators with customers, third parties, suppliers, distributors, government representatives, competitors and the community in general.

Based on its values, Jalles formalized this Policy to guide, define responsibilities and limits, as well as declare its commitment to its Collaborators.

Jalles is a reputable company that operates in accordance with the Integrity Program in the national and international market, always in accordance with the highest ethical values and good corporate governance practices.

Jalles also reiterates its commitment to society, clients, partners and suppliers, and any conduct that goes against the good faith, integrity, ethics of the Company and anti-corruption measures will be investigated in accordance with national and international laws, regulations, decrees, policies, rules and procedures that govern them.

As part of the process of generating value for society and with the objective of increasing our contributions to the Sustainable Development Goals (SDGs), we have in our materiality matrix related topics that prioritize the commitment to the 2030 agenda.

Jalles

1. GOAL AND VALUES

- The Jalles (or “Company”) Code of Conduct is a guide that aims to guide the conduct of all employees and managers (hereinafter referred to as “Collaborators”) in the exercise of their responsibilities, whether in an internal or external environment of the Company.
- Ethics and transparency are the basic principles, rooted in the Company's culture and must, therefore, guide all relationships established around the Company's business. This Code of Conduct is intended to reflect the non-negotiable guidelines for any person or organization to interact with the Company. All Collaborators, third parties, suppliers, customers and business partners are expected to adopt behavior consistent with the conduct described in this code.

2. DETAILS

- The Integrity Commission is responsible for the policy of this procedure and the Human Resources Area for the control and review from this Code of Conduct, including, but not limited to, any activity necessary for the maintenance and updating of this Code of Conduct.
- However, each and every individual who maintains a relationship with the Company, including, but not limited to, Collaborators, business partners, third parties, suppliers and customers, must report immediately any violation of the guidelines expressed in this document to the Integrity Commission, directly or through the reporting channel made available by the Company.



3.

GUIDELINES FOR CONDUCT**3.1 COMPLIANCE OF LAWS AND REGULATIONS**

- The rules and guidelines established herein must be followed by all Collaborators and must serve as a reference for the Company's commercial partners, third parties, suppliers and clients.
- Jalles conducts its business observing the legislation in force in the country and human rights in general, and its Collaborators must know and adopt the same conduct in relation to the laws and other rules, including, but not limited to, the rules of protection of the Company's information, the fight against corruption and the Company's Policies.
- Jalles supports the principles governed by the Universal Declaration of Human Rights, of the United Nations and the Declaration of Fundamental Principles and Rights at Work, of the International Labor Organization. It understands that dignity, integrity and respect for human rights must be assured to all Collaborators and will serve as a reference for all commercial partners, third parties, suppliers and clients. The goal of the workplace is to favor mutual integration among all people. In view of this, it promotes well-being, respect, individual freedom, equal treatment, intolerance for child and forced labor, diversity and a work environment free of discrimination, harassment, violence and intimidation of any nature. It promotes relationships with the community, supports the preservation of the environment and offers a safe and healthy workplace, through compliance with current legislation.
- To this end, Collaborators must be familiar with the laws, rules and regulations in force, especially those related to agro-industrial and administrative/financial activities.
- Following the ESG theme (Environmental, Social and Corporate), the company promotes relations with the community, supports the preservation of the environment and offers a safe and healthy environment, in compliance with current legislation.
- Jalles does not tolerate any type of illegal acts, corruption, or any other attitude that may characterize undue advantage practiced against public administration, national or foreign, or competition.
- Head Management supports the Integrity Program and is aware of its importance for creating an organizational culture where all Collaborators or third parties linked to the Company value strengthening the ethical environment, acting in a way to prevent, detect and remedy deviations.
- Therefore, the entire management body of Jalles is emphatic in not tolerating any harmful act contrary to its principles, making available to interested parties the Code of Conduct, Collaborator Manual, among other policies.

