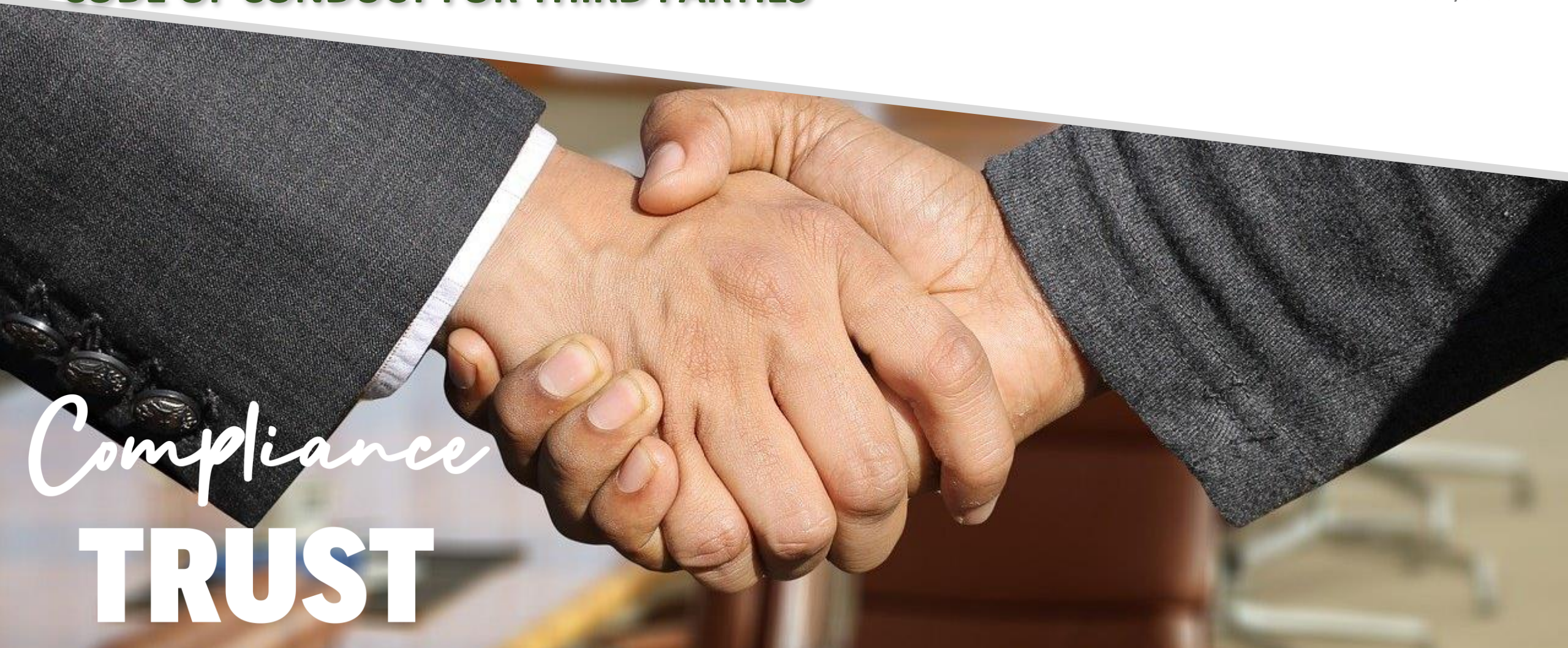


TRAINING FOR BUSINESS PARTNERS

CODE OF CONDUCT FOR THIRD PARTIES



LÍDER MUNDIAL
EM MUNIÇÕES



Compliance
TRUST

PRESENTATION

Dear Partner,

Welcome to CBC's Third-Party Code of Conduct Training. In this session, we will walk you through the key guidelines that all our Business Partners are expected to follow.

At CBC, we are committed to conducting business with the highest standards of ethics, transparency, and compliance with current laws and best industry practices.

Our Integrity Program includes comprehensive policies, procedures, controls, and training, aligned with Decree 11,129/2022, which implements the Anti-Corruption Law (12,846/2013).

The Third-Party Code underscores our firm stance against corruption, bribery, and the trafficking of weapons and ammunition. We count on all our partners to adhere to and promote these guidelines within their teams, fostering ethical, transparent, and responsible business relationships.

