



CODE OF ETHICAL CONDUCT
CITRÓLEO GROUP

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STATEMENT OF MISSION, VISION AND VALUES

Mission

To transform, in a sustainable way, raw materials from nature into active functional ingredients, generating value for communities, people and the environment, thus connecting biodiversity with the well-being of being natural in its own right.

Eyesight

To be for our customers the best supplier of natural raw materials from Brazilian biodiversity, and a reference in sustainability.

Values

Concern about quality - 100% natural products

Work together with communities and rural producers, know when and how to collect the raw material, respecting the period of harvest and seed maturity, aiming to guarantee the manufacture of value-added raw materials, always with high quality control and proof of results.

Concern for sustainability and regular supply

Focused on a production that values respect and protection for the environment, the cultivation of seedlings is conducted through close interaction between communities in the field and Citróleo Group, ensuring the sustainability and traceability of raw materials, through approved management plans Brazilian legislation and respect for harvest periods, thus ensuring regular supply and the sustainability of its products.

Fair price for the entire supply chain

The Citróleo Group encourages the community and the rural producer to stay in the countryside by paying a fair price for their raw materials. The incentive for the community to stay in the countryside, contributes to the generation of income for their families, in addition to valuing the wealth of the local ecological heritage also contributed to its preservation, as we believe that the best way to preserve the environment is to keep the community there.

Concern for nature

Nature is a precious asset of the company, since the raw materials for the development of products depend directly on its conditions, therefore the balance of the ecosystem and biodiversity are fundamental for the business of today and tomorrow. Thus, Citróleo Group is a green company, with aggressive sustainability policies and a focus on natural products.

Concern for well-being

Providing well-being to people is the end result of the entire production chain. Cosmetics collaborate with the self-esteem of people, who are increasingly concerned with their health, beauty and feeling of being well with themselves. As people are the center of attention of the company, everything is designed to improve their lives, including for their employees who tell about the development policies of the communities that work in their subsidiaries.

SCOPE

OUR CODE OF ETHICAL CONDUCT IS APPLICABLE TO ALL CITRÓLEO GROUP EMPLOYEES.

We expect our employees, as well as third parties with whom we have relations, to act ethically and in accordance with our Code. All employees are required to participate in training in relation to the Code, and must sign the Adhesion and Commitment Term for such training. Citróleo Group may take disciplinary action, including termination or dismissal, against any employee who violates the Code, Citróleo's policies or any law, or acts in an unethical manner. In case of doubt about the Code or the appropriate way to act, please contact our Ombudsman, your manager or Human Resources representative.

CONFLICT OF INTERESTS

BY ENTERING IN THE CITRÓLEO GROUP, YOU ASSUME THE COMMITMENT NOT TO USE YOUR LINK WITH THE COMPANY TO ACHIEVE PERSONAL GAIN OR BENEFIT, FOR OTHER BUSINESS OR OTHER PEOPLE, DIRECTLY OR INDIRECTLY.

In order to correctly meet this obligation, it is essential to know how to identify and avoid situations that may place your interests on the one hand and those of the Company on the other. In case of real or perceived conflicts, we require that all employees proactively and immediately disclose what happened.

When is there a conflict of interest?

There will be conflict whenever you find yourself in a situation that could lead you to make decisions motivated by interests other than those of the Company.

PARALLEL ACTIVITIES

Our employees must perform their duties with excellence while working at Citróleo Group, whether internal or external. However, Citróleo Group supports that, during their free time, employees seek entrepreneurial activities that do not conflict with Citróleo's business, interests and industry.

*** We consider parallel activity the performance, by the employee, of another professional activity in addition to that performed at Citróleo Group.**

What can?

- You can perform the parallel activities you wish, as long as they do not impair your income at work, that are performed outside the working hours agreed with Citróleo Group and that do not conflict with Citróleo's business, interests and sector.
- The sale of other products on Citróleo's premises is also permitted, as long as it does not impair the smooth running of the work, which are not products of irregular origin and which do not conflict with the Company's business, interests and sector.

What can not?

- You cannot provide services to Citróleo Group as a supplier.
- Employees working in parallel activities cannot use their working relationships to obtain benefits from this parallel activity.