3.2 COMMERCIAL AND FINANCIAL PRACTICES

- All Jalles Collaborators must guarantee the competitiveness of the Company seeking to safeguard its interests in internal and external trading situations, acting according to criteria defined by the Company.
- All Jalles operations - whether purchase or sale of goods and services – should be based on legitimate and reputable business procedures; and which- Either behavior outside of these standards should be communicated by the Collaborator to their immediate superior.
- All commercial and financial transactions – foreseen or within the scope of the position held by the Employee in any area of Jalles – must be duly registered in Accounting, in order to maintain a perfect internal control system, periodically estimated and documented.
- The contracting and partnership with Third Parties will obey the objective criteria, as described in policies and in no case will it be carried out by indication or recommendation of Public Officials. Third Parties are chosen based on screening in which they should be analyzed the history, the know-how, the experience and its ethical practices in Brazil and the countries in which it operates.
- No Contributor will be retaliated against or penalized due to delay or loss of business resulting from your refusal to pay or receive bribes.
- Jalles does not accept or support any unlawful activity, especially those whose purpose is to conceal or legitimize illicit financial resources. It's important that all Collaborators are attentive to the following behaviors:
 - Unusual forms or complex patterns of payment;
 - Unusual transfers to/from countries non-related to the transaction;



- Customers who are eager to avoid information registration requirements;
- Transactions that previously involve locations associated with "money laundering" or tax evasion.

■ Any indicative mentioned above should be communicated to the direct manager or to the reporting channel made available by the Company.

3.3 RESOURCE MANAGEMENT/MARKETING OF GOODS

■ All transactions of purchase and sale of products and services necessary for the management of the business of Jalles should be based on criteria of quality, price and technique;

■ The Company's service providers must not be hired for private services for a Collaborator;

■ Access to Jalles products for personal use must obey the same rules as for external clients, or to existing standards the subject, defined by the Board;

■ It is the responsibility of the Collaborator to ensure the good use and conservation of the resources/patrimonies of the Company placed under its guard/responsibility;

■ Jalles products or assets should not be used for private purposes;

■ Jalles respects the privacy of its Collaborators. Without prejudice to this premise and aiming to ensure the security of the information and the correct use of technological resources, when strictly necessary, Jalles may monitor the use of such corporate resources by Collaborators, valuing the protection of confidentiality of this information.

■ The marketing and exchange of goods of particular interest on Company grounds is prohibited.



3.4 GIFTS AND INVITATIONS

- Jalles expects gifts, presents and entertainment to be refused when they are offered to Collaborators with the power to interfere in a decision in the interest of the donor. The exceptions are gifts identified as being distributed free of charge (with no commercial value as they display a brand or advertisement, characterized as institutional) that can be granted and accepted;
- Gifts, presents or entertainment received, whose commercial values exceed BRL 250.00 (two hundred and fifty reais), must be reported by the Collaborator to the Board and will be considered property of the Company, which will decide on its use;
- Everyone must be aware of the context of receiving gifts and not just their value; in case of doubt, they should consult their immediate superior. It is forbidden to receive offers in cash for any reason;
- Collaborators must inform all persons and entities with whom they maintain relations on behalf of Jalles about the Company's conduct and policy regarding gifts and presents;
- The same principles must be applied when Jalles offers gifts and invitations to its commercial partners, suppliers, customers and members of government bodies;
- Invitations to events with expenses borne by customers, suppliers, members of government agencies and other stakeholders can only be accepted (i) when there is a real opportunity to develop commercial and institutional contact, (ii) when it has also been extended to professionals from other Companies and (iii) upon authorization from the board of directors.

3.5 INFORMATION SECURITY AND INTELLECTUAL PROPERTY

- All matters and information of the Company, without exception, obtained by the Collaborator in the scope of his/her work or in the performance of his/her functions must be treated with secrecy and confidentiality, preserving the confidentiality of the information and, consequently, the name and image of Jalles;

Collaborators, regardless of hierarchical level, are not allowed to use or pass on to third parties any confidential information, such as industry secrets, processes, technologies, know-how, improvements, electronic systems, copyrights, among others. As well as disclosing non-official information (rumors) of any species.



