



# CODE OF ETHICS AND CONDUCT



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## 01 PRESIDENT'S MESSAGE

To our Employees, Clients and Partners,

Our mission is to democratize access to goods and logistics services, shortening distances in an increasingly connected world.

To achieve this goal with excellence and integrity, we rely on our Code of Ethics and Conduct, which establishes the principles, guidelines and values that guide our journey.

Each of us has the responsibility to be a guardian of ethics. We do not allow compromises or shortcuts when it comes to Integrity.

In a connected world full of interactions, we believe that respect for people is a fundamental value, which must be reflected in all our relationships.

This includes our internal and external relationships, generating a relationship of trust. The same determination that drives us to overcome challenges is what guides our commitment to compliance and the highest ethical standards. Our strength lies in collaboration and building strong relationships. Together, we work to ensure that the Total Express Group is an example of integrity and responsibility.

To promote a culture that the Total Express Group is an example of integrity and responsibility.

To promote a culture that encourages ethical conduct, commitment to integrity and transparency, we rely on the #IntegridadeTotal Compliance Program, which expresses our belief that doing the right thing always works!

I invite you all to join me on this journey toward ethical excellence. Let us work together to build a more transparent, fair and trustworthy market where everyone can thrive.

Warm regards,

Felipe Lima  
CEO of Total Express



## 02 INTRODUCTION AND PURPOSE

This Code of Ethics and Conduct (“Code”) aims to provide a general understanding of the conduct and ethical principles that guide the commitment of Tex Courier S.A. and its subsidiaries (“Company”), part of the Total Express Group, to the integrity of their business and internal and external relationships.

To this end, this Code:

- Defines ethical standards that guide conduct and relationships in professional activities;
- Outlines basic guidelines for the development of specific ethical procedure rules, adapting conduct to a standard of ethical excellence.

## 03 PRINCIPLES AND VALUES

We believe that the values and principles guiding our actions are essential to building a solid, ethical and sustainable culture. They not only guide our daily behavior but also demonstrate our commitment to quality, innovation, and respect for people and the environment.

Every decision and interaction with customers, employees and partners is based on these principles, which form the core of our purpose. In this way, we seek to strengthen relationships of trust and contribute to a prosperous future, guided by responsibility, ethics, integrity and transparency. Our values are:

- **Ownership Mindset:** We always seek the strengthening and sustainability of our business.
- **Drive:** We overcome our challenges with determination to do what must be done.
- **Customer Empathy:** We understand our clients’ business and needs, striving to exceed their expectations.
- **Respect for People:** We respect individuality and differences, creating a challenging environment that promotes collective growth.
- **Team Spirit:** Our teamwork enables us to achieve lasting results and overcome challenges that could not be reached individually.
- **Culture of Innovation:** We foster innovation and “intrapreneurship” to exceed our clients’ expectations.

## 04 SCOPE

This Code applies to TEX Courier S.A., its subsidiaries and its Employees, understood for the purposes of this Code as its statutory directors, members of the Board of Directors, its advisory bodies and members of the Fiscal Council, as well as all other employees of any position working for the Company.

This Code also applies to the Company's Third Parties, understood for the purposes of this Code as suppliers, outsourced service providers, partners, clients, and individuals or communities that interact with the Company.

In addition to this Code, everyone interacting with the Company must understand and comply with other Company Policies, Normatives and Internal Procedures, as well as any applicable Brazilian legislation.

In case of doubt about any provision of this Code, consult your immediate supervisor or the Compliance Department, through the following contact channels: [compliance@totalexpress.com.br](mailto:compliance@totalexpress.com.br)

## 05 COMMITMENTS WITH SOCIETY, HUMAN RIGHTS AND ENVIRONMENT

In addition to our principles and values, we are committed to always acting ethically, responsibly, and transparently in all our relationships, respecting human dignity, diversity, and sustainability. These commitments reflect not only compliance with the law but also the Company's awareness of its importance and responsibility in making Brazilian society increasingly just, inclusive, and safe.

Thus, the Company, its Employees and Third Parties must assume and maintain the following commitments:



### 5.1. Combating Moral Harassment

Moral harassment occurs through abusive conduct, whether words, gestures, nicknames, pejorative names, behaviors or attitudes, which attack the dignity, physical or psychological integrity of a person, potentially degrading the work environment or threatening the maintenance of the employment relationship. Moral harassment also does not depend on a hierarchical subordination relationship to occur.

We do not tolerate abusive or offensive practices at any hierarchical level. We are committed to preventing, investigating, and combating situations of embarrassment, humiliation, or intimidation.

We expect all Employees and Third Parties to ensure the quality of relationships and to promote a healthy environment based on respect and collaboration.

### 5.2. Combating Sexual Harassment and Misconduct

Sexual misconduct covers any situation that causes sexual embarrassment, without the need for hierarchical subordination. Sexual harassment is characterized by persistent insinuations to obtain sexual favors, usually by someone in a position of power, and may occur physically, verbally, non-verbally, or virtually.

These practices are serious; therefore, we do not admit unwanted sexual conduct and reinforce that sexual harassment and misconduct are crimes under the Penal Code.

