CODE OF ETHICS AND CONDUCT

(COMPLIANCE AND ANTI-BRIBERY)

RG 007 ▫ REV 03
06/04/2026

1. PURPOSE

To establish guidelines, principles, rules, and values that guide the ethical and honest conduct of SEEPIL VALVES in the prevention, detection, and combating of bribery, applicable to its activities, business relationships, and interactions with employees, clients, suppliers, business partners, and public or private entities.

To promote awareness and understanding of the requirements of the Compliance and Anti-Bribery Management System (SGAS), reinforcing the organization's commitment to integrity, transparency, legal compliance, and the prevention of illicit practices across all its operations.

SEEPIL VALVES undertakes to comply with the Brazilian legislation applicable to combating bribery and corruption, as well as other legal, regulatory, and contractual requirements pertinent to its activities, prohibiting any form of bribery, illicit payment, undue advantage, or practice incompatible with the organization's ethical principles.

Failure to comply with the guidelines established in this document may subject employees, service providers, business partners, suppliers, representatives, and other parties involved to applicable disciplinary, administrative, civil, and criminal measures, without prejudice to other sanctions provided for in current legislation and in the organization's internal procedures.

2. APPLICATION

This document applies to all employees, staff, service providers, third parties, and business partners of SEEPIL VALVES, covering all activities, processes, and relationships established by the organization.

The guidelines established herein also apply to relationships with external interested parties, including clients, suppliers, subcontractors, representatives, business partners, and public or private bodies and entities, whenever they act in the name, interest, or benefit of SEEPIL VALVES.

3. REFERENCE DOCUMENT(S)

This document was prepared based on the following normative and legal references and internal documents applicable to the Compliance and Anti-Bribery Management System (SGAS):

Normative and Legal References

- ABNT NBR ISO 37001:2025 – Anti-Bribery Management Systems – Requirements with guidance for use;
- ABNT NBR ISO 37301:2021 – Compliance Management Systems – Requirements with guidance for use;
- Law No. 12,846/2013 – Anti-Corruption Law;
- Law No. 13,709/2018 – General Personal Data Protection Law – LGPD;
- other legislation, regulations, contractual requirements, and other compliance obligations applicable to the organization.

4. DEFINITION OF BRIBERY

For the purposes of this document, bribery is understood as the offering, promising, giving, soliciting, accepting, or receiving of an undue advantage, of any nature, financial or non-financial, directly or indirectly, regardless of value, with the aim of influencing, obtaining an improper benefit, undue favoring, or inducing someone to act in breach of their legal, ethical, or professional obligations.

Bribery may occur in relationships with public or private entities, involving employees, suppliers, business partners, representatives, intermediaries, clients, or any third parties acting in the name, interest, or benefit of SEEPIL VALVES.

SEEPIL VALVES prohibits any form of bribery, corruption, illicit payment, or undue advantage, even when carried out by third parties in its name or benefit.

4.1 Types of Bribery

Bribery may occur in different forms, involving relationships with public or private entities, directly or indirectly. For the purposes of this document, the following types of bribery are highlighted:

4.1.1 Public Bribery:

Characterized by the offering, promising, granting, soliciting, or receiving of an undue advantage involving a public agent, body, or public entity, with the aim of obtaining favoring, undue influence, facilitation of processes, contracts, licenses, authorizations, or any improper benefit.

4.1.2 Private Bribery:

Occurs in relationships between companies, business partners, or individuals, when there is an offer, promise, granting, or receipt of an undue advantage to influence commercial, contractual, or professional decisions in an unethical or inappropriate manner.

4.1.3 Direct Bribery

Occurs when the interested person themselves directly offers, promises, solicits, or grants the undue advantage to the other party.

4.1.4 Indirect Bribery

Occurs when bribery is carried out through third parties, intermediaries, representatives, business partners, suppliers, consultants, or any person acting in the name, interest, or benefit of the organization.

4.1.5 Facilitation Payment

Consists of undue payments made with the aim of speeding up, facilitating, or ensuring the execution of routine or administrative acts. SEEPIL VALVES expressly prohibits this type of practice, even where culturally tolerated in certain locations.

