

CODE OF
ethics and conduct



December . 2024



At Tigre Group, the Code of Ethics and Conduct represents a clear expression of the values that underpin our journey and the principles we aim to preserve as we continue to grow.

Throughout these years, it has reaffirmed our most authentic principles, reinforcing our commitment to business sustainability. Our Code of Ethics and Conduct guides us so that every decision, every project, and every interaction reflect this spirit, which has been the distinguishing feature of this extraordinary team, our greatest asset.



Felipe Hansen
Chairman of the Board of
Directors of Tigre Group



Our Code of Ethics and Conduct is more than a set of rules; it represents the essence of our commitment to excellence and integrity. It reflects our identity, embodies the “Tigre Way of Being,” and highlights our core values, including respect, integrity, transparency, and responsibility.

It serves as a guide for our daily actions, offering clear guidelines for making ethical decisions in any situation. It reaffirms our commitment not only to Tigre but also to the communities, partners, and professionals we interact with. Furthermore, it fosters a positive work environment where everyone feels valued, safe, and encouraged to act fairly.

Each of us plays a fundamental role in this process. It is essential to live by the values of the Code, transforming its guidelines into daily practices.

Collective engagement is crucial to building a strong and sustainable ethical culture where responsibility is shared. Each of us is tasked with upholding Tigre’s ethical standards, and together, we will build an even stronger Tigre, where ethics and respect are the pillars of our continued success.

We count on each of you to commit to this journey.



Luis Felipe Dau
CEO of Tigre Group

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MISSION, VISION, AND VALUES

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

Our Mission is to create innovative solutions for the construction world. Our Vision is guided by the phrase: "We believe that the places where people live can always be better." Our practices are based on the following Values:

TRUST

We are a solid brand that operates ethically, with integrity and commitment. We provide unmatched quality solutions that deliver real value to our customers, ensuring peace of mind for every type of project.

INNOVATION

With an active, agile, and bold approach, we strive for leadership and innovation in all the segments we operate. We foster a creative and restless attitude in seeking new products, services, and solutions for the construction world.

CUSTOMER COMMITMENT

We are a partner to all our stakeholders (customers, distributors, construction professionals, and our team members), recognized for our commitment to delivering value, focusing on results, and building genuine and close relationships with simplicity.

SUSTAINABILITY

We understand our role in the world and society through the development and promotion of sustainable actions and social responsibility initiatives that create value for both our business and the environment in which we operate.

DIVERSITY

As a Brazilian multinational with a strong presence in Latin America, the United States, and various countries through exports, we embody an entrepreneurial spirit that values and promotes diversity and inclusion. We believe that talent and the encouragement of our high-performance teams build the success of our business every day.

COMPLIANCE ECOSYSTEM TIGRE GROUP



PREVENT

CULTURE

Actions that strengthen the compliance culture, including the dissemination of the Code of Ethics and Conduct and our Internal Policies.

ACTIONS

Training and Communication Plans, as well as the implementation of Procedures that allow for the control and monitoring of relationships with suppliers, customers, and employees.



DETECT

CULTURE

Tools designed to identify Conduct violations, such as the Ethics Channel and the three lines of defense.

ACTIONS

Investigation of complaints with the support of Auditing and procedures that assist in identifying exposure, such as risk analysis and tracking KPIs.



IMPROVE

CULTURE

A continuous improvement approach to reflect legislative changes and best practices.

ACTIONS

Audits of the Integrity Program, annual compliance surveys, and periodic policy reviews.

CORRECT

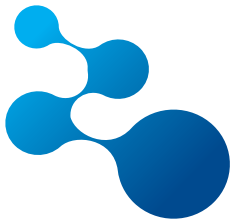
CULTURE

Zero tolerance for identified misconduct, with corrective and educational disciplinary measures.

ACTIONS

Application of the Consequences Policy, development of action plans to adjust processes with the support of internal controls.





Introduction and scope of the code

The objectives of the Code are:



The Code applies to all members of the Board of Directors, Executives, and professionals (including interns and apprentices) of Tigre Group, its subsidiaries, and controlled companies in Brazil and abroad.

Tigre is committed to complying with all laws and regulations applicable to its business. In countries with stricter laws than those outlined in the Code, local legislation will prevail.

The rules also apply to Tigre Group's Business Partners, such as suppliers, customers, service providers, consultants, representatives, attorneys, consultancies, brokers, joint ventures, and third parties with contractual or commercial relationships.

