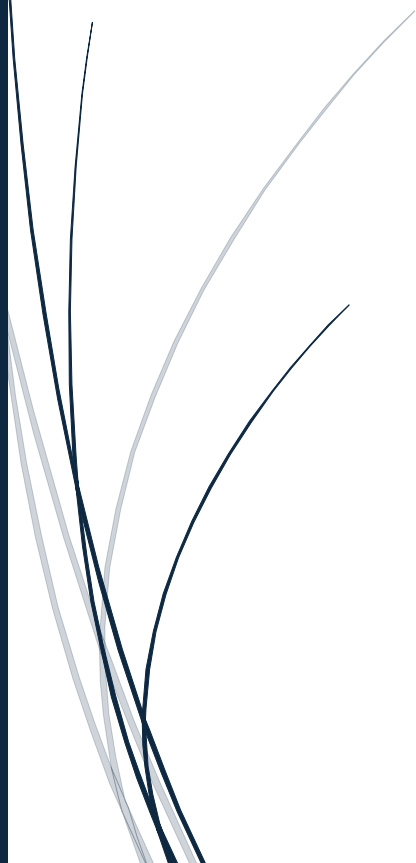


# CODE OF ETHICS AND CONDUCT

# ARGENTERA



## 1. OBJECTIVE

The purpose of drawing up this Code of Ethics and Conduct is to promote our values such as: Commitment, Innovation, Purpose and Sustainability. These values guide our conduct and serve as a basis for establishing Argentera's principles in relation to its internal and external relationships, involving employees, customers, suppliers, partners, the community, society, competitors and public authorities.

It is also an instrument for valuing what is most important to us: our human capital, because we believe that a well-trained, motivated team imbued with these values is capable of delivering increasingly better work.

For Argentera, these behaviors and actions should guide the work environment, valuing mutual respect and promoting continuous improvement in our company.

## 2. MISSION, VISION AND VALUES

**OUR MISSION:** To make it possible for international companies in this segment to be able to supply their equipment to oil and gas projects in Brazil, bringing new technologies, competitiveness and quality to the sector.

**OUR VISION:** To become a leading company in the oil and gas consultancy and service sector.

**OUR VALUES:** Commitment, Professionalism, Innovation, Purpose and Sustainability.

A company, just like a person, has dreams (vision of the future), purposes (mission) and beliefs (organizational values). The professional routine consists of interaction between different people, sharing their expectations and skills.

Learn about the principles that Argentera Oil Gas values and expects from its employees.

### COMMITMENT

Dedication to service and the involvement of everyone, prioritizing what is really important: the quality and effectiveness of our work.

## **PROFESSIONALISM**

Adopt a professional and competent attitude in your actions in search of the best results. We encourage training, education and professional and personal growth to improve your skills and become the best version of you.

## **INNOVATION**

The search for innovative solutions, transforming and enabling efficiency gains, whether in time or money, so that the best decisions can be made to solve problems more assertively.

## **PURPOSE**

Believing in the pursuit of understanding what you do and achieving your goals. Being passionate about your work and, above all, the importance of results.

## **SUSTAINABILITY**

Wasting less, using our own resources, taking care of what could become scarce. Sustainability also requires actions aimed at reducing impacts on the environment.



---

Management

### **3. APPLICATION AND COMPLIANCE**

The terms established in this Code of Ethics and Conduct apply to all Argentera partners and employees. Therefore, everyone is responsible for respecting what is established in this Code and maintaining their conduct to the highest ethical standards, as well as reporting any conduct that does not follow these guidelines to the Internal Ethical Transparency Channel.

The adoption of our values and principles by partner organizations, customers and suppliers is also planned in all joint activities

### **4. HUMAN RIGHTS**

In all its decisions, Argentera takes into account the equal treatment of all employees, partners, suppliers, clients or anyone in society who may be impacted by our activities, without distinction of any kind, regardless of color, ethnicity, religious or political option, gender, marital status, nationality, sexual orientation, disability, age, opinion, social class, among many others.

In this sense, Argentera has the Universal Declaration of Human Rights adopted and promulgated by the United Nations as one of the pillars of this Code of Ethics and Conduct.

### **5. RELATIONSHIPS**

We understand that the development of closer interpersonal relationships between employees is entirely permissible. However, favoritism will be discouraged and actions will be taken to eliminate such risks and occurrences.