3.6 RELIABILITY

- Jalles conducts its business in an absolutely transparent manner, but reserves the right to previously assess the disclosure of information that may affect its interests or jeopardize its competitiveness;

Likewise, all market information, used for analysis and positioning, must be obtained through transparent means and in accordance with suitable practices;

- No Jalles Collaborator may use any information involving the Company's business for their own benefit or that of third parties.

3.7 CONFLICT OF INTEREST

- Collaborators are prohibited from participating in Conflicting Activities (as exemplified below) or in decision-making processes whose decision may bring an individual benefit to the Collaborator in question or to third parties related to him.

No Jalles Collaborator may get involved in any activities, commitments and relationships that conflict with the Company's interests.

Any involvement with Distributors, Resellers, Competitors, Suppliers, Service Providers, Jalles Customers and/or any legal and natural persons with whom Jalles maintains or intends to maintain a relationship or participation.

- Involvement means any participation, investment, partnership, consultancy, representation, administration, commercial transactions and/or operational agreements.

- Jalles Collaborators may not be directly involved in Conflicting Activities, have a commercial or financial interest, or receive wages, fees, commissions or any other compensation arising from Conflicting Activities.

- The participation of family members in any Conflicting Activity requires that the Collaborator communicate, in writing, to his/her hierarchical superior the conditions under which this relationship will take place (position, type of business, etc.), so that it can be evaluated by the Management whether or not there is a conflict of interest. Parents, spouses, partners, sons or daughters, grandparents, uncles, aunts, brothers, sisters and their respective spouses are considered family members.

Collaborators who intend to carry out external activities, which are not Conflicting Activities, but which involve particular financial interests (family businesses, corporate participation, consultancy, etc.) must inform their superior.



3.8 POLITICAL ACTIVITIES AND CONTRIBUTIONS

- No Collaborator may act on behalf of the Company, or contribute funds or assets - without explicit authorization from Jalles - - for party movements; political committees and candidates or public office, as well as for class association, non-governmental bodies and other representative entities;

Individual participation in any lawful political activity is a personal and autonomous decision of each Collaborator.

3.9 DISCRIMINATION / PREJUDICE

Jalles values diversity in work relationships.

- No practice of discrimination or prejudice, whether of sex, race, origin, religion, age or any other prejudiced expression, will be tolerated in our work environment.

3.10 HARASSMENT AND ABUSE OF POWER

Jalles does not tolerate harassment such as: sexual, economic, moral or of any nature, nor situations that constitute disrespect, intimidation or threat in the relationship between Collaborators, regardless of their hierarchical level.

- All Collaborators shall act with dignity and respect for the individual values of their co-workers, avoiding any occurrence that characterizes moral or sexual harassment.

3.10.1 Psychological Violence, Moral Harassment and Sexual Harassment

- Psychological violence is characterized by offensive gestures, words, attitudes or actions, explicit or subtle, disqualifying, discriminating, humiliating and embarrassing, resulting from work relationships, which violate the dignity of the person and are potentially capable of compromising their professional career, causing damage to their physical and mental integrity, which may lead to deterioration of the work environment.
- Bullying is characterized by the repeated and lasting occurrence of psychological violence at work, which can compromise their professional career, cause damage to their physical and mental integrity and cause deterioration of the work environment, illness and even death.
- Sexual harassment is characterized by conduct of a sexual nature, manifested physically, by words, gestures or other means, proposed or imposed on people against their will, causing embarrassment and violating their sexual freedom.
- Any complaint regarding possible ethical infractions will be received and treated confidentially in a reserved space, by the Human Resources and/or Legal Managers, who are members of the Integrity Committee, and/or by the social worker.