Conduct in relationships with various stakeholders

Tigre strives to meet customer needs in accordance with its Quality and Environmental Policy, conducting regular surveys and sharing the results. It participates in associations and technical standards, focusing on the development of products that respect safety, the environment, quality, and anti-trust regulations.



Relationship checklist



- Respect
- Transparency
- Confidentiality
- Commitment

Check out our latest sustainability report:
www.tigre.com.br/sustentabilidade



1

Relationship with customers and consumers

Tigre professionals must provide responsive service and effectively address customer and consumer demands. Relationships should be objective and transparent, avoiding personal influences, violations of anti-trust laws, or consumer protection legislation.

It is strictly prohibited to gain undue advantages through inappropriate means. Tigre is committed to protecting and keeping customer information confidential, adhering to a data privacy policy applicable in all countries where it operates.



BEST PRACTICES

- Tigre serves its customers and consumers with the best business practices and without any discrimination.
- Professionals must respect the customer's freedom of choice.
- Tigre keeps customer information confidential.



POINTS OF ATTENTION

- Tigre may accept or refuse contracts with customers, always providing justification for any refusal.
- It may terminate business relationships, based on contractual and/or commercial justifications.
- Tigre does not engage in agreements with customers to prevent them from establishing relationships with other customers.
- It does not condition the sale of one product or service on the purchase of another.



2

Relationship with professionals

Work relationships at Tigre must be based on respect and impartiality, free from discrimination, and fostering an inclusive and accessible work environment. Everyone must be treated and evaluated fairly, without favoritism or prejudice.



A) Conflict of interest

Tigre professionals must avoid conflicts of interest in their activities. In case of questions or need for assistance, they should consult their direct manager, HR, or Compliance to evaluate the situation and handle it according to Tigre's rules.

Examples of conflicts include ▼

- Having a personal interest that affects the evaluation of a business deal.
- Using confidential information for personal gain.
- Accepting external tasks that hinder performance.
- Receiving gifts outside Tigre's internal policies.
- Using company resources for personal interests.
- Maintaining private business relationships that grant privileges.
- Conducting voting processes contrary to the organization's interests.



All professionals must complete a conflict-of-interest self-declaration after mandatory training via the corporate education platform.



BEST PRACTICES



- Tigre encourages new ideas that bring innovative solutions, provided they align with the company's objectives and do not result in personal gain.
- Professionals may occasionally engage in parallel activities, as long as these do not impair their performance, compromise working hours, or conflict with Tigre's business activities.

POINTS OF ATTENTION



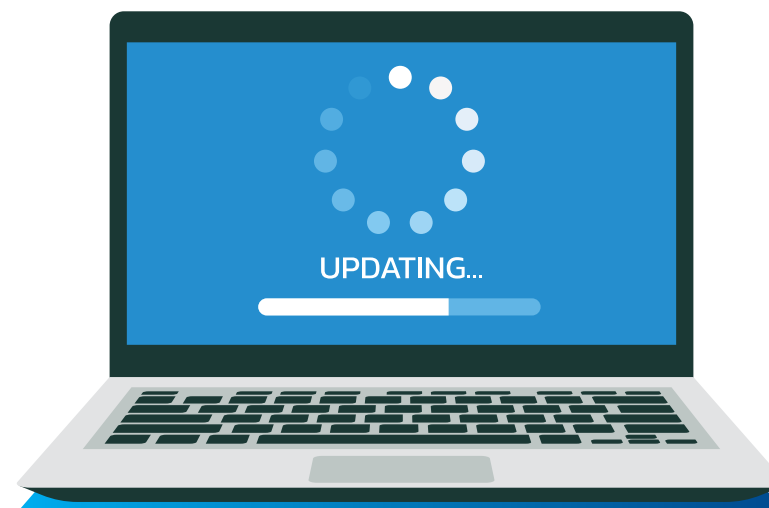
- Professionals cannot provide services or products to Tigre, even during non-working hours.
- Professionals and their direct relatives (father, mother, siblings, children, stepchildren, spouse, or partner in a stable union) must not have ownership ties with suppliers, customers, or competitors if their positions grant them privileged information or the power to influence transactions with these companies.
- Professionals cannot sell products or services within Tigre's premises, whether during or outside working hours.

