

# CODE OF CONDUCT



**SipcamNichino**  
BRASIL

# CODE OF CONDUCT

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The Code of Conduct represents commitment of SIPCAM NICHINO BRASIL SA (later referred to as SIPCAM NICHINO or only the Company), in the supply of products and services that meet the needs of customers and effectively contribute to the development of agricultural activities, in an environment that fosters the sustainability of its activities and businesses.

The Code of Conduct is made up of standards and a commitment to business ethics aimed at ensuring sustainable growth based on respect for customers, the quality of products and services, the attention to the needs of employees and, in general, of interested parties.

The purpose of the Code of Conduct is to clearly define the values and principles whose observances are absolutely essential for our activities to be carried out with high standards of business and professional integrity. The Code of Conduct also defines the principles of business conduct and commitments, but does not provide ready solutions for all day-to-day issues, but it is believed that this code encourages continuous reflection on the values and principles that SIPCAM NICHINO wants to apply to its professional practice.

This Code of Conduct reaches the relationship between directors, officers, employees, collaborators, suppliers, partners, customers and other interested parties related to the business with SIPCAM NICHINO BRASIL SA. We expect our suppliers and the contracted companies with whom we do business, to adopt similar patterns and values in their organizations.



# STATUTE OF VALUES / BYLAWS

## OUR MISSION

Introduce solutions through products and services developed by us, our shareholders and strategic partners, contributing to the improvement in the quality, quantity and profitability of the agricultural production in Brazil.

## OUR VISION

Through a portfolio of differentiated and competitive solutions and an inspiring and productive team, be considered by our main customers as a key supplier for their businesses.

## OUR VALUES

- Team work;
- Flexibility and agility;
- Innovative thinking;
- Upright behavior;
- Compliance with laws and regulations;
- Respect for the environment and human health;
- Commitment to organizational objectives;
- Commitment to quality;
- Safety as a primary factor;
- Valuing people and respecting diversity.

### GENERAL RULES

We are committed to managing the Company by maximizing safety and financial return and respecting: (1) fair competition and functional market rules, (li) the environment, (Ili) the rights and dignity of all workers.

Relations with public and political administrations, organizations of labor and governmental unions, the controlling and regulatory authorities of the pesticide industry are considered and conducted with honesty, integrity, impartiality, transparency and independence.

We reject the use of slave labor and child labor.

We do not admit any types of actions that may be related to money laundering and bribery, as well as any illegal acts.

Members of the Company's management, as well as employees and collaborators are prohibited from offering or accepting gifts, hospitality or any other type of benefit that could compromise their independence of judgment in any and all situations.

Communications and financial estimates are presented to our shareholders with reliability and transparency, in order to provide complete, clear and extensive information, of an economic, financial and equity nature.

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As one of the Shareholders listed on the Stock Exchange, the members of the Board of Directors, Directors, as well as employees who have access to privileged, reserved and confidential information about the Company, are prohibited from using such information to conduct personal transactions, even through intermediaries.

The principles and measures contained in the Code of Conduct are directed to the Directors, to the people who are on the payroll of SIPCAM NICHINO ("Employees") and to all the people who work for SIPCAM NICHINO ("Collaborators").

Sipcam Nichino complies with all applicable national and international laws and regulations, in particular the General Data Protection Law (LGPD), which aims to protect the privacy of personal data of holders, whether employees, collaborators, customers, consumers and business partners, observing the guidelines established in their Personal Data Protection Policy.

A copy of the Code of Conduct will be distributed to those involved and cited, who must commit themselves, signing and respecting it completely.

### **EXECUTIVE DIRECTORS AND ADVISORS**

We consider the people who work at the Company to be essential components for the company's success and we are committed to respecting the skill, personality and dignity of each one.

We are fully committed to providing equal opportunities, as well as ensuring equal treatment for all workers. We fight discrimination and prejudice of any nature of race, color, religion, age group, gender, political conviction, social position, cultural level, nationality, marital status, sexual orientation, physical capacity, among other diversities.

We are committed to creating an adequate and appropriate work environment for our Employees, maintaining the physical integrity of everyone.

We are committed to communicating the Company's strategies and goals.

We aim to act with integrity, transparency and impartiality, disregarding, in our practices and actions, any personal interests that constitute favoring and conflict of interests.

We ensure that our accounting and financial documents and statements reflect our reality with clarity, simplicity and consistency.

We respect loving and family relationships between employees in the workplace, as long as they work in different areas and service stations and have no subordinate relationship.

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We do not accept harassment of any kind, such as: moral, sexual, physical, psychological or verbal, or situations that constitute intimidation or threats in the relationship between different audiences, regardless of hierarchical level.

We maintain our position of neutrality and impartiality in relation to candidates and political parties.

