



Code of Ethics and Conduct

 Constellation.

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Word from the Chair of the Board of Directors:

Dear all,

It is with pride that I present to you our updated Code of Ethics and Conduct, a document that embodies the core values that have propelled Constellation to new heights over the past decade.

Since its inception in 2013, our commitment to safety, trust, sustainability, and excellence has evolved, becoming not just a set of guidelines, but the very foundation of our success.

In the years since we first launched our Code, we have witnessed significant changes in our industry and society. We have strengthened our dedication to making our values more transparent and actionable. This is evident in our unwavering focus on safety in our operations, our cultivation of an environment built on mutual trust and ethical conduct, and our relentless pursuit of excellence in everything we do.

Our revised Code now places a stronger emphasis on critical areas that reflect our growth and the changing world around us:

- **Sustainability:** we recognize our responsibility to the planet and future generations.
- **Diversity and Inclusion:** we celebrate the unique perspectives and experiences of our team members.
- **Human Rights:** we are committed to upholding the dignity and the rights of all individuals.
- **Innovation:** we embrace new ideas and technologies to drive progress.
- **Human Factors:** we prioritize the well-being and the performance of our people.
- **Leadership Behavior:** we set the standard for ethical and inspiring leadership.

As Chairwoman of the Board of Directors, I cannot overstate the importance of cultivating a team that lives these values. We must continue to invest in the development of our people, particularly our leaders, to foster an environment of respect, technical excellence, and ethical behavior. It is through our people that we achieve innovation and excellence, which is why we remain dedicated to their growth and success.

I urge each of you to embrace this Code of Ethics and Conduct. Let it serve as your compass, guiding your daily actions and decisions. By adhering to these principles, we not only strengthen our reputation for integrity but also pave the way for a more sustainable, inclusive, and innovative future for Constellation.

Together, we will continue to build a company that not only leads in its field but also sets the standard for ethical business practices in the 21st century.



Sincerely,
Maria Gordon
Chairwoman of the
Board of Directors
Constellation

Word from our CEO:

Dear employees and partners,

At Constellation, safety, trust, sustainability and excellence are more than just concepts; they are the intrinsic values that support each aspect of our business. These principles are fundamental to our identity and to what we aspire to convey in our relationships with customers, suppliers, partners and all stakeholders.

With more than 45 years of experience, we are proud of our unwavering commitment to ethics and sustainability. Throughout the years, we have trained inspiring leaders and implemented innovations that reaffirm our mission to contribute to a future with more integrity and a fairer society.

We have ethical behavior not just as a guideline, but as an essential pillar that guides our daily actions, guaranteeing efficiency and promoting an environment of respect and free competition.

Our Code of Ethics and Conduct clearly guides the behavior expected in interactions between each of us, with the public and private sectors and with society in general, creating a space where ethics and trust prevail.

I am particularly enthusiastic about the guidelines that strengthen our commitments, such as sustainability, diversity and inclusion, in addition to social responsibility. These elements not only enrich our organizational culture but also ensure a future more aligned with the demands and expectations of today's society.

I invite all to read and apply on the day to day the guidelines of our Code of Ethics and Conduct, as well as the rules and guidelines of the other associated documents.

Each of us plays a crucial role in promoting a culture of integrity and respect.

Together, we can strengthen our reputation and build a more sustainable and innovative future for Constellation.



Kind regards,
Rodrigo Ribeiro
CEO
Constellation

III. Our Values

Constellation has been building its reputation on the basis of non-negotiable values and principles of **safety, trust, excellence** and **sustainability**, which structure our relationships in an honest, transparent and ethical manner. Each one of us has the responsibility of cultivating and acting with respect and integrity in our daily lives, when making decisions and choices.

We are committed to respecting the rules, encouraging ethical behavior and promoting compliance with the laws of the countries in which we operate. By adopting this stance, we protect and expand the credibility and reliability that has been deposited by the market in Constellation throughout our whole history.

So, it is up to each of us to operate with responsibility, respect and observing the values of the company in all our activities, reinforcing our purpose of providing services of excellence, valuing of people, maximizing value to stakeholders and encouraging innovation.

This Code is a guide for our interactions internally, with customers, suppliers, shareholders, related parties and communities; and applies to all board members, officers, employees and all people who work directly or indirectly for Constellation, its subsidiaries and companies under common global control.