3.11 USE OF ALCOHOL, DRUGS AND WEAPONS

- The illegal use, possession, sale, distribution, transport or any form of facilitation of illegal drugs, toxic agents, controlled substances or accessories for drugs, within the Company's establishments, in the use of Company vehicles or, even, when on duty outside the Company's premises;
- It is also forbidden to consume alcohol during the work day, except in official Company celebrations, when authorized;
- The Company encourages the treatment of drug addicts and makes efforts to improve the quality of life and strengthen the family environment through social responsibility actions.
- Weapons of any kind are not permitted on the Company's premises, except for those carried by security professionals expressly authorized by law and by the Company, when they are necessary for the performance of their duties.



3.12 HEALTH AND SAFETY AT WORK

- Occupational health and safety rules and procedures aim to offer Collaborators a safe and healthy work environment, in addition to complying with current legislation.
- It is the responsibility of each Collaborator to observe and comply with these rules.
- Collaborators must demonstrate a personal commitment to safety. Reporting situations of risk and insecurity that they have identified to their immediate superior and seeking to resolve them with perseverance are examples of this commitment. Collaborators must treat safety concerns seriously, resolving issues with an appropriate sense of priority.



3.13 (E) Environmental of ESG

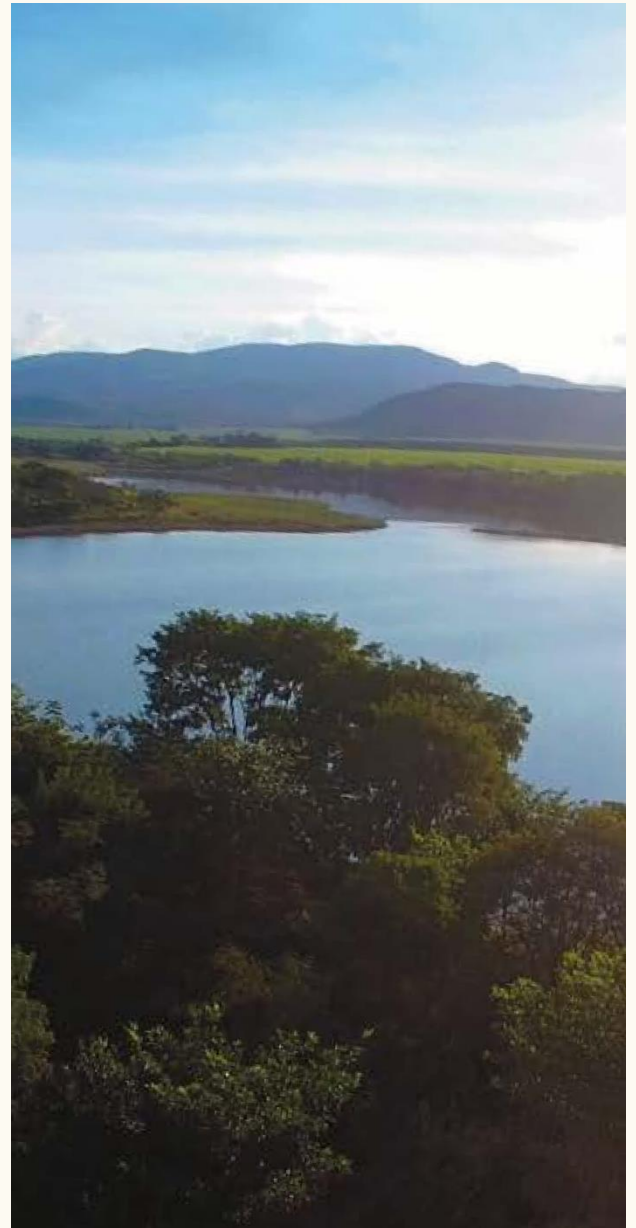
- We support the preservation of the environment and value environmental education, ensuring that our operations and products meet legal standards and determinations, as well as the best market practices. It is the responsibility of each Collaborator to observe and comply with these rules and legal provisions.

3.14 (S) Social of ESG

- The Company will approve actions aimed at the exercise of citizenship and local development and, in particular, for the relationship and promotion of improvement in the quality of life of the communities where it operates. All donations to social projects, with or without tax incentives, must be approved by the Board of Directors.

