



CODE OF CONDUCT





INTRODUCTION

We are all responsible for the image and reputation of PETTENATI S.A., which is why we must act with integrity.

The Code of Conduct establishes the values, guidelines, and standards of behavior that guide business decisions and the conduct of all managers and employees of PETTENATI S.A. at all levels, without exception.

This Code should also serve as a reference for business partners such as suppliers, service providers, and sales representatives, among others.

This document also provides guidelines for complying with the Global Integrity Policy (Compliance), which includes all applicable laws and regulations against bribery and corruption.

However, it is understood that ethical situations may arise that are not covered by this code.

Therefore, in case of doubts about interpretation or situations not addressed in this manual, seek guidance and support from the areas responsible for conduct and integrity matters.

Pettenati provides a whistleblowing channel that is accessible to both internal and external parties to report situations that conflict with the guidelines of this Code of Conduct, as well as other matters related to corporate Compliance. To access the channel, visit <https://portal.contatoseguro.com.br>.

Reports can be made anonymously, and confidentiality is guaranteed in handling the matter. All credible reports, meaning those that contain information enabling the understanding and resolution of the issue, are investigated and followed up with the whistleblower. We are committed to ensuring that no whistleblower faces retaliation for reporting matters in good faith.

We count on your cooperation to maintain a work environment aligned with our values.

Message from Management

This Code of Conduct aims to guide professionals and various stakeholders interacting with PETTENATI S.A. in their daily activities, decision-making, relationships, and behaviors.

This version reflects the company's guidelines regarding integrity standards, Compliance, and adherence to relevant legislation in Brazil.

We are confident that each of our professionals and business partners will implement PETTENATI S.A.'s standards of Conduct and Integrity, always upholding our values and guidelines.

PETTENATI S.A.'s Code of Conduct is based on clear principles of good Governance and is rooted in practices that are well-known to all.

Please read it carefully, and if you have any doubts, contact your unit's Human Resources department or use the whistleblowing channels provided at the end of this document.

We count on everyone's support to make this happen.

Ricardo Pettenati



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1. CORPORATE PHILOSOPHY

The conduct standards are strongly aligned with the Vision and Values defined by the company. The Mission, Vision, and Values of PETTENATI S.A. were recently revised collaboratively by professionals, managers, and representatives of other stakeholders.

These Values are fundamental to the success of PETTENATI S.A.'s business and are based on respect for and appreciation of people.

Mission: To provide innovative and sustainable textile solutions for the success of our clients and a better world.

Vision: To be the best textile solution in the Americas. A reference in environmental care. Recognized and desired by its professionals, clients, suppliers, and other stakeholders

Purpose: Innovation with soul, quality with passion, dressing the future with responsibility.

Values: Respect, impartiality, integrity, responsibility, and cooperation.

Principles:

We love Fashion

We seek quality in everything we do

The customer is our greatest commitment

We work with energy and commitment

We thrive by transforming and innovating

We form people of value

Together, we are greater and better

We care because we love and respect

2. SCOPE

This Code of Conduct applies to all individuals connected to Pettenati S.A., including all shareholders, associations, professional entities, clients, the community, employees, suppliers and service providers, Municipal, State, and Federal governments, and regulatory bodies for media and communication.

3. RELATIONSHIPS

3.1 Relationships with Professionals

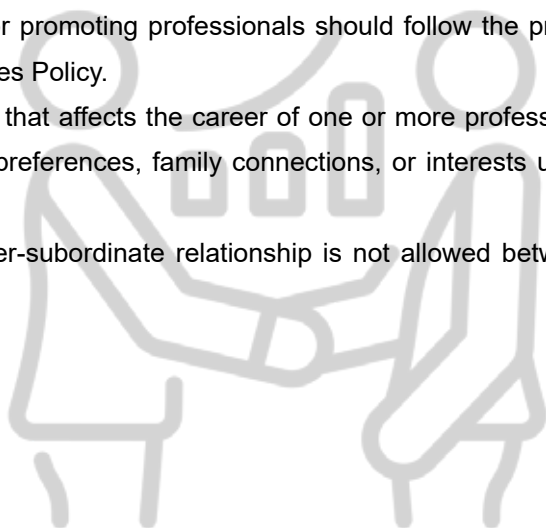
The relationship between Pettenati S.A. and its professionals must be based on a sense of fairness, motivation, mutual respect, and appreciation for the individual, transparency, and shared responsibilities.

