



1. DLC business ethics guidelines

1.1. Message from the Chairman

Throughout its history, Diesel Line Cambuí has conducted its business based on a code of conduct and ethics, where it can solidify itself and establish a constructive presence in the market in which it operates.

We consider ethical conduct to be that which aims to comply with the guidelines set out in this document, as well as legal, technical and civil standards, considering all the behavioral aspects involved.

In this sense, it is worth noting that integrity, the result of this ethical conduct, should lead us to be able to say: "we would feel responsible and proud if our actions went public".

Considering this aspect, it should be noted that integrity requires an environment that is not only free and open, but also respects issues related to privacy and confidentiality.

We emphasize that the company aims to create a harmonious and transparent environment, so we encourage voluntary or anonymous communication that helps us identify any act and/or suspicion that violates this integrity, as well as acts of misconduct by employees towards our customers and representatives.

We would also like to emphasize that DLC strives to act in accordance with the manuals, standards and codes of ethics of our stakeholders and, with this, we want to develop actions that curb any conduct that is inappropriate.

1.2. Values Charter

OUR PURPOSE

To generate **success** for all our connections with **transparency, commitment, care and collaboration.**

OUR VISION

- To be recognized by our clients as a unique company in building its operational results.
- To be considered one of the best companies to work for in our segment and size.
- To be recognized by our employees as a company that challenges and provides professional development.
- To be recognized by our neighbors as a generator of success in our regions.
- To generate profitability capable of guaranteeing the success of all our connections.

OUR DIFFERENTIALS

- Processes that exceed the expectations of our connections.
- Constructive and lasting professional relationships.
- Ability to anticipate our partners' needs.



Family | Transparency | Trust
Respect | Commitment



Demanding customers in our markets who are looking for specialized solutions with quality and reliability for its operations in an agile manner, valuing commitment, integrity and security.

OUR COMPETENCIES TO BE DEVELOPED



Ability to develop constructive and lasting communications and relationships with all our connections.



Developing and practicing processes that challenge the development and retention of our talents.



Adding value to our partners' critical operations.

SIG Policy

To meet our clients' needs, seeking its satisfaction and the sustainability of the business;
Comply with current specifications and legislation;
Continuously improve the management system and prevent its impacts;
Sharing transparent information with stakeholders;
Promote employee development through actions to generate competence and awareness.



1.3. Scope

We emphasize that the guidelines in this document may be complemented by internal guidelines, policies, procedures, collective agreements and current legislation, also presented as primary conditions in work relations and with our external public.

These rules are applicable to the entire DLC Group and are essential for a climate of harmony and integration.

It is worth pointing out that the regulatory actions contained in this document extend to all the company's employees, without distinction of hierarchy or professional category, and the obligation and commitment to comply with them is everyone's responsibility.

2. Guidelines for conduct in the workplace

2.1. Intellectual property

In order to guarantee the competitiveness of the company and its strategic planning, as well as the differential with its market competitors, it is necessary to guarantee the confidentiality of information, technological innovations, documents, prototypes, project manuals, technical opinions and other aspects.

To this end, the employees directly or indirectly involved with this information have as one of its duties to maintain the utmost confidentiality of any information that falls within the scope described above, which also extends to the information of our customers and/or suppliers.

Confidentiality of the DLC business must be respected, and it is the responsibility of employees to ensure that this restriction of data or information is guaranteed, and any contrary application is a serious offense, subject to civil and criminal penalties.

Our employees are expressly forbidden from collaborating with information of any kind relating to institutions that are competitors of the company and/or our customers and suppliers, without prior authorization from the board of directors.

Taking notes or copies of technical and administrative details on any matter relating to the company's industrial and commercial activities for private purposes, as well as allowing or facilitating its removal from company premises, is prohibited as an act of breach of professional secrecy and an act of misconduct.

It is forbidden to falsify or adulterate any information, whether in company and/or partner documents or in any other medium that is detrimental to the company, and the employee may even be implicated in civil and criminal proceedings.

It is forbidden to carry out any act which, if made public, could defame the image of the company and/or partners. Our inner rules and the code of conduct and ethics of our clients and/or suppliers must always be respected.