Our environment respects people's individual skills and the diversity of our team members.

### **6. EMPLOYMENT, SELF-EMPLOYMENT AND PROFESSIONAL ACTIVITIES**

It is understandable that employees have private projects outside the company routine. In order this to happen in a healthy way, it is forbidden to carry out these activities during Argentera's working hours, and it is unsustainable for such a venture to create a direct conflict with our company's own product, and employees are not allowed to act as our competitor.

If you witness the situations described above, please report them to the Internal Ethics Transparency Channel via e-mail - [ana.thereza@argenteraoilgas.com](mailto:ana.thereza@argenteraoilgas.com)

## **7. CONFLICT OF INTEREST AND FAIR COMPETITION**

From a commercial point of view, it is essential that those involved understand the risks (as in internal relations) of prioritizing personal relationships over merit. In order for there to be fair competition between our suppliers, it is important to prioritize the factors related offering the service/product.

Below are some behaviors that can lead to conflicts of interest and unfair competition:

- During negotiations, include personal, economic or even professional benefits to be used by the negotiator (or their family and friends) outside the interests of Argentera Oil Gas;
- Informally adding financial requirements that do not appear in the official negotiation documentation;
- Favoring discounts and making processes more flexible for clients in order to benefit the salesperson or their family and friends;
- Seeking information about our competitors through illegal means, causing employees of other companies to breach their own codes of ethics;
- Sharing information about our strategic processes or confidential data about our suppliers, customers and employees with other people outside our company;
- Demanding gifts of any value from potential suppliers who do not yet have a business relationship with our company and of substantial value from suppliers who already provide us with services.
- Gifts such as shirts, tickets to sporting events or concerts are acceptable, but must be reported to the Internal Ethics Transparency Channel.
- Institutional gifts with no commercial value such as office supplies, diaries, pens, calendars, caps, books, etc. are acceptable, so they must remain with the employee.

## **8. EMPLOYEE RELATIONS**

Our environment is one of respect for people's individual skills and the diversity of our employees. One of the ways we ensure compliance with this Code of Ethics is by respecting other people's boundaries. Each individual has a story, and when we notice our colleagues being uncomfortable with comments and actions, it's time to rethink that boundary.

The most effective way to avoid discomfort is to observe people and listen empathetically to their dissatisfactions. Insisting on a joke that clearly annoys the other person is a practice we should not engage in. And when this behavior has manipulative potential or generates public humiliation, harassment takes on an even more serious level. Therefore, there should be no discrimination or segregation of people in our work environment.

Any treatment that is considered inappropriate or contrary to the values, principles and rules set out in this Code of Ethics and Conduct should be reported to the Internal Ethics Transparency Channel by e-mailing [ana.thereza@argentera.com](mailto:ana.thereza@argentera.com)

## **9. CUSTOMER RELATIONS**

Argentera is committed to supplying services and products under appropriate conditions and in strict compliance with the law and the contract, paying attention to:

- The adoption of a relationship of mutual trust and loyalty;
- Supplying products and services with quality and safety;
- Communication based on clear, truthful information through respect.

## **10. RELATIONSHIP WITH THE ENVIRONMENT**

Argentera acts and encourages actions for sustainable development and the preservation of the environment.

Its premise is to optimize resources, disseminate selective collection and the correct disposal of waste generated in favor of environmental preservation.

## **11. PERFORMANCE EVALUATION, EDUCATION AND TRAINING**

Argentera evaluates its employees according to the criteria that guide the promotion of an employee, which are: merit, experience, commitment and individual attitudes, which are essential for professional growth.

Employees must comply with internal rules and regulations, taking into account their responsibility to acquire the knowledge, skills and attitudes necessary for the proper performance of their job.

The leader must pay special attention to the motivation and professional development of the team, and to this end must encourage and foster learning, recognizing their efforts in a specific way.

Employees will be evaluated annually or whenever deemed necessary, following the guidelines of the Employee Evaluation Report.

In everyday activities, mistakes can happen and should be treated with understanding and constructive guidance. Repeated errors resulting from carelessness, negligence or lack of interest should be given special attention in quarterly feedback, as they may ultimately be subject to disciplinary action.

