

# **CODE OF ETHICS AND CONDUCT**

## **FOR SUPPLIERS**

# 1.

## INTRODUCTION

**The purpose of this Code of Ethics and Conduct** for suppliers is to formalize and institutionalize conduct standards, establishing a model for the relationship between Grupo Tigre and its suppliers, complementing the Grupo Tigre Code of Ethics and Business Conduct.

**Through this Code, we aim to promote ethical behavior in the business environment** that can generate the highest possible economic value not only for Tigre Group but also for our partners.

We therefore conduct our business with honesty, integrity, fairness, and good faith, expecting the same reciprocity from companies wishing to engage with Grupo Tigre.

**All parties involved in this partnership must respect, comply with, and enforce the standards of this Code.** Suppliers are also responsible for extending these criteria to the companies they contract, thus contributing to building a sustainable business model and a fairer, more balanced, and prosperous society.

## 2.

## SCOPE

- **This Code applies to all Grupo Tigre suppliers,** both in Brazil and abroad.
- **Its goal is to provide clear and non-negotiable guidance regarding commitment to ethical and conduct standards.** It is mandatory and may be updated over time.
- **The relationship between Grupo Tigre and its suppliers must be based on objective and transparent criteria,** avoiding the influence of personal relationships and interests that may affect decision-making and cause harm to the company.
- **Grupo Tigre is committed to fully comply with all laws and regulations applicable to its business in Brazil and abroad.** If the countries where Grupo Tigre operates have stricter laws than those established in this Code, local legislation will prevail.
- **The company's vision, mission, and values** define its organizational identity and guide its business conduct.

# 3.

## PRESENTATION

**With more than 80 years of history,**

Grupo Tigre is a Brazilian multinational company with a strong international presence, leading in solutions for the construction industry.

**The company offers a wide and expanding portfolio of products every year.**

**We are driven by managing water to transform people's quality of life.** We transform your experience with water beyond the construction site, using the best solutions on the market

**Grupo Tigre was founded in 1941 by visionary entrepreneur João Hansen Júnior, producing combs, fans, and accessories made from plastic. Years later, through intensive research into the material,** Grupo Tigre established the first PVC pipes and fittings manufacturing in Brazil, earning consumers' trust.

**Its products are sold in over 90,000 retail locations in Brazil and abroad.**

**Present in about 30 countries, Grupo Tigre has over 5,000 professionals, 11 plants in Brazil, and 13 abroad.**

**It operates in sectors such as plumbing, electrical, drainage, sanitary accessories, infrastructure, industry, irrigation, painting tools, sanitary metals, and solutions for water and wastewater treatment and reuse.**

**Our history is marked by a strong commitment to providing complete, innovative, and high-quality solutions,** making life easier for those who build and design.

# 4.

## FUNDAMENTAL PRINCIPLES OF THE ORGANIZATION

### Purpose:

managing water to transform people's quality of life.

### Competencies:

**People:** we care for, challenge, and develop our people. Our environment fosters respect, accountability, and collaboration.

**Results:** we are driven by results. We set ambitious goals, overcome challenges, and deliver what we promise.

**Customers:** we know our customers, understand their needs, and deliver solutions with agility and excellence.

**Innovation:** we innovate with simplicity and creativity. Our ideas solve real problems, improve processes, and make our solutions stand out.

# 5.

## ANTI-CORRUPTION POLICY

**Grupo Tigre does not tolerate any form of bribery or corruption, public or private, domestic or transnational,**

nor does it accept the offering or promising of undue advantages by its suppliers, whether by the company itself or by third parties.

**We expect our suppliers, service providers, and other companies and third parties that interact with Grupo Tigre to act according to the Grupo Tigre principles and values,** particularly by engaging in the implementation of mechanisms to prevent corruption, fraud, money laundering, and other illicit acts against public administration.



# 6.

## ETHICS AND TRANSPARENCY

### 6.1. Gifts and Presents

Exchanging gifts and presents is very common in business relationships. However, this practice must be conducted appropriately, so it doesn't influence or seem to influence decisions and consequently it won't generate undue favors.