We maintain secure and confidential reporting channels so that any occurrence can be reported and properly investigated.

### 5.3. Respect for Diversity

We value and respect diversity in all its forms, promoting an inclusive, respectful environment free from any form of discrimination. Thus, we reject distinctions or exclusions based on race, color, gender, sexual orientation, gender identity, age, religion, disability, nationality, ethnicity, marital status, socioeconomic condition, or any other personal characteristic, whether in the professional environment, outside of it, or in digital media.

We believe that diversity is a value that strengthens the Company, fosters innovation, and drives collective development. We also encourage equal opportunities, the deconstruction of stereotypes, and the inclusion of different social groups, promoting freedom for each person to be who they are, with dignity and safety.

Therefore, we maintain the DiversificaTotal Committee, an initiative focused on eliminating barriers, deconstructing stereotypes, and promoting equal opportunities. To learn more, join the Committee:

[https://forms.office.com/pages/responsepage.aspx?id=gkkdts0q5keB6GssZuLEw5gA1g0qi5FvcyuUlmM\\_WlUN08zSFVQVVk5WkEwODRDNk9UNlRGV0hQQi4u&route=shorturl](https://forms.office.com/pages/responsepage.aspx?id=gkkdts0q5keB6GssZuLEw5gA1g0qi5FvcyuUlmM_WlUN08zSFVQVVk5WkEwODRDNk9UNlRGV0hQQi4u&route=shorturl)

#### **5.4. Protection of Human Rights**

We strongly condemn any form of human rights violation, including work in conditions analogous to slavery, coercive practices, punishments, degrading or punitive disciplinary measures, or actions that violate fundamental rights, human dignity, and individual freedom.

We fully comply with labor, civil, and constitutional laws, as well as applicable international conventions, ensuring that our activities and relationships are guided by ethics, respect, and integrity.

#### **5.5. Environmental Protection**

Sustainability is an essential part of our operations. We conduct our activities in accordance with the law and continuously seek to improve processes to reduce environmental impacts, preserve natural resources, and foster sustainable innovation.

Our commitment extends to generating shared value with employees, suppliers, clients, shareholders, and communities, always focusing on the protection of life, social responsibility, and a positive legacy for future generations.

Therefore, we must adopt and maintain necessary conduct and controls for proper waste disposal, emission control, and responsible use of natural resources, promoting practices that prevent pollution and reduce environmental impacts of operations.

## 5.6. Combating Child Exploitation

We fully comply with all applicable laws, regulations, and conventions, rejecting any form of child labor and sexual exploitation of children and adolescents. We do not employ minors under 18 years of age in night work, hazardous, or unhealthy activities, in strict compliance with Article 7, item XXXIII, of the Federal Constitution.

We reaffirm our commitment to the full protection of childhood and adolescence, rejecting situations involving irregular work, neglect, exploitation, or violation of rights. Similarly, we consider any practices of child sexual exploitation or violence inadmissible, reinforcing the need for prevention, awareness, and reporting.

All employees, suppliers, and partners have the duty to immediately inform the Compliance Department or use the Whistleblowing Channel of any suspicion or identification of situations involving child exploitation or violations of children's and adolescents' rights, ensuring that such occurrences are investigated with seriousness and responsibility.

## 5.7. Health and Safety

We recognize that our greatest asset is human capital, which is why preserving health and ensuring the safety of all is a top priority commitment. For us, health and safety go beyond legal compliance and reflect a non-negotiable value.

Everyone must strictly observe internal standards and applicable legislation regarding occupational health and safety. The use of uniforms and Personal Protective Equipment (PPE) is mandatory in areas where their use is indicated, and it is the responsibility of each Employee to correctly follow these guidelines. Similarly, leadership is responsible for monitoring and reinforcing the proper use of PPE.

Departments that use outsourced labor must necessarily contact the SESMT area in advance to receive guidance on the appropriate procedures for the activities to be performed.

Through leadership, example, and each employee's commitment, we continuously seek to improve processes, invest in training, and implement preventive measures that ensure a safe, healthy, and productive work environment, preserving the physical and psychological integrity of everyone involved.



## 5.8. Conducting Business with Ethics, Integrity and Transparency

We conduct our activities with integrity, ethics, and transparency, maintaining zero tolerance for practices of corruption, fraud, bribery, money laundering, or any illegal conduct that may compromise society's and our Third Parties' trust.

We fully comply with Brazilian anti-corruption legislation (Law No. 12,846/13 and other related laws), as well as internal integrity and compliance policies. All our Employees and Third Parties must act honestly, loyally, and responsibly, ensuring that their decisions and conduct uphold the highest ethical standards.

**Attention:** if you know of or witness any violation of the above commitments or any other provision in this Code or in the Company's other internal rules, it is the duty of our Employees and Third Parties to report such situations to the Compliance Department or through the Company's Whistleblowing Channel.

