

THE CODE OF CONDUCT



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INTRODUCTION

Jaupavi was founded in 1979 in Jaú (SP) and started its services and works in the central region of São Paulo State. Since then, the company has been operating throughout the interior of São Paulo with special artworks, canals, tunnels, earthworks, paving and galleries, always using modern equipment and specialized professionals.

VISION

Consolidate in the markets already conquered, trying to improve the workforce, reduce costs and strengthen the company.

MISSION

Perform public and private works, taking care to meet the technical and quality requirements established by the authorities and ensuring the full satisfaction of customers and users, seek full satisfaction of customers and users, promoting the welfare of people and the community in a sustainable manner.

VALUES

- ✓ Respect for customers, partners and employees;
- ✓ Ethics and personal and professional responsibility;
- ✓ Quality of services and products;
- ✓ Customer satisfaction;
- ✓ Technological innovation;
- ✓ Continuous development.



THE CODE OF CONDUCT

Jaupavi's Code of Conduct describes the principles of personal and business behaviour and aims to establish the company's fundamental principles and policies towards its employees and towards third parties acting on its behalf.

The Code of Conduct, based on ethical and moral principles, is followed by all directors, employees, associates, interns or third parties serving the Company, always respecting the principles defined herein. All professionals who use its resources, both in the company's premises and plants and outside, are equally responsible for ensuring that the principles are understood and put into practice.

When necessary, the Code will be revised to ensure continuous and permanent improvement.

Presentation of the Code to new members is made by



HR (when hiring new employees) and by the technical department (when hiring third-party companies). In both cases, a copy of the Code of Conduct is handed out and the acknowledgement and commitment clause (Appendix I and II) is formalized.

The Jaupavi company does not directly or indirectly use child labor, slave labor or the like, nor does it have anything to do with prostitution and sexual exploitation and vehemently rejects such practices among its service providers.



INTERNAL RELATIONSHIP

In the working environment

Jaupavi, through its directors and employees, is committed to conducting its business and relationships without prejudice with respect to race, color, religion, sexual orientation, politics, age, social status, physical and mental condition, or any other form of discrimination, and emphasizes equality for all before the law, conventions, and contracts.

In addition, Jaupavi's position is not to conceal or hide errors, but to report them so that they can be addressed in a timely manner.

Abuse of Power and Harassment

Respect and order must prevail in the work environment so that moral and sexual harassment and situations that constitute intimidation are suppressed, regardless of hierarchical level.

CONFLICTS OF INTEREST

Conflicts of interest occur when the personal interests of employees or third parties conflict with the interests of the Company and result in special benefits and/or losses, and are sanctioned as follows:

Family members of employees

It is permitted to hire family members of employees through an impartial selection process.

Affective relationship between employees

Affective relationship between employees is permitted as long as there is no direct subordinate relationship between the parties.

Gifts

Offering gifts, presents or financing entertainment trips is permitted only in the context of business relationships and when it is not intended to influence decisions.

In relationships with partner companies, suppliers or service providers, this practice is permitted if it is done to strengthen the relationship, with items of low commercial value and preferably for use in daily work and never to influence decisions or create the need for retribution, favors, benefits or any kind of advantage.

Secondary activities

These are activities that employees perform outside of their working hours, whether paid or not.

Managers, engineers, and supervisors are not permitted to engage in parallel commercial activities. Other employees may engage in other occasional commercial activities, provided that such activities cannot adversely affect their performance or the Company's image and do not compete with Jaupavi, and the parallel activities are not permitted during office hours or on the premises of the workplace.

Employees are also not permitted to participate in the management or boards of competing companies or to develop activities that may conflict in any way with Jaupavi's interests.

In order to ensure transparency of relationships, it is recommended that invitations to assume management activities in another company be communicated and confirmed by Jaupavi's Managing Partners.

Jaupavi recognizes the importance of volunteer activities and supports them as long as they are performed outside of working hours and the workplace. Volunteer activities during working hours are only allowed if they are encouraged by Jaupavi.

EXTERNAL RELATIONSHIP

Political and religious participation

Jaupavi respects the religious and political freedom of its employees, but prohibits the holding of partisan or religious events on company premises or in its name.

Employees who decide to run for public elective office must first leave the company.

Donations

Any donations or contributions must be social or cultural in nature and adhere to the following guidelines:

- ✓ Donations to charitable institutions must demonstrate the existence of the institution and must be of a purely philanthropic nature;
- ✓ There are no conflicts of interest between Jaupavi and the institution receiving the donation or contribution;
- ✓ The philanthropic character and eligibility of the institution must be carefully assessed and must not be associated with a public official or a family member, a political party or a governmental entity, or be an operator of financing for illegal acts;
- ✓ Donations and contributions shall be accounted for on a regular basis.