WHO DOES IT APPLY TO?

This Third-Party Code of Conduct applies to all partners who have a direct or indirect relationship with CBC, both in Brazil and abroad.

Adherence to these guidelines is mandatory throughout the entire duration of your engagement with CBC, regardless of whether a formal contract is in place.

All contracts established with CBC include clauses on **Standards of Conduct** and **Compliance with Anti-Corruption Practices**, reinforcing your commitment to these principles.

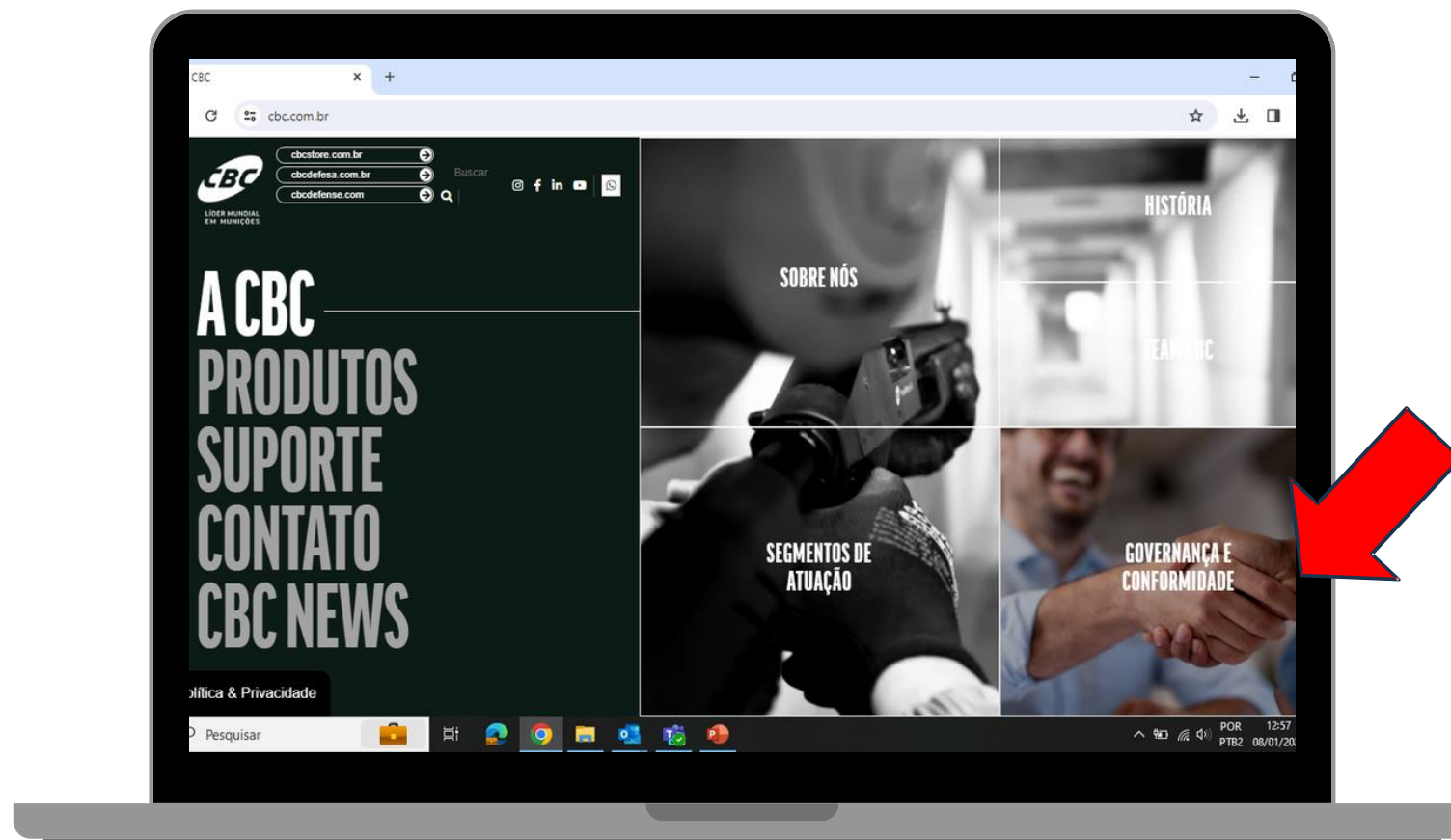
Failure to comply with this Code will be considered a breach of CBC's policies and may result in penalties, contract termination, or even liability for losses and damages.