## 06 COMMITMENTS WITH OUR RELATIONSHIPS

### 6.1. Workplace Relations

Our interactions must be based on transparency, integrity, respect, and team spirit; therefore, we must:

- Work to ensure that, in the pursuit of results, the spirit of respect and collaboration with colleagues and other areas of the Company predominates;
- Combat any type of intimidation that constitutes sexual harassment or misconduct, moral harassment, or discrimination;
- Maintain due confidentiality regarding the work we perform, and it is prohibited to disclose the Company's confidential information to the market, especially information that may harm the Company;
- Use internal communication channels (such as e-mail or any other official communication channel) only for matters relevant to our work and in a constructive manner;

- Use work materials responsibly and properly, ensuring the integrity and safety of equipment provided by the Company for performing work, returning them immediately after use and avoiding their use for personal purposes;
- Ensure and contribute to compliance with this Code of Ethics and Conduct and, whenever necessary, report and forward ethical questions and concerns to the Company's Compliance Department;
- Observe the rules defined in the Conflict of Interest Normative in situations such as romantic relationships between Employees, kinship relationships among Company Employees, performing parallel activities, commercialization of products, financial arrangements in the workplace, and use of Company resources, with the aim of preserving integrity, ethics, and transparency in professional interactions.

The Company expects everyone to be respectful and transparent in their relationships, whether with Employees or Third Parties. Therefore, we must not make racist, homophobic, or sexist comments in any situation or location, nor comments that may embarrass others.

We must not share information that could defame someone or create an unpleasant work environment, even if true. It is also prohibited to consume or share any pornographic content within the Company's premises.

Before making any decision, especially in situations of doubt, it is essential that everyone critically asks themselves:

- Do I have authorization to perform this action?
- Is this action the most appropriate and correct to take?
- Is this action legal and aligned with the guidelines established in this Code and the Company's internal policies?
- Would I feel comfortable reporting this action to someone I respect and trust?
- How would this action be perceived by my colleagues and family if it were revealed?

If you answer "no" to any of the questions above, do not continue with the conduct and immediately report it to the Compliance Department.

## 6.2. Conflict of Interest

A Conflict of Interest is a situation in which an Employee's personal interests conflict with the Company's interests, in a way that may compromise or improperly influence their job performance. This conflict can impair the impartiality and objectivity required for decision-making in the workplace.

To prevent this, it is essential to avoid situations, actions, and attitudes that may characterize or suggest a conflict between personal interests and professional performance.

The rules defined in the Internal Conflict of Interest Normative must also be observed for cases of romantic relationships and kinship among Company employees, parallel activities, commercialization of products, financial arrangements in the workplace, and use of Company resources.

Employees may complete the Transparency Declaration (Annex II) intended for those who have a situation that requires Compliance validation, involving possible Conflict of Interest situations, according to the rules set forth in this Code.

### 6.2.1. Kinship and Romantic Relationships

The Company values relationships and respects the emotional and kinship bonds among its Employees. However, it is essential to respect the limits established in the Internal Conflict of Interest Normative to ensure these bonds do not result in conflicts of interest, preserving integrity and impartiality in corporate decisions and actions.

Considered relatives and related persons are: father, mother, brother/sister, grandfather/grandmother, grandson/granddaughter, cousin, uncle, nephew/niece, stepson/stepdaughter, and other direct ascendants or descendants. Related persons also include spouse, partner, boyfriend/girlfriend, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, godfather, godmother, and godchild, in addition to relationships established through adoption or other close family and social ties.

You may not benefit from your emotional or kinship relationship with individuals working in the Company, competitors, public agencies, or suppliers, to obtain any type of advantage.

### 6.2.2. Parallel Professional Activities

Employees may occasionally engage in professional activities unrelated to their positions and functions in our Company, provided that the following conditions are met:

- They do not constitute a Conflict of Interest;
- They do not occur during working hours at Grupo Total Express;
- They do not use any resources or assets of Grupo Total Express;
- They do not compromise the performance of their duties at Grupo Total Express;
- Confidential information from Grupo Total Express is not used to benefit their business and/or parallel activity;
- It is considered compatible by Grupo Total Express;

The position and the name of Grupo Total Express cannot be used to benefit the parallel professional activity, unless expressly authorized by the Compliance Department or the CEO of Grupo Total Express.

The Employee must inform the Compliance Department of the existence and any changes to this parallel activity through the contact channels: [Compliance@totalexpress.com.br](mailto:Compliance@totalexpress.com.br).

### 6.2.3. Commercialization of Products and Financial Arrangements in the Workplace

The Company values a healthy and safe work environment. Therefore, the commercialization of products within the Company's premises is not allowed.

Any type of financial arrangement in the workplace, such as pyramid schemes, gambling, raffles of any kind, personal loans between Employees, and personal loans between Employees and service providers, is also prohibited.

#### 6.2.4. Use of Company Resources

It is everyone's responsibility to preserve and take care of the resources provided by the Company, whether financial, material, intellectual, furniture, equipment, or infrastructure.

Therefore, all Employees must take care of their workplace and preserve the resources provided for performing their duties.

The Company does not allow any appropriation of any type of Company property outside its premises when it is unrelated to the performance of duties. Such conduct may be classified as theft or embezzlement, under the law. The installation of any software/application on the Company's computers is prohibited, and any exceptional situation must be previously validated with the Information Technology Department through a specific request.