3.15 (G) Governance of ESG

- In favor of good corporate governance among partners, board of directors, management, inspection and control bodies, as well as with other interested parties; our relationships are based on principles such as equity, transparency, corporate responsibility and accountability.



3.15 EXPLOITATION OF CHILD/ADULT LABOR/HUMAN TRAFFICKING

- The Company complies with the legislation that prohibits child labor outside the limits of learning, under the terms of the legislation in force. Likewise, it does not allow the occurrence of slave labor and human trafficking.
- It rejects abusive and exploitative practices and hopes that its suppliers, partners and contracted companies also have the same values. Failure to respect these values will constitute an impediment to maintaining commercial relations with the Company.

3.16 HIRING RELATIVES

- The hiring of family members of Collaborators is authorized, as long as there is no direct or indirect relationship of subordination between them. This requirement does not include large volume hiring of seasonal workers. Other exceptions must be previously approved by the Board.

3.17 OBLIGATION OF EXCLUSIVITY

- Collaborators undertake to work exclusively for Jalles during the working day, refraining from carrying out any parallel activities that may compete, disperse or jeopardize the good progress of the work. They also undertake not to use the Company's resources to carry out such activities. Exceptions must be analyzed by the Board.

3.18 CORRUPTION AND ILLEGAL PAYMENTS

- Jalles and its Collaborators undertake to respect the highest standards of integrity, honesty and rectitude in all relationships inside and outside the Company, in compliance with national laws, best practices against corruption and to contribute to building an ethical culture through the Compliance Program.



Code of Conduct

- The Company does not tolerate any type of corruption (defined as accepting or receiving money to gain business improper advantage) in relation to public officials or representatives of international organizations or third parties connected or linked to public officials, or in relation to legal entities or individuals or other subjects differently indicated by the laws applicable
- No Collaborator may, directly or indirectly, accept, request, offer or pay sums of money or other favors, in the conduct of Jalles' business, (including privileges, specific benefits, illegal contributions, gifts, entertainment or donations, with the exception of commercial objects of modest economic value), even having suffered illicit pressure.
- The search for anti-bribery practices should guide all and any relationships with the Public Sector. Any attitudes, whether by Collaborators or third-party representatives of Jalles, that lead to offering payments, donations and privileges to people linked to the Public Administration, in order to maintain or secure an undue advantage, are prohibited. Attitudes must always be based on:
 - Commitment to the guidelines provided in the Code of Ethics, as well as, of its related policies;
 - Business and professional ethics;
 - Knowledge and unrestricted compliance with policies, internal regulations, legislation and Regulations applicable to the activities of the Company;
 - Effort to mitigate any risks that may expose Collaborators and the Company to investigations before judicial or administrative orders.
- Those responsible must keep records of economic relations with the Public Administration, whether expenses, remuneration, etc., and any requests made directly or through an intermediary, with the aim of obtaining an advantage, must be immediately notified to Senior Management and the Compliance Committee.



3.19 TRADE UNION ASSOCIATION

- Jalles respects free association, recognizes trade unions as legal representatives of Collaborators and seeks constant dialogue. Likewise, the Company directs that its Suppliers and service providers equally respect the right of all of their employees to organize through associations or trade unions, in accordance with applicable laws in the locality where they operate, and which maintains constant dialogue with such organizations.
- Negotiations and dialogue with the entities should be carried out only by the persons formally authorized to do so.