4.1.6 Undue Advantage

An undue advantage is understood as any financial or non-financial benefit offered, promised, granted, or received for the purpose of improperly influencing a decision or obtaining improper favoring.

These may include, among others:

- money or financial equivalent;
- gifts and promotional items;
- travel and hospitality;
- personal favors;
- business opportunities;
- undue benefits or privileges.

5. RESPONSIBILITIES AND ANTI-BRIBERY CONDUCT

SEEPIL VALVES expects all employees, service providers, business partners, suppliers, third parties, and other interested parties to act ethically, honestly, transparently, and in accordance with the principles established in the Compliance and Anti-Bribery Management System (SGAS).

It is everyone's responsibility to:

- comply with applicable legislation, the requirements of the SGAS, the Code of Ethics and Conduct, the Compliance and Anti-Bribery Policy, and the organization's internal procedures;
- act with honesty, impartiality, and responsibility in professional and commercial relationships;
- prevent, identify, and report actual or suspected situations of bribery, corruption, fraud, conflict of interest, or any conduct incompatible with the organization's ethical principles;
- refuse any practice of bribery, undue advantage, or improper favoring;
- protect the reputation, credibility, and integrity of SEEPIL VALVES;
- cooperate with audits, investigations, and internal processes related to the SGAS;
- participate in the training and awareness actions promoted by the organization.

No employee or third party acting in the name of SEEPIL VALVES is authorized to offer, promise, grant, solicit, or receive any type of undue advantage, directly or indirectly, with the aim of obtaining an improper benefit, commercial favoring, undue influence, or any advantage incompatible with the applicable ethical and legal principles.

SEEPIL VALVES encourages the raising of concerns and ensures protection against retaliation for persons who, in good faith or on reasonable grounds, report suspicions or violations related to compliance and anti-bribery.

Failure to comply with the guidelines established in this document may result in the application of disciplinary measures, contractual sanctions, and other applicable administrative, civil, and criminal measures.

5.1 Culture of Compliance and Anti-Bribery

SEEPIL VALVES promotes a culture of compliance and anti-bribery based on ethics, integrity, transparency, responsibility, and fulfillment of compliance obligations.

Top Management and leadership must demonstrate, through their decisions, actions, and behaviors, commitment to the organization's values, encouraging employees and other persons acting in its name to fulfill compliance obligations, prevent bribery and other improper conduct, raise concerns in good faith, and contribute to the continuous improvement of the Compliance and Anti-Bribery Management System.

No commercial, operational, or financial target justifies non-compliance with legislation, compliance obligations, or the organization's ethical and anti-bribery guidelines.

5.2 Permitted Gifts and Hospitality:

Institutional, promotional, public, and non-exclusive promotional items, gifts, and hospitality may be offered or received exclusively, provided they fully comply with the ethical principles and requirements of the Compliance and Anti-Bribery Management System (SGAS).

Only gifts and hospitality that meet the following criteria will be permitted:

- have an institutional, promotional, or legitimate corporate relationship character;
- do not have the purpose of influencing decisions, obtaining improper favoring, or generating an undue advantage for SEEPIL VALVES or for third parties;
- do not represent an explicit or implicit exchange of favors, benefits, or privileges;
- do not include money, financial transfers, or monetary equivalents, such as gift cards, vouchers, or payment receipts;
- are not luxurious, excessive, or extravagant, and must be of modest value, limited to a maximum of R$ 100.00 (one hundred reais);
- are offered or received on a sporadic basis, preferably limited to 1 (one) occurrence within a 12-month period with the same party;
- are carried out in an open, transparent, and ethical manner;
- are related to the promotion, demonstration, or institutional presentation of products and services;
- comply with applicable legislation and the organization's internal requirements;
- are duly recorded, where applicable, in accordance with the internal controls established by SEEPIL VALVES.

SEEPIL VALVES may refuse any gift, hospitality, or benefit that may generate a conflict of interest, compromise the impartiality of decisions, or represent a risk to the Compliance and Anti-Bribery Management System.