Contributions to political parties

Contributions to political parties are prohibited.

Public Sector

Relations with the public sector are guided by ethics, respect, integrity and transparency. It is forbidden to promise, offer or grant, directly or indirectly, any financial advantage, benefit or other advantage to any public or private employee, or even to any other person related or referred to him/her.

Therefore, all employees must comply with the provisions of Law No. 12,846/13 of August 1, 2013, as well as other applicable laws that establish the guidelines and standards for relations with the public sector.

Regarding participation in public tenders, compliance with applicable laws and the adoption of ethical and transparent behaviors is mandatory.

Competition

Jaupavi respects its competitors and does not agree with illegal competitive practices such as cartelization, price fixing, industrial/commercial espionage or other actions that violate Brazilian competition legislation. It is also prohibited to adopt an attitude that could damage the image of competitors.

Social responsibility

Jaupavi adopts and implements the development of social, environmental and voluntary practices with the aim of contributing to an improvement in the quality of life of the community and environmental sustainability.

Media and Press

Contacts with the press will be handled exclusively by a press officer authorized by Jaupavi's management.

If the employee is contacted by the press and does not have the necessary and explicit authorization, he/she must not comment and must immediately inform the management.

Social Media

Considering that interaction through media/social networks is becoming more present in relationships, it is established that the dissemination of photos and videos related to Jaupavi, customers or partners is allowed only with the express authorization of the company management.

In addition, it is extremely important that employees maintain respect in the virtual environment and conduct themselves in a manner that is free of prejudice and discrimination.

RELATIONSHIP WITH USERS

Respect for customers is demonstrated in the provision of excellent services. It is also committed to the continuous improvement of its services to ensure quality, workmanship and durability.



RELATIONSHIP WITH SUPPLIERS

The evaluation criteria for suppliers take into account technical, economic and suitability aspects, excluding any kind of discrimination.

Jaupavi also undertakes to maintain the confidentiality of information received by any means, whether oral, written, e-mail, telephone or telematic, and its disclosure may only take place in exceptional circumstances and with the express authorization of the company's management.

The Supplier may be replaced in case of non-compliance with environmental, labor, tax, health and safety regulations.

Jaupavi does not agree with the use of child labor, slave labor or similar, as well as any kind of violation of human rights, and reserves the right to terminate relations with companies that use such practices.

Commissioning of third parties

The commissioning of third parties shall be carried out, if necessary, after an analysis based on technical and legal criteria and production capacity.

The contracted third parties must adhere to the object of the contracted service and may not, under any circumstances, offer any type of benefit on behalf of Jaupavi to public or private representatives, their consultants and family members, and comply with all other requirements of this Code.

Payments to third parties

Payments to third parties from Jaupavi shall be made in accordance with signed and executed contracts, subject to the following:

- ✓ Jaupavi does not use the cash payment system or bearer documents to pay third party suppliers or services;
- ✓ Payments shall be made only by deposit into a bank account in the name of the contracting individual or legal entity.
- ✓ Payment is always made upon presentation of a tax document with a description and the value of the services rendered or material purchased, a document required for the accounting recording of the transaction.

Subcontracting

The contract entered into between Jaupavi and the service provider shall, when signed, contain an express clause authorising or prohibiting subcontracting. Any subcontracting agreement to be executed by a supplier, partner or service provider must first be submitted to management for approval.

After signing the subcontract, the supplier, partner or service provider is obliged to sign the corresponding Declaration of Recognition and Commitment (Appendix II).

USE OF RESOURCES

Physical Heritage

Jaupavi emphasizes the rational use of available resources and promotes conscious and sustainable practices in the use of equipment and materials.

Electronics

Company computer equipment may not be used to disseminate news with topical content, rumors, pornography, or defamation.

Access to internal computer systems will be granted only to employees authorized by management, noting the level of hierarchy.

When using the company's internal radios, only company matters related to the smooth operation of production lines and occupational safety will be discussed, and polite and appropriate language must be used at all times.

Company-provided cellular phones will be used only for matters related to production processes, plant and vehicle supplies, and workplace safety, with exceptions made only for private emergencies. The same procedure applies to the use of landline telephones.

On construction sites and in machining centers, cell phones may only be used at predetermined points.



Monitoring

Jaupavi employees understand that computer equipment, including company email, in all of its files are monitored at all times. Monitoring extends to all files and folders, and this practice is not a violation of any rights, as the equipment is the property of the company.