The company must offer equal growth opportunities to all professionals, rejecting any form of discrimination.

Hiring and/or promoting professionals should follow the procedures outlined in the Human Resources Policy.

No decision that affects the career of one or more professionals may be made based on personal preferences, family connections, or interests unrelated to Pettenati S.A.

The manager-subordinate relationship is not allowed between individuals with family ties.





3.2 Harassment

The company does not tolerate any form of moral or sexual harassment against any professional. Moral harassment is characterized by the abuse of power, disqualifying, belittling, or humiliating another person.

Sexual harassment is characterized by someone making a sexual proposition to another person, denying them the ability to refuse through intimidation, blackmail, or other coercive means.

3.3 Resources and Care for Property

Pettenati S.A.'s facilities, equipment, machines, materials, and information must be used by professionals solely for work-related purposes in accordance with company guidelines.

Professionals must request written permission before using these assets for projects or purposes unrelated to the company or personal reasons.

All files and information created, received, or stored on Pettenati S.A.'s computers and servers, including mobile devices, are considered company property. For this reason, Pettenati S.A. may monitor any information transmitted or stored on these devices.

The proper use of the company's computational resources is detailed in the Information Security Policy.

Managers, representatives, and professionals of Pettenati S.A. must not offer, accept, request, or promise any economic advantage of any kind that could be related to any type of negotiation within the context of Pettenati S.A., except for small-value items classified as gifts, which should be occasional and not luxurious or extravagant, and must be forwarded to the Human Resources department in accordance with the current policy.



3.4 Managerial Responsibilities


It is the responsibility of the Board Members, Officers, Managers, Coordinators, Supervisors, and other employees with management responsibilities at Pettenati S.A., as well as their institutional representatives, in the performance of their duties, to:

- Lead by example, adopting attitudes and behaviors consistent with Pettenati S.A.'s Values;
- Promote and commit to ethical conduct, including impartial treatment in situations that may present personal and professional conflicts of interest, whether actual or potential;
- Take all necessary measures to protect the confidentiality of restricted information about the company, including market, technological, and securities-related information;
- Avoid conflicts of interest by communicating to the Conduct and Ethics Committee any relationships or transactions that may potentially involve such situations or any violation of the guidelines in this Code;
- Support and ensure compliance with all rules and procedures of integrity within the organization;
- Ensure the observance of this Code of Conduct and communicate its content to the professionals in their team.

3.5 Relationships with Business Partners

Business partners, primarily suppliers, service providers, sales representatives, financial institutions, distributors, and resellers, play an important and strategic role for Pettenati S.A.

Long-term relationships must be built with clear rules based on mutual trust and commitment through shared learning and experiences, promoting practices that lead to mutual success.



The business partners of Pettenati S.A. must have their rights respected and preserved, as well as fulfill the contractual obligations established by mutual agreement between the parties involved.

Business partners of Pettenati S.A. are required to fully comply with all provisions of this Code of Conduct, as well as the specific requirements outlined in the Supplier Code of Conduct, available at <https://www.pettenati.com.br>.

The supply of products or services by companies whose professionals, partners, or representatives have family ties with managers of Pettenati S.A. who work in user or contracting areas, or who are in positions that may directly influence decision-making, is not allowed.

Any situation that deviates from the above guidelines must be immediately reported by the professional to the Conduct and Ethics Committee.


3.6 Relationships with Investors

The relationship with investors must be based on transparency and trust in the information provided through clear, prompt, and objective communication. Information about business, financial results, the market, and other matters must only be provided by authorized individuals in accordance with Pettenati S.A.'s Information Disclosure Policy and specific regulations from the Brazilian Securities and Exchange Commission (CVM). Professionals are not permitted to advise on the buying or selling of shares or use non-public information to influence, positively or negatively, the stock price in the market.