YOUR ROLE

- Professionals and their direct relatives must inform their direct manager of any positions they hold in other entities for an evaluation of potential conflicts of interest.
- Professionals invited to serve on the boards of organizations must notify their direct manager and/or the People and Compliance departments for an analysis of potential conflicts of interest.
- Professionals must report to their direct manager or the Compliance area any situation that could represent a conflict of interest.
- Conflicts of interest must be immediately communicated to the direct manager, HR, or Compliance.

B) Use of Tigre's resources

Materials provided by Tigre are intended to facilitate work and must be well-maintained. Computers, phones, tablets, and software are the exclusive property of Tigre unless otherwise stated in a contract. Tigre may access and monitor information on these resources in accordance with the Information Technology Policy.



BEST PRACTICES

- Professionals may use Tigre resources for work and projects, in line with internal rules and policies.
- Sharing personal passwords with other professionals or third parties is prohibited.
- Resources should be used sensibly to avoid waste.
- Company-provided resources must be used exclusively for corporate purposes.

POINTS OF ATTENTION

- For virtual meetings, professionals should be in a private setting and use headphones to ensure confidentiality.
- Tigre may collect information from company assets and resources during investigations, respecting the professional's privacy.
- Digital messaging programs create permanent records that can be forwarded or stored. Messages must be respectful and avoid abusive, obscene, offensive, or discriminatory content, as should verbal communications.

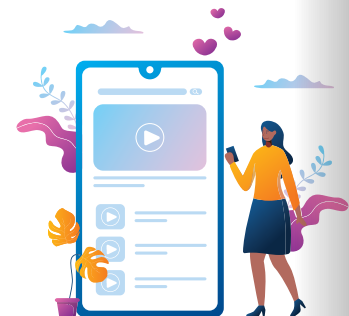
YOUR ROLE

- Professionals must protect and make proper use of company assets and adhere to internal rules and policies regarding the use of digital equipment and virtual information.
- Professionals responsible for maintaining and storing information must follow the methods and deadlines outlined in the Privacy Policy to preserve the integrity of documents and data.

C) Social media

In addition to being careful with what you POST also be careful with what you SHARE

It is important to consider that social media influences public opinion. Tigre professionals must exercise caution when expressing personal opinions, as the online environment is public, and content can affect not only Tigre's reputation but also that of the professional. The company values freedom of expression but advises its use with common sense, ethics, and respect, avoiding harm to others and refraining from spreading hate speech or committing digital crimes.



D) Kinship or romantic relationships

Tigre allows the hiring of family members from professionals, provided they compete on equal terms and there are no privileges or conflicts of interest.

Tigre also respects relationships formed between professionals, as long as they do not harm the company or create internal conflicts that damage the professional environment.



BEST PRACTICES

- Professionals must remain alert to situations that could create conflicts of interest involving relatives within Tigre.
- Job rotations or vacation substitutions in departments with family members should be considered and analyzed beforehand.

POINTS OF ATTENTION

- Direct or indirect reporting relationships between relatives is not allowed.
- Administrators cannot have direct relatives employed in any department of the company.

YOUR ROLE

- Profissionais com parentesco que não respeitem essas regras devem informar seus superiores, a área de Pessoas ou Compliance para que medidas adequadas sejam tomadas.

E) Respect for individuals (prejudice, discrimination, and harassment)

At Tigre, positions are filled based on technical qualifications, with zero tolerance for prejudice or discrimination in hiring, evaluation, promotion, or dismissal processes. The company fosters an inclusive and welcoming environment, valuing diversity and mutual respect.



DIVERSITY AND INCLUSION

Tigre is committed to an inclusive environment without distinctions based on gender, race, age, origin, sexual orientation, political or religious beliefs, or physical disabilities.

HARASSMENT

Tigre strictly prohibits moral and sexual harassment and enforces disciplinary measures against such behavior.

RETALIATION

Using retaliation against those who report inappropriate behavior is not allowed. Protective measures will be taken if necessary.

Tigre does not tolerate

- Abusive behavior, harassment, or arbitrary actions.
- Slave labor, child labor, or employment of minors under 16, except as apprentices.
- Alcohol and drug use on company premises or during work hours.
- Carrying weapons, except for authorized service providers.
- Discrimination based on origin, gender, race, age, sexual orientation, political or religious beliefs, or physical disabilities.

3

Relationship with suppliers, service providers, and third parties in general

We expect our suppliers, service providers, and partners to act in accordance with the principles of this Code, especially by implementing mechanisms against corruption, fraud, money laundering, cartels, and other illegal activities.