ENVIRONMENT

Jaupavi practices the conscious use of natural resources and the preservation of the environment through sustainable attitudes. Stations for the separate collection of waste materials are available at various points of the facilities and construction sites and must be used by all. The collected material must have an environmentally safe destination and, if possible, be recyclable.

SECURITY AND HEALTH

Promote and encourage practices that help improve quality of life by adopting appropriate attitudes toward safety and health, such as those listed below:

- ✓ Report to supervisor all workplace accidents that occur in company areas and on job sites;
- ✓ Maintain organization, safety, and appropriate cleanliness in the workplace;
- ✓ That employees, including contracted service providers, use personal protective equipment- PPE and collective protective equipment-CPE when performing their work activities;
- ✓ Notify supervisor of occurrence of risk situations at work;
- ✓ Report to the supervisor and the company physician any medical treatment, with or without the use of medication, that could affect the performance of your duties and/or your safety.

It is strictly prohibited to report to work under the influence of illicit drugs and/or after drinking alcohol, as well as its consumption during working hours.

Only legally authorized persons may carry weapons for the performance of property security function. For all others, access to the company's premises or the workplace,

including construction sites, is strictly prohibited, carrying weapons or any other device that may put the physical integrity of other employees and other people at risk, except for civil or military police in the performance of its legal duty.

Smoking is prohibited indoors, in vehicles and machinery, in processing facilities and near vehicles and utility areas, as well as in posted areas and other places defined in State Law No. 13541/2009.

On construction sites, smoking is allowed only in the marked places and near the appropriate dumps.

The company has a cooperating doctor who, in addition to the appropriate medical procedures and treatments, also guides smokers who want to give up their addiction.

INTELLECTUAL PROPERTY

It is hereby established that the intellectual property of the plans, programs and projects developed in the company belongs to Jaupavi, even after the responsible employee leaves.

The employees understand that the files related to their activity are the property and possession of Jaupavi and, therefore, must not be deleted or copied, otherwise they will be liable for the damages resulting from it.

ACCOUNTING RECORDS

The operations carried out by Jaupavi are registered and evidenced in accordance with the applicable regulations and laws.

Jaupavi does not allow its employees to alter accounting records; does not allow fraudulent entries; does not allow tampering with supporting documents, including receipts, invoices and expense reports.

All accounting records are kept on a regular basis in accordance with the time limits set forth in specific regulations and laws.

MONEY LAUNDERING

Money laundering is considered a crime under Brazilian law and is strictly prohibited.

Therefore, any employee who detects or suspects such a practice must immediately inform the company's management.

INFORMATION CONFIDENTIALITY

Jaupavi establishes that the strategic information of the company, customers, third parties, subcontractors and also the personal data of the employees are kept confidential and their disclosure can only be made in special cases and with the express authorization of the Board of Directors.

Therefore, some precautions must be taken:

- ✓ Do not disclose information to employees that they do not need as part of their job;
- ✓ Immediately inform the supervisor of any information leak;
- ✓ For activities such as photographs, filming, interviews, seminars, lectures and the like, obtain prior approval from management specifying the disclosure.

It is also extremely important to pay attention to security when sharing passwords/user data for internal systems.



Star Wash
Urea

JAUPAVI



COMPLIANCE COMMITTEE

The main role of Jaupavi's Ethics Committee is to ensure the effective application of this Code of Conduct. It is composed of employees who are recruited within the company, act impartially and without bias, and are entrusted with the following tasks:

- ✓ Evaluate and decide on violations of the Code of Conduct;
- ✓ Analyse, evaluate the impact of, and decide on cases not provided for in this Code;
- ✓ Recommend updates to the Code of Conduct;
- ✓ Enable activities that can improve the "compliance culture".

LEGISLATION

Compliance with federal, state and local laws and regulations applicable to the Company's activities is mandatory for all Jaupavi employees, including directors, vendors and service providers.



PERSONAL CONDUCT

Each employee must maintain a work environment in which respect, fairness, ethics, and professionalism prevail.

Inappropriate behaviours include:

- ✓ Physical, verbal or written actions, jokes, insults, threats that may interfere with performance or cause conflict;
- ✓ Helping people with behaviour that is in violation of the rules;
- ✓ Entering the workplace with another employee's badge or transferring one's own;
- ✓ Absence from work without supervisor's permission;
- ✓ Gambling or betting;
- ✓ Being a loan shark or applying for loans;
- ✓ Spreading rumours, data or false news about internal affairs of the company and its employees.
- ✓ Failure to comply with the attitudes and behaviours set forth in this Code.