5.3 Travel, Training, and Related Benefit Expenses

SEEPIL VALVES prohibits the offering, payment, or reimbursement of travel, accommodation, training, entertainment, or similar benefit expenses to Public Authorities when such actions may constitute undue influence, improper favoring, or a violation of applicable laws and the principles of the Compliance and Anti-Bribery Management System (SGAS).

Requests involving the funding of expenses for Public Authorities must be previously assessed by Top Management and the Anti-Bribery Compliance Function, considering the applicable legal requirements, the legitimate purpose of the activity, the risks involved, and the organization's ethical principles.

Payment of travel, accommodation, training, or related activity expenses may only be made for employees, business partners, contracted third parties, or service providers who are legitimately engaged in activities of interest to SEEPIL VALVES, provided that:

- there is a legitimate professional, technical, or institutional purpose;
- the expenses are appropriate, reasonable, and proportional;
- there is no aim of obtaining an undue advantage or improper favoring;
- supporting documents, invoices, travel reports, and other applicable records are presented;
- payments are made transparently and in accordance with the organization's internal controls;
- the expenses are duly recorded in the accounting books and records of SEEPIL VALVES.

SEEPIL VALVES may refuse requests or reimbursements that do not comply with the ethical principles, internal guidelines, or requirements of the Compliance and Anti-Bribery Management System.

5.4 Donations and Sponsorships

SEEPIL VALVES supports social, institutional, and community initiatives compatible with its ethical principles, organizational values, and social responsibility objectives.

Donations, contributions, and sponsorships made by the organization must have a legitimate, transparent, and duly documented purpose, and their use as a means of obtaining an undue advantage, improper favoring, or inappropriate influence over commercial, regulatory, or institutional decisions is prohibited.

The making of donations and sponsorships must strictly observe the applicable legal requirements, the principles of the Compliance and Anti-Bribery Management System (SGAS), and the organization's internal procedures.

For them to be carried out, at least the following criteria must be observed:

- prior approval by Top Management and the Anti-Bribery Compliance Function;
- verification of the legitimacy and integrity of the beneficiary institution;
- performance of a risk analysis and, where applicable, Due Diligence;
- transparency and traceability of the process;
- compliance with applicable legislation and regulations;
- prohibition of use to obtain undue favoring or improper influence;
- adequate recording in the organization's controls, books, and records.

SEEPIL VALVES must ensure that donations and sponsorships are not used, directly or indirectly, to promote illicit payments, conceal undue advantages, or enable practices incompatible with this Policy, with the Code of Ethics and Conduct, or with applicable legal requirements.

Contributions may include financial resources, goods, services, or any other item of value, provided they are compatible with the ethical principles and controls established by the organization.

In case of doubt regarding the appropriateness of donations, contributions, or sponsorships, the Anti-Bribery Compliance Function must be consulted in advance.

5.5 Promotions and Marketing

SEEPIL VALVES uses promotional, institutional, and marketing activities as a legitimate means of strengthening its brand, visual identity, commercial relationships, and the promotion of its products and services.

All promotional and marketing actions must be conducted ethically, transparently, and in accordance with the principles of the Compliance and Anti-Bribery Management System (SGAS), and their use to obtain an undue advantage, improper favoring, or inappropriate influence in commercial or institutional decisions is prohibited.

SEEPIL VALVES does not use Public Authorities in promotional actions, institutional campaigns, or marketing activities that may generate a conflict of interest, undue favoring, or compliance and bribery risks.

Expenses related to promotional and marketing activities may only be made when:

- they are directly related to the organization's legitimate institutional, promotional, or commercial activities;
- they are appropriate, reasonable, and proportional to the intended purpose;
- they are previously approved in accordance with the applicable internal controls;
- they are paid directly by SEEPIL VALVES to the corresponding supplier or service provider;
- they are duly documented, recorded, and traceable in the organization's controls;
- they comply with the applicable legal, regulatory, and internal requirements.

SEEPIL VALVES may refuse or cancel any promotional action or marketing expense that presents a risk of violating the ethical principles, the SGAS guidelines, or applicable legislation.

5.6 Political Contributions

SEEPIL VALVES prohibits the making of political contributions, financial or non-financial, in the name of the organization or for its benefit, including donations to political parties, candidates, electoral campaigns, or public agents.

