



Code of Conduct

Tortuga Rubber Products Ltd, a company with a history of over 40 years, has been consolidated throughout this time, especially by people from the most diverse places, with varied cultures, specialties and backgrounds. All this diversity is largely responsible for our success, however, it was necessary to establish a Code of Conduct that aims to clearly present all the principles of building a reputation that has positioned us as the best reference in the market in which we operate.

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1. Business Operating Principles

The **Business Operating Principles** are attitudes, commitments and standards of behavior that ensure the strength and sustainability of the company. Acceptance and adherence to these principles are expected from everyone, regardless of their position or organizational level within the company.

Tortuga is expected to be guided by four operating principles:

Market focus

- a. Seek to understand consumers' needs, exceeding their expectations by offering them high-quality products.
- b. Consolidate, improve and increase the company's distribution channels in order to positively impact the price, image and quality of the products and services sold;
- c. Seek to increase the company's value, operating profitably and maximizing market share in the chosen areas or categories.

Market leading products

- a. Provide innovative, superior-performance products with high perceived value, at a fair price to the consumer;
- b. Seek market leadership in each basic product category in which we compete through an appropriate mix of price, product quality, marketing and technological innovation;
- c. Consolidate and sustain long-term growth through the development of new product and business lines.

Achievement Environment

- a. Sustain and improve an organizational climate that leverages interpersonal communication, human relations and, above all, the establishment of positive attitudes to face increasingly greater challenges;
- b. Provide a work environment that enables employees to achieve their professional potential, reconciling individual capabilities with improved quality of life;

Corporate Ethics

- a. Establish strong and lasting partnerships with clients/suppliers whose business principles are compatible with ours, promoting mutual profitability within business ethics;
- b. Understand and meet the desires for social and environmental improvement in the communities in which we operate, adopting specific programs designed to bring about positive changes.

These principles guide Tortuga's business strategies, corporate behavior and relationships with suppliers, customers, communities and each employee.

2. Teamwork and commitment

We practice **Teamwork** when we respect the differences between people and are able to set aside our convictions in pursuit of the development of the organization first and foremost, as this should be a common goal.

Fulfilling our employment contract, treating everyone with respect and dignity, and not accepting any type of intimidation or discrimination are also basic requirements for developing good relationships.

Practice **Commitment** when we assume our responsibilities, treating day-to-day matters as our own, protecting our brand and our information and using the resources made available by the company appropriately only for its benefit.

There is no such thing as Half Committed, you are either committed or you are not.

3. Application

This Code of Conduct is mandatory for all Employees.

4. Business Conduct

4.1 Employee Relations

Tortuga Produtos de Borracha relates to its employees, following the basic criteria below:

Complying with Brazilian legislation, in all areas of Public and Private Law;

Not tolerating influence in the work environment or outside it, factors from the personal lives of our employees, or vice-versa;

Requiring and respecting compliance with the rules established internally (procedures, Work Instructions, Internal Policies);

Personal relationships are not considered as a factor in decisions regarding the development of any employee's professional career;

Considers hiring relatives as long as they are evaluated and compete for job opportunities on equal terms with other candidates, and this process must be submitted to the approval of the Company's Management. However, direct or even indirect subordination between individuals who have any degree of kinship will not be permitted;

It values the privacy of the data of its individuals and is committed to protecting them, in accordance with the General Data Protection Law, No. 13,709/2018.

Tortuga maintains agreements with learning institutions, aiming to combat child labor and develop young people based on the values of its business and its culture.

Tortuga is also committed to ensuring that all forms of modern slavery, including forced labor and human trafficking, are excluded from its business.

To meet the needs of activities and labor outside its core business, the company relies on partner suppliers, thus helping to achieve its objectives and goals. In order to combat slave labor, the company requires the presentation of legal documentation from outsourced employees, as well as proof of social obligations (Registration Form, OHC, Social Charges, etc.).

4.2 Occupational Health and Safety

Tortuga Produtos de Borracha considers issues related to Occupational Health and Safety to be of utmost importance. The health and physical integrity of its employees are priorities for the Company. It does not allow undue exposure of any employee in order to achieve production goals or economic results.

The Company provides any and all resources (PPE and EPC) necessary to protect employees, with due quality and compliance with standards.