3.7 Relationships with the Environment

Our approach to the environment prioritizes respect for nature, the prevention and reduction of environmental impacts through actions and the commitment of people, process improvements, and the application of appropriate technologies aimed at sustainable development.

We are committed to social and environmental responsibility and strive to align our strategies with the principles of the Global Compact.



We conduct rigorous monitoring and external audits annually, which ensure transparency and contribute to improving the company's practices and performance.

These measures ensure that we are acting responsibly and sustainably in all our operations. Additionally, we are proud to say that we have a supply chain of partners equally committed to social and environmental responsibility, aligned with our values and purposes.

3.8 Relationships with the Community

Pettenati S.A. is committed to contributing to the development of the communities in which it operates. The company is focused on identifying opportunities for corporate social responsibility activities within its communities, aligned with the value of Sustainability. In Brazil, Pettenati S.A.'s social responsibility is carried out through the "Tia Fran" Early Childhood Education School, whose mission is the holistic development of its students, who are the children of the company's employees. Community practices should not be adopted if they benefit the personal interests of Pettenati S.A.'s managers or professionals, or politicians to the detriment of institutional interests or practices that do not strictly adhere to legal principles.

3.9 Relationships with Clients

Customer satisfaction is the reason for Pettenati S.A.'s success. Efforts should be directed towards identifying what is perceived as valuable by customers, establishing actions that can transform these values into profitable, mutually beneficial outcomes, supported by secure, long-term relationships. Professionals, at any hierarchical level, are free to engage with clients if approached. However, any client-related information must be forwarded to the appropriate department for processing. Promptness and agility in responding to clients are fundamental to Pettenati S.A.'s image, and it is the responsibility of professionals to answer all client inquiries and clarify the company's policies with transparency and respect.



3.10 Relationships with Competitors

Pettenati S.A.'s relationship with competitors must be based on respect. Competition must be viewed as healthy and a source of reference for new challenges, fostering continuous improvement and innovation. Except within the context of industry associations, engaging with individuals affiliated with competitors on any matter that could impact the interests of Pettenati S.A. is not permitted. Pettenati S.A. will not enter into formal or informal agreements with its competitors regarding price manipulation, participation in public tenders, or product allocation. In dealings with competitors, all anti-corruption laws and other laws protecting free competition will be observed. Pettenati S.A.'s professionals must not obtain or use confidential information from competitors that has not been made publicly available. Similarly, the transmission of any company information to competitors is prohibited.

3.11 Relationships with the Press and Information Disclosure

Pettenati S.A.'s relationship with the press must be based on the commitment to provide consistent and transparent information, respecting ethical principles, current legislation, and the specific regulations of the Brazilian Securities and Exchange Commission (CVM).

Public statements and communications to the press must only be made by individuals expressly authorized by the company.

Pettenati S.A.'s professionals at any hierarchical level must not use confidential and/or privileged information that may influence investment decisions or generate undue advantages. Such information must not be disclosed to third parties, even if they are family members or close friends. Any disclosure of information involving material acts and facts, as well as the maintenance of confidentiality regarding undisclosed information, must be handled by Management.



3.12 Relationships with Non-Profit Entities

Pettenati S.A.'s relationship with non-profit entities must be guided by professionalism, safeguarding the company's interests and commitments respectfully and legally. Pettenati S.A. must respect its professionals' right to freely associate with these entities, ensuring that there is no form of discrimination. The conduct of professionals representing the company with these entities must strictly follow the principles defined in this code.

3.13 Political Activities

The company may publicly express its position on topics of interest, represented by designated managers for this purpose, and may also support positions of industry associations that represent it.

There should be no restriction on employees' political party activities, but they must always act in a personal capacity and in a way that does not interfere with their professional responsibilities. Such activities must not occur in the workplace nor involve the company's resources, materials, or equipment.