CODE OF CONDUCT FOR THIRD PARTIES



The full version of the Third-Party Code of Conduct can be accessed on our website:

www.cbc.com.br

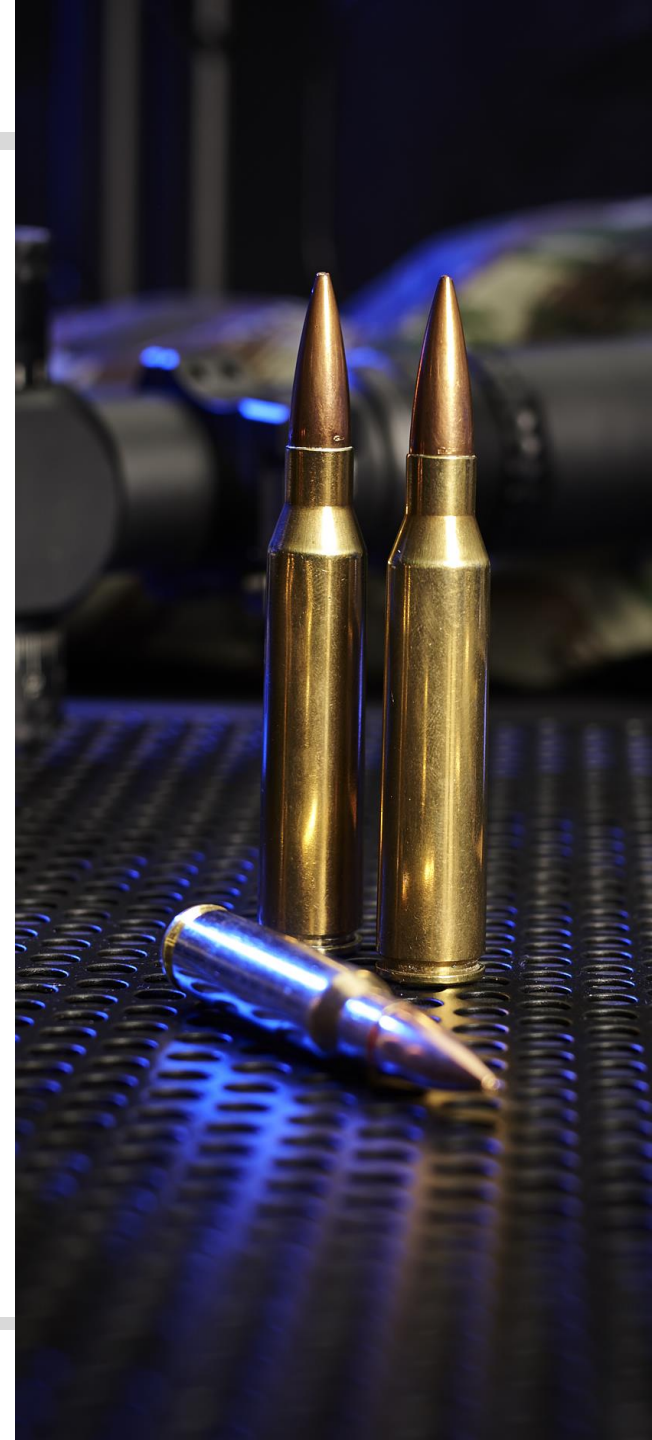


CBC INTEGRITY PROGRAM

The Third-Party Code of Conduct is part of CBC's Integrity Program, which consists of a set of internal mechanisms and procedures focused on integrity, auditing, and encouraging the reporting of irregularities.

Its main goal is to prevent, detect, and address any potential misconduct, fraud, or unlawful acts, while fostering a strong culture of integrity throughout our business environment.

The robustness of this program has enabled us to obtain the international ISO 37001 certification, which reinforces our commitment to the highest ethical standards across all our operations and institutional relationships.