KINDNESS AND AFFECTIVE RELATIONSHIP

We are a company that respects and supports the affective and kinship bonds that unite our employees inside and outside the company. However, we understand that some limits need to be established so that conflicts cannot influence our decisions.

What can?

- You can refer a relative or friend to open positions within the company, in which he will go through a normal selection process, where you should be absent from any decision-making process, without influencing the outcome of the decision.
- We allow kinship and affective relationships between employees, as long as there is no level of hierarchical subordination between these employees or the influence of one of the employees on the other with respect to management decisions and processes. In the case where there is no hierarchy, but there is influence on the part of one party on a career decision or activity on the other, the employee must be absent from decision making.
- In situations of kinship with spouses / partners, parents, siblings and / or children who work in competitive companies, you must inform your manager.

What can not?

- You cannot benefit from your affective relationship or kinship with people who work in public agencies, to obtain advantages for Citróleo Group.
- You cannot hide the existence of an affective bond or kinship with another employee when there is the possibility of establishing hierarchical subordination, management influence, decision influence, both in management and in processes between you.

TRAVEL AND ACCOMMODATION

Business inspires us! And as a company employee, you may be required to travel on business on behalf of Citróleo Group. In such cases, all employees must comply with our internal procedures, following the Accountability and Reimbursement Standard.

What can?

- You can accept or request subsidized trips by the company to attend meetings, lectures, congresses, fairs or other events, as long as your participation is approved by your manager.
- Accompanying persons are allowed on professional trips, as long as their manager approves this situation and that no Citróleo Group resources are used to finance the passage, lodging, meals or any type of expense that their companion may generate. The manager must consult the feasibility with the area responsible for the event.
- Miles earned on corporate trips are a benefit and can be used by the employee for personal purposes.

What can not?

- You cannot accept payment or discount on tickets and / or accommodation when the benefit takes the form of a gift and can be interpreted as personal favor, gratification or an attempt to influence decision making.
- You cannot use Citróleo's resources to pay extra costs due to personal preferences or choices.

POLITICAL ACTIVITIES

Citróleo Group is always committed to citizenship and believes in the involvement of the community to generate positive social changes. However, the company does not contribute directly or indirectly in favor of political parties, movements, committees, political organizations or unions, their representatives or candidates.

What can?

- The employee can join political parties;
- Any employee can exercise public office, as long as the specific and governing legislation so authorizes or does not prohibit.
- If an employee decides to run for political office, he must promptly communicate his decision to his manager and the Ombudsman.

What can not?

- Employees cannot associate any political candidacy with Citróleo Group or speak on their behalf as a political or official candidate, either during their working hours or outside, regardless of the chosen means of disclosure (printed documents, social networks, etc.);
- Employees are not allowed to use the premises of Citróleo Group or any other business means, including those of communication (e-mail, telephone, among others) to publicize their own candidacy, of a third party, or to promote any political party;
- Employees cannot use data, information, physical or technological resources from Citróleo Group for any political campaign activity.
- Employees cannot harm their activities or that of their colleagues due to their partisan performance.

FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

The Citróleo Group guarantees and recognizes free union association and the right to collective bargaining, respecting and valuing the participation of employees without any type of discrimination, and complying with established agreements. In addition, it recognizes union entities and class associations as legal representatives of employees, maintaining a respectful relationship with their representatives and managers.

RELATIONSHIP AND WORK ENVIRONMENT

WE BELIEVE IN THE POWER OF PEOPLE WHO ACT WITH TRUTH, HONESTY AND RESPECT, BEFORE OUR EMPLOYEES AND OUR WORK ENVIRONMENT.

These values also apply when hiring employees and interacting with third parties and service providers, which strengthen our Company's image. By becoming a Citróleo Group employee, you become part of an engaged, high-performance, diverse and inclusive workforce, where you will be able to understand the challenges and needs of our employees, suppliers and customers.

PREJUDGEMENT, DISCRIMINATION AND HARASSMENT

We value the diversity of our team and reject any and all forms of prejudice, discrimination and harassment.