No employee, third party, business partner, or representative is authorized to use the resources, assets, structure, name, image, or any other asset of SEEPIL VALVES for party-political or electoral purposes.

SEEPIL VALVES respects the individual right of its employees to participate in the political process and exercise their citizenship in a strictly personal and private capacity, provided that:

- such activities do not use the resources or structure of SEEPIL VALVES;
- they are not carried out in the name of the organization;
- they do not generate a conflict of interest;
- they do not compromise the impartiality, integrity, or reputation of the company;
- they do not create an undue association between personal opinions and the organization's institutional positions.

Political contributions or expressions made in a personal capacity may not, under any circumstances, be presented as linked to SEEPIL VALVES.

In case of doubts related to political contributions, conflicts of interest, or situations that may impact the Compliance and Anti-Bribery Management System (SGAS), the Anti-Bribery Compliance Function must be consulted in advance.

5.7 Conflict of Interest

All employees, service providers, and third parties acting in the name of SEEPIL VALVES must carry out their activities with ethics, integrity, impartiality, good faith, and in accordance with the best interests of the organization.

Professionals must avoid situations of conflict of interest, whether actual, potential, or apparent, that may compromise their independence, objectivity, decision-making ability, or improperly influence their professional activities.

It is prohibited to:

- use a position, function, or role to obtain a personal benefit or favor third parties;
- use confidential or privileged information for one's own benefit or that of third parties;
- participate in decisions or negotiations involving personal, family, or commercial interests conflicting with the interests of SEEPIL VALVES;
- maintain relationships, activities, or businesses that may compromise professional impartiality, independence, or integrity.

Any situation of conflict of interest, or potential conflict, must be immediately reported to the responsible leadership or to the Anti-Bribery Compliance Function for appropriate assessment and handling.

SEEPIL VALVES ensures that all reported situations will be analyzed ethically, impartially, and confidentially, in accordance with the principles of the Compliance and Anti-Bribery Management System (SGAS).

Identified conflicts of interest must be assessed and handled in a manner proportional to the risk, and may result, where applicable, in the removal or withdrawal of the person involved from the decision, the establishment of additional controls, a formal declaration of the conflict, or other measures necessary to preserve the impartiality and integrity of decisions.

Conflict-of-interest situations must be reassessed whenever relevant changes occur in the functions, responsibilities, or relationships of the persons involved.

5.8 Due Diligence

SEEPIL VALVES carries out Due Diligence processes with the aim of assessing compliance risks and bribery risks related to business partners, suppliers, third parties, service providers, employees, and other parties involved in its activities and commercial relationships.

Due Diligence consists of carrying out verifications proportional to the identified risk level, seeking to ensure that the relationships established by the organization are aligned with the ethical and legal principles and the requirements of the Compliance and Anti-Bribery Management System (SGAS).

Due Diligence processes may include, where applicable:

- verification of integrity and reputation;
- identification of possible conflicts of interest;
- analysis of professional and commercial history;
- assessment of compliance and bribery risks;
- verification of sanctions, restrictions, or involvement in illicit practices;
- assessment of adherence to the organization's ethical guidelines and requirements.

The intensity and scope of Due Diligence will be proportional to the nature of the relationship, the criticality of the activity, and the identified risk level.

SEEPIL VALVES may refuse, suspend, restrict, or terminate commercial relationships when risks incompatible with the ethical principles, legal requirements, or SGAS guidelines are identified.

All records related to Due Diligence must be kept as documented information, in accordance with the internal controls established by the organization.

5.8.1 Engagement of Intermediary Third Parties and Business Partners:

SEEPIL VALVES carries out Due Diligence processes for the engagement, maintenance, and monitoring of Intermediary Third Parties and other Business Partners, with the aim of preventing compliance risks, bribery risks, and practices incompatible with the organization's ethical principles.

The organization recognizes that it may be held liable for acts carried out by third parties acting in its name, interest, or benefit, including agents, representatives, consultants, suppliers, service providers, subcontractors, commercial partners, and other intermediaries.

All Intermediary Third Parties and Business Partners that maintain a relationship with SEEPIL VALVES must act with integrity, ethics, transparency, and in accordance with the requirements of the Compliance and Anti-Bribery Management System (SGAS).