We would like to emphasize that the following attitudes are considered to be very serious faults on the part of our employees, including the company's Leadership and Senior Management:



- ▶ Disclosure of the direct or indirect financial situation of a client and/or supplier, with the exception of information required for registration and related legal procedures;
- ▶ Use of information that promotes gain or advantage for themselves or third parties, including the purchase or sale of information related to business in which DLC is involved.

2.2. Personal, confidential and privileged information

DLC is concerned with the protection of personal, confidential and privileged information of all its employees, ensuring compliance with the General Data Protection Law, LGPD, Law 13.709 of 2018 and other stakeholders in accordance with current laws and contracts.

Any information that is not in the public domain (such as financial results, potential acquisitions or disposals, the loss or conclusion of a major contract and ongoing litigation) must be protected, regardless of the existence of contracts or formal confidentiality obligations. This also applies to information about the company and its employees and other stakeholders.

Personal or confidential data must be used legitimately and for the specific purpose for which the information was collected, received and stored. Data should only be stored for as long as is necessary for the purpose for which it is processed. Protection of personal data offers individuals who have its information stored the right to control its maintenance in accordance with the Law.

2.3. Conduct in relation to SMS

DLC, as well as its directors and employees, is guided by the best health and safety practices that guarantee the physical and psychological integrity of all those who, directly and/or indirectly, work in our facilities, those of our clients and/or suppliers.

Our activities are guided by the practice of preserving the environment, taking into account compliance with all legal requirements.

We emphasize to our employees, partners and suppliers that we constantly comply with all requirements related to Safety, Environment and Health, so that our activities are always guided by best practices.

3. Complementary ethical guidelines

3.1. Discrimination, abuse of power and harassment

DLC is against discrimination of any kind, so it is expressly forbidden to promote acts that offend the moral, physical or psychological integrity of any person, to engage in prejudiced discussions based on sex, gender identity, sexual orientation, race, color, religious belief, nationality, physical or mental disability, political option, among others; to direct insults, use words or gestures that are inappropriate to morality and respect.

Company is also against any form of intimidation, abuse of power, harassment and/or sexual, moral, religious, political or organizational aggression. As such, our focus is on encouraging work environments that promote personal fulfillment and offer prospects for human and professional development.

See the Moral and Sexual Harassment Policy.

3.2. Slave and child labor

We are strictly against forced labor and situations that potentially involve coercion, punishment under any pretext, degrading disciplinary measures or punishment for exercising any fundamental right.

DLC does not condone such practices and if it are identified, it will be properly reported to the competent authorities and requires its suppliers to adopt the same practice.

We are against child labor and do not agree with any situations that potentially involve the items below, providing solutions, on our own initiative or in partnership, when these prove possible:

- ▶ Irregular employment of adolescents under the age of 16 (except as apprentices, from the age of 14);
- ▶ Conditions unsuitable for the work and development of adolescents aged 16 to 18;
- ▶ Identifying any form of discrimination, violence or violation of the fundamental rights of children and adolescents.

3.3. Alcohol and drugs

When it comes to alcohol and drug control, the DLC complies with the precepts set out in the legislation, which states:

"Art. 1 of Law 6.383, of October 21, 1976 (Narcotics Law)":

Art. 1 - It is the duty of every individual or legal entity to collaborate in the prevention and repression of illicit trafficking and undue use of narcotic substances or those that determine physical or psychic dependence".

Company is concerned about the effects that the use and abuse of alcohol and/or drugs (legal or illegal) can have on the health and safety of its employees. Company therefore prohibits the use of illicit substances in the workplace.

We would like to point out to our employees that the use of alcohol is not allowed throughout the working day, whether on DLC premises or on the facilities of our customers and suppliers.

Company relies on the collaboration and participation of its employees in complying with these internal rules.

Company's objectives with regard to the practice of the Alcohol and Drugs Policy are:

- ▶ To raise awareness, prevent and discourage the misuse and possession of drugs and alcohol, in order to protect the physical and psychological integrity of employees and its families, as well as the clients and partners with whom the company interacts.



- ▶ Promote internal campaigns to help employees with issues related to the use of tobacco, uncontrolled medication and excessive use of alcohol, providing information or making referrals to related service centers.