We are committed to investigating and any situations of subordination, disadvantage, humiliation, intimidation, exposure to ridicule, hostility and embarrassment in our work environment, whether related to color, race, sex, sexual orientation, language, religion, physical, gender, age, political opinion or other reason nature, nationality, social origin or any other reason.

Harassment is unwanted and offensive conduct that can interfere with a person's ability to do their job.

The most common forms of disrespectful behavior that can characterize harassment include:

- Tell jokes with obscene and sexual character
- Show or share explicitly sexual images or drawings
- Letters, notes, emails, phone calls or messages of a sexual nature
- Sexual comments on how to dress or look
- Make sexual sounds or gestures
- Direct or indirect threats with the objective of having sex.
- Invite someone repeatedly to have sex or to go out
- Call names, insult
- Look offensive
- Inappropriate questions about one's sex life
- Touch, hug, kiss someone without consent
- Chasing or trying to control someone's personal life
- Sexual attack

What can?

- You must report situations of prejudice, discrimination, abusive behavior to our Ombudsman, such as aggression or threat, or harassment in our work environment. Complaints will be investigated and the names of the complainants will be kept confidential, to the extent permitted by law.

What can not?

- You may not adopt abusive, inappropriate or offensive conduct in the work environment, whether verbal, physical or gestural, against colleagues, partners or visitors.
- You may not adopt conducts that constitute harassment in the exercise of your function, inside or outside Citroleo Group.

USE OF ALCOHOL, DRUGS AND WEAPONS

We demand a peaceful and respectful environment among our employees. In case of violations, talk to your manager or call the Ombudsman.

What can?

- You can consume alcohol moderately on our premises only when there are authorized social gatherings.
- The use of cigarettes is authorized only in the areas designated for this purpose.

What can not?

- You may not carry, consume, enter or remain in our facilities or in external activities related to Citróleo Group, including driving, when you are affected by the effect of alcoholic beverages or any type of illicit or narcotic drugs.
- You can not store or carry any type of weapon on our premises or in external activities related to Citróleo Group. Service providers (eg security guards) who use weapons as a work tool must be duly authorized, identified and technically qualified for such activity.

PRESERVATION AND PROPER USE OF THE COMPANY'S GOODS AND RESOURCES

Upon joining Citróleo Group, we make available to employees all the resources and assets of our company (financial, material or intellectual, assets, furniture, equipment or infrastructure) necessary for the performance of each function.

It is up to the employee to ensure the cleanliness and organization of his workplace and the conservation of the materials and resources made available, as well as to avoid waste and unnecessary expenses by himself and others, respecting the sustainability principles that guide our business.

What can?

- You can use Citróleo's resources and assets only to exercise your job responsibilities.

What can not?

- You cannot use Citróleo's resources and assets without prior authorization.
- You cannot misappropriate the assets, taking them out of the premises or making unnecessary use in your role.
- You cannot waste the resources provided by the company, using more than necessary.

HEALTH, SAFETY AND ENVIRONMENT

The Citróleo Group is committed to providing a safe and healthy workplace for employees, business partners, visitors and suppliers who work or visit our facilities and offices.

What can?

- You must comply with the Health, Safety and Environment standards or procedures of Citróleo Group and your workplace.
- You must identify and correct activities carried out outside the standards of safety, health and the environment.
- If you identify any situation that threatens your physical integrity or that of your colleagues in the work environment, you must guide the employee and communicate with your manager and the Occupational Safety area. In this situation, if the risk is serious and imminent, you must exercise the right of refusal, interrupting the activity and immediately reporting the fact to your manager and to the Occupational Safety.

What can not?

Infringing internal rules and taking risks in any dependency of Citróleo Group.

HIRING OF EX-EMPLOYEES AND EX-THIRD PARTIES

Rehiring is permitted as long as certain standards are followed.

- A former employee can be hired, as long as the applicable legislation is respected and the employee has not been dismissed for cause.
- Before rehiring, it is still necessary to carry out a formal consultation of the performance evaluations, contract and termination history of the former employee.

RESPECT FOR CORPORATE POLICIES, STANDARDS AND PROCEDURES

It is the responsibility of each employee to become familiar with and comply with the corporate policies, rules and procedures that regulate Citróleo's activities and processes.

