

## CODE OF ETHICS AND CONDUCT – ASeB

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### I. Message from the CEO

The Code of Ethics and Conduct of **AEROPORTOS DO SUDESTE DO BRASIL SA** (“**ASeB**”), a Zurich Airport Brasil company, is a guide to the principles, values and guidelines that reflect our way of working, our way of being and reinforce our commitment to ethics, honesty, responsibility and respect that we must have in all our daily relationships.

We believe that the commitment of each one of us to the content of this Code is essential so that we have a strong organizational culture, after all, we are all responsible for building a successful trajectory for our airports, based on trust, ethics and respect.

Thank you for your commitment!

**Ricardo Gesse – CEO of the Aeroportos do Sudeste do Brasil S.A.**

### II. Purpose and Objective

**ASeB** 's activities are carried out in compliance with legal regulations and the internal instructions and guidelines of the company, the shareholder and in particular the **ASeB** Code of Ethics and Conduct. All measures, information, risk assessments and controls are coordinated and duly guaranteed. Compliance is a concept that we live and promote at all hierarchical levels. Aligning the conduct of employees, administrators, shareholders, as well as customers and business partners and in the best interests of the Company, obeying internal laws and rules, is one of the premises of the Code.

This Code of Ethics and Conduct is part of all **ASeB** employment contracts and does not present a complete guide to all of the Company's guidelines and policies.

All employees, administrators, customers and business partners must know and comply with all the Concessionaire's guidelines and policies that are related to their work, their role, their duties and contractual obligations. They must understand that any infraction, non-compliance or intentional violation of the provisions or intent of this Code, or any other Company policy, law, commercial principle or guideline will give rise to disciplinary action by **ASeB**, and may even result in termination of employment. work or contracts.

### III. Coverage

All employees, interns, apprentices, administrators, advisors and shareholders (“Employees”), as well as customers, business partners, direct and indirect suppliers, service providers of **ASeB** (“Third Parties”) must follow the established principles and standards in this Code, in the interactions they maintain with each other, with the market and with society.

The “Receipt and Commitment Agreement - **ASeB** Compliance Program” (Annex I) is an integral part of this Code, which must be signed by all Employees and Third Parties annually.

## IV. Fundamental principles

### 1. Compliance with Legislation, Bylaws, Policies and Governance Rules

**ASeB** defends unconditional compliance with current legislation and ensures strict compliance in all its businesses and activities, creating governance policies and rules to assist and guide its Employees and Third Parties in everyday corporate relations.

For the purposes of this Code, the term “legislation” must be defined as any and all national or international legislation applicable to **ASeB** and no Employee will be exempt from complying with it on the grounds of not knowing the law. Therefore, in case of any doubts, the Legal Department should be consulted.

Therefore, each Employee and Third Party is responsible for knowing and complying with legislation, other policies and governance rules, as well as ensuring compliance with the principles and standards of conduct established in this Code.

### 2. Responsibility to People

#### 2.1. Intolerance to any type of Harassment and/or Threats

**ASeB** respects the personal dignity of each individual, and it is absolutely prohibited any and all types of unethical conduct, outside or inside your work environment, including, but not limited to, but not limited to acts of power, abuse, moral, sexual or verbal harassment, microaggressions, as well as any other behavior that is considered offensive, humiliating, intimidating or what represent threat The life or The integrity physics and moral of people.

#### 2.2. Diversity and Inclusion

**ASeB** believes in the strength of diversity and, more than that, proactively defends the inclusion of all people, seeking to promote a healthy, happy work environment, free from any and all forms of discrimination, treating people equally and encouraging overcoming. of all unconscious biases.

No form of discrimination is tolerated, whether based on race, color, origin, physical characteristics, social class, nationality, disability or physical or mental limitation, gender, sexual or religious orientation, family responsibilities, marital status, union membership, political ideology, age or any other condition, making it part of the company's policy to hire people with special needs.