**Offering, receiving, or granting gifts, presents, and hospitality may, in some situations,** create expectations or claims of favoritism, bribery, or undue advantages, characterizing a conflict of interest. **Therefore, it is essential to follow these mandatory principles:**

- The practice must be ethical, transparent, and compliant with applicable laws and principles;
- Gifts, presents, or hospitality in cash (money or any other form of financial transaction) are not allowed;
- They must never constitute undue advantages or have the intent to influence decisions;
- They must not exceed the price limits defined in this Code, to avoid being interpreted as bribery;
- The frequency of offering gifts to the same partner must not be excessive, so as not to constitute bribery or an attempt to influence decisions;
- Employees are prohibited from soliciting favors or gifts from third parties with whom they do business.

**Gifts and presents offered by Tigre's suppliers or partners may be accepted as long as they are symbolic and do not exceed the price of USD 50 (fifty US dollars).** The gifts must have an institutional, educational and/or scientific purpose.

### 6.2. Business Meals

**Business lunches or dinners are common and routine practices in all industries and are also accepted by Grupo Tigre, provided that the following guidelines are observed:**

- Meals must be related to Tigre's business issues, with a strictly professional purpose, and cannot be a reason for the personal interests of those involved;
- Prices should not be exaggerated, avoiding exuberance, and should be equivalent to a normal business meal, according to local standards;
- Meals should not include the spouses of those involved, when they are not directly involved with the business;
- Don't involve the expectation of something in return.

### 6.3. Social Events

Invitations to social events are common due to commercial relationships between suppliers and buyers. **However, invitations to shows, dance performances, concerts, games, and other entertainment activities require special attention** since they are not usually related to business matters.

**Frequent or repeated invitations may constitute a conflict of interest.** Therefore, professionals should consult internal policies on gifts, donations, and sponsorships, or contact the Compliance department for guidance.

### 6.4. Truth and Transparency

**Grupo Tigre suppliers must commit to the accuracy of all information provided, including but not limited to legal, fiscal, economic, financial, health, safety, environmental, and quality information.** To avoid misunderstanding or misleading communications, clarity is essential throughout the service contracting process.

**Grupo Tigre does not tolerate any illegal conduct, such as:**

- Supplying products or services of illegal origin;
- Forgery of documents, signatures, trademarks, or products;
- Involvement in tax evasion, smuggling, and trafficking, among other acts.



## 6.5. Abuse of Power and Harassment

**Grupo Tigre does not tolerate abusive or coercive conduct.**

Suppliers must treat both their employees and Grupo Tigre professionals with respect. Harassment of any kind (moral, sexual, racial, political, or religious) and acts of intimidation or threats in the relationship are strictly prohibited. **Tigre's policies and practices prohibit discrimination or prejudice of any nature.**

## 6.6. Unfair Competition

**Relationships between Grupo Tigre professionals and suppliers must be based on transparency,** with no decisions influenced by personal criteria. Grupo Tigre suppliers must act consistently and conduct their business in compliance with fair competition and applicable laws. **Under no circumstances may Grupo Tigre Group business partners act to harm free competition or the market,** including but not limited to price-fixing or sharing commercially sensitive information, abuse of market power, market manipulation, or other practices constituting unfair competition or harming economic order.

## 6.7. Negotiation and Payments

**All negotiations with suppliers and service providers of the Grupo Tigre must be carried out exclusively through the Purchasing team, in accordance with internal procurement processes and policies.** No professional outside this area is authorized to negotiate commercial terms, prices, deadlines, or payment methods directly with suppliers. Technical discussions between departments and suppliers may occur for scope alignment and operational matters, as long as they do not involve commercial negotiations. All binding negotiations, such as defining prices, supply conditions, deadlines, discounts, and other contractual terms, are the exclusive responsibility of the Purchasing team. Payments must be made solely and exclusively through the company's official channels, ensuring traceability, control, and compliance with internal and external regulations. Any attempt to agree on amounts directly, make parallel payments, or carry out personal transfers constitutes a violation of this Code and of the Grupo Tigre's Compliance policies, subjecting the offender to applicable disciplinary measures and the contractual sanctions established.