Tortuga requires its Occupational Safety team to ensure the correct use and application of these resources through training and guidance for employees, and may also punish non-compliance with standards, improper use, or non-use of the resources discussed herein.

Commitment to **NR 01 (General Provisions and Occupational Risk Management)** Tortuga is committed to complying with NR 01 (General Provisions and Occupational Risk Management), including its key points:

- Occupational Risk Management (GRO);
- Risk Management Program (PGR);
- Responsibilities of employers and employees;
- Capacity building and training.

4.3 Protection of Company Assets

The Company's Assets are all assets (tangible and intangible) owned by Tortuga Produtos de Borracha, such as:

Technical Collection	Technical Knowledge
Business Strategies	Customer Data
Supplier Data	Financial Assets
Documents	Technical Manuals
Real Estate	Tools
Computers	Software
Passwords	Furniture
Machinery	Raw Materials
Parts	Stocks - Processed
Mobile Phones	Stocks - Semi-processed
Automobiles	Among others

All employees and third parties are responsible for the care and safeguarding of these assets, and any misconduct when the aforementioned assets are altered without the knowledge and consent of the Company will be subject to civil and criminal punishment.

In addition to the above, any damage or damage caused to the Company's assets will be reimbursed by the responsible party or parties, once negligence, incompetence, misuse or recklessness is proven.

The Company has a Fire Brigade, composed of employees trained and qualified to act in emergency situations.

Any situation that represents an imminent threat or risk to employees, third parties and/or the company's assets must be immediately reported to the Emergency Brigade.

4.4 HR Benefits and Policies

a. Medical Assistance

The Company grants its direct employees the option of participating in a group Health Plan.

The Plan is extended to dependents (spouses and children) and co-participation is only for consultations and exams.

Children will remain in the plan until they are 18 years old.

b. Own Dental Care

The company offers its employees exclusive dental care at no cost, except for cases involving prosthetics.

To enjoy this benefit, employees cannot be on a trial period and must wait in line for care.

c. Own Restaurant

The company provides its employees with a restaurant managed by a renowned supplier in the market, with balanced meals supervised by nutritionists. Breakfast, lunch, dinner and supper are served, with a minimum legal discount for the employee.

It is strictly forbidden to leave the restaurant with food, for hygiene and health reasons.

d. Parking

The company provides parking to all its employees, whether for cars, motorcycles or bicycles.

To access the parking lot, employees must register their vehicle with HR and leave the identification provided by the company on the rearview mirror of the vehicle so that the data can be verified.

Periodically, re-registrations are carried out, when changes occur in identification. Therefore, always keep vehicle data up to date, as access is not permitted without updated identification.

Note: This benefit is not available to those who use the transport voucher.

A second copy of identification has a cost.

e. Food Voucher

The company provides its employees with a meal voucher every month. The voucher is credited electronically on a magnetic card. In addition to this amount, the employee may receive a bonus, provided that he or she is not in a trial period and meets the conditions for granting the voucher, as specified in the Collective Bargaining Agreement (CBA) between the union and the company. Furthermore, the company may deduct up to 5% (five percent) of the fixed amount credited from the employee's payroll.

The improper use of this benefit, as well as its informal trading, are considered a serious offense.

f. Transportation Voucher

The provision of the Transportation Voucher by the Company is carried out in accordance with Brazilian labor law regulations, therefore, it is important to emphasize that this benefit is intended for those who really need it and/or choose to receive it solely for their home/work, work/home commute. Therefore, neglecting to provide information, engaging in informal trade, as well as making improper use of the benefit constitutes a serious offense and is severely prohibited and punished by the company.

New requests for Transport Vouchers must be made by the 20th of each month, for credit in the following month.

g. Pharmacy Agreement

The agreement is intended for purchases of medicines using a card and upon presentation of a medical prescription, the consumption will be debited from the payroll. The inclusion of the benefit will only be carried out after the employee has been approved during the trial period.

h. Life insurance

Tortuga maintains a group life and personal accident insurance policy, 50% subsidized by the company and 50% by the employee.

i. Medical Emergencies

The company has an emergency service, which can be called upon in any medical situation that occurs during working hours.

j. Workers' Medical Service

Tortuga maintains an Outpatient Clinic staffed by an Occupational Health Nurse to assist employees.

k. Badge

It is mandatory to present your badge at the reception, as it is the key to access the company and the restaurant. The badge is also used to record working hours. If you forget your badge, notify the doormen and fill out a document, as well as notify your immediate superior.