### 2.3. Freedom of Association

The right to free association is respected, including unions, associations, professional associations, political parties or any other constituted entities, as long as it is exercised responsibly and ethically, within legal limits. The Employee may freely exercise his right to freedom of association, as long as he does not link, in any way, such activities to the name of **ASeB** and does not unreasonably affect the provision of his regular working hours.

### 2.4. Freedom of Expression and Social Media

Freedom of expression of opinions, ideas and thoughts, in its most diverse manifestations, is guaranteed, as long as it is exercised responsibly, ethically, within legal limits and without any connection to the name of **ASeB**.

The use of the **ASeB** name or brands in public, including on social media, will be permitted, as long as it is done responsibly, it is clear that it is not an official statement on behalf of **ASeB** and it does not generate any reputational risk to the image of **ASeB**, and the use of social networks to commit offenses, illicit, unethical acts or acts contrary to the conduct of this Code is prohibited.

The Communication area must be consulted in advance for statements and/or disclosures regarding any sensitive information about **ASeB**, such as its business, events and activities, taking into account the confidentiality and relevance of this information.

## 3. Responsibility to Society

**ASeB**, as a company of the Flughafen Zurich Group, has joined the United Nations Global Compact (UNGC). With this, we reinforce our commitment to corporate governance, human rights and social and environmental responsibility. Through our commercial activities, we aim to contribute to achieving sustainable development objectives.

### 3.1. Respect for Human Rights

**ASeB** respects, complies with and protects the human rights provided for in legislation and, in the same way, all its Employees and Third Parties must act, whether carrying out their activities or outside the work environment.

### 3.2. Child labor, forced labor or labor in degrading conditions

**ASeB**, as a company of the Flughafen Zurich Group, is committed to Conventions no. 138 and 182 of the International Labor Organization.

Child labor is vehemently condemned, except for the hiring of minor apprentices over the age of 14 (fourteen), in accordance with the law.

Likewise, **ASeB** does not accept any form of forced labor or in degrading conditions that are incompatible with human dignity or that, in any way, put the health and life of the worker at risk, such as exhausting working hours, debt bondage and trafficking of human beings.

### **3.3. Sustainable development**

**ASeB** believes in the sustainable development of its airports and, therefore, attitudes towards the environment have as a priority respect for nature, our neighborhood, compliance with legislation and the prevention and reduction of environmental impacts.

In this sense, the development of programs and projects is encouraged in order to obtain people's commitment, improve processes and apply “green” technologies aimed at sustainable development. We adopt practices that optimize the use of electricity and water, in addition to taking the necessary precautions to manage solid waste, aiming to reduce environmental pollution.

It is essential that Employees avoid wasting energy, water and paper, properly disposing of the waste produced in their work environment.

**ASeB** is aware of the impact that our activities have on the environment. To achieve this, we take measures to reduce the harmful effects of our activities on air, water and biodiversity, work to reduce overall resource consumption, strengthen the circular economy and avoid waste. We take measures to reduce noise and its effects.

Our goal is to reduce our greenhouse gas emissions to reach net zero by 2040 and promote green technologies. Human rights.

### **3.4. Risk Management, Security and Quality of Services**

Through risk management in accordance with the Flughafen Zürich Group's risk management system, we guarantee the administration of the Concessionaire successfully and in a manner adapted to the risks involved.

We implement national and international aviation security requirements across the group.

We live by the “Safety First” principle and promote an active safety culture that ensures operational safety (Safety) at our airports.

To this end, we train our employees in a targeted manner and seek continuous improvement, using relevant regulations in the area as a reference.

Continuous improvement in the quality of services offered to its passengers and customers is one of ASeB's pillars, which is why it invests in permanent innovation, choosing the best partners and constantly improving its processes, aiming to provide maximum safety, quality and efficiency.

### 3.5. Fire safety and evacuation

As an operator of a high-frequency site, we pay special attention to fire protection and evacuation. We consistently comply with local fire protection and evacuation regulations and, if necessary, issue additional, case-appropriate internal guidelines.