Possession of licit or illicit drugs of any kind is strictly forbidden in any sector, be it within DLC's premises or on the premises of our clients and suppliers. Use, possession and/or distribution of these items by any employee is subject to legal sanctions and is considered a threat to everyone's integrity.

In the case of smoking, this is only permitted in exclusive environments for this purpose in open areas that are signposted, isolated and without risk of fire.

See the Alcohol and Drug Use Control Policy.

3.4. Firearms

It is strictly forbidden to carry a weapon of any kind in any sector or facility of the company. Possession and/or distribution of such items by any employee is subject to legal sanctions and is also considered a threat to everyone's integrity.

4. Ethical guidelines with other stakeholders

4.1. Investors

Company's business is sustainable through the establishment of trust between the management body and the company's shareholders. We understand that the company grows by advancing in a long-term relationship with its shareholders and in the certainty that they are committed to the business.

Our efforts are aimed at achieving sustainable and profitable growth, while maintaining a respectful relationship with investors, creditors, the market and the general public.

4.2. Customers

We work to build strong, long-lasting and sustainable business relationships with our clients, always seeking to follow legal precepts and honest business practices, guided by our values and aiming for the best interests of DLC.

We are committed to the pursuit of excellence in all our products and services, and strive to meet or exceed our customers' expectations for quality, security and confidentiality.

DLC authorizes the use of gifts and entertainment that make it possible to represent the company's brand, and such action is not considered inappropriate conduct, as long as it does not infringe the code of ethics of our clients and representatives.

4.3. Suppliers

In the same way, we seek commercial relationships with our suppliers, which intensify our interest in honest business practices, guided by legal precepts, our values and the best interests of DLC and our connections, so that these relationships tend to be strong, long-lasting and sustainable.



DLC undertakes to hire suppliers on the basis of a prior qualification analysis carried out by the Supply Chain and QSMS departments in order to assess its level of commitment to trade bodies and legal compliance.

DLC allows the receipt of gifts from suppliers up to \$100, provided that such gifts do not affect professional relations or influence the decisions made by the employee.

In the case of hiring suppliers who are directly, collaterally or transversally related to DLC Group employees, approval must be formalized by the Supplier Management Committee.

It is forbidden for managers and/or requesting departments to hire suppliers who are directly, collaterally or transversally related to them to carry out services, supply inputs and/or any commercial relations.

Supplier Management Committee will be made up of the following organizational positions:

- ▶ CEO
- ▶ Technical Director
- ▶ Service Manager
- ▶ CRM Manager
- ▶ People & Management Coordinator
- ▶ Financial Coordinator

4.4. Government

DLC is firmly committed to fighting corruption in all its forms, including extortion and bribery. To this end, the Company complies with anti-corruption laws and regulations wherever it does business.

DLC does not tolerate any form of active or passive corruption, such as extortion or bribery, in an attempt to influence business or obtain any undue advantage.

Money laundering is understood to be economic and financial practices aimed at concealing the illicit origin of certain assets, so that these assets appear to have a licit origin. DLC does not condone such practices and if they are identified, they will be properly reported to the competent authorities.

In relations with the public sector, it is forbidden to offer or receive courtesies from public officials or political office holders and their parties.

Any contribution, donation or sponsorship to political parties in exchange for undue favor or advantage or to influence the decision of a public official or politically exposed person, directly or indirectly, is not allowed, even if the favored entity is a charitable institution.

Note: Use and distribution of items used to promote the brand of competing companies by DLC Group employees, whether by physical or digital means, is not permitted.

5. Final considerations



5.1. Violations

Any violation of the provisions of the Code of Ethics and Conduct entails serious consequences for those involved. Any violation involving a criminal act must be reported to the competent authorities and the offender may be prosecuted.

5.2. Open communication

We emphasize that DLC encourages an "Open Door" policy, keeping all confidential channels available for suggestions and complaints.

Anyone who identifies a violation of the Code of Ethics and Conduct should report it via www.dlcdiesel.com/etica . All cases will remain confidential and anonymity will be protected. No retaliation against the whistleblower will be tolerated!

Content of the report must be as complete as possible (indicating the day, place, time, people involved and detailed facts) in order to ensure a thorough investigation.

Luiz Antônio Caporali

CEO