The manager has a fundamental role in guiding the employee about the Policies / rules that involve the performance of his / her function and also those that involve the entire Company. We reinforce the importance of some rules that everyone should know and apply in their daily lives, we highlight the most common ones here: Goods and Services Acquisition Policy, Vehicle Use Policy, Student Aid Policy and Accountability and Refund Policy.

CHILD LABOR AND YOUNG WORKERS

The Citróleo Group is strictly opposed to child labor and other forms of child exploitation. Our employees and suppliers must not get involved or benefit from the use of child labor, in accordance with ILO Convention 138. Under 16 years of age, any work is prohibited, except as an apprentice from the age of 14, enrolled in the Young Apprentice Program, where tasks should be simple and of a limited nature and should not compromise the health or safety of workers.

FORCED LABOUR

Our employees must not participate in or benefit from any form of forced labor, including labor, forced labor, slavery, servitude or trafficking in human beings, in accordance with ILO conventions 29 and 105. The Citróleo Group must not retain any part of salary, benefits, property or documents (for example, identity cards and travel documents) to force the employee to continue working. Employees must have freedom of movement during their employment and Citróleo Group must not engage in or tolerate the use of corporal, mental or physical punishment, coercion or verbal abuse of personnel.

SUSTAINABILITY AND ENVIRONMENT

Sustainability is our business! We act responsibly contributing to the conservation of natural resources, providing dignified and fair conditions for workers and promoting good relations with the community close to their area.

Aware of the correct use of natural resources, Citróleo Group employs sustainable management techniques, assessing its environmental, social and economic aspects, respecting the relevant legislation

and not complying with illegal logging practices and other forestry activities that violate ethical concepts.

NO ANIMAL TEST

We consider ethical and humane treatment of animals to be paramount. Therefore, we do not carry out and do not support animal tests.

PRIVACY

In the course of doing business, we collect and store personal information about employees, business partners, suppliers and others, such as dates of birth, addresses and financial and other information. When we collect and process personal information, we must comply with local laws and keep the information confidential.

Personal information should be collected only for legitimate business purposes, shared only with those who are allowed access and used only as long as necessary.

USE OF CONFIDENTIAL AND PRIVILEGED INFORMATION

CONFIDENTIAL INFORMATION IS A VALUABLE PART OF OUR INTELLECTUAL HERITAGE, THEREFORE, WE MUST PROTECT THE CONFIDENTIAL INFORMATION OF OUR COMPANY.

Intellectual property includes copyrights, patents, trademarks, product and packaging designs, brand names and logos, research and development, inventions and trade secrets.

INFORMATION SECURITY

All files and data related to professional activity created, received or stored in our systems, be it e-mail, network or corporate cell phone, are the property of Citróleo Group and constitute commercial and legal assets of the Company, to the extent permitted by law. Confidential information must be stored securely and can never be shared with other stakeholders, investors, partner companies or competitors.

In case of termination of the employee, voluntary or not, all of them must be kept in the company, prevailing the employee's obligation to maintain confidentiality, under penalty of being liable for possible damages to the Company.

What can?

- You can leave your workplace when necessary, as long as you lock or disconnect your computer or terminal, preventing others from using it instead.

What can not?

- You cannot install any kind of "pirated" or free software (considered "freeware") on your computer on your own, you must request the Information Technology area to make a check and, if necessary, the installation.

- You may not, under any circumstances, share your credentials, be they login, password or badge. These data are individual and non-transferable and their custody, confidentiality and maintenance are the

responsibility of the employee, provider or third resident.

USE OF ELECTRONIC MEANS

Access to the internet and the telephone, as well as the use of Citróleo's e-mails, software, hardware, equipment and other assets must be related to the exercise of professional activity. As these are corporate means, we can monitor the use made by our employees at any time.

What can?

- You can use Citróleo's electronic resources and means, such as internet or telephone, for personal purposes, as long as it does not contradict internal rules and guidelines or hinder the progress of your work.

What can not?

- You may not use our electronic means for games, chain mail, exchange or storage of obscene, pornographic, violent, discriminatory, racist, defamatory content or that disrespects any individual or entity.

VERACITY OF ADVERTISING INFORMATION

We are a company totally against any kind of misleading or abusive advertising.