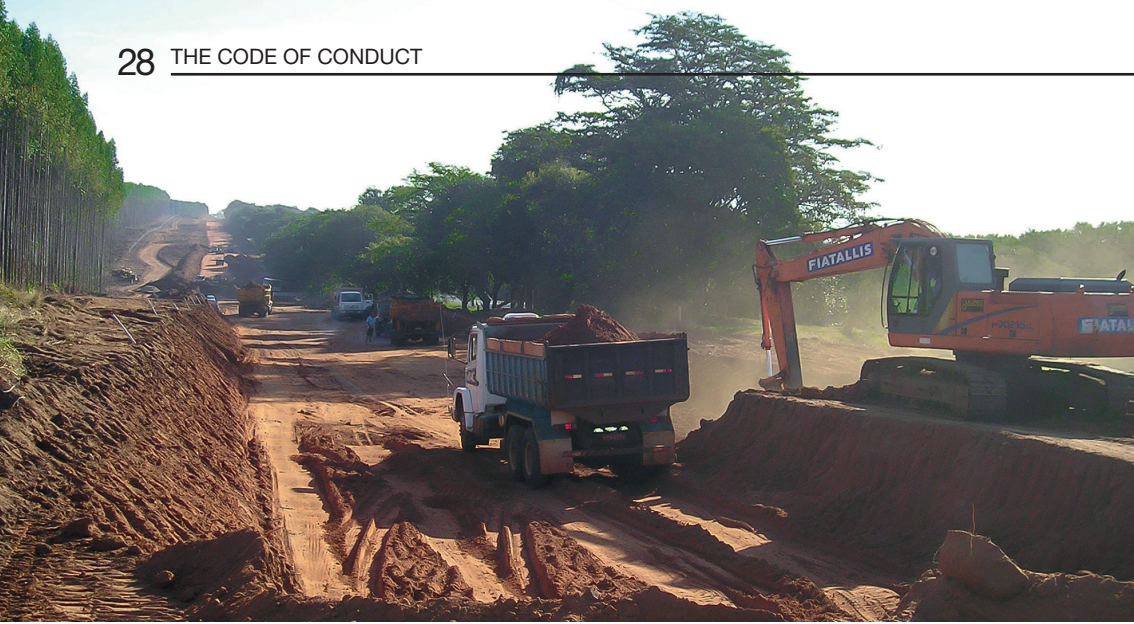
VIOLATION OF THE CODE OF CONDUCT

Jaupavi ensures that the Code of Conduct is known to all and that all of its provisions are followed.

Suspected activity in violation of applicable law or this Code of Conduct must be reported immediately to the supervisor, who will forward the information to the Ethics Committee. As of the complaint, the Committee is responsible for verifying the truth of the information.

If the violation of the Code of Conduct is proven, the employee may be subject to the following sanctions, taking into account the severity of the case:

- a) Verbal warning;
- b) Written warning;
- c) Suspension of up to 30 calendar days;
- d) Termination of employment contract.



COMMUNICATION

Clarification of doubts and communications regarding violations of the Code of Conduct must be communicated to the supervisor, who is required to report to the Compliance Committee.

Any doubts regarding the interpretation or omission of matters covered by this Code must be resolved by the Ethics Committee.

Employees may use the communication channels to resolve doubts or report violations of this Code to the Ethics Committee, always maintaining absolute anonymity.

The conclusion of the procedures carried out by the Ethics Committee must be submitted to the competent bodies, depending on their organizational structure and the function of the person who carried out the verified acts, for the application of the appropriate measures and sanctions.

Appendix I

TERM OF ACKNOWLEDGEMENT AND SELF-COMMITMENT

Employee

I declare that I have received, acknowledged and understood Jaupavi's Code of Conduct and that I agree with the basic principles and the established policies, as well as with the meaning of the document that represents the company's principles and behavioral objectives.

By signing this document, I agree to comply with all terms and conditions, even under threat of administrative measures, including termination of my employment contract.

Name: _____

Occupational field: _____

Date: ____/____/____

Signature: _____

This Letter of Acknowledgement and Self-commitment is an integral part of the employment contract with Jaupavi Terraplenagem e Pavimentação Ltda.

Appendix II

TERM OF ACKNOWLEDGEMENT AND SELF-COMMITMENT

Subcontractor

I declare that I have received, acknowledged and understood Jaupavi's Code of Conduct and that I agree with the basic principles and the established policies, as well as with the meaning of the document that represents the principles and behavioral objectives of the contracting company.

By signing this document, I agree to comply with all terms and conditions, even under threat of administrative measures, including those that may lead to the termination of the service contract.

Company: _____

Name: _____

Assigned Service: _____

Date: ____/____/____

Signature: _____

This Letter of Acknowledgement and Self-commitment is an integral part of the contract with Jaupavi Terraplenagem e Pavimentação Ltda.





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