If the document is lost, HR must be notified immediately.

It is not permitted to lend the badge to a colleague, as this is considered a serious offense.

There is a fee for issuing a second copy of the badge.

l. Working Hours

Working hours must be completed and recorded correctly.

l.1 If you leave during working hours, you must obtain **exit authorization** from your immediate superior and register your time.

l.2 In the event of a delay, it is necessary to sign the document at the reception and register the point duly.

l.3 Overtime is not authorized. Exceptions will only occur with prior authorization from Management.

l.4 In case of absence due to illness, you must inform your immediate manager, notify HR/Nursing Assistant via WhatsApp and deliver the original document to HR within 24 hours of the document being issued. Certificates must be validated by the Company doctor.

l.5 The time card must be signed electronically and monthly, as authorized by HR.

m. Cell phones

For internal security reasons, the entry and use of cell phones in the factory area is not permitted.

n. Anti-Smoking Law

In accordance with Federal Law 9,294/1996, which restricts the use of cigarettes in closed, private or public spaces throughout the country, we emphasize that the use of cigarettes, cigarillos, cigars, pipes or any other smoking product, whether or not derived from tobacco, is prohibited on company premises, understanding that the workplace must be a healthy environment and free of products that cause physical and/or psychological dependence.

o. Corporate etiquette and posture

o.1 Dress code rules

The employee is responsible for building his/her professional image, as well as representing the Company externally. Therefore, the values of the Company and the employee must be preserved, demonstrating seriousness, commitment, formality and discretion.

o.2 Moral and sexual harassment

Tortuga values respect in personal relationships and considers any inappropriate behavior that amounts to moral or sexual harassment to be unacceptable. Insulting, offending, attacking, being rude or using vulgar language in face-to-face relationships, via email and/or over the phone are considered intolerable behaviors.

o.3 Political and Electoral Harassment

Political and electoral harassment in the workplace occurs when employers or managers attempt to coerce, intimidate, or influence the voting choices and political freedom of expression of their employees. Tortuga declares itself institutionally neutral. The organization respects the plurality of ideas and the individual right of choice. The use of company resources (emails, systems, meetings, and others) for partisan propaganda is strictly prohibited. Healthy debate is allowed during breaks; however, the imposition of ideas from a superior to a subordinate is strictly forbidden. Furthermore, our Whistleblowing Channel is available to receive reports related to various situations, including coercion.

o.4 Policy against racism and other forms of discrimination

Tortuga values cultural diversity and rejects any form of discrimination, whether based on origin, race, color, religious belief, gender, age, marital status, economic status, disability or sexual orientation. Everyone must be treated equally and with respect, regardless of position or role.

o.5 Use of alcohol, drugs, weapons.

Tortuga encourages respect for others, physical, mental, intellectual and emotional balance among its employees, as well as safety in the workplace. Therefore, it is not permitted to use or be under the influence of alcoholic beverages or any toxic substance during working hours, nor to carry them on company premises. The same applies to possession of any type of weapon or similar objects.

o.6 Posture on social networks

The employee is responsible for protecting the good image, good name and good reputation of the Company, as well as that of the colleagues who work there. Therefore, posts on social media with content that disqualifies, embarrasses or offends the Company and/or any person linked to it will be rejected.

4.5 Freedom of Association / Relations with Trade Unions

Tortuga recognizes the legitimacy of unions and respects the right of employees to join any legitimate organization that complies with current legislation.

In these terms, the Company is committed to seeking solutions that meet the needs of the parties involved in the employment relationship, through dialogue, in any situation and, with prior and formal authorization from the Company, allows union representatives to remain on the Company's premises.

5. Worker Behavior

5.1 Introduction

Its employees are required to conduct themselves in an exemplary and honest manner, within the ethical standards universally accepted by the Company.

The Company will deal with all procedures and facts involving suspicions of fraud, theft, robbery, misappropriation, violation of intellectual property, unfair competition, illegal acts or criminal offenses, as well as all acts that deviate from internal procedures and this Code of Conduct, with the utmost rigor and in a legal manner.