The Company also makes the necessary efforts to monitor the proper use of its assets and other work tools to prevent theft and other improper practices regarding its property. Any equipment and/or corporate information may be monitored by the Company whenever deemed necessary.

#### 6.2.5. Right of Association and Political and Religious Expressions

The Company recognizes and respects the individual right to political and religious association, including unions, associations (private or state), professional entities, or any other established entities, provided it is exercised responsibly and ethically, within legal limits and respecting the Company's image in society. However, as Employees representing the Company, certain precautions must be taken:

- It is not permitted to engage in political or religious expression on the Company's premises at any time;
- It is not permitted to link the Company's image or name to any political or religious expression in media, such as newspapers, magazines, television, radio, and social media;
- It is not permitted to use your political or religious affiliation to harm or benefit Employees or Third Parties.

**Attention:** Any and all political or religious affiliation is individual, and the Company's linkage to any of these entities is prohibited. The Company is non-partisan.



### 6.2.6. Hiring Suppliers

The Company values integrity and transparency in its procurement processes, protecting its values and image. Relations with suppliers must be based on respect, impartiality, and fair competition, considering the quality and feasibility of services.

Below are the guidelines for the supplier engagement process:

- Only companies of former employees dismissed more than 18 (eighteen) months ago may be contracted;
- Employees should not be influenced by personal or friendship matters and must conduct the competition process clearly and fairly;
- It is prohibited to hire suppliers who knowingly act illegally, distort the classifications contained in the Anti-Corruption Law (Law No. 12,846/2013), or engage in acts harmful to Grupo Total Express and Third Parties;
- No supplier may speak to the press about projects developed with Grupo Total Express, whether completed, ongoing, or future;
- If you have or are aware of personal ties between Employees and suppliers, contact the Compliance Department and provide the information clearly;
- Do not use ambiguous or double-meaning terms to gain commercial advantage;
- It is prohibited to use your internal position to contract services or materials for personal purposes from any service provider;
- While employed, you are not allowed to be a supplier to the Company, either as a freelancer or a partner in another company;
- It is not permitted to engage in the hiring or management of a supplier with whom you have a kinship relationship at any level, even considering subcontracting.

### **6.2.7. Engagement of Public Agents, Former Agents, or Related Persons**

Hiring Public Agents, Former Public Agents, or people related to them (relatives by blood or affinity) is permitted provided ethics, integrity, internal controls for selecting and hiring new Employees, and other norms of the Company's Compliance Program are observed.

The Compliance Department will evaluate the hiring of Public Agents, Former Public Agents, or related persons (relatives by blood or affinity). For their analysis, the following information must be provided:

- Relationship with the Public Agent, if the candidate is a relative by blood or affinity;
- Existence of a quarantine or legal impediment due to the position;
- Agency, Entity, level (Federal, State, Municipal), and position of the Public Agent;
- Whether the Company is supervised by the Agency or Entity to which the Public Agent belongs;
- Compliance with the requirements of Law No. 12,813/2013, if applicable; and
- Position and role desired in the Company.

The Compliance Department may request additional information deemed necessary for evaluating the hire.

The Compliance Department may recommend (i) proceeding with the hire; (ii) not proceeding with the hire; or (iii) proceeding with the hire with mitigating measures, such as limitations on the exercise of duties and responsibilities.

For more information, consult the Anti-Corruption Policy and the Normative on Interaction with Public Agents.

### 6.2.8. Gifts, Presents, Hospitality, and Corporate Courtesies

The Company allows the receipt and sending of institutional gifts, according to the Internal Normative on Gifts, Presents, Hospitality, and Corporate Courtesies.

Although this practice is common in the corporate environment, it must be conducted discreetly to avoid any impact on business decisions. The rules to be followed are:

ITEM	PUBLIC AGENT	PRIVATE AGENT	FREQUENCY
GIFTS	Up to R\$ 100.00 per offer acceptance, subject to prior consultation with the Compliance Department	Up to R\$ 100.00 per offer /acceptance	Limited to 1 (one) time per year
PRESENTS	<b>Prohibited</b>	Up to R\$ 100.00 per offer /acceptance	Limited to 1 (one) time per year.
CORPORATE MEETING MEALS (HOSPITALITY)	Prior consultation with the Compliance Department required	Up to R\$ 100.00 per offer /acceptance	Limited to 4 (four) Meals per year.
OTHER HOSPITALITIES	Prior consultation with the Compliance Department required	Prior consultation with the Compliance Department required	Limited to 1 (one) time per year.
CORPORATE COURTESIES	<b>Prohibited</b>	Prior consultation with the Compliance Department required	Limited to 1 (one) time per year.

### 6.3. Leadership Responsibility

Leadership has direct responsibility for the performance and development of their teams. More than words, it is by example that our leaders influence and inspire all of us.

**Leadership responsibilities include:**

- Ensure an environment of trust and transparency, ensuring that the Company's ethical practices are effectively adopted by all.
- Ensure an environment of trust and transparency, ensuring that the Company's ethical practices are effectively adopted by all.
- Recognize and value each Employee, acting as a partner in their professional growth;
- Make decisions fairly and impartially, without personal favoritism;
- Use the position with integrity, without requesting personal favors or services;
- Encourage collaboration, mutual respect, and the daily practice of the Company's principles and values;
- Disseminate, promote, and ensure understanding and application of this Code of Ethics and Conduct.