7.

## REDUCING RISKS OF SIGNIFICANT ECONOMIC DEPENDENCE

Grupo Tigre discourages contracting suppliers for whom Grupo Tigre represents **more than 40%** of their annual revenue, **to prevent financial dependence on the company.**



# 8.

## SECRECY AND CONFIDENTIALITY OF INFORMATION

All documents and information related to negotiations, including commercial proposals (prices, supply terms), drawings/specifications, contracts, and supplier records, must be treated as confidential and not disclosed to competitors or third parties.

### 8.1. Information Security

**Both parties must contribute to data protection**, including themselves, their advisors, partners, directors, agents, professionals, representatives, or contracted third parties who have access to personal data.

**Furthermore, the parties must comply with Data Protection Laws**, ensuring that their Data Processing Agents adopt effective measures so that operations carried out during the execution of contracts adhere to the principles of purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, accountability, and auditability. When applicable, in the sending/receiving of personal data, both parties must also ensure that they maintain procedures to identify, address, and eliminate Information Security Incidents involving the Personal Data they have access, being fully responsible to one another for any violations of Data Protection Laws caused by their exclusive fault or by third parties under their responsibility that affect the processing of Personal Data to which they have access.

### 8.2. Use of Social Media

**Social media plays an important role in shaping public opinion.**

It is expected that our suppliers, when expressing their company's opinions, consider that this environment is public and that the content of their messages will be accessed by thousands of people and must not damage Tigre's reputation. We value the freedom of expression of our suppliers and, seeking balance in this relationship, we encourage the use of social media with good judgment, ethics, and respect.

**Attention points:**

- Do not disclose documents or information related to Grupo Tigre without proper authorization from the company and/or stakeholders.
- Do not express yourself on behalf of Grupo Tigre in comments, confrontations and/or questions made by other users, even if regarding a subject of your domain or area;
- When expressing your company's opinion, do not expose, offend, and/or make comments that may defame the image of Grupo Tigre, its professionals, and/or any of the audiences with which the company interacts.

# 9.

## QUALITY IN SUPPLY

**Grupo Tigre requires a quality standard and service capacity in accordance with the company's established norms.**

It is the supplier's responsibility to monitor and provide training to its professionals to ensure the best performance in their functions and the proper execution of the contracted services and products. Suppliers must continuously improve their performance and quality through appropriate measures. They must also comply with recognized or contractually defined quality requirements to provide products and services that consistently meet Tigre's needs, perform as expected, and are safe for their intended use.

# 10.

## HUMAN RIGHTS AND FUNDAMENTAL LABOR RIGHTS

### 10.1. Slave Labor

**Grupo Tigre does not tolerate the use of slave labor, child labor, or work by minors under 16 years of age,** except for the hiring of apprentices as permitted by law.

### 10.2. Diversity and Inclusion

**At Grupo Tigre, there are 18 units and more than 5,000 employees connected across various cultures.** It is no coincidence that diversity is one of our core values. With an entrepreneurial spirit and understanding that, with respect, we can encourage the talent of each professional to successfully build together our business every day.

**Diversity:** It is the plurality of cultures. This includes our experiences, backgrounds, and ways of thinking. We are all diverse, regardless of where we were born or physical and emotional characteristics.

**Inclusion:** It involves a set of actions that promote equal participation, rights, and opportunities for everyone.

Our suppliers must also ensure that their professionals do not suffer any type of discrimination.