What we value:

- Safety;
- Strategic solutions;
- Watch out for the people;
- Positive impact;
- Transparency;
- Quality;
- High performance;
- Innovation;
- Proactivity;
- Collaboration;
- Sustainability.



IV. Non-negotiable Commitments

- Development of a **safe and healthy work environment**, physically and psychologically, free from harassment and discrimination.
- Creation of **protagonist, inspiring and strategic leaders**, as a vector for the dissemination of an engaging and reliable corporate culture.
- Investment in **diversity, equality and inclusion** as a granary of plural ideas and innovation.
- We do not tolerate work analogous to slavery or child labor.
- We do not tolerate any acts of corruption or bribery, fraud, money laundering, financing terrorism or unfair competition.
- We look after privacy of personal data and the **security of information** we deal with.
- We believe in **sustainable growth**, aligned with the preservation of the environment and with the pillars of the Environmental, Social and Governance (ESG) agenda.

V. People and Behaviors

Human Factors

Trust is the foundation of our relationships and must be cultivated with ethics, transparency and respect.

Our leaders have an important role to play in this journey, as they must promote an environment of **psychological safety**, where people feel encouraged to admit mistakes, share ideas and raise concerns without fear of retaliation.

In an environment of continuous learning, we strengthen trust, promote engagement, drive improvements and value our human capital as the center of our business.
People are the solution!

With a systemic vision, mistakes become opportunities for organizational improvement, reinforcing trust and collective responsibility. For a safer and more efficient future, the focus should be on learning, and not on blame.



Occupational Safety

Building a **culture of occupational safety** is a responsibility of all of us and requires a strict commitment to safe practices, mutual collaboration and compliance with standards. It starts with constant attention to risks and identifying situations that could harm the integrity of anyone in the work environment. We must commit ourselves to observing what happens around us and taking preventive measures, reporting any unsafe conditions immediately so that corrective actions can be taken.

In this sense, the use of **Personal Protection Equipment (PPE)** is a fundamental requirement! We must always be properly equipped before carrying out our activities. PPE is not just a legal requirement, but an essential barrier against accidents and damage to health. The commitment to the proper and constant use of PPE shows the respect for the safety of everyone in the work environment.

In addition to the physical integrity, we are also concerned with the **preservation of mental health and the misuse of alcohol and drugs**, according to internal guidelines of the company. The workplace should be a place where everyone is fully able to carry out their activities with focus, discipline and responsibility.

For this reason, we believe that **internal procedures** established in each area are essential to guarantee the safety and efficiency of operations. Each process and procedure has been designed to minimize specific risks, and its compliance is the most direct way to ensure that all the necessary cautions are being taken.

We do not tolerate threats, vandalism or sabotage! When an individual or group of people intentionally commit acts in the workplace with the aim of compromising operations, they are putting at risk all the security designed to protect assets and people. These actions increase the risk of accidents, including the risk of death, as well as generating financial losses and damage to Constellation's reputation. Such acts can directly impact the people, the operation and trust placed by the market in us.

Occupational safety is the result of conscious acts, i.e., a commitment of everyone to maintain a safer environment, preserving the health of ourselves and the people around us.

Positive Work Environment

We are committed to building a work environment in which **everyone feels welcome and respected**. Therefore, we do not tolerate any type of behavior such as: moral harassment, bullying, sexual harassment, sexual misconduct and discrimination. Remember: virtual environments are also the real world! Our behavior on social networks directly impacts the reputation of Constellation, either positive or negatively. Be cautious!

Bullying is an act of physical or psychological violence, intentional and repetitive, that occurs without evident motivation, practiced by an individual or group, against one or more people, with the aim of intimidating, humiliating, discriminating, assaulting; or verbal, moral, sexual, social, psychological, physical, material or virtual actions, causing pain and anguish to the victim, in a relationship of imbalance of power between the parties involved.

Sexual Harassment is a crime, defined as the act of constraining someone to obtain sexual advantage or favor, in which the agent, who is a hierarchical superior or performs inherent exercise of employment, position or function, takes advantage. Here, the exercise of power is an essential requirement. Unlike moral harassment, sexual harassment does not require repetition. If it happens once, it is enough to be considered sexual harassment.

Moral Harassment is any repeated attitude, inappropriate behavior, word, gesture, that translated into exposure or violation of dignity or integrity, psychic or physical integrity in damage and constantly submits the victim to a vexatious situation. It does not depend on the intentionality of those who carry out the act for it to materialize; it is enough that it fulfills the requirements described in the concept and attacks the integrity, identity and human dignity, causing degradation of relations in the workplace and often impacting on the emotional and physical stability of the victim.