5.2 Duties

It is the duty of all Employees to use their working hours solely for the benefit of the Company, that is, to comply with their Employment Contract.

The Company will not allow its Employees to have other professional activities that compete directly or indirectly with the products and services offered by Tortuga Produtos de Borracha.

The Company considers it a serious offense to disclose internal information, as well as facts or data relating to employees, directors, customers, suppliers, and government agencies, as they must be treated with absolute discretion and total confidentiality.

5.3 Everyone's responsibility

Tortuga Produtos de Borracha, always aiming to increase its efficiency, expects everyone to understand and comply with the provisions below:

1. Actively cooperate so that the Company reaches a level of excellence in terms of people's health and well-being, the quality of the work environment, cleanliness, hygiene and safety, mainly;

2. To sustain Tortuga Produtos de Borracha's commitment to its market, with regard to the quality of its products, the reliability of its services, the accuracy of the information provided and the fulfillment of the obligations assumed;
3. Notify your superior of any irregularity of which you are aware; report specific facts that may harm the Company's assets or image;
4. Refuse to grant irregular benefits or favors to third parties and reject advantages offered to them by those interested in establishing an institutional relationship with Tortuga Produtos de Borracha, demonstrating the intention of obtaining some commercial or financial favor;
5. Protect the confidentiality of commercial information, conducting negotiations in an impersonal, organized, fair and transparent manner;
6. Protect the Organization's intellectual and industrial property on products, processes, brands, patents and related rights, in accordance with current legislation;
7. Disclose, exploit or use, without authorization, knowledge, information or confidential data of Tortuga Produtos de Borracha (industry, commerce or provision of services) to which access was had through a contractual relationship, even after the end of the contract;
8. Comply with and comply with current laws, contracts, all bilaterally signed agreements, the Company's internal policies, systems and occupational safety standards established by law;
9. Take care of the materials and equipment under your responsibility and act to eliminate waste, to reduce unnecessary costs and expenses;
10. Protect our confidential information, including after the Company leaves;
11. Always preserve the Company's image;
12. Constantly seek your own professional development;
13. Comply with Company Rules and Policies.

5.4 Responsibility of Employees in Management Positions

1. Always seek to guide the best execution of its services, supporting and evaluating them with criteria and impartiality and providing them with information about their development;
2. Prevent unreal facts and false information from becoming obstacles to the normal development of the Company's activities, adopting a frank and truthful discourse, to disseminate relevant aspects regarding the Organization, without prejudice to the required confidentiality;
3. Encourage the development of initiative and creativity, in order to prevent stagnation and disinterest;
4. Actively contribute to the implementation of a culture that consolidates compliance with the Code of Conduct throughout the Company;
5. Immediately report to the Company's Management any acts and facts that may put people and the Company at risk.

5.5 Unacceptable behavior

Tortuga Rubber Products considers the following behavior to be serious:

1. Violate the Tortuga Rubber Products Code of Conduct;
2. Receiving money or other utility, or accepting a promise of payment or reward, in order to, failing to fulfill the duty of an employee, provide an advantage to competitors of Tortuga Produtos de Borracha;
3. Disclose, exploit or use, without authorization, knowledge, information or confidential data of Tortuga Produtos de Borracha (industry, commerce or provision of services) to which access was gained through a contractual relationship, even after the end of the contract, excluding those that are public knowledge or that are evident to a technician in the subject;
4. Belonging to the corporate structure of a firm whose scope is to operate in the same market segment as our Organization, constituting unfair competition;
5. Act as a third-party attorney for the Company, or provide services to entities contracted by Tortuga Produtos de Borracha;
6. Make public information about our customers, such as registration data, prices, payment terms and ongoing negotiations, unless formally authorized by them;
7. Promote partisan political activity in the workplace that involves any resource from Tortuga Produtos de Borracha, as well as support or engage in electoral campaigns, using the name, structure and prestige of the Company;
8. Practice within the Company, piracy of software, music, or any intellectual property, whether for your own use or that of third parties;
9. Using e-mail for matters not related to work, putting information security at risk;
10. Internally practice the trade of any product or service.
11. The dissemination of messages not related to work, especially those containing illegal, racist, religious, political and pornographic content, from a computer or notebook owned by the Company is prohibited;
12. Taking advantage of the position to obtain advantages for oneself, or family members, with commercial banks, financial institutions, factors and similar entities, which transact with Tortuga Produtos de Borracha;
13. Taking advantage of your position, using your influence to obtain an advantage for yourself or others in selection processes for positions in other organizations, as well as obtaining favors or other benefits;
14. Use, for your own benefit or that of third parties, goods, services or credits from Tortuga Produtos de Borracha;
15. Use information that you are aware of, due to the performance of your duties, for your own benefit, such as commercial opportunities, to promote yourself before other coworkers or people outside the Company;

Failure to comply with the Standards, Work Instructions and Policies established by the Company.