A) Evaluation of suppliers and service providers

Tigre evaluates suppliers and service providers based on technical and economic criteria, without discrimination or favoritism. All professionals must act objectively and impartially. Hiring companies owned by former employees is permitted, provided they meet Procurement criteria and precautions are taken to avoid labor-related risks.



B) Contract registration

Contracts with suppliers and partners must be reviewed by the Corporate Legal team and include clauses ensuring compliance with applicable laws, including anti-corruption and anti-bribery provisions. The Corporate Legal team must review and approve all contracts to safeguard the rights and responsibilities involved.

C) Gifts and presents

The receipt and offering of gifts, presents, entertainment, hospitality, and meals are common in business but must comply with Tigre's Gifts and Hospitality Policy and applicable legislation. It is prohibited to receive, offer, or promise such items to influence business decisions or obtain personal benefits. If you have any questions, please contact the Compliance department.

What to do when receiving a gift/present indirectly?

1st STEP

Check if the value does not exceed what is stipulated in the specific policy (50 dollars)

2nd STEP

If the value exceeds this amount, contact the Compliance area.

3rd STEP

If necessary, return the gift with a thank you letter (available from the Compliance area).

BEST PRACTICES

- Gifts and presents may be accepted if their value does not exceed USD 50 or the equivalent in local currency. The total value should not exceed this amount if multiple items are received.
- Entertainment, hospitality, and meals must follow the Gifts and Hospitality Policy and the rules for donations and sponsorships.
- Offering gifts to business partners requires prior approval from the direct manager and must comply with the Gifts and Hospitality Policy.
- Sales or Marketing representatives may offer gifts to maintain good business relationships, in line with the current policy.

POINTS OF ATTENTION

- Entertainment, hospitality, and meals must not extend to spouses or family members not involved in the business.
- Accepting cash or cash equivalents from business partners is prohibited.
- Professionals must not request gifts or presents from business partners without a direct link to Tigre, nor create pressure to receive them.

YOUR ROLE

- Gifts or presents exceeding USD 50 must be returned with a thank-you letter from Tigre, via the Compliance department.
- Professionals must inform partners about Tigre's Gifts and Hospitality Policy.
- When offering gifts, presents, entertainment, hospitality, or meals, professionals must properly record the expenses.

D) Donations and sponsorships

Tigre encourages donations and sponsorships to positively impact the community, strictly following the guidelines of the Donations and Sponsorships Policy and applicable laws. The Carlos Roberto Hansen Institute (ICRH) manages donations, focusing on the education of children and adolescents, health, and sanitation improvements. Professionals are encouraged to volunteer and develop social projects.

Tigre Group and ICRH use a transparent process to select and support projects, following policy criteria and conducting due diligence on the supported entities.

Learn about the
**Carlos Roberto
Hansen Institute**



BEST PRACTICES

- Donations and sponsorships are formalized in writing, using the Donation Agreement.
- Projects, institutions, events, and others receiving sponsorships or donations are periodically monitored to ensure compatibility with Tigre's values, principles, and applicable legislation.
- Donations or sponsorships that provide tax benefits must strictly comply with regional/country laws.

POINTS OF ATTENTION

- Donations and sponsorships offered by Tigre should not create dependencies for the continued benefit.
- No donation or sponsorship may be given with the intent to obtain undue advantages or seek reciprocity.
- Tigre professionals cannot make Donations or Sponsorships on behalf of the company.
- Tigre does not make donations or sponsorships to individuals.
- Tigre does not make any kind of donation to political parties, candidates and/or events related to electoral campaigns.

E) Mergers and acquisitions

Before entering into any partnership, associative contract, joint venture, merger, acquisition, or other transactions, Tigre conducts detailed due diligence. This includes a careful evaluation of companies and entities to mitigate risks such as corruption, bribery, illegal practices, impacts on the competitive environment, and legal, accounting, labor, environmental, and integrity issues.

4

Relationship with the public sector

A) Government interactions on behalf of Tigre

Tigre values integrity and honesty in its interactions with public entities, requiring professionals to adhere to ethical principles and respect laws and regulations. Relationships with public officials must comply with the Institutional Relations Policy, the Anti-Corruption and Anti-Bribery Policy, and the Best Practices Guide for the Sanitation Market, which establishes specific rules for interactions and meetings.