MAIN GUIDELINES OF THE THIRD-PARTY CODE OF CONDUCT

Our **Third-Party Code of Conduct** applies to all CBC partners and reinforces the company's commitment to ethics, legal compliance, and integrity in all business relationships.

Its main guidelines are:

- ✓ Absolute prohibition of any form of corruption, bribery, fraud, extortion, document forgery, or any other unlawful acts;
- ✓ Mandatory commitment to combat the trafficking of weapons and ammunition;
- ✓ Obligation to comply with all applicable laws and regulations;
- ✓ Adherence to ethical conduct and transparency when interacting with public officials and government entities;
- ✓ Use of CBC's Whistleblowing Channel to report any situation that is not in compliance with this Code or any other illegal or unethical act;
- ✓ Awareness of the applicable sanctions in the event of a violation of this Code's provisions.

CBC, through its Compliance Department, continuously monitors its business partners. Under no circumstances do we maintain business relationships with companies involved in corruption, forced or child labor, tax evasion, or any other unethical or unlawful practices.



OUR COMMITMENT TO COMBATING CORRUPTION AND BRIBERY

Our Third-Party Code of Conduct aims to strengthen the environment of trust and integrity between CBC and its Business Partners by establishing clear guidelines for the prevention and mitigation of bribery, corruption, and fraudulent practices.

CBC does not tolerate any involvement of its partners in acts that constitute corruption, bribery, or fraud. We operate in full compliance with current Anti-Corruption and Anti-Bribery Laws and expect our partners to adopt and strictly adhere to these same standards.

DEFINITION OF CORRUPTION ACCORDING TO THE ANTI-CORRUPTION LAW (Law 12,846/2013 – Article 5)

“To promise”, offer, or give, directly or indirectly, an undue advantage to a public official, or to a third party related to them



OUR COMMITMENT TO COMBATING THE TRAFFICKING OF FIREARMS AND AMMUNITION

CBC is firmly committed to combating the trafficking of firearms and ammunition.

Our operations, both in Brazil and abroad, are strictly conducted in accordance with the authorizations and regulations established by the relevant national and international authorities.

General Rules:

- ✓ It is prohibited to establish or maintain commercial relationships with clients or intermediaries whose activities may raise doubts regarding the legality or purpose of the operation, as well as the destination of our products, ensuring that they remain out of the reach of unauthorized individuals, groups, or countries.
- ✓ Attention must be paid to any indication that the resources involved in any operation may originate from dubious or illegal activities.



OUR COMMITMENT TO COMBATING THE TRAFFICKING OF FIREARMS AND AMMUNITION

Partners who store CBC products at their facilities must ensure appropriate physical security measures, in accordance with the standards approved by the relevant regulatory authorities.

Any suspicion or indication of irregularities must be immediately reported through CBC's Whistleblowing Channel, ensuring that all information is handled responsibly and confidentially.



COMPLIANCE WITH LAWS, RULES, AND REGULATIONS

Partners working with CBC must be in full compliance with all applicable laws, rules, and regulations, both in Brazil and abroad.

The practice of any act harmful to public administration or private entities is strictly prohibited, including facilitation payments or any other conduct forbidden under Brazilian law, particularly Law No. 12.846/2013 (the Anti-Corruption Law).

It is also prohibited for any partner to make donations, political or otherwise, on behalf of CBC. CBC does not make, promote, or finance donations to political parties, candidates, their representatives, or events of a political nature.

Additionally, we strongly encourage and advise our partners to monitor their value chains to prevent and combat unlawful practices such as corruption and bribery, forced or child labor, tax evasion, or any unethical or illegal conduct.



BUSINESS PARTNERS RELATIONSHIP WITH PUBLIC OFFICIALS

In cases where partners act on behalf of CBC in the intermediation or negotiation of our products with Public Authorities, whether national or international, the relationship between the parties must always be guided by respect, professionalism, courtesy, honesty, and transparency.

All partners must communicate with Public Officials in a clear, direct, and honest manner, using formal and appropriate language, and avoiding any ambiguous expressions or statements that could be misinterpreted. Communications must be conducted exclusively through official channels, such as corporate email addresses, ensuring the traceability and integrity of the information.