Leadership also has a duty to act as a partner of the Compliance Department, facilitating and encouraging open communication between Employees and the Compliance area. Therefore, leadership must not, under any circumstances, create obstacles or exert any pressure that prevents or intimidates Employees from collaborating freely.

**6.4. Relationship with Clients, Partners, Suppliers, Service Providers, and Outsourcing**

We recognize our clients as our main factor for success and sustainability. Therefore, we ensure compliance with commitments, strive to provide fast and efficient service, and dedicate all efforts to achieving and maintaining their satisfaction.

Similarly, we value our business partners, with whom we seek to maintain healthy and long-term relationships aimed at generating mutual value.

We also recognize that our suppliers and service providers are essential for the quality and continuity of our operations. Therefore, we seek relationships based on fair and transparent criteria, always prioritizing respect for the law, ethics, and market best practices.

Our relationship with clients, partners, suppliers, and outsourcing companies must be based on respect, transparency, loyalty, and honesty, observing the following rules:

- Choose suppliers and outsourcing companies based on technical, fair, and transparent criteria, always seeking the best cost-benefit;
- Respect and comply with agreements and contracts;
- Acknowledge, communicate, and resolve as quickly as possible any problems caused by errors;
- Respect privacy and data protection, ensuring that information is treated confidentially;
- Do not conduct or maintain business with unregistered companies or companies engaged in illegal activities with resources from illegitimate sources;
- Actively encourage partner companies to share the same values adopted in this Code of Ethics and Conduct;
- Maintain business only with partners who combat and reject prejudice, discrimination of any kind, harassment of any kind, child labor, forced labor, slave labor or similar conditions, and sexual exploitation;
- Do not recruit professionals from clients and business partners to work in the Company without their prior consent;
- Do not take actions that harm the image of partner companies or allow partners to compromise the Company's image;
- Do not offer or receive gifts, presents, or hospitality in disagreement with the Internal Normative on Gifts, Presents, Hospitality, and Corporate Courtesies.
- Report any potential personal ties between Employees and partners so that the Company's Compliance Department can evaluate them with the approval of the Ethics and Integrity Committee;
- Do not harm the image of partner companies, and consequently, no partner actions that could impact the Company's image will be accepted.



## 6.5. Relationship with Competitors

The competitiveness of our products and services must be based on free and fair competition and compliance with economic regulations and competition law, namely Law No. 12,529/2011.

We believe that the presence of competitors in the market helps our learning process and provides a constant and healthy challenge to our ability to innovate.

We act with integrity and promote a business environment free of fraud and manipulations of any kind. We are committed to the quality and accuracy of all information we provide, both internally and externally, ensuring that relevant data is not omitted.

**Thus, we must:**

- Use legitimate and lawful means to obtain information about our competitors and the market;
- Protect our intellectual capital and sensitive information;
- Reject actions to agree, combine, manipulate, or adjust prices, advantages, conditions, market segmentations, or others with our competitors;
- Use objective and clear language, leaving no room for ambiguity.

## 6.6. Relationship with Public Administration

We must maintain an attitude of respect and collaboration with public representatives and authorities. When interacting with public bodies, we must ensure that the relationship with public officials is for discussion, technical decision-making, and service approval in accordance with the rules established by applicable legislation.

It is forbidden to hire intermediaries who commit any act that could be characterized as corruption. Our Company does not hire Third Parties that violate the Anti-Corruption Law (Law No. 12,846/2013) and other applicable regulations, as well as those who distort standards of ethics, morality, good faith, and transparency in conducting business with the public administration and Third Parties in general.

In communications with public officials, our Employees and Third Parties are expected to:

- Use clear and objective language, without room for misinterpretation.
- Use official contact channels.
- Schedule meetings during business hours and, preferably, at the official's headquarters.

**Important:** Under no circumstances should any promise or favor be made to a public official involving, directly or indirectly, an undue advantage.

### **6.7. Relationship with the Press and Digital Content Channels**

We recognize the importance of traditional and digital media for society and are aware that building credibility and preserving the Company's image and reputation also depend on the proper use of these media.

Thus, only Company-authorized spokespersons, duly guided by the Press Office or the Marketing Department, may interact with journalists or representatives of digital content channels. All communications must comply with the Policy for Disclosure of Material Facts.

Likewise, the use of the Company's logo, name, or visual identity in any material is only allowed with prior Marketing authorization, to ensure brand standardization and review of the content being disclosed.

Additionally, we encourage responsible and ethical use of social media. We expect our Employees to behave appropriately in virtual communities, forums, or any digital environment, whether representing the Company or not. Therefore, it is prohibited to:

- Use social media to spread offenses, commit illegal acts, or engage in unethical conduct contrary to the good practices described in this Code of Ethics and Conduct;
- Associate personal activities with the brand or use it as a reference in public statements, etc.