Sexual Misconduct is a crime that materializes when, without the consent of the other, someone performs or behaves with the aim of satisfying their own sexual desire or that of third parties. In sexual misconduct, there is no hierarchy involved, only a practice of libidinous act, without the other's consent.

Discrimination is a crime that stems from the act of treating someone differently or segregating them because of their ethnicity, social status, nationality, religion, age, retirement, disability, gender, marital status, sexual orientation, health condition, pregnancy, union affiliation, political affiliation or other characteristics protected by law.

Conflict of Interests

A conflict of interest arises when an employee's decisions or actions are taken influenced by personal considerations that do not concern Constellation's interests or are aimed at their own benefits, whether real or potential. This situation may compromise impartiality, affect the integrity of decisions and result in considerable damage to reputation and to results of Constellation.

Conflicts of interest jeopardize our credibility, our internal trust and Constellation's image in the market. It is therefore essential that employees are aware of how to recognize and avoid these situations and know the importance of always acting with transparency. Constellation, as an organization committed to ethics, establishes standards to prevent and handle conflicts of interests, maintaining a stance of integrity in all its operations.

In addition, all employees must **report promptly any conflict**, actual or potential, to their immediate superior or through the Constellation Ethics and Conduct Channel. This procedure is essential so that the company takes preventive measures, avoiding situations that may jeopardize its image and operations.

In general terms, employees should **always inform their potential conflicts and avoid making decisions** when there are interests that may conflict with those of Constellation. This principle applies in situations in that there is the possibility of benefits personal or of third parties with whom the employee maintains some type of link. The conduct of an employee before of a possible conflict is not just an act of responsibility, it is a demonstration of commitment to the ethical values that guide Constellation.

Protagonism of Leadership

We believe in a protagonist leadership, in which our leaders, in addition to managing processes and teams, focus their actions on inspiring, motivating and creating an environment which fosters cooperation, innovation and excellence; promoting the growth of Constellation and its people.

This protagonism is essential to build relationships of trust and engagement of teams, showing strategic vision and resilience of leaders and promoting high-performance and innovation environments, as well as:

- Understanding that people need to feel valued, motivated and aligned to the organizational goals, because only then will they be stimulated to creativity, belonging and high levels of performance;
- Encouraging **accountability**, making clear expectations and ensuring that everyone understands their role in the collective success, offering support, feedback and resources so that each employee achieves their full potential, promoting a virtuous cycle of development and growth;
- Making decisions in challenging situations, **with a sense of urgency** and precision, assessing risks, considering multiple perspectives, communicating their choices transparently and reinforcing trust, even in adverse scenarios;
- **Communicating effectively**, translating the organizational strategy into clear and relevant messages for your teams, ensuring alignment at all levels, promoting dialogue open and constant feedbacks, strengthening connections and avoiding misunderstandings;
- Maintaining **optimism grounded** as a brand, because this positive attitude, before challenges inspires teams to overcome them, with a clear vision of the future, identifying opportunities and directing efforts to corporate goals, promoting cohesion and purpose;
- Keeping abreast of changes in the market in which we operate, especially **innovations** and expectations of customers, anticipating trends and adapting strategies to ensure the relevance and competitiveness of Constellation; and
- Acting quickly in scenarios of uncertainty, promoting continuous improvement and accepting **mistakes as part of learning**, demonstrating resilience, overcoming setbacks without losing the focus and serving as example of stability for the teams.

VI. Human Rights

Child Labor and Work Analogous to Slavery

Fighting child labor and work analogous to slavery is a matter of human rights and social responsibility, being an obligation of the government as well as of companies and society.

The practice of employing children in activities that harm their development, or subjecting individuals to degrading situations or forced labor, perpetuates cycles of poverty and social exclusion.

Constellation believes that these practices not only violate human rights, but also have a negative impact on the economy and society. So, we adopt strict internal rules and policies of promoting a culture of social responsibility, **not tolerating, under any circumstances, child labor or work analogous to slavery.**

We are sure that guaranteeing decent work conditions, respecting human rights and promoting sustainable development are indispensable steps for building a fairer and more equal society.