### 10.3. Safety and Health at Work

- **Grupo Tigre considers it essential to preserve everyone's health and physical integrity, as well as to promote quality of life in the workplace.** It is everyone's duty to ensure a healthy and safe work environment, in accordance with current Occupational Safety and Health legislation.
- **Therefore, our suppliers must provide, at a minimum, decent working conditions, always striving to reduce unhealthy and hazardous environments for their professionals.** Working hours, compensation, benefits, and compliance with health and safety regulations must adhere to current laws.
- **Everyone must respect differences in gender, origin, ethnicity, and beliefs.** We consider it important to include, whenever possible, people with disabilities in the workforce.
- **It is extremely important to provide a safe and healthy workplace for employees,** as well as personal protective equipment (PPE) and other necessary materials, and to meet or exceed international safety standards.
- **Grupo Tigre does not tolerate the consumption of alcoholic beverages, illicit drugs, or narcotics within its premises,** nor being under their influence during working hours or while providing services to the company.

# 11.

## RESPONSIBILITIES

### 11.1. Social & Environmental Responsibility and Sustainable Development

**Grupo Tigre operates in accordance with applicable standards and legislation governing its activities and follows international best practices.** It uses natural resources sustainably, whether renewable or nonrenewable, and disseminates knowledge through campaigns, projects, educational programs, and initiatives that strengthen sustainability throughout society.

Therefore, it is important that its suppliers practice **Social and Environmental Responsibility** and commit to **Sustainable Development** in their daily actions. Suppliers must comply with relevant laws and regulations, such as environmental protection, including obtaining and maintaining all valid licenses, permits, and studies required for their operations, and adopt appropriate measures and procedures to prevent any risk or harm to human rights. It is everyone's duty to respect the environment and contribute to a more sustainable future.

### 11.2. Social

Grupo Tigre works on social projects through its social branch, ICRH (Carlos Roberto Hansen Institute), responsible for managing and/or supporting initiatives mainly focused on children and adolescents, as well as developing projects aligned with Tigre's business, such as rational water use and attention to sanitation.

**Purpose: To positively impact the lives of children and adolescents** in the areas of Health and Education, leveraging the strength of our business.

**The Institute has already invested more than R\$ 52 million and benefited 4.5 million children and young people since 2003.**

For more information about the projects, to request support, or to become a volunteer, visit:  
<https://icrh.com.br/>



# 12.

## AUDIT AND CONTRACT TERMINATION

**Grupo Tigre reserves the right, at any time, to verify whether its Suppliers are complying with the provisions of this Code and all other contractual terms.**

If we become aware of any actions or conditions that violate it, we reserve the right to require suppliers to take the necessary corrective measures. The terms and conditions set forth in this document are valid for the duration of the supply of products, without prejudice against any supplier obligations established by law.

# 13.

## COMMUNICATION

All Grupo Tigre suppliers must be familiar with the Policy on Relationships with Suppliers, Service Providers, and Third Parties in General, available at: [http://auxiliarfiles.tigre.com/cgf\\_condicoes\\_gerais\\_fornecimento.pdf](http://auxiliarfiles.tigre.com/cgf_condicoes_gerais_fornecimento.pdf)

**Whenever a possible violation of this Policy is identified, a report may be conducted through the following channels:**

- Report to the Ethics and Compliance Committee via <https://www.contatoseguro.com.br/tigre>
  - Direct phone line: 0800 602 1350
  - Smartphone app – Contato Seguro
- WhatsApp: +55 51 3376-9353

All reports will be received by the Ethics and Compliance Committee, which will handle them while maintaining the confidentiality and privacy of the information, except in cases where there is a legal obligation to inform government authorities.

# 14.

## VIOLATION OF THE POLICY ON RELATIONSHIPS WITH SUPPLIERS, SERVICE PROVIDERS, AND THIRD PARTIES IN GENERAL

**Infringements of this Code, as well as Tigre's internal policies and standards,** shall be subject to disciplinary action and/or penalties based upon the applicable legislation.

**Grupo Tigre does not tolerate retaliation against any employee** who reports any potential unsuitable behavior or who feels coerced or intimidated by abusive conduct.

***TIGRE*** 