## 4. Responsibility to the Market

### 4.1. Government Relations

Interactions with public agents and government bodies must be based on the highest standards of ethics and integrity, always observing the principles and norms established in this Code and other documents that make up the **ASeB** Governance Program.

All people who act on behalf of **ASeB** must observe the ethical guidelines established in this Code in their relationships and communications with public bodies in general and with authorities at all levels of government.

Meetings with government agents must be held by at least 2 (two) employees, with open doors and be recorded through meeting minutes, which must, at a minimum, indicate the participants, the agenda, the summary of the that was discussed and eventual decisions. Verbal interactions should be kept to a minimum and sent to those involved to preserve the history. The provision of information to all spheres of government must preferably be carried out in writing, through a protocol and with due guidance from the Legal Department.

It is prohibited to make contributions or statements favorable to candidates for any political position, politicians, political parties and government entities on behalf of **ASeB**.

### 4.2. Preventing and Combating Corruption

The practice of corrupt acts in all its forms is strictly prohibited. At **ASeB**, we conduct our activities in accordance with national and international legislation aimed at preventing and combating bribery and corruption, and this is how all Employees and Third Parties must act.

In this way, **ASeB** expressly prohibits any and all forms of corruption, direct or indirect, active or passive, both in the public sphere (involving the government directly or indirectly) and in the private sphere (between private companies), whether in the country in which the company is located or abroad.

Therefore, the following are expressly prohibited:

- Promising, offering, directly or indirectly, an undue advantage to a public agent, national or foreign, or a person related to them;
- Practice fraud, offer, ask for or obtain undue advantage, whether financial or otherwise, through rewards, for ASeB, for yourself or for Third Parties;
- Require or induce someone to act incorrectly or illegally in the performance of their duties;
- Finance, fund, sponsor or in any way assist in the practice of illegal acts provided for in the Anti-Corruption Law;
- Make campaign donations and/or finance politicians or parties on behalf of ASeB.

#### **4.3. Competition Defense**

ASeB's hiring and partnerships are conducted ethically and fairly, respecting the principles of free enterprise and free competition.

The use of illegal or unethical methods to obtain information about competitors is not permitted, such as obtaining other people's business secrets, inducing the disclosure of confidential information by its employees or theft of confidential information, among others.

#### **4.4. Customs Control**

Commercial transactions must comply with national and international legislation applicable to customs control, ensuring at the same time, (i) correct compliance with applicable laws and regulations (domestic and international), as well as (ii) the enjoyment of expected advantages and benefits both in international agreements/treaties or even in Brazilian legislation, in order to be efficient and competitive in the international market.

It is the duty of every Collaborator and Third Party to consult the restrictions imposed on countries, companies or legal entities before starting new business. In case of doubt, a specific consultation should be made to the Legal department.

#### **4.5. Financial and Accounting Statements**

Financial records and statements must be prepared in accordance with the accounting rules and principles set out in national and international legislation, and ASeB must maintain adequate accounting and internal control systems that are easy to understand and monitor and in accordance with the best corporate governance practices.

All financial accounts, books and records must reflect financial transactions and operations in detail. No undisclosed or unaccounted parallel recording of ASeB resources or assets may be made for any reason.

#### 4.6. Money laundry

In order to prevent the use of its activities for money laundering purposes, **ASeB** will only conduct business with clients and partners whose activities are lawful and whose funds come from legal sources. Additionally, all payments made to airports must be made through legal means.

Employees must be alert to suspicious behavior by our retailers, suppliers and business partners, and bring any irregular situation to the attention of the Compliance Department.

**ASeB** does not tolerate, under any circumstances, fraud or falsification of documents, especially with the aim of camouflaging unwanted results in the exercise of its activities or in internal and/or external audits, including results of goals or its quality programs.

### V. Standards of Conduct

#### 1. Behavior

It is the duty of all Employees and Third Parties to comply with and enforce the provisions of this Code, with managers having the additional duty to publicize and ensure compliance with this document in their respective areas of work.

**ASeB** does not allow the exercise of political activities within the work environment nor the involvement of its resources and equipment in these activities.

