

Code of Ethics and Conduct

Introduction

The CONEXLED Code of Ethics and Conduct aims to define the essential criteria and elements that must be considered in the relationships established with its employees at all hierarchical levels, clients, suppliers, and service providers. In this way, we preserve the company's credibility and image, ensuring compliance with laws and responsible decision-making. This Code contributes to establishing a standard of respectful, transparent, and good-faith relationships, with the objective of guiding us to always act in accordance with our Values and Ethical Principles."

CONEXLED ORGANIZATIONAL IDEOLOGY

CONEXLED values citizenship, ethics, respect, and loyalty in its relationships, as it understands that this expands the possibilities for personal growth and drives its development towards new business opportunities.

Mission

To offer innovative, reliable, and sustainable solutions, contributing to the planet's decarbonization through the supply of high-performance products for lighting and electrical installations, aimed at the development of industrial, public, and corporate sectors.

Vision

To be a leader in Industrial Lighting, Explosive Atmospheres, and operate in the Public Lighting market. Explore new segments and conquer the Americas. Achieve sustainability through an organization focused on high quality, productivity, and certifications. Drive innovation through investments in IT, Artificial Intelligence, employee training, and process improvement.

Values

- Organization
- Excellence
- Effective Communication
- Respect
- Commitment

BUSINESS ETHICS GUIDELINES

CONEXLED understands that all its hierarchical superiors must be examples of ethical conduct in their professional activities; that it is the obligation of all its employees to comply with the norms established in this Code of Ethics and Conduct, and is confident that this is an extremely useful and necessary work tool, capable of inspiring in the conduct of daily activities and in the art of transforming personal and professional conduct into good examples for all.

CODE OF ETHICAL CONDUCT

Professional and Personal Conduct

- Employees must act responsibly and ethically in their relationships with suppliers, customers, and colleagues.
- Respect and comply with all laws in force in the country, whether they are of a fiscal, labor, criminal, civil, or economic nature.

Conflict of Interest

- A conflict of interest is the clash between CONEXLED's interests and personal interests that may compromise and/or influence the performance of the employee's or supplier's duties.
- CONEXLED does not tolerate situations of conflict of interest, therefore, in case of situations that prevent or compromise the performance of duties adequately and that may affect the ability to act in the best interest of CONEXLED, it must be reported through the internal Reporting Channel.

Workplace Duties

Treat everyone with cordiality, allowing for the free expression of ideas and opinions, provided that it is conducted with respect and valuing diversity, and declaring that attitudes of depreciation, discrimination, and disrespect in all their forms, whether based on race, color, gender, sexual orientation, religion, language, nationality, ethnicity, or social condition, will not be tolerated.

Workplace Ethics

- The work environment must be fair and free from any favoritism.
- Any inappropriate or violent behavior that may pose a threat to the workplace and/or people will not be tolerated under any circumstances.
- The sale of any products within the company premises is prohibited.
- Employees must always perform their duties with the utmost dedication and responsibility, eliminating situations that lead to errors or delays in the provision of their services.

Anti-Corruption Policy

At CONEXLED, we are committed to conducting our business with integrity, ethics, and transparency. Our Anti-Corruption Policy reflects our commitment to strictly complying with current legislation, such as the Brazilian Anti-Corruption Law (Law No. 12.846/2013). www.conexled.com

We prohibit any form of bribery, corruption, undue advantages, or facilitation payments, whether involving public or private agents. All interactions with customers, suppliers, and partners must be conducted with respect for our ethical guidelines and social responsibility.

We expect all employees, partners, and third parties to comply with this policy, reporting any suspected violations immediately to our Whistleblower Hotline: governanca@conexled.com. We emphasize that acts of corruption will not be tolerated and may result in internal sanctions and legal actions, preserving our company's reputation.

We guarantee that ethics and integrity are pillars of our sustainable growth in Brazil and the Americas.

Information Handling Conduct and Ethics

We respect the General Data Protection Law and applicable local legislation on the subject, the right to privacy and confidentiality. Confidential information about our employees, suppliers, and customers, which is known to managers and employees, must be kept confidential and used only for appropriate and consensual purposes. Internal documents and information may only be shared with a formalized justification and with the appropriate approval.

Competitor Treatment

CONEXLED will always treat all its competitors fairly and will provide its services and solutions based on their merits, without disparaging them or providing misleading information. Employees must not engage in any behavior that could publicly defame the image of competitors. Employees must avoid all actions that could be interpreted as contrary to international, national, or local laws governing competitive market practices.

Customer Relations

The services provided and delivered to customers must always meet the expectations and needs for which they were contracted. All employees must adopt impartial, transparent, and confidential attitudes during the performance of their duties, always seeking the best service for customers. Customer information must be used responsibly, respecting privacy rights and keeping it in a secure location. It is forbidden to benefit customers due to personal ties or kinship, nor to obtain commercial advantages through illegal practices such as bribery, extortion, or other acts not provided for in this code of ethics.

Management Posture

Managers are responsible for interacting with their subordinates in order to align with the Mission, Vision, and Values established by CONEXLED.

Use of Assets

CONEXLED's assets are understood to be all goods owned, possessed, or used by it, such as real estate, vehicles, systems, equipment, documents, materials, technical and intellectual assets, raw materials, inputs, products, financial resources, information, etc.

CONEXLED's assets must be used solely and exclusively for the performance of daily activities. Therefore, it is the employee's responsibility to take care of the company's facilities and maintain all work equipment.

CONEXLED prohibits any appropriation of any type of company property, outside of its premises, when it is not related to the performance of the employee's duties.

The installation of any software/application on CONEXLED computers is prohibited, and any specific situation must be validated in advance with the employee's direct management in conjunction with the Information Technology area.

Compliance with the Code of Ethics and Conduct

It is the responsibility of all managers, employees, and business partners to be familiar with the practices expressed in this Code of Ethics and Conduct. Reports and violations, which must be reported with evidence, will be treated confidentially, and no retaliation will be taken against those who report in good faith. Reports can be made anonymously or identified, through the email governanca@conexled.com. All cases will be thoroughly investigated, ensuring appropriate solutions to prevent recurrence. The investigation of reports will be conducted impartially and independently by the Human Resources department, which is responsible for monitoring the application of appropriate corrective measures in proven cases of violation. Non-compliance with this Code of Ethics and Conduct may result in penalties according to the severity of the offense, unilaterally or otherwise, and may include: i) guidance and training; ii) verbal or formal warning; iii) suspension; iv) dismissal with or without just cause; v) termination of the contract with the supplier; vi) legal action, if applicable.

"We are Light, Energy, and Movement"

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