## **6.8. Use of Alcohol and Drugs, and Possession of Weapons**

We value a healthy and safe work environment and therefore do not allow the possession or use of drugs on Company premises. Similarly, we do not tolerate work activities being compromised by the consumption of controlled substances.

Consumption of alcoholic beverages on Company premises is prohibited, regardless of the time, as well as entering the premises under the influence of these substances.

The exception for alcoholic beverage consumption is for events previously authorized by competent leadership, where consumption must be moderate and according to the Company's guidelines.

It is also forbidden to carry firearms or weapons in general (cutting, piercing, or blunt instruments intended for attack or self-defense) at any time on Company premises, except for permitted instruments (e.g., scissors and utility knives), in accordance with Company guidelines.

## **6.9. Responsibility for Personal Belongings**

It is everyone's responsibility to take care of their own belongings and personal items, even on Company premises.

All items found on our premises without identification must be directed to the GRIS - Risk Management area. Do not take responsibility for guarding other Employees' or Third Parties' belongings under any circumstances.

In this regard, the Company does not tolerate any conduct that constitutes theft or robbery on its premises. Employees and Third Parties who commit such acts will be subject to the disciplinary measures provided in this Code.

# **07 COMMITMENTS TO COMBAT CORRUPTION, FRAUD, AND MONEY LAUNDERING**

We are committed to conducting our business ethically and with integrity, preventing and combating acts of corruption, fraud, and money laundering in all our relationships, whether with Third Parties or at any level of the national or foreign Public Administration.

Therefore, the Company observes and complies with the provisions of anti-corruption legislation, especially Law No. 12,846/13 and its regulations, as well as other related laws and regulations.

**We therefore do not permit the following acts:**

- Offer, promise, pay, or receive, directly or indirectly, an undue advantage in dealings with public and private agents, nationally or internationally. We understand that undue advantage includes cash or non-cash payments, as well as goods, services, and courtesies, such as invitations, tickets, dinners, travel, accommodation, and donations or sponsorships.
- Agree to requests or demands for gifts from public or private agents;
- Hinder investigation or inspection activities by agencies, entities, or public officials, regulatory agencies, or financial system supervisory bodies;
- Use an intermediary natural or legal person to conceal or disguise our real interests or the identity of the beneficiaries of corrupt acts;
- Make facilitation payments to obtain undue advantages of any kind for the Company or any of its employees and administrators;
- Commit fraud, through falsification, alteration, omission of documents, contracts, indicators, reports, processes, systems, among others, in the Company or in dealings with Third Parties and with the national or foreign Public Administration; and
- Launder money through any acts intended to conceal or disguise the nature, origin, location, disposition, movement, or ownership of assets, rights, or values derived, directly or indirectly, from illicit activities.

**Important:** the Anti-Corruption Law (Law No. 12,846/2013), in particular, establishes severe penalties for companies involved in corruption practices. The Company may be held responsible if it fails to prevent acts of corruption committed by any person associated with it, which includes Employees and Third Parties acting on its behalf.

All Employees and Third Parties of the Company must observe in their relations with Public Administration, public and private agents, the internal rules and, especially, the principles of this Code of Ethics and Conduct. Failure to comply with these guidelines is characterized as an unlawful practice and contrary to the values and principles established by the Company and will be subject to applicable penalties.

**Do not fail to consult our Anti-Corruption Policy.**

### **7.1. Training**

All Company Employees must be familiar with this Code, the policies, internal rules and procedures, including those governing the activities and processes of the Company and its subsidiaries, as well as the General Data Protection Law and the Anti-Corruption Law (Law No. 12,846 of August 1, 2013).

The Company will provide periodic mandatory training for all Employees, physically and/or virtually, regarding the main practices to be observed by everyone and the need to comply with the above provisions, considering identified risks and the target audience.

## **08 COMMITMENTS TO LEGAL AND REGULATORY COMPLIANCE**

It is our duty to know, comply with, and guide our colleagues regarding the laws, rules, and regulations that impact their functions.

The Company will provide Employees with the necessary information about rules, regulations, and laws relevant to their activities through this Code of Ethics, internal policies, and any communications. In case of a real or apparent conflict between this Code and any law, regulation, or rule, the applicable law or regulation shall prevail.

Employees must not follow any order that contradicts the provisions of laws, rules, or regulations, even if the order comes from a superior.



## 8.1. Protection of Company Assets and Intellectual Property

### Confidential Information

Confidential Information consists of facts, data, and non-public knowledge that have commercial or strategic value for the Company. May include:

- Technical Information: research and development data, software, engineering projects, codes, and algorithms;
- Financial Information: prices, forecasts, and budgets;
- Human Resources Information: personal, salary, and medical data;
- Commercial Information: client lists, supplier information, market strategies, and prices;
- Strategic Information: business plans, acquisitions, and regulations;
- Supplier Information: lists, quality information, and product prices.

We must protect the Company's image, trade secrets, copyrights, and other confidential information, as well as respect the intellectual property rights of Third Parties.

This information must be used solely for work purposes, shared only with those authorized to access it, and never provided to Third Parties without a confidentiality agreement reviewed by the Legal Department. This obligation remains even after the Employee leaves the Company. Misuse of this information may result in legal action, fines, and other penalties, both for the Company and for any of its Employees.