**ASeB** does not prohibit the free expression of religious activities, which, however, must have minimal impact on the employee's workday or work environment.

It is strictly prohibited to carry and work under the influence of alcohol and/or illegal drugs, as well as carrying weapons of any kind on **ASeB** premises.

**ASeB** provides a safe and healthy working environment, taking appropriate measures to prevent accidents and damage to health, encouraging its Employees to take responsible attitudes with regard to health and safety at work.

#### 2. Affective and Kinship Relationships

We value trust and transparency in our relationships and, for this reason, Employees must inform the Compliance area of any family relationship and/or emotional relationship within the company or another Zurich Airport Brasil company.

Hiring relatives of Employees may be considered, as long as they are evaluated and compete for job opportunities under identical conditions to other candidates, without this posing any type of advantage. If there is a kinship relationship between Employees within

**ASeB** or another Zurich Airport Brasil company, they will not be allowed to work in the same department, nor will a subordination relationship be permitted.

### 3. Conflict of Interest

**ASeB** resources and equipment must be used solely in the exercise of professional activity, so that the results expected by the company are achieved, and never for personal use or gain of any kind.

Negotiations are not permitted with companies whose employees, partners or representatives have family ties with Employees who work in a user or contracting area, or who are in a position that can directly or indirectly influence the decision-making process for their hiring, as long as they have prior authorization from the Board.

Employees may not perform any other remunerated activity, except with prior written authorization issued by the Board.

Some situations may suggest or generate a conflict between personal interests and those of **ASeB** or public bodies. We must be careful to avoid and/or deal with these situations impartially, focusing on **ASeB**'s interests. The Compliance area has the role of preventing and detecting these situations and helping to clarify any doubts on this topic.

Any conflict or potential conflict between individual interests and the interests of **ASeB** must be immediately brought to the attention of the Compliance area.

### 4. Giveaways , Gifts and Invitations

Decisions made by all those who act on behalf of **ASeB** must have the company's interests as their sole objective.

Collaborators and Third Parties must not request, accept or offer gifts, compensation or any favors or economic advantages of any nature in a value above the equivalent of R\$300.00 (three hundred reais), except promotional gifts with a logo, distributed generally as a courtesy, advertising, regular publicity or on the occasion of special events or commemorative dates.

Representatives of the public sector must be committed to the interests and well-being of society, and, therefore, must not receive gifts, invitations or other hospitality that could raise doubts as to their impartiality in managing public interests.

Therefore, it is prohibited to receive or offer gifts and hospitality to representatives of the public sector, in any sphere, with the exception of gifts of a promotional nature with a logo, distributed generally as a courtesy, advertising, regular publicity or on occasion. special events or commemorative dates.

The offering or receipt of courtesies, giveaways, gifts, gratuities, favors, trips, invitations to events (cultural, sporting, etc.) of excessive value or even discounts in personal



transactions may be perceived as undue advantage, bribery or other ways of influencing a decision, regardless of the intention of those who carried out the act.

For this reason, before offering or receiving a gift or giveaway, it is necessary to make sure that there is no excessive frequency in offering or receiving it, and that this is a symbolic gift, of a promotional nature with a logo, distributed in a generalized way as a courtesy, advertising, usual publicity, such as: pens, notebooks and the like.

Courtesies, gifts, gifts, gratuities, favors, trips, invitations that do not meet the standards above may be kindly returned or sent to the Compliance area or People Management area, which will draw them among **ASeB** Employees.

In the case of business meals carried out, expenses of up to R\$500.00 per person are authorized and if they are for legitimate purposes of the Company's business such as institutional actions as a courtesy, as well as respecting the Company's internal policies.

Invitations to domestic or international travel may only be accepted or offered if they are in a legitimate business context and travel and accommodation costs are covered by the invitee.

## 5. Company Assets

**ASeB** provides IT resources to carry out the functional duties of its Employees and/or Third Parties. Its use must be in accordance with legislation and the Information Security Policy, and other internal regulations.