5.6 Favors / Gifts / Courtesies

Receiving gifts or favors from suppliers and customers is prohibited.

6. Resources granted for the performance of work.

6.1 Vehicles

For leased vehicles, the driver will be responsible for carrying out periodic maintenance within the timeframes or mileages established by the rental company, and will be responsible for any penalties applied by the latter for failure to do so.

As a rule, the company authorizes the rental company to provide popular basic model vehicles with a 1.0 engine power. However, when traveling, if necessary, Managers may request higher categories offered by the rental companies, with due approval from their respective management.

6.2 Portable Micro Computers

Employees who use this equipment must return it when requested by the company in perfect physical and usable condition. It is strictly forbidden to make any changes to its configuration from when it was delivered.

It is important to emphasize that it must be used exclusively during working hours.

Material and operational damage to the equipment will be subject to due compensation by the responsible employee.

The transfer of this equipment to third parties, even for a period of time, is strictly prohibited.

6.3 Cell Phone

Employees who use this equipment must return it when requested by the Company in perfect physical and usable condition. It is strictly forbidden to make any changes to its configuration from when it was delivered.

It is important to emphasize that it must be used exclusively during working hours.

Material and operational damage to the equipment will be subject to due compensation by the responsible employee.

The transfer of this equipment to third parties, even for a period of time, is strictly prohibited.

6.4 General Observation

Violation of any of the rules set forth in this chapter will subject the person responsible to severe punishment, which may constitute serious misconduct resulting in dismissal for just cause.

7. Relationship with print/electronic media.

Only people determined by the Company's Management are able to speak on behalf of Tortuga Produtos de Borracha and make comments about it to the press, in general.

8. Code of Conduct Administration

8.1 Management commitment

Managers, especially due to the dedication of their working time, their presence, their experience and, above all, their example, are directly responsible for the entire process of maintenance,

communication, monitoring, auditing, compliance and application of penalties provided for in the violation of this Code and will be regularly evaluated for this.

8.2 Failure to comply with the Code of Conduct

Violation of any provision of the Code of Conduct will be treated as a matter of extreme seriousness, as will any violation of the Procedures and Work Instructions. or Administrative rules.

Therefore, the offending employee will be subject to administrative sanctions, which may result in dismissal for Just Cause.

An employee who becomes aware of a violation (non-compliance) of any aspect of this Code by third parties must bring this fact to the attention of his/her immediate superior, who will then inform the Company's Human Resources Department.

8.3 Distribution and dissemination

All Employees must receive a copy of this document or be notified of its contents through electronic channels (Website/Employee Portal) acknowledging receipt in a protocol of agreement. This code will be available on the Company's official website: www.tortugaonline.com.br, providing everyone with access to the content.

8.4 Claim of ignorance (Impossibility)

After the wide dissemination and distribution of this code, as well as its updates, Tortuga Produtos de Borracha will not consent to or accept any claim of lack of knowledge of the content of this document on the part of the Worker.

8.5 Validity

This code of conduct is valid for an indefinite period,

8.6 Update

Whenever the Company's Management deems it necessary, updates to this code will be published through communications indicating the subject and content of the change or inclusion, and will also be made available on the Company's official website.

Term of Knowledge and Receipt

I, _____, on the date of ____/____/____, I declare that I have received a copy of the Code of Conduct and that I am aware of its content and the responsibilities assigned to me, committing myself to ensuring compliance with them.

This document is available on the company's website www.tortugaonline.com.br as well as individually disclosed and available on the employee's dashboard at the following electronic address: platform.senior.com.br (seniorX platform). Therefore, considering the broad and general dissemination and especially for environmental reasons, all direct and indirect employees are aware of the content of this document.

Signature - Employee