If a Public Official requests any undue advantage or makes a request that may raise doubts about its legitimacy, the partner is obligated to refuse and immediately report the incident to CBC through its Compliance Department or via the Whistleblowing Channel.

All reports will be treated with strict confidentiality, and the whistleblower will be protected against any form of retaliation, even if the report results in the loss of a business opportunity.



CONFLICT OF INTEREST

A conflict of interest occurs when a partner allows, or appears to allow, personal, family, or third-party interests to influence their ability to act objectively, impartially, and effectively in negotiations or in their relationship with CBC.

Such conduct may improperly compromise the integrity of business decisions and interactions, undermining mutual trust and ethical standards in operations between the parties.

The following situations are considered conflicts of interest:

- ✓ Disclosing or improperly using privileged information obtained through activities carried out with CBC for personal benefit or for the benefit of third parties;
- ✓ Engaging in illegal or fraudulent acts for the benefit of CBC employees, directly or indirectly (through third parties), with the intent to influence decisions favorable to the third-party company;



CONFLICT OF INTEREST

- ✓ Harassing, coercing, or offering gifts, favors, or other benefits to CBC employees with the intent to gain an advantage in their decisions;
- ✓ Having family or personal relationships with a CBC employee that could characterize or suggest favoritism;
- ✓ Maintaining an employment or service relationship in parallel that could create a conflict with CBC's interests or compromise impartiality in business relations.

The partner must always act in a way that prevents and avoids any situation that could create a conflict of interest. If the partner identifies any situation that may constitute such a conflict, they must inform CBC in advance or as soon as they become aware of it.



GIFTS, PRESENTS, AND HOSPITALITY

The relationship between CBC and its partners, as well as between partners and their clients or other business associates, must be based on transparency, integrity, and ethics.

Under no circumstances may a partner offer, promise, give, or receive gifts, presents, or hospitality (such as entertainment) to or from partners, whether they are public officials, CBC employees, or third parties in the private sector, with the intent to obtain an undue advantage or illicit benefit.

A partner may offer gifts and other benefits, provided that:

- ✓ They have no significant commercial value – gifts are understood to be modest items (up to approximately R\$150.00) distributed for brand promotion purposes;
- ✓ They fall within normal market standards of courtesy;
- ✓ They are permitted under applicable laws.



GIFTS, PRESENTS, AND HOSPITALITY

The partner must not, directly or indirectly, accept, request, or offer any gifts, hospitality, or other benefits that may:

- ✓ Constitute, or even be interpreted as, an attempt at bribery or an effort to influence a third party as a form of payment, favoritism, or facilitation of a negotiation;
- ✓ Compromise, or appear to compromise, their integrity or objectivity in fulfilling their duties and responsibilities toward the company;
- ✓ Violate any applicable law or regulation.



SOCIAL MEDIA, CORPORATE IMAGE, AND COMMUNICATION

CBC's credibility, image, and reputation have been built over time through the dedication and efforts of our professionals and partners, grounded in CBC's principles and values. Therefore, it is essential to preserve this valuable asset.

Accordingly, partners must not act or speak on behalf of CBC, nor express opinions that could be attributed to CBC including on external social media platforms, business forums, or other communication channels, unless expressly authorized by CBC to do so.

At the same time, we respect and uphold our partners rights, especially regarding freedom of expression on social media, whether in commercial posts, personal statements, or content related to the private lives of their representatives.

However, we rely on everyone's good judgment and sense of responsibility to ensure that nothing is published that could be interpreted as: discriminatory opinion; hate speech; or any message that incites hostility or violence against an individual or group based on race, ethnicity, age, gender, sexual orientation, disability, religion, political opinion, national or social origin, economic status, birth, or any other personal characteristic – as well as defamation or slander against individuals or companies.



CONFIDENTIALITY OF INFORMATION

The partner must maintain the confidentiality and secrecy of all CBC information to which they have access, including documents, projects, and any materials filed or recorded, whether originals or copies, in any format (graphic, electronic, or otherwise). It is the partner's responsibility to protect such information and prevent its disclosure to third parties.

The use of CBC's image, name, or trademarks is not permitted unless previously and formally authorized, and solely for purposes directly related to the partner's professional activities. When applicable, CBC's brand usage guidelines must be followed.