Diversity, Equity and Inclusion

Diversity, equity and inclusion are essential to fulfilling human rights. Valuing differences is not only an ethical commitment, but also a strategic factor. It's about creating environments where all people feel respected, represented and valued for being who they really are, without a need to adapt to standards patterns. This requires empathy to understand the experiences of different groups and the willingness to overcome prejudices and deep-rooted stigmas.

Here at Constellation, we believe in **plurality of ideas, perspectives and experiences** that each individual brings with them. We embrace diversity and inclusion as part of promoting innovation and, for this to be possible, respect is non-negotiable and must go beyond theory, in all its aspects (gender, LGBTQIA+, gender identity, ethnic-racial, sexual orientation, age, place of birth, people with disabilities, religion, health or cognitive conditions, territoriality, among others).

There is no future dissociated from diverse, inclusive and equitable approaches, where respect and empathy shape all interactions. We need to contribute to a fairer society, but also build a competitive edge in the market. Therefore, we reinforce our commitment to moving to a more plural and collaborative tomorrow.

VII. Sustainability

Sustainability is a value of our company and a strategic pillar that constantly reinforces the commitment to growth and the responsible development of our business. We always seek to evolve in the conduct of our operations, with a focus on safety and connected to the promotion of the **Sustainable Development Goals (SDG)**, proposed by the United Nations (UN).

Periodically we present our goals and commitments report with the **Environmental, Social and Governance (ESG)** agenda, built in a multidisciplinary manner by the Executive Directors, administrative and operational areas and approved by the Board of Directors.

The impacts that we produce on the environment are carefully monitored, contributing to an operational performance directed toward economic growth associated to the Environmental, Social and Governance (ESG) commitments.



VIII. Compliance with Legislation

Constellation has an **absolute commitment to the laws and regulations applicable to the places where it operates, complying with the requirements of the authorities, which regulate and inspect the company's operations.** Non-compliance with these guidelines may generate financial and reputation damage, putting the continuity of the business at risk. Thus, our actions should be guided by the strict compliance with the standards in force.

Anti-corruption and Anti-bribery

Constellation has a **zero-tolerance policy to any situation considered bribery or corruption**, whether public or private. This commitment with integrity comes from the highest governance levels of the company, which expects its employees to fully comply with it. Facilitation payments are also a kind of bribery and are therefore forbidden. We do not adopt, encourage or allow the practice of any conduct that constitutes or results in harmful acts to Public, National or Foreign Administration, as per the laws.

Prevention of Money Laundering and Terrorism (AML/CFT)

Constellation recognizes the gravity of any infractions related to money laundering and terrorism financing and holds a firm stance of repudiation to and prevention of these activities, reinforcing its commitment to transparency and integrity in all its relationships.

International Sanctions and Restrictions

Any potential **commercial transaction involving countries, entities or international assets** must be previously communicated to the Compliance Department to be analyzed and guided, as to prevent any type of non-compliance with sanctions and restrictions occasionally applied on such entities.

Anti-trust and Free Competition

Constellation operates based on legitimate competition differentials, always in compliance with legal standards. We do not adopt any disloyal competition practices and operate rigorously within the legal parameters which ensure the preservation of **free competition**. We reject any action which may restrict, distort or harm free competition or free initiative, as well as practices aiming to illegally dominate a market for goods and services or increase profits artificially.

Operational Legislation

At Constellation, we comply with all the mandatory legislation for the full and safe performance of our operation. Cherishing for safety of employees and sustainability, we comply with all **applicable legislation, technical, regulatory, audit and inspection standards** required by regulating agencies, public authorities and clients, thus ensuring the compliance of our activities.

IX. Personal Data Privacy and Information Security

Constellation reaffirms its commitment to the confidentiality and security of personal data under its responsibility. In compliance with current legislation, Constellation adopts strict practices and policies for:

- Ensure the **right to privacy** of holders' personal data, whether they are employees or stakeholders;
- Ensure the **confidentiality of the personal data** accessed, allowing wide accessibility to the owner of personal data and using them exclusively for the appropriate needs provided for by law; and
- Observe the provisions of the General Data Protection Law (Law No. 13.709/2018), in the General Data Protection Regulation of the European Union (GDPR) and other applicable legislations on privacy of personal data.