4. COMMUNICATION

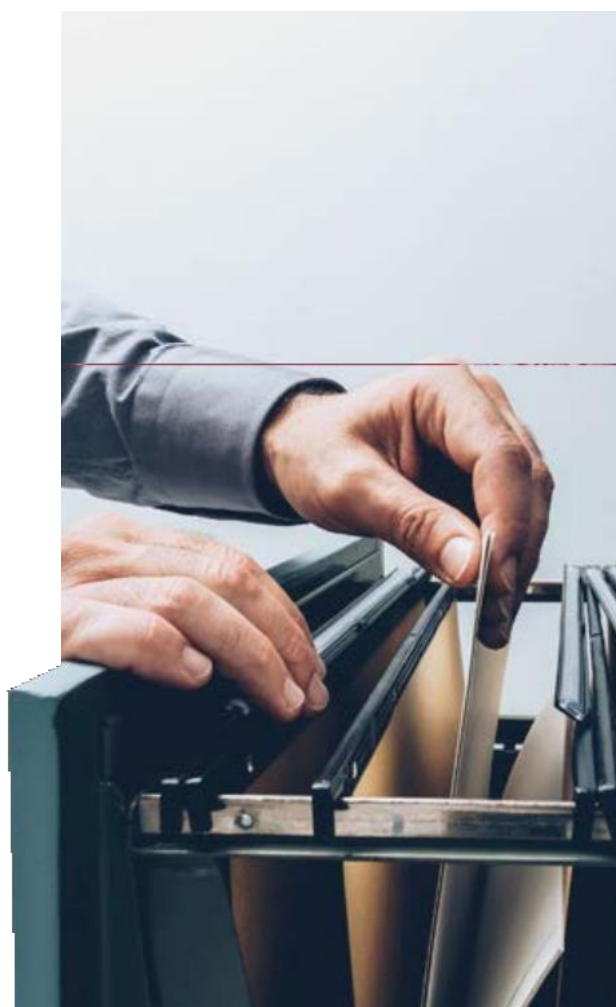
- Our communications with all our stakeholders must be guided by ethics and transparency.
 - Only the directors and persons authorized by them may represent Jalles to the public or media and speak on behalf of the company. If the employee receives a request from an external contact regarding the disclosure of company matters, he must forward the request to the Communication area.
- To express personal opinion in any medium or communication vehicle, especially in public forums, social networks, etc., the employee may not use the corporate email or make reference to Jalles.



5.

GENERAL DATA PROTECTION LAW

- Jalles ensures compliance with Law 13.709 of 2018. Therefore, it is extremely important that the Employee follows the conduct listed below:
 - Please note the storage period and form of disposal of documents containing personal data, related to your activities, in the Disposal Policy.
 - Note how files and documents containing personal data are stored, which you have access to, so that they are not exposed and easily accessible by others.



- It is not allowed to disclose personal data of Collaborators, clients or suppliers to any person, company or on social networks, and the internet in general.

- It is not allowed to extract from the Company's databases (digital or physical) any personal data information for purposes that are not directly linked to its activities.

Any personal database sent to third parties must contain a password and be sent by

- means of a contract signed with a specified LGPD (Brazilian Data Protection Law) clause.

It is not allowed to record videos or take photos within the Company's premises.

- It is not allowed to share videos recorded by the monitoring cameras on social networks,
- WhatsApp, and the internet in general.

Any and all requests from owners, whether clients, collaborators or suppliers must be forwarded to the data officer appointed by the Company.

- Failure to comply with the above conduct may result in termination with fair cause or lawsuit.

6.

ACTIONS IN CASE OF NON-COMPLIANCE

- Failure to comply with any provisions of this Code of Business Conduct, other Company policies or applicable legislation will not be tolerated and will be subject to disciplinary measures such as warning, suspension and even termination with fair cause, which will be determined by the Commission of Integrity or by the Audit Committee.
- Once the occurrence of a violation has been determined, the Integrity Committee or the Audit Committee (as the case may be) will decide to adopt corrective actions and disciplinary measures, always proportional to the seriousness of the violation, according to the sanctions defined below:

Verbal warning. The Integrity Committee must explain to the Employee the reasons for his warning, guiding him on the appropriate form of procedure and his expectation. This warning is not mandatory and may be cancelled depending on the severity of the occurrence.

Written warning. The Integrity Committee must explain to the Employee the reasons for his warning, guiding him on the appropriate form of procedure, thus avoiding recidivism.

Suspension. The Integrity Commission determines the suspension of the Employee from the exercise of his duties for a determined period based on the severity of the violation.