Employees must also not wear company uniforms or any company identification when engaging in political activities. All professionals, including third parties representing or potentially representing Pettenati S.A. in these activities, must equally observe this Code of Conduct, as well as other company policies and applicable laws.

3.14 Relationships with Government and Public Bodies

Pettenati S.A.'s relationship with authorities, public agents, and politicians must be based on respect for the applicable legislation and the ethical principles established in this Code. Professionals representing Pettenati S.A. in dealings with these institutions must not offer, accept, request, or promise gifts or economic advantages of any kind in exchange for improper, personal, or company-related benefits. Contracts and tenders with public authorities must follow applicable legislation and the guidelines of this Code of Conduct. Any relationship or transaction that could imply the potential existence of conflict-of-interest situations must be immediately reported to the company's management or the Conduct and Ethics Committee.

4. DONATIONS, CONTRIBUTIONS, AND SPONSORSHIPS

Pettenati S.A. may make donations, contributions, and sponsorships to public or private institutions supporting projects and events aligned with the company's values and objectives.

Support for political candidates or parties within the country is strictly prohibited under any circumstances. These donations, contributions, and sponsorships must be made transparently, based on a written contract, for a legal purpose, appropriately compensating the offered support, and in full compliance with applicable legislation.

It is not permitted to offer, accept, request, or promise gifts or economic advantages of any kind in exchange for private benefits or those that are incompatible with the company's values or could harm its reputation.

Pettenati S.A. does not make donations, contributions, or sponsorships to candidates or political parties. Any situation that raises doubts about its correctness or integrity must be submitted for review to the management before being implemented.

5. PREVENTING MONEY LAUNDERING AND FIGHTING CORRUPTION

Pettenati S.A. is committed to following the principles of anti-corruption and anti-money laundering legislation in the markets where it operates, promoting a culture of transparency and anti-corruption.


To achieve this, unusual financial transactions that could lead to corrupt practices, money laundering, or in any way harm national or foreign public assets must not be tolerated. Therefore, through investment in compliance programs and tools, including the application of training on respecting the law, Pettenati S.A. seeks to ensure compliance with the relevant legal precepts.

6. COMMUNICATION CHANNELS

The Communication Channels are responsible for safeguarding and updating this Code, promoting its disclosure, and disseminating appropriate conduct standards for Pettenati S.A. They are also responsible for guiding those with questions about the application of this Code, as well as investigating and making decisions when violations of its principles are identified.

Pettenati S.A. provides an exclusive channel for reporting violations, which must be used responsibly and seriously. Access the reporting channel at <https://portal.contatoseguro.com.br>.

Through this channel, you can report situations of non-compliance with the Code of Conduct and established compliance practices, violations of the company's laws and values, such as fraud, harassment, discrimination, and misappropriation of resources. It operates 24/7 and is managed by the Conduct and Ethics Committee, ensuring impartiality, security, and a total commitment to the whistleblower's confidentiality and the confidentiality of the reported matter.



However, these channels should not be used to address other issues but only for matters related to ethical conduct, integrity, and compliance. False or defamatory reports made to persecute or harm others will not be tolerated.

6.1 Conduct and Ethics Committee


The primary responsibility of this Committee is to coordinate the adoption of the guidelines in the Code of Conduct for everyone within the Pettenati context in Brazil, evaluating and responding to relevant inquiries received through the company's whistleblowing channels.

It reports to the company's management and consists of the heads of the Human Resources, Industrial Operations, Legal Advisory, and Controlling and Finance departments. Other members may be appointed by the Management.

No person involved in the situation being evaluated, directly or indirectly, is allowed to participate.

Regarding this Code of Conduct, the Conduct and Ethics Committee is responsible for:

- Converting Pettenati's principles and values into rules for acceptable and unacceptable conduct;
- Coordinating investigations of fraud or irregularities and recommending penalties (to be executed by immediate managers), ensuring fairness in the sanctions applied;
- Ensuring measures to enhance trust (both internal and external), the company's image, and reputation;
- Protecting the organization's physical and intellectual assets;
- Managing conflicts of interest;
- Overseeing activities related to the whistleblowing channels;
- Identifying opportunities to improve internal processes;

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- Safeguarding and updating the Code of Conduct, promoting its dissemination, and spreading appropriate conduct standards;
 - Guiding those with questions regarding the application of this Code;
 - Investigating and making decisions when violations of the established principles are identified;
 - Acting as a consultative and decision-making body for all matters involving the application of this Code and/or other Pettenati regulations.