But for this to happen, it is essential that all employees understand their role in the privacy of personal data and the security of information. Therefore, we count on with everyone to:

- Respecting purposes and legal bases, understanding that the treatment of personal data must be carried out only for specific purposes, legitimate and provided for in our policies, procedures and applicable legislation;
- Adopt practices of Privacy of Personal Data and Security of Information, complying with the procedures and policies of Constellation regarding privacy and protection of personal data and evaluating, carefully, which personal data are strictly necessary for the execution of its activities before carrying out its processing; and
- Ensure **Information Security**, by not sharing access passwords with third parties, nor using others' credentials to access systems or corporate equipment, in compliance with the Information Security Policy of Constellation; as well as, when using its equipment and resources provided by Constellation. Know that there is no expectation of personal data privacy as to content produced there or transited, since they are being accessed by Constellation, always in compliance with the applicable Privacy and Personal Data Protection laws.

Constellation understands that the protection and privacy of personal data is not just a legal requirement, but an essential pillar of its corporate responsibility. For this reason, the company invests in continuous actions to guarantee compliance with current legislation, protecting the privacy of personal data of all the parties involved and minimizing risks associated to handling it.

X. Insider Information

The misuse of insider information, also known as **Insider Trading**, occurs when someone uses relevant and confidential information of Constellation that have not yet been disclosed to the public, to obtain advantage in operations of purchase or sale of securities, such as shares or other securities issued by Constellation.

This type of practice is illegal and highly harmful, both to Constellation and to the financial market in general, because it compromises transparency, investor reliability and the integrity of financial operations.

- At Constellation, any person who has access to relevant information and not yet disclosed to the public is strictly prohibited from:
- Sharing or suggesting to third parties, with basis on inside information, any guidance on operations with the securities;
- Passing on this information to any person with the intention of enabling that it realize or leave of realize operations of purchase or sale of securities; and
- Use this information to carry out transactions with securities issued.

XI. Protection of Assets

At Constellation, we value the **preservation of our assets**, including equipment, vehicles, computers, furniture, facilities, systems, brands, patents, technologies and information technology resources, such as telephones, internet, software, hardware, among others. All these assets are for use for professional purposes and must be accessed only by authorized employees and legal representatives of company. If it is necessary to use these resources for personal issues, we should do it responsibly and with moderation.

The data, records and information generated in the work environment belong exclusively to Constellation. It is the responsibility of all of us to protect these assets and ensure their efficient use.

We are aware that Constellation keeps records on the use of the Internet, emails and other information stored on our devices, as well as on records related to the use of mobile and landline telephony resources.

As for the use of **Artificial Intelligence**, employees are authorized to use them for purposes regarding work. This includes tasks such as: generating text, content for reports, emails, presentations, images and communications in general, always observing the ethical guidelines, confidentiality and copyright established in the pertinent legislation, internal policies and in the **Guide for Acceptable Use of AI**.



XII. Gifts, Presents, Entertainment and Hospitality

The granting of gifts, presents, entertainment and hospitality is a common way for companies to maintain good business relations. However, offering or receiving gifts, presents, entertainment and trips can appear to be an attempt at bribery. So, **before granting or receiving these benefits, please consult the Compliance Department.** It is strictly prohibited to grant or receive gifts or presents in cash, in kind or equivalent.

Due to the particularities of some countries' legislation, the offering of hospitality may be restricted or prohibited. Therefore, when granting hospitality to people in other countries, please contact the Compliance Department, to comply with the procedures of the Internal Policy on the subject.



XIII. Donations, Sponsorships and Relationships with Political Parties

The **donations and sponsorships** made by Constellation have specific rules and are always guided by ethics, transparency and good faith.

We reinforce our respect for Brazilian law, which expressly prohibits donations by private companies to political parties or electoral campaigns (Law No. 13.165/2015), but we recognize the constitutional right of our employees to do so as individuals, respecting the requirements of the law and without any association with our brand.

Likewise, **demonstrations or political, public or partisan activities** are not authorized in Constellation's facilities and must be carried out in the name of the employee, off working hours.

Also, employees who wish to obtain public positions must first notify the Compliance Department for analysis and guidance.

XIV. Transparent Financial Reports

No operation of an economic, financial or patrimonial nature involving Constellation should take place without due registration in the accounting and financial books. All transactions and payments made by the company must be informed to the competent areas, investigated, justified and released timely and correctly in the accounting records, after due authorization.

Constellation maintains all supporting documentation for these transactions filed, as per the established legal deadlines.

It is strictly forbidden to record transactions in an obscure manner or to omit, partially or totally, any operation from the accounting controls and records, including transactions with related parties.

It is also strictly forbidden to keep undisclosed and unregistered accounts keeping for any purpose.