Facilities, equipment, machines, materials, files and information created, received or stored in electronic systems are the property of **ASeB** and must be used by Employees and Third Parties in a responsible manner and only for the performance of their activities.

Employees should have no expectation of privacy in relation to devices and systems made available to carry out professional activities, such as the internet, telephones, emails, software, hardware and any others. **ASeB** may monitor such devices and systems whenever necessary, within the limits of the law and regardless of prior notification.

Exchange, dissemination, access, storage or any use of material with obscene, pornographic, violent, discriminatory, racist, slanderous, defamatory content or that disrespects any organization or individual is prohibited, under penalty of individual civil and criminal liability, without prejudice to the adoption appropriate disciplinary measures.

## 6. Choice of Suppliers and Partners

The choice, hiring and maintenance of Suppliers and other business partners are based on technical and quality criteria, which take into account ethical, reputational, socio-environmental and legal compliance aspects, through the use of impartial and fair evaluation processes, without privileges or discrimination of any nature.

As a rule, a request for proposals must be issued to the market to hire Suppliers, with a view to obtaining at least 3 (three) commercial proposals, in accordance with the procedure and rules established in the **ASeB** Purchasing Policy, exceptions permitted. in the aforementioned Purchasing Policy.

In accordance with the procedure of the **ASeB** Purchasing Policy, during competition and during the execution of contracts, as circumstances require, documented audits are conducted including, in particular, the verification of: corporate structure, certificates, legal proceedings, communications to press, credit quality, financial statements and other aspects relevant to the conclusion and/or maintenance of the business.

It is not permitted to negotiate directly with suppliers who have a personal connection with the **ASeB** Administrators, Zurich Airport Brasil companies or with the negotiating Employee, which may cause any personal advantage or privilege to them in the transactions.

Suppliers guarantee from now on that they fully agree with this Policy, being encouraged to improve their relationship with society and with their own employees, as well as to seek continuous improvement in productivity and processes, as a way of promoting and ensuring their competitiveness and longevity of the commercial partnership.

Audits of suppliers, business partners and service providers must be adopted as a way of verifying compliance with the terms of this Code as they apply to them.

## **7. Confidentiality**

Employees and Third Parties must respect and protect the confidentiality of information from **ASeB** and Zurich Airport Brasil companies to which they have access, regardless of whether it is classified as “confidential information”, during the period in which they maintain a relationship with the company and up to 5 ( five) years after the end of said relationship and may only be used for the purposes for which they were authorized and limited to the people involved in the project to which the information refers.

It is the Employee's obligation to maintain the confidentiality of the data and information obtained during their activities and performance of duties in the company, and their use for private purposes or transfer to third parties is prohibited.

Sensitive information cannot be exposed in any location with public access, at workstations, printers and meeting rooms, nor can it be discussed in public places such as elevators, taxis, in meetings with unions, associations and others.

## **8. Relations with the Press and Disclosure of Information**

Only the **ASeB** Board of Directors, employees authorized by it and the Communication area, as well as people authorized by them, can officially speak out on behalf of the company in relation to the press in general and other media outlets.

Any interaction/communication between employees and professionals and representatives of the press or digital content channels, partners and/or consumers is not permitted, with the exception of the Communications team and spokespersons, when properly guided and accompanied by the press office team. .

Any and all requests from media professionals (press or social networks, blogs and influencers) must be forwarded to the Communication department for analysis and response by this department.

In the event of circumstances not provided for in this Code and which involve the dissemination of information or the expression of an opinion on behalf of **ASeB**, to any external means, including social networks, prior consultation with the Communication area is necessary.

## 9. Intellectual Property

The services, products or systems developed by Collaborators and Third Parties in the exercise of their activities are the property of **ASeB**, which may be used for any purpose, whether for payment or free of charge, except in cases where there is a written agreement to the contrary between the company and the employee.

It is the duty of all Collaborators and Third Parties to safeguard **ASeB** 's business secrets, formulas, processes, brands and patents, protecting them from any incorrect, unauthorized or illegal use, and must also observe the duty of confidentiality regarding information related to intellectual property, as provided for in this Code.