Participation in public tenders or business negotiations with public officials must be handled carefully, adhering to the principles and guidelines of the Code of Conduct and company policies and conducted by the appropriate business areas.

B) Contributions to political parties

Tigre encourages its professionals to exercise citizenship, including voting and advocating for rights, but prohibits the use of company resources for political activities.

C) Gifts and hospitality

Tigre professionals are not permitted to offer courtesies, gifts, or presents to public sector employees. Furthermore, Tigre does not allow undue payments to obtain advantages or expedite administrative actions.

D) Donations and sponsorships

Tigre does not make Donations or Sponsorships to legal entities controlled directly or indirectly by public officials, government authorities, or politically exposed persons for the purpose of obtaining any advantage or benefit.

Growing together
with cities,
states, and
países do
mundo.



5 Media relations

We are always promoting our brand and the actions we conduct in society.

At Tigre, the Marketing department is responsible for media relations. Only authorized professionals may disclose information about the company, customers, suppliers, and partners. All disclosures must be approved by the Marketing department, which also manages media relations. Professionals must inform the department or their direct manager if they identify incorrect or negative information about Tigre or its products in the media.



6 Intellectual property

Any intellectual property created by Tigre professionals during their employment contract, using company resources or on company premises, will belong to Tigre.

BEST PRACTICES

- Professionals may use the company's intellectual property for its appropriate purpose, respecting Tigre's interests and objectives.

POINTS OF ATTENTION

- Confidential company information, such as commercial strategies and specific plans, cannot be used or disclosed by professionals for personal or third-party benefit.
- Professionals may not disclose relevant information about Tigre that has not been made public to third parties.
- Disclosure of personal records is not permitted unless authorized or required by law, regulation, or judicial decision.

YOUR ROLE

- All Tigre professionals are responsible for protecting the company's intellectual property, including but not limited to technology, technical and procedural knowledge, trademarks, patents, and industrial processes.
- All professionals must safeguard Tigre's intellectual property, encompassing technology, technical knowledge, brands, patents, industrial processes, and more.

7 Accounting and financial records

Keep an Eye On: It is extremely important to record all financial activities involving the company in any way.

All of Tigre's accounting and financial transactions must be recorded accurately, supported by proper documentation, and free from fraud or money laundering, in compliance with legislation, internal policies, and international accounting principles. Accounting records and financial files must be maintained in accordance with local laws. Professionals must fully cooperate with auditors, providing complete and accurate information within the required timeframe.



8 Health, Safety, and the Environment

All professionals must be aware and strictly comply with the standards and policies of health, safety and the environment; as well as report to their direct manager any event that may threaten their physical or moral integrity. These rules also apply to third parties and service providers on Tigre premises.



A) Sustainability and the environment

Tigre has always integrated sustainability into its operations, conducting business transparently, ethically, and responsibly, valuing its professionals, and innovating solutions.

We operate in compliance with applicable standards and legislation, using natural resources sustainably. All professionals have a duty to respect the environment and contribute to a more sustainable future.

B) Health and safety

The health and physical integrity of professionals are priorities for Tigre. The company operates its businesses according to the applicable occupational health and safety laws, providing uniforms and Personal Protective Equipment (PPE) to all professionals who require them, and it is mandatory to use these in the manufacturing area.

Any potential emergencies and their magnitude are acknowledged and evaluated, and procedures to reduce or eliminate potential risks are adopted.

Tigre analyzes and investigates incidents and accidents, documents the results, and shares the adopted health and safety protection procedures with all professionals and contracted service providers.

Golden Rules of Security



1

Maintain safety devices and machine and equipment guards in working order.



2

Use personal/collective protective equipment appropriately when accessing the factory area and/or performing activities.



3

Operate machinery and equipment, including material handling equipment, only when trained and authorized.



4

Perform high-risk work only with a Tigre Work Permit.



5

Perform machine and equipment maintenance with lockout and tagout procedures.



6

Access hazardous and controlled-access areas only with formal authorization.



7

Comply with formal procedures and/or safety practices for activities.



8

Do not use defective, improvised, or damaged tools.



9

Do not wear jewelry in the factory and/or talk/text on a cell phone while walking/operating machinery and equipment.



10

Do not run (except for emergency assistance) or walk outside of crosswalks or in prohibited areas.

BEST PRACTICES

- Tigre provides periodic training on health, safety, and the environment to ensure everyone acts responsibly and safely.
- If you identify a threat to physical integrity at work, guide the affected professional and inform your manager and the Occupational Safety department. In cases of severe and imminent risk, stop the activity and immediately notify your manager and Occupational Safety.