Information related to contracts or commercial terms must be treated as confidential, always respecting the intellectual property rights of CBC and its partners during the performance of contracted activities.



CBC WHISTLEBLOWING CHANNEL

The CBC Whistleblowing Channel is the communication platform through which partners, employees, clients, and others can report any acts or suspected acts of bribery, corruption, fraud, legal violations, unethical behavior, or any other situations and conduct that breach the CBC Third-Party Code of Conduct.

Any partner who becomes aware of any such violation **MUST** report the facts through the CBC Whistleblowing Channel, using one of the following methods:

- ✓ **Website:** <https://contatoseguro.com.br/cbc> – to access the reporting form; or
- ✓ **Phone:** 0800 601 8667 – available 24 hours a day, 7 days a week.

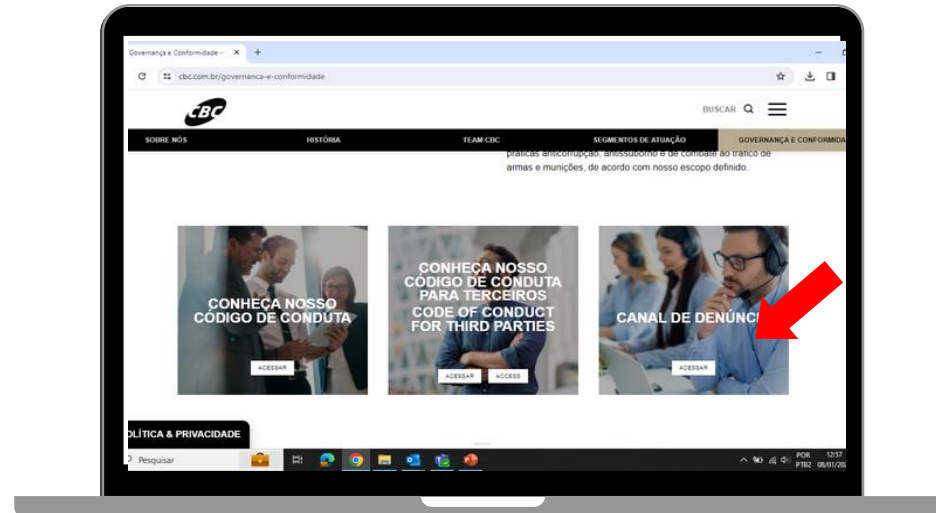
The channel is operated by an independent, specialized external company, ensuring that all reports are properly received. In addition, reports may be submitted either anonymously or with identification, according to the reporter's preference.

All reported cases will be appropriately investigated by the Compliance Department, and measures will be taken in accordance with the findings, circumstances, and applicable laws.



WHERE TO ACCESS THE WHISTLEBLOWING CHANNEL?

Access to our Whistleblowing Channel is available on the CBC website:
www.cbc.com.br



Prohibition of Retaliation: CBC does not tolerate any form of retaliation, punishment, or threat against whistleblowers who raise a concern, make a report, express a question, or report potentially inappropriate behavior (except in cases where the individual was involved in the violation), or who refuse to participate in bribery or corruption, even if such refusal may result in the loss of a business opportunity for CBC.



NON-COMPLIANCE WITH THE CODE OF CONDUCT

Any partner who fails to comply with this Code of Conduct will be subject to penalties such as:

- ✓ Formal warning;
- ✓ Contractual fine;
- ✓ Contract termination;
- ✓ Inclusion on a restricted list.

The imposition of sanctions will always be carefully evaluated, in accordance with the principles of reasonableness and proportionality, as well as the provisions set forth in applicable law. Breaching the Code of Conduct may also result in civil or criminal proceedings.

CBC reserves the right to take any action or disciplinary measure against a partner involved in conduct deemed immoral, unethical, or illegal, regardless of whether such conduct constitutes a direct violation of this Code of Conduct.





Compliance **TRUST**

CBC Commitment: Ethics, Transparency, Legality, and Mutual Respect.

We appreciate your commitment to conducting our business in an ethical and transparent manner.

Questions? Please contact our Compliance team.
compliance@cbc.com.br