### Records and Controllershship

All Employees are responsible for maintaining the Company's internal control system, including the finance team.

The controllership provides the correct environment for recording and submitting updated, reliable, and accurate information, used for decision-making and the Company's strategic planning.

Financial records must be complete, accurate, and up-to-date in all material aspects, in accordance with regulations established by the competent authorities.

Accounting records must always be precise, complete, and truthful, observing applicable accounting legislation and ensuring that all transactions and operations are fully documented in writing and properly approved by the competent authority.

The following must be recorded, among others:

- Expense reports;
- Accounting entries;
- Reimbursement requests;
- Financial reports;
- Test and research results;
- Assets provided by the Company; and
- Any other facts inherent to the Employee's work activities.

It is the duty of every Employee to report any entries, reports, accounting, or financial documents that are out of standard or violate this Code and other internal Company regulations. Some warning signs include:

- Costs significantly higher or lower than the market;
- Lack of supporting documents (invoice, receipt, contract, etc.);
- Request for cash payments;
- Request for payment to accounts or Third Parties not involved in the contract.

### **Company Assets**

The Company provides all of us with assets and work tools, such as facilities, inventory, office supplies, protective equipment, and electronic devices (computers, cell phones, tablets, printers, etc.).

It is each Employee's responsibility to use them correctly, protect them, and return them at the end of the employment contract.

## 8.2. Information Security

The Company considers information a strategic and essential asset for business success; it is committed to supporting and strengthening an information security culture to mitigate internal and external risks to which the information under its responsibility is exposed, keeping information security risks at acceptable levels.

Information Technology resources are essential for the proper functioning of the Company and must be used in compliance with laws, internal regulations, and current information security policies.

To this end, technical and administrative controls are implemented, and all Employees and Third Parties acting on behalf of the Company must fully comply with the Information Security Policy and its complementary documents, adhering to general rules such as:

- Classify information according to sensitivity level;
- Use and dispose of information securely, preventing its recovery, whether in physical or digital format;
- Use systems and equipment according to corporate guidelines;
- Transfer client, consumer, and corporate data only via secure means provided by the Company;
- Do not attempt to bypass rules or technological controls;
- Report to the information security area whenever there are suspicions or identification of vulnerabilities in environments or processes that may impact the integrity, confidentiality, and availability of information;
- Comply with regulations regarding equipment, internet, email, and corporate access.

All Employees and Third Parties acting on behalf of the Company are responsible for complying with all policies and complementary information security documents.

## 8.3. Position Regarding Compliance with the General Data Protection Law

The Company seeks to comply with the General Data Protection Law - LGPD in all operations. We will use personal data only according to the principles of the law:

- **Purpose** - specific and informed to the data subject, cannot be used for another purpose;
- **Adequacy** - compatible with the purpose informed to the data subject (e.g., not requesting blood type for product delivery);
- **Necessity** - collect only the data necessary to achieve the declared purpose;
- **Free Access** - provide mechanisms for easy access to the data and information regarding the processing to data subjects;
- **Quality** - ensure the accuracy and updating of data;
- **Transparency** - ensure transparency with the data subject, being truthful, informing what is actually done with their data, generating trust;
- **Security** - ensure technical and administrative measures to reduce the risk of security incidents;
- **Prevention** - measures that prevent harm to data subjects due to data processing;
- **Non-discrimination** - ensure that data is not collected for discriminatory, abusive, or illicit purposes;
- **Accountability** - demonstrate that practices have been adopted to reduce risks, providing evidence of data care.

All Employees and Third Parties acting on behalf of the Company are responsible for complying with all privacy and data protection policies and complementary documents, observing local laws, regulations, and applicable national and international standards, honoring privacy and keeping personal data secure during work.

Employees and Third Parties must also report to the Company's Data Protection Officer (DPO) any suspected incidents or events that violate the Policy or may put personal data at risk.

If it is necessary to exercise your rights regarding privacy and data protection, visit: <https://helloethics.com/totalexpress/lgpd>

## 09 GENERAL PROVISIONS

### 9.1. Whistleblowing Channel

Whenever you witness or suspect any violation of this Code of Ethics and Conduct, regardless of your hierarchical level, report the occurrences through the Whistleblowing Channel.

The Company's Whistleblowing Channel is impartial, secure, confidential, and preserves the identity of the people involved, in addition to addressing each issue while respecting rights, legislation, policies, regulations, and internal procedures.

Through this channel, anyone — inside or outside the Company — can ask questions about the Code of Conduct and Ethics or report situations that violate its rules. Examples of non-compliance include: corruption, bribery, fraud, environmental damage, dissemination of false information, inaccurate accounting records, misuse of Company assets, discrimination based on race, color, religion, sex, disability, or social condition, as well as unethical actions or practices.