We strongly repudiate all illicit acts involving fraud, robbery, theft, damage to property, embezzlement, swindle, bribery, forgery, simulation, concealment, corruption, money laundering, as well as acts of discrimination, prejudice, racism, including influence trafficking, fanaticism, torture and terrorism.

The disclosure of internal information that may have an effect on the market and/or for personal gain, which conflict with the interests of the Company and its Shareholders is prohibited.

We do not accept promises or personal advantages for employees, organizations, public agencies, both at home and abroad.

We fight favoritism, clientelism, employability and corruption in all its forms.

## EMPLOYEES AND COLLABORATORS

We undertake not to carry out activities related to other companies, to sell goods or provide services, or any other similar activities during office hours or at Sipcam Nichino's premises.

We reject acts of indiscipline and disrespect for Sipcam Nichino's internal rules and procedures, as well as the procedures and instructions relevant to the activities carried out.

We commit not to work under the influence of alcoholic beverages or any illegal drugs.

We repudiate illegal acts involving fraud, robbery, theft, damage to property, embezzlement, swindle, bribery, forgery, simulation, concealment, corruption, as well as acts of discrimination, prejudice and racism.

We take care of our personal presentation, wearing discreet and appropriate clothing, both in the work environment and at external events in which the Company is represented.

We reject the reproduction of rumors, gossip, slander, defamation, bullying or any other social slander.

We commit not to take credit on behalf of others or to grant loans on our behalf to coworkers.

The passwords required to access, authorize and enter the Company, as well as computer information, are non-transferable, and each person is responsible for their correct use and protection.



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We are committed to ensuring an adequate work environment, not tolerating any kind of discrimination, be it physical, verbal, psychological, sexual, or anything that damages the personal dignity of our workers.

The privacy of personal data must be respected, whose limits and rules of collection, use and treatment are duly regulated in the respective Personal Data Protection policy and must be known to all.

It is strictly forbidden for the employee/collaborator to disclose false or distorted information within the Company. Information about confidential internal procedures and processes, information and personal data without prior authorization may also not be used for private purposes or to achieve personal advantages.

The use and handling of the Company's assets must be carried out responsibly. Material values: vehicles, equipment, raw materials, products and non-materials are considered as assets of Sipcam Nichino, such as: technology, standards, guidelines, policies, records, our inventions and confidential information.

Company facilities and objects may not be used or removed from within the Company without express authorization from the Board of Directors with the knowledge of the CEO.

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It is prohibited to remove any document, book or document belonging to Sipcam Nichino from the workplace, without being legally authorized.

Confidential information must be kept secret and protected against misuse. This also applies to information entrusted to us by third parties.

The company will take disciplinary action, up to and including termination of employment, against any employee or executive involved in retaliation.

The adoption of ethically correct principles is the obligation of our Directors, Officers, Employees and Collaborators when conducting the business of Sipcam Nichino Brasil S.A.

### OUR CUSTOMERS

We are committed to promoting and maintaining stable and constructive relationships with our customers, based on our values.

We are committed to providing solutions to our customers in a simple, practical and ethical way, based on their real needs.

We promote responsible trade in our products, ensuring that we are meeting the needs of our customers and, at the same time, respecting and observing the laws that regulate market and advertising activities.

The negotiations are conducted in an ethical manner and with fair competition with our competitors, always observing all applicable laws, standards and rules.

We offer clear, reliable and timely information and guidance to our customers and expose the advantages and limitations with respect to our products and services, not promising what cannot be fulfilled, respecting freedom of choice and allowing them to make the best decision.

We do not offer services and commercial agreements with which we have a kinship relationship up to the second degree, by affinity or any bond, except when known and approved by the Chief Executive Officer. We respect the privacy of our Customers, keeping their information, personal data and their operations confidential.

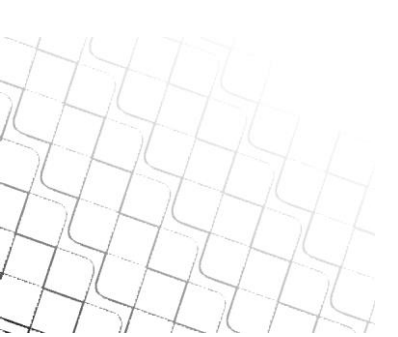
We deliver our products and services within the negotiated terms and do not carry out operations of any kind without the Customer's consent. We reject any type of financial transaction of fraudulent origin or with evidence of money laundering.

### OUR COMPETITORS

We seek information about the market and competitors through transparent and reputable practices, made publicly available, including published articles, market analysis and reports, adopting a posture that does not harm the image of our competitors.

We treat our competitors with respect and within the parameters of the legislation that establishes the competition guidelines in the market. We value our services and products, without detracting from the image of our competitors.

Responsibility for conducting business ethically extends to our customers, shareholders, suppliers, competitors and regulatory bodies.