## **12. ASSET LIABILITY**

The conduct expected of our employees is not only limited to interpersonal behavior, but also to how people respect the company's physical, intellectual, internal and external assets. It is the duty of all employees to ensure the preservation of the building, furniture and technological equipment, and not to destroy physical and virtual documents without authorization. The same conduct is expected when behaving towards our brand. Spreading opinions externally that could damage our market value and credibility is an act that violates our code.

## **13. INTELLECTUAL PROPERTY**

Argentera is committed to maintaining the confidentiality, integrity and availability of company information. The processes, procedures, tools, methods and documents created to meet our internal or external demands must be duly identified as company property.

It is everyone's role to ensure that these documents are not shared improperly, since they represent our differential in the market and are the result of the synergistic and not just individual intelligence of our employees.

Any disclosure of material or practice carried out within our company must be authorized in advance by management.

#### **14. INFORMATION SECURITY**

All employees who use computers and laptops are instructed during the induction week how to make good use of the equipment and are not allowed to share passwords

It is necessary to know and respect our Information Technology Policy in order avoid any kind of transgression, especially regarding the use of the Internet.

It is standard for web access to be partially released according to the demand that each area or employee is exposed to.

Any way of circumventing this rule is considered unethical, including when it comes to permitting the use or not of personal electronic equipment during work, such as cell phones, tablets, etc.

It is forbidden to share logins and passwords, which are for personal and non-transferable use.

#### **15. ACTIVITIES AND POLITICAL CONTRIBUTION**

We understand that it is natural for employees to be interested in taking an active part in politics at any level, whether through their right to vote or to support public figures. However, internally, certain rules must be :

- Employees may not be coerced or harassed by others, especially those in leadership positions, into voting or not voting for any candidate or supporting or not supporting any campaign;
- As with private businesses, working hours cannot be used to campaign or support political actions;
- Under no circumstances may the Argentera Oil and Gas brand be linked to any political campaign or action without authorization.



## **16. DATA PROTECTION**

ARGENTERA is committed to the privacy and protection of personal data, including that collected from its business partners, establishing the rules on processing within the scope of the contractual relationship, in accordance with current legislation.

### **The company's principles are:**

- Adopt measures and good practices for the protection of personal data in order to reduce the risks of failure, damage and/or harm that could be caused by an incident.
- Promote actions to educate its employees about information security and the protection of personal data.
- Meet the security and transparency requirements, the standards of good practice and governance and the general principles established in the General Personal Data Protection Law ("LGPD") by Resolution CD/ANPD No. 2 of January 2022 and by the National Data Protection Authority (ANPD).
- To take all appropriate measures to maintain the absolute secrecy and strict confidentiality of all personal data and information related to the identified or identifiable natural person, restricting the processing of personal data to employees and authorized third parties, within the limits necessary to meet the purposes established by Argentera.
- Ensure that the transfer of personal data to another country is carried out when it ensures an adequate level of protection of the rights and freedoms of the Data Subject, adoption of specific contractual clauses and safeguards required by the applicable Data Protection Laws and with the prior authorization of ARGENTERA.

## **17. DISCIPLINARY MEASURES**

Failure to comply with the values, principles and rules set out in this Code of Ethics and Conduct will result in disciplinary measures, ranging from a warning, suspension and even dismissal for cause, as well as possible civil and criminal implications.

## **18. INTERNAL ETHICAL TRANSPARENCY CHANNEL**

Argentera undertakes that all reports will be received, analyzed and treated confidentially, and the content will not be disclosed.

If you witness any situations that are inappropriate or contrary to this Code of Ethics and Conduct, you must notify the Transparency and Ethics Channel by e-mailing [ana.thereza@argentera.com](mailto:ana.thereza@argentera.com)

## TERM OF DELIVERY AND RECEIPT

I declare under penalty of law that:

( ) I have received information about the Code of Ethics and Conduct of ARGENTERA ENGENHARIA E SERVIÇOS DE PETRÓLEO E GÁS LTDA, and I fully agree with the rules and guidelines contained therein, ensuring that they are applied.

( ) I agree that I should not share personal information and data in accordance with the ethical principles of the General Data Protection Act.

( ) I am aware that if I have any questions I can consult the Code of Ethics and Conduct at any time, which is available at

Collaborator ( ) Supplier ( ) Partner ( )

Local: \_\_\_\_\_ Data: \_\_\_\_/\_\_\_\_/\_\_\_\_

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

Revision 03 - 12/02/2025