When advertising and publicizing our products, Citróleo Group guarantees the veracity of the information transmitted, whether written, spoken or in the form of images. All employees must check with their manager the use of advertising messages, before posting them on social, digital and institutional media.

ANTI-CORRUPTION RULES

ANTI-CORRUPTION AND ANTISUBURN LAWS

The Citróleo Group takes a firm stand against bribery in line with anti-bribery laws that exist in many countries around the world. We strictly prohibit, by our employees or third parties in the conduct of our business, bribes, kickbacks, illegal payments and any other offer of items of value that may, inappropriately, influence or reward a customer to order, buy or use our products.

What can?

- You must report to our Ombudsman any fraud, bribery, facilitation payments, illicit payments, extortion, corruption or other illegal activities of which you become aware. These activities are not only violations of the Code, but also serious violations of criminal and civil laws in several countries. If you or any other Citróleo Group employee receives an offer or request for a bribe or other improper payment, for you or for third parties, you must immediately inform your manager and the Ombudsman. Complaints will be investigated and the names of the complainants will be kept confidential, within the limits allowed by law.

- You must ensure that all travel, entertainment and gifts comply with our policies, including the requirements set out therein, that all such expenses must be modest, properly recorded and for legitimate

business purposes.

- You must comply with all applicable trade sanctions, embargoes and export and import laws where we do business, including ensuring that Citróleo Group does not do business directly or indirectly with entities that are listed on the relevant embargo lists.

What can not?

- Employees and third parties acting on behalf of Citróleo Group may not give, offer, promise, accept, ask for or receive a bribe or any other type of illegal payment.
- You cannot, in the exercise of your function, obtain earnings for yourself, for third parties or for Citróleo Group through fraud.
- You may not, in the course of your activity with Citróleo Group, make donations to politicians, political campaigns, political parties or candidates for public office during or outside electoral periods. Such donations may be considered a crime in some countries.
- We do not tolerate unlawful practices by our suppliers or third parties in conducting our business. Our third-party intermediaries cannot offer, give or receive bribes or any other type of illegal payment. You should never accept improper personal benefits for the purpose of winning or maintaining a business or other advantage from third parties, whether in the public or private sector.
- When acting on behalf of Citróleo Group, an employee cannot influence any official public agent through the use of the employee's personal or family relationship to obtain benefit, directly or indirectly, for Citróleo Group or a third party.

ANTITRUST AND COMPETITION LAWS

Antitrust and competition laws promote fair competition and protect consumers from unfair business practices. These laws often deal with areas such as illegal agreements between competitors with the aim of preventing or restricting free competition, pricing and unfair commercial practices. We fully comply with all applicable antitrust and competition laws.

We are responsible for dealing fairly with customers, suppliers, competitors and third parties. This means that our employees avoid obtaining unfair advantages through manipulating, covering up or misrepresenting important facts or other unfair practices. For questions about antitrust and competition laws, contact the legal department.

GLOBAL COMMERCIAL COMPLIANCE: ANTIBOICOT AND COMMERCIAL SANCTION LAWS

As a global supplier of products, we conduct export transactions every day and must comply with all applicable local, regional and international trade laws, rules and regulations. We also respect trade sanctions and import / export restrictions imposed by governments that are applicable to our activities.

GIFTS AND OTHER OFFERS

The exchange of gifts is a common practice in the business world, but we must be cautious when giving or receiving gifts.

What can?

- You can give gifts on behalf of Citróleo Group at corporate events or on the company's premises, so that

the gift contains the company's visual identity and this act does not appear to influence business decisions.

- You can accept gifts, gifts and other symbolic offers from Citróleo's suppliers and partners.
- You can accept invitations to institutional events, training or others, as long as prior approval is requested from your superior. Travel expenses must be combined and follow the Goods and Services Purchase Policy.

What can not?

- You cannot give or receive a gift (including cash equivalent gift, such as coupons or gift cards), unless it is compatible with Citróleo's policies and all applicable laws.

COMPANY RESPONSIBILITIES

The Citróleo Group companies encourages its employees to report any potential illicit practices. We offer channels through which employees can make complaints, and we also have a process by which complaints are investigated and addressed. All complaints raised in good faith about inappropriate conduct by Citróleo Group or by its employees or partners will be investigated in a consistent manner and appropriate measures taken.