### OUR SUPPLIERS

We choose our suppliers following the standards of ISO Certifications, as well as, through the evaluation of quality, price of products, services offered by them, technical reasons and compliance with deadlines.

It is mandatory for the supplier to respect the Code of Conduct of Sipcam Nichino Brasil S.A., as we expect from our Suppliers the same attitude listed in this Code of Conduct.

We reject the act of making or receiving irregular payments in our dealings with partners and suppliers, obtaining advantages, influencing decisions or inducing people to grant improper permissions, characterizing a bribe or kickback.

We only accept invitations to events of any nature, with expenses borne by suppliers, government agencies and others, after being authorized by the Director of the area and knowledge of the PRESIDENT DIRECTOR and provided that they are recognized as modest amounts and do not represent an attempt to influence any transaction commercial or regulatory or governmental character.

We act in such a way as not to accept or offer, directly or indirectly, gifts, or favors that characterize our professional reputation and the objectives of SIPCAM NICHINO, and gifts of commercial value of up to R\$100.00 (one hundred reais) may be accepted, always with the knowledge of the area director.

If it is necessary to receive gifts to maintain the business relationship, the fact must be formally reported to the immediate Director, who must report to the Chief Executive Officer to determine the destination of the gift received.

### **OUR ENVIRONMENT AND THE COMMUNITY AS A WHOLE**

We use natural resources, such as water and electricity, responsibly.

We maintain channels of dialogue permanently open with the communities in which we operate.

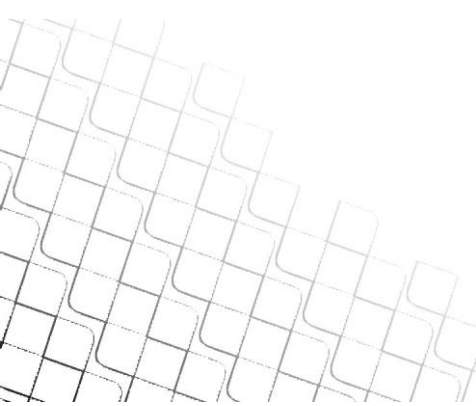
We aim to prevent pollution and minimize any damage that may be caused by our activities, services and products.

We promote the continuous improvement of our Environmental Management System.

### **GOVERNMENTAL BODIES AND REGULATORY BODIES**

We fully respect the laws of our country, the rules applicable to our business model and those defined by regulatory bodies.

We reject benefits arising from relationships and political influences to conduct business and obtain privileged information.



# PROCEDURES FOR APPLYING THE CODE OF CONDUCT

Any complaints or doubts about the company's procedures received will be treated with confidentiality and secrecy, except for those where there is a legal obligation to inform government authorities.

The complaint can be made through the following channels:

- 1) By direct phone: 0800 900 9292;
- 2) By website: [www.contatoseguro.com.br/snb](http://www.contatoseguro.com.br/snb);
- 3) By App: Contato Seguro.

On the SNB website: [www.sipcamnichino.com.br](http://www.sipcamnichino.com.br) - Company - the Code of Conduct will be available for reading.

Complaints or suggestions will be received by the company Contato Seguro, which provides monitoring and control systems that optimize the processes of: governance, risk management and compliance, promoting a culture of honesty and integrity.

After registering the suggestion or denunciation, Contato Seguro will forward this information to the Vice President of the Board appointed by Sipcam Nichino, for its analysis and investigation, and the "Supervisory Committee" may be appointed for the necessary measures.

The Supervisory Committee shall meet immediately after the calling of the Vice President to discuss the report received.

The procedure guarantees the anonymity of the person who pointed out the violation.

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Any type of threat to a person who, in good faith, has pointed out possible violations of the Code is considered a violation of the Code of Conduct. Likewise, anyone who falsely accuses others of having violated the Code will also be considered a violator of that Code of Conduct.

The Vice President of the Board must receive the Minutes of each meeting of the Supervisory Committee.

The proven violation of this Code of Conduct constitutes an unlawful act subject to punishment by the addressees and can lead, depending on the severity, to the issuance of sanctions, including the dismissal of the employee, in accordance with the content of the applicable laws and with possible legal consequences in the illicit acts.

The proven violation of the Code by External Employees or Suppliers, allows the Company to take the appropriate measures to combat it, which can lead to breach of contracts and total dismissal from the Company.

While we respect people's interest in privacy, we will properly investigate any behavior that may violate company law or policies, or that may damage the company's reputation or impact security.

Sipcam Nichino will not tolerate any reprisal or retaliation against a person who, in good faith, reports a known or suspected violation of the law or Company policies, including the Code.

Infringements of this Code will be subject to disciplinary measures and/or penalties based on applicable law.



# COMPOSITION OF THE SUPERVISORY COMMITTEE

The Supervisory Committee is chaired by the Vice President of the Board and the members appointed by him.

São Paulo, October 19th,2023

Alexandre Gobbi  
CEO