POINTS OF ATTENTION

- It is not permitted to work in manufacturing areas without Personal Protective Equipment (PPE) or uniforms when their use is mandatory.
- Visitors to manufacturing areas must wear appropriate clothing and footwear, as outlined in safety rules and procedures.



9

Anti-corruption and anti-bribery

Ethics above all



Tigre does not tolerate acts of corruption, bribery, extortion, fraud, or any illegal or unethical behavior by its professionals or business partners. Such practices are illegal, unethical, and carry serious consequences. Tigre adopts a zero-tolerance policy, complying with the Brazilian Anti-Corruption Law (Law No. 12,846/2013 and its regulations), the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), and other international laws. The company has a clear Anti-Corruption and Anti-Bribery Policy with guidelines that must be followed by everyone.

YOUR ROLE

- If you become aware of any practice involving corruption or bribery, it is your duty to report it through our Ethics Channel or contact the Compliance department.

10

Competition

Tigre maintains transparent relationships with competitors, promotes fair competition, and rejects any anti-competitive behavior such as cartels or boycotts. The company strictly complies with competition laws and its own policies on relationships and good business practices.

We advise against discussing sensitive information with business partners, such as prices, promotions, or marketing strategies. At events involving competitors, Tigre follows the guidelines of the Best Business Practices and Relationship Policy and the Institutional Relations Policy.



Respect for our competitors and market competitiveness

YOUR ROLE

- If you become aware of any practice involving anti-competitive behavior, it is your duty to report it through our Ethics Channel or contact the Compliance department.

Tigre values integrity and does not tolerate practices involving money laundering, terrorism financing, drug trafficking, or the proliferation of weapons of mass destruction, adhering to all related laws. To prevent its operations from being used for illegal activities, it is essential for professionals to review the Anti-Corruption and Anti-Bribery Policy and remain vigilant for warning signs.



POINTS OF ATTENTION

- Business partners who are reluctant to provide complete information, or provide false, suspicious, or insufficient information.
- Payments not corresponding to the company or directed to unidentified third parties.
- Payments made through multiple transactions.
- Inability or difficulty to verify corporate history of an entity and/or its partners.
- Negative publications or comments in the media or in the community concerning the integrity, ethics, legitimacy of the entity or the individual.



If you identify a violation of the code,
REPORT IT!

If everyone does their part, we will have a stronger and more united Tigre. Tigre professionals and business partners must respect the code of ethics and conduct and the company's policies, acting with integrity. Violations may lead to disciplinary actions such as warnings, suspension, dismissal, and legal proceedings. Suppliers and service providers may have their contracts terminated and face appropriate legal measures.

Violations must be reported to a supervisor or through the Ethics Channel. Reports will be handled confidentially by the Ethics and Compliance Committee unless there is a legal obligation to inform authorities. The withholding of essential information for ethics and integrity investigations is strictly prohibited.

Tigre does not tolerate retaliation against whistleblowers.



Reports can be made through the following methods:

- Report to your direct manager.
- Inform the BP or Personnel area.
- Inform the Compliance area.
- Website: www.contatoseguro.com.br/tigre
- Smartphone app – Contato Seguro

Scan the QR code and do your part!



Brazil	0800-602-1350
Argentina	0800-333-9101
Bolivia	800-100-871
Chile	1230-080-8966
Colombia	01800-518-2172
Paraguay	009-800-110-137
Uruguay	000-416-205-2744
Peru	0800-55308
United States	1-800-986-9306

Tigre is committed to ensuring the integrity of investigations and therefore does not set deadlines for closing cases. Everyone who reports situations contrary to the Code or the company's ethical values will receive a conclusive response about the resolution of the case.

13

Unsure? What to do?

If the professional is unsure about the practice of any type of conduct, they should ask themselves:

- Is it consistent with the Company's Code of Ethics and Conduct?
- Is it ethical?
- Is this act legal?
- Is this conduct fair and honest?
- Will it reflect well on me and the company?
- Would I like to read about it in the newspaper?
- Would I advise my children to act in this manner?

Professionals should not refrain from reporting any infringement when they find themselves in situations of doubt. If the answer is "No" to any one of these questions, the conduct should not be adopted.



Remember: you can contact your direct manager or Tigre's Compliance area about any questions you still have.



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December . 2024