The Whistleblowing Channel is managed by the Company's Compliance Directorate and can be accessed through the following means:

Phone: 0800-888-1125

E-mail: [totalexpress@helloethics.com.br](mailto:totalexpress@helloethics.com.br)

Site: [www.helloethics.com/totalexpress](http://www.helloethics.com/totalexpress)

#### It is important to remember that:

- Records will be verified and processed under absolute confidentiality and according to the severity.
- Those responsible for confirmed violations will be guided, warned, or dismissed, according to their responsibility.
- There will be no penalty or retaliation for reporting in good faith questions or issues related to violations of this Code of Ethics and Conduct.
- Situations not explicitly covered in this Code will be evaluated by the Compliance Directorate and validated by the Ethics and Integrity Committee.
- The Company does not tolerate any form of retaliation or intimidation against any person who raises doubts, questions, or reports in good faith a suspected violation of the Code of Ethics and Conduct, policies, internal procedures, laws, or applicable regulations.



## 9.2. Educational Measures - Consequence Management

Any Employee, including members of Senior Management, or Third Party who violates the guidelines of this Code of Ethics and Conduct is subject, without prejudice to other applicable judicial and administrative measures, to the following penalties:

- Guidance and training;
- Verbal warning;
- Written warning;
- Suspension;
- Simple dismissal;
- Dismissal for just cause;
- Temporary or permanent blocking, in the case of affiliated drivers; and
- Termination of the current contract(s), in the case of suppliers, service providers, and clients.

In addition to the above sanctions, any inappropriate conduct will subject the violator to possible civil, criminal, and administrative sanctions arising from violations of the Anti-Corruption Law and other applicable regulations.

In case of violation by Third Parties, the contract may be terminated, and any applicable fines may be imposed, without prejudice to claims for losses and damages, in addition to civil, criminal, and administrative sanctions arising from the Anti-Corruption Law or other applicable rules.

## 9.3. Advisory Body and Compliance Directorate (Committee)

The Company will create an Advisory Body called the Ethics and Integrity Committee, which will be formed according to composition and functioning rules documented appropriately.

The Committee will supervise, among other functions, the activities of the Compliance Directorate regarding the maintenance, update, and application of the Company's Compliance Program.

To perform these functions, the Compliance Directorate has the following prerogatives and guarantees:

- Sufficient budget for the performance of its activities, approved by Senior Management;
- Independence and authority;
- Direct access and reporting to the Company's Senior Management; and
- unrestricted access to documents and employees.

#### **9.4. Review of the Code of Ethics and Conduct**

This Code was prepared by the Compliance Directorate with the support of other interested areas and presented to the Company's Senior Management.

Future revisions will be carried out by the Compliance Directorate as needed.

Although the objective of this Code is to address most situations involving ethical issues, new situations may arise, making it necessary to define rules and update the Code of Ethics and Conduct with the Company's Senior Management.

#### **9.5. Commitment Statement to the Code of Ethics and Conduct**

All employees must sign the Commitment Term (Annex I) to the Code of Ethics and Conduct upon acknowledging the content of this Code, committing to follow the rules contained herein and agreeing to adhere to the ethical principles established by the Company in their professional activity.

#### **9.6. ANNEX I - COMMITMENT TERM.**

#### **9.7. ANNEX II - TRANSPARENCY DECLARATION.**

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## ANNEX I - COMMITMENT TERM

I declare that I have read and understood the Total Express Code of Ethics and Conduct and am aware of the rules contained in this document, and I commit to following these guidelines in my professional activities, under penalty of disciplinary measures, according to the Consolidation of Labor Laws (CLT), contractual terms, and even civil and criminal liability, as provided by law.

I declare that, at this moment, I am not in any situation that violates these guidelines and that I am not aware of any situation that may cause a conflict with the rules herein.

I declare that I am responsible for communicating the rules of the Total Express Code of Ethics and Conduct and other policies, regulations, and internal procedures to other employees.

I acknowledge that the processing of personal data collected herein is intended for the identification of the EMPLOYEE and complies with the principles and rights established in Law 13.709/18 (LGPD).

Name:

Area:

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

**ANNEX II - TRANSPARENCY DECLARATION**

This declaration is intended for Employees who have a situation that requires validation by Compliance, involving possible situations of Conflict of Interest, according to the rules set forth in this Code.

Fill in the fields below, sign, and send to the responsible Compliance area for evaluation.

Are you a partner, administrator, or hold a decision-making position in another company? ( ) YES ( ) NO Which?

Company/Department:

Relationship with the Company:

Position/Role:

Report individuals in your relationship who are partners and/or administrators in companies that are competitors, provide services, and/or supply Total Express. ( ) I HAVE ( ) I DO NOT HAVE

Full Name:

Relationship Level:

Company/Department:

Report individuals with whom you have a family relationship or connection who work in companies that are competitors, provide services, and/or supply Total Express. ( ) I HAVE ( ) I DO NOT HAVE

Full Name:

Relationship Level:

Company/Department:

After reading this Code of Ethics and Conduct, is there any situation you would like to report that requires validation? Which Situation?

I declare that the information provided by me in this document is true, with no omission of any information that could influence decisions that Total Express needs to make regarding this declaration.

Area: \_\_\_\_\_

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

Signature: \_\_\_\_\_

This term consists of two copies. One remains with the Company and the other with the employee.