## VI. Violations and Sanctions

Situations that characterize a violation or potential violation of the fundamental principles and standards of conduct provided for in this Code, or that are in disagreement with **ASeB** 's policies and procedures, as well as that violate national or international legislation must be immediately reported, in an identified manner. or anonymously, to the Compliance Department, responsible for receiving and handling such reports in a secure and confidential manner, guaranteeing the anonymity of the complainant.

It is the responsibility of each Employee to be aware of the policies and practices expressed in this Code, and it is absolutely encouraged that any and all complaints are reported to the Compliance area. The Employee's omission when aware of possible violations of this Code will also be considered unethical conduct.

The offender will be subject to disciplinary measures that include, but are not limited to, warning (verbal or written), suspension or dismissal, with or without just cause, in the case of Employees; and, termination of the contract and demand for the return of any amounts paid, in the case of Third Parties, without prejudice to the application of contractual penalties and civil and criminal liability, as applicable.

When applying disciplinary measures, the nature and severity of the infraction, recurrence and legislation will be considered.

## VII. Reporting Channel

Reports of violations of this Code may be made identified or anonymous.

The Compliance area will be responsible for receiving and handling such reports in a safe and confidential manner, guaranteeing the anonymity of the whistleblower in good faith.

**ASeB** strongly condemns any and all forms of retaliation against a whistleblower in good faith, even if the complaint proves to be unfounded or if there is any reasonable doubt about its origin.

Procedures will be observed to protect the rights of the complainant and the person being reported, always respecting the legislation in force. Complaints will be investigated independently, cautiously and in a fair and impartial manner.

Communications may be made through the following channels:

- Telephone contact or sending an email to the Compliance area;
- Reporting Channel.

## VIII. Communication and Training

The provisions of this Code and its subsequent amendments will be widely disseminated to all Employees and Third Parties, and will be available for consultation in the **ASeB** Compliance area. This Code will be part of the list of mandatory documents to be presented when hiring new Employees and hiring new Third Parties.

Annual training will be carried out to guide all Employees and Third Parties regarding the content of this Code and other **ASeB** governance policies and rules, disseminating the principles and values that represent the profile of our airports.

## IX. Term and Update

This Code will come into force from March 19<sup>th</sup>, 2024 and will be reviewed annually, although it may be amended at any time, with a view to its permanent updating and improvement.

For the purposes of any application of the guidelines contained in this Code, any doubts must be resolved by the Compliance area.

## X. Annex I – Receipt and Commitment Term - ASEB Compliance Program (Model)

I, \_\_\_\_\_, registered with the CPF under no. \_\_\_\_\_, member of the staff of **AEROPORTOS DO SUDESTE DO BRASIL SA (“ ASeB ”)**, a company that is part of **ZURICH AIRPORT BRASIL (“ ZAB ”)**, I hereby declare:

1. Have received a complete copy, read and understood the Code of Ethics and Conduct of \_\_\_\_\_ (“Code”), also available at <https://vitoria-airport.com.br/estatisticas-e-documentos> or <https://macae-airport.com/estatisticas-e-documentos>
2. Make a commitment to comply with it in all my activities in the company, as well as to be its guardian.
3. Immediately inform the Compliance area of Zurich Airport Brasil, via email [compliance@zurichairportbrasil.com](mailto:compliance@zurichairportbrasil.com), or via the Reporting Channel <https://app.denouncefy.com/portal/zurich-airport-brasil> or to my direct manager \_\_\_\_\_, if I know or suspect any attitude, behavior, practice, fact or information that does not comply with the Code.
4. Be aware that non-compliance with the principles of this Code will subject me to appropriate disciplinary sanctions, without prejudice to other legal measures.
5. Be aware that even if you deliberately fail to report violations relating to this Code of Conduct and Ethics or omit relevant information, I will also be subject to disciplinary sanctions.
6. Have participated in specific training on the Zurich Airport Brasil Compliance Program.

(Digital Signed Document)

Contributor)