7. DISCIPLINARY ACTIONS

Pettenati S.A. does not tolerate ethical violations and behaviors that are inconsistent with the guidelines of this Code.

The company encourages the initiative to voluntarily report involvement in a violation, and this action will be taken into account when determining the appropriate disciplinary action.

The Conduct and Ethics Committee has the authority to determine the application of disciplinary actions based on the severity of the violation, using the following references:

Mild cases: verbal warning;

Moderate cases: written warning;

Severe Cases: disciplinary suspension from work and even dismissal for just cause (Article 482 of the Consolidation of Labor Laws).

The penalties applied by the company do not exempt or replace any potential legal penalties for violations of norms or regulations of agencies or entities with which Pettenati S.A. engages.

8. HUMAN RIGHTS POLICY

Pettanati S.A. is committed to ensuring that basic human rights are upheld in all its operations, both in Brazil and abroad. This commitment covers the following issues:

8.1 TChild Labor: Child labor is prohibited within the legal limits of each country. Work for underage apprentices must follow the specifications for professional qualification permitted by law.


8.2 Forced Labor: Any form of worker exploitation is prohibited, such as coercion, threats, or deception to exploit a person or reduce or deprive them of their freedom, including human trafficking, servitude, forced labor, debt bondage, document retention, payment of deposits as a condition for employment, and other forms of slavery.

8.3 Health and Safety: Basic standards for a safe and healthy work environment must be followed, including potable water, sanitary facilities, applicable safety equipment, and necessary training.

8.4 Freedom of Association: Employees have the right to join unions and engage in collective bargaining through their representative bodies.

8.5 Discrimination: Any form of discrimination based on race, gender, color, ethnicity, sexual orientation, body type, nationality, religion, health, social class, political stance, or association with unions is prohibited.

8.6 Disciplinary Practices: Corporal punishment, mental or physical coercion, and verbal abuse of professionals or other stakeholders within the company premises are prohibited.



8.7 Working Hours: The maximum daily working hours, the interval between shifts, and weekly rest must be adhered to as defined by local labor legislation or collective labor agreements.

8.8 Compensation: Salaries paid must meet all the legal minimum requirements of the country or collective labor agreements.

8.9 Women's Rights: Everyone must work toward gender equity and treat women equally (equal pay, right to promotions, right to freedom of thought, right to maternity leave, etc.).

8.10 Diversity and Inclusion: Pettenati values diversity and inclusion as fundamental pillars for creating a healthy, innovative, and productive work environment. Pettenati believes that diversity in perspectives, backgrounds, and experiences strengthens our ability to meet the needs of our customers and create innovative solutions.

9. BRAZILIAN GENERAL DATA PROTECTION LAW

Pettenati complies with the guidelines and standards for the processing of personal data in accordance with the Brazilian General Data Protection Law (LGPD) - Law No. 13709/2018, aiming to ensure the protection of fundamental rights to freedom, privacy, and the free development of an individual's personality. This includes respecting principles, the rights of data subjects, and the obligations of Controllers and Processors, as well as implementing security measures.



10. FINAL CONSIDERATIONS

This Code of Conduct will be evaluated and revised, whenever necessary, by the Conduct Committee, composed of members appointed by the Board, who, among other duties, are responsible for ensuring its compliance and relevance to the business environment.

Any behavior deviating from this Code of Conduct, as well as any doubts or suggestions, must be immediately reported to the Conduct and Ethics Committee via <https://portal.contatoseguro.com.br>, the Human Resources department, or the Compliance department. Confidentiality will be maintained, and the anonymity of the informant will be preserved.



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