The Code of Ethical Conduct will be revised according to the demands for changes, and the Ombudsman and the Ethics Committee are responsible for forwarding suggestions for improvement.

EMPLOYEE RESPONSIBILITIES

When joining the Citróleo Group, employees must start to respect what is established in our Code of Ethical Conduct, while carrying out their duties and throughout our chain of relationships, responding for their actions and presenting an integral conduct in line with our ethical principles.

Whenever cases of noncompliance with this Code are identified, they must be reported to the Ombudsman in order to receive appropriate treatment. The consequences applied to misconduct can range from disciplinary actions, such as warning, suspension or termination.

The employee is responsible for communicating with his manager and the Ombudsman, whenever he becomes aware of a possible situation of violation of the Code of Ethical Conduct, as well as in situations of conflict as mentioned in this material.

DIALOGUE CHANNELS

WE BELIEVE THAT DIALOGUE CHANNELS ARE THE BEST WAY TO IMPROVE OUR BUSINESS PROCESSES AND RELATIONSHIPS. WE HAVE ELECTED OUR MANAGERS, HUMAN RESOURCE REPRESENTATIVES AND THE OMBUDSMAN AS INTERLOCUTORS THAT WILL HELP US FIND THE RESPONSES TO SOLVE QUESTIONS RELATING TO CONDUCT IN THE CITROLLE GROUP.

You can count on the Ombudsman, a channel to register and investigate cases of non-compliance with the Citroleo Group's Code of Ethical Conduct. The Ombudsman ensures security, confidentiality and preservation of the demonstrator's identity, within the limit allowed by applicable law. It is possible not to identify yourself (anonymous manifestation). In this case, we ask that you inform the greatest number of facts about the case so that it can be forwarded. Every received demonstration is treated with confidentiality and the protesters will be protected against reprisals, within the limit allowed by the applicable legislation.

OMBUDSMAN CHANNELS:

Site: <http://citroleogroup.com/site2017/ouvidoria/>

Email: ouvidoria@citroleogroup.com

Phone: +55 (14) 3656-9900

Address: Rod. SP 197, km 18 Torrinha / SP – Brazil, CEP 17360-000

ETHICS COMMITTEE

- THE ETHICS COMMITTEE IS FORMED BY:

- Director of Operations
- President
- Ombudsman

IT HAS AS ASSIGNMENTS:

- Ensure compliance with the Citróleo Group's Code of Ethical Conduct and clarify doubts regarding its content;
- Analyze and deliberate on deviations in conduct and conflicts of an ethical nature in relation to the established guidelines;
- Stimulate the adequacy of practices, policies and procedures to the Citróleo Group's Code of Ethical Conduct;
- Guarantee the privacy and protection of topics and people involved in ethical issues;
- Approve and guarantee the relevance of the Citróleo Group's Code of Ethical Conduct, proposing the improvement of the document.

TERM OF MEMBERSHIP AND COMMITMENT

I DECLARE THAT I TAKEN KNOWLEDGE OF THE CITRÓLEO GROUP'S CODE OF ETHICAL CONDUCT AND, AFTER READ AND UNDERSTAND ITS CONTENT, I AGREE TO THE RULES CONTAINED IN THIS DOCUMENT AND ASSUME THE COMMITMENT TO FOLLOW SUCH GUIDELINES IN MY PROFESSIONAL ACTIVITIES UNDER THE PENALTY OF CAUSING DISCIPLINARY ACTIONS, SUCH AS WARNING, SUSPENSION OR TERMINATION.

I assume the responsibility and commitment to report and formalize to my manager and the Ombudsman any behavior or situation that is in disagreement with the rules established in the Citróleo Group's Code of Ethical Conduct. I declare that, at this moment, I am not in any situation that violates these documents and that I do not know of any circumstance that could generate any conflict with the rules contained therein. I declare to be responsible for transmitting the rules of the Citróleo Group's Code of Ethical Conduct to the employees under my management and to act in situations of non-compliance with these documents.

Location, (day) of (month) of (year).

(Signature)

Employee name