Termination with fair cause. Under the terms of the legislation in force, transcribed below, the dismissal for just cause will be applied in the occurrence of the acts provided for in Article 482 of the CLT (Consolidated Labor Laws): "It is also just cause for dismissal of employee the practice, duly proven in an administrative investigation, of acts against national security. It is also worth mentioning that the recidivism in the warnings may also characterize an act of incontinence of conduct or bad procedure, disdain in the performance of the functions or another paragraph of the aforementioned article, thus authorizing the "Fair Cause".

7. COMPLAINT CHANNEL

- It is the responsibility of all Collaborators to ensure compliance with this Code of Business Conduct, other Company policies and current legislation. Collaborators are expected to question any contrary guidance and refrain from performing any acts contrary to the Company's principles and values, as established in this Code of Business Conduct, and current legislation.
- It is also the Collaborator's duty, upon becoming aware of any act that characterizes a violation of this Code of Business Conduct, the other Company policies or the legislation in force, immediately bring it to the attention of their immediate superior or communicate the fact through the reporting channel made available by the Company.
- The Company has an external and independent reporting channel, managed by the company ICTS Global Brasil ("ICTS"), for reporting conduct that violates the Code of Business Conduct, other Company policies or current legislation ("Integrity Channel"). The Integrity Channel ensures that the whistleblower is heard confidentially and has his or her anonymity preserved.
- In order to increase vigilance and, consequently, control over possible cases of violation of the Code of Business Conduct, other Company policies or current legislation, the Integrity Channel is open not only to Collaborators, but also for suppliers, commercial partners, clients, investors and other external interfaces of the Company.



- The Integrity Channel can be accessed: through the electronic portal **jalles.com/integridade** by e-mail **jalles@canaldeintegridade.com.br**, or by telephone, anonymously and free of charge, through **cellphone number 0800 591 4168**, from Monday to Saturday, from 7am to 7pm.
- Complaints made through the Integrity Channel will be investigated by the Integrity Commission, which will also be in charge of leading to their conclusion, as well as the eventual application of corrective actions and disciplinary measures.
- Once a complaint is initiated through the Integrity Channel, the system will generate an anonymized protocol number and designate a rapporteur, a member of the Integrity Commission, to follow up on the investigation of the reported incident. All communication with the complainant is intermediated by ICTS, in order to preserve their identity. Additionally, the progress of the complaint can be monitored instantly and anonymously by the complainant through the electronic portal <https://canaldeintegridade.com.br/jalles>, based on the anonymized protocol number generated by the system.
- Once the facts have been ascertained, the rapporteur will present his opinion on the incident to the other members of the Integrity Commission who will deliberate, by majority, regarding the filing of the complaint or the eventual application of corrective actions and disciplinary measures.
- The Integrity Committee is made up of a multidisciplinary body, with at least one member from the Legal Department and one member from the Company's Human Resources Department. In order to avoid conflicts of interest in the investigation stages and application of disciplinary measures, the Integrity Channel will redirect any complaint involving members of the Integrity Committee or the Company's top executive management to the Audit Committee. This ensures impartiality and autonomy in the process of investigating complaints.
- The Company does not tolerate any type of retaliation against whistleblowers who report in good faith a violation or suspected violation of the Code of Business Conduct, other Company policies or applicable legislation, with confidentiality guaranteed regarding their identity. The practice of retaliation is subject to disciplinary measures that may even result in the dismissal of the Collaborator or termination of a contract, as the case may be.
- The Company will ensure the confidentiality and independence of the Integrity Channel, also guaranteeing the possibility of sending doubts, suggestions or eventual complaints anonymously, in order to avoid retaliation against the person who reports any situation, including situations that may characterize a conduct that violates the Code of Business Conduct, other Company policies or applicable law.
- The Company must ensure that any measure that constitutes retaliation against the whistleblower is severely punished, in accordance with the sanctions provided for in this Code of Conduct.

**CODE OF BUSINESS CONDUCT
VERSION 7 - 02/2023**

**Coordination:
Jalles Human Resources Management**



Jalles

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