These guidelines ensure the **transparency and precision of financial records**, contributing to legal compliance and the integrity of the company's accounting statements.



XV. Ethics and Conduct Channel

Principles

The Ethics and Conduct Channel is a space built to receive doubts, suspicions and reports of violations to the guidelines of this Code, Policies and Internal Procedures or laws of countries where we operate.

The Channel is available to receive reports in good faith, which can be **anonymous or identified** and will have their content protected by **confidentiality**.

A team of specialized professionals will handle each report **independently and impartially, and retaliation is not allowed**.

Internal Investigations

Any information that involves violations to our Code of Ethics and Conduct will be investigated with due diligence, using public and shared data in our corporate tools, including personal data, subject to the purpose of internal investigation.

All employees and persons subject to rules and guidelines on this Code have the responsibility of cooperating in good faith with any investigation conducted by Constellation or on behalf of it.

Disciplinary Measures

If, after internal investigation, any improper conduct is confirmed, disciplinary measures may be applied, considering the seriousness of the situation and the current legislation.

The goal of Constellation is to reinforce an ethical and transparent work environment.

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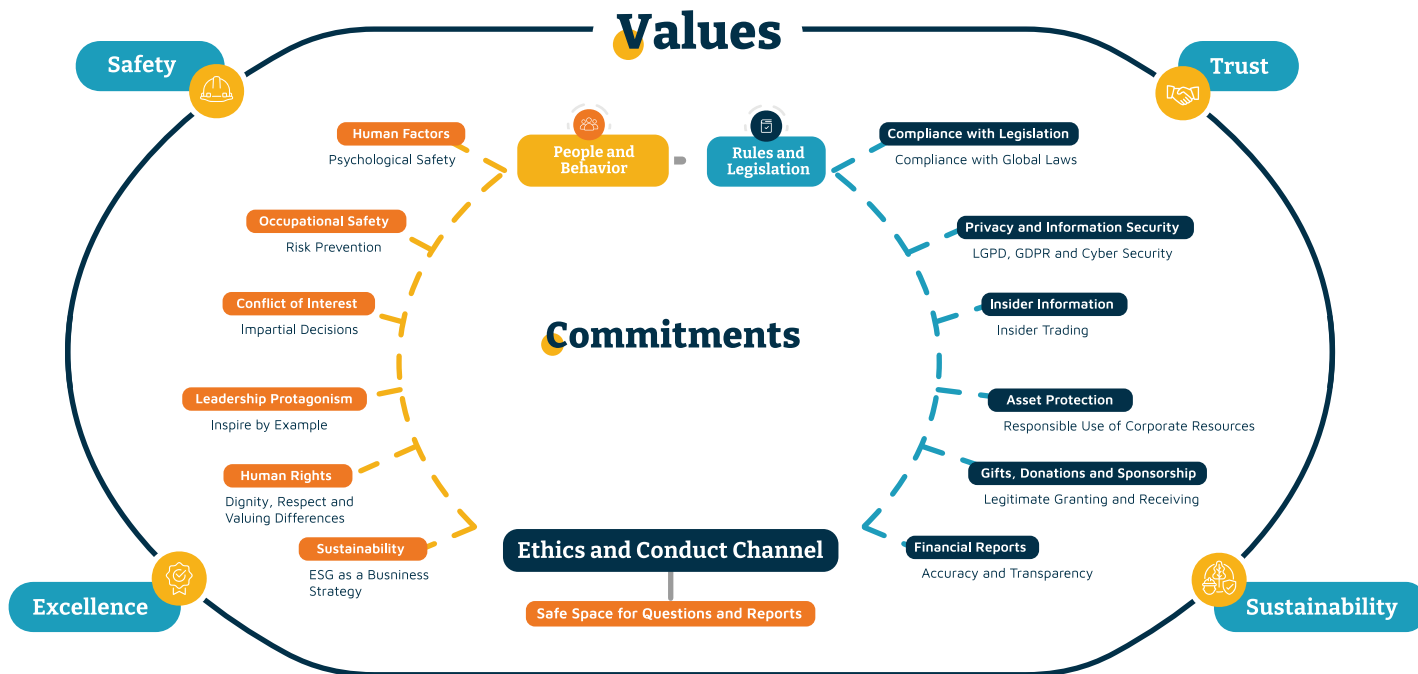
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XVI. Mind Map



Notes



Constellation.



constellation oil services



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