Before the engagement or formalization of the commercial relationship, Due Diligence proportional to the identified risk level must be carried out, in accordance with the organization's applicable internal procedures.

Due Diligence may include, where applicable:

- verification of integrity and reputation;
- identification of possible conflicts of interest;
- analysis of ties with Public Authorities;
- assessment of the technical capacity and legitimacy of the activities performed;
- analysis of compliance risks and bribery risks;
- verification of sanctions, restrictions, or involvement in illicit practices;
- identification of “Red Flags” or situations that may expose the organization to legal, financial, reputational, or regulatory risks.

Any suspicious situations, deviations, irregularities, or “Red Flags” identified during the Due Diligence process must be analyzed by the Anti-Bribery Compliance Function before the engagement, continuation, or renewal of the relationship.

No employee of SEEPIL VALVES may solicit, permit, tolerate, or ignore improper conduct carried out by Intermediary Third Parties or Business Partners.

Any suspicion of violation of the Code of Ethics and Conduct, the Compliance and Anti-Bribery Policy, or the requirements of the SGAS must be immediately reported to the Anti-Bribery Compliance Function or reported through the organization's whistleblowing channels.

SEEPIL VALVES may carry out additional Due Diligence in mergers, acquisitions, investments, incorporations, partnerships, or joint ventures, where applicable and proportional to the identified risks.

All relationships with Intermediary Third Parties and Business Partners must be formalized through contracts, purchase orders, or equivalent instruments, containing clauses related to ethics, compliance, anti-bribery, and anti-corruption, in accordance with the organization's internal requirements.

6. FACILITATION PAYMENTS

SEEPIL VALVES expressly prohibits the making, offering, promising, authorizing, soliciting, or accepting of facilitation payments, regardless of the value, location, or cultural practice involved.

A facilitation payment is understood as any payment, benefit, or undue advantage offered directly or indirectly to a public agent or third party with the aim of speeding up, ensuring, favoring, or facilitating the execution of administrative, routine, or non-discretionary acts.

Facilitation payments may include, among others:

- speeding up releases, licenses, or authorizations;
- expediting administrative processes;
- bringing forward inspections, audits, or approvals;
- facilitation of public services;
- obtaining preferential treatment or improper favoring.

No employee, third party, business partner, or representative acting in the name of SEEPIL VALVES is authorized to make facilitation payments for the benefit of the organization.

If any person is asked to make a payment of this nature, the situation must be immediately reported to the Anti-Bribery Compliance Function or reported through the organization's whistleblowing channels.

All situations related to requests, suspicions, or attempts at facilitation payments must be handled in accordance with the procedures of the Compliance and Anti-Bribery Management System (SGAS).

7. BOOKS, RECORDS, ACCOUNTING, AND PAYMENT PRACTICES

SEEPIL VALVES maintains complete, accurate, and transparent accounting, financial, and operational books and records with integrity, in accordance with applicable legislation, accounting principles, internal controls, and the requirements of the Compliance and Anti-Bribery Management System (SGAS).

All transactions, payments, receipts, expenses, contracts, reimbursements, and other financial movements must be duly authorized, documented, recorded, and traceable, and the making of false, incomplete, misleading records or records without adequate supporting documentation is prohibited.

It is prohibited to:

- maintain parallel, hidden, or unofficial records;
- make payments without adequate supporting documentation;
- record false, inaccurate, or incomplete information;
- use the organization's resources for illicit purposes or purposes incompatible with the company's ethical principles;
- make payments in disagreement with the established internal controls;
- make cash payments without formal authorization and adequate justification, where applicable.

All payments made by SEEPIL VALVES must have a legitimate purpose, be related to the organization's activities, and observe the approval levels, segregation of duties, and financial controls established in the internal procedures.

Expenses, reimbursements, and payments must be supported by valid supporting documents, including invoices, contracts, receipts, reports, and other applicable records.

The organization carries out financial and non-financial controls aimed at the prevention, detection, and response to compliance risks, bribery risks, fraud, and irregularities.

Any irregularity, inconsistency, or suspicion related to accounting or financial records or payment practices must be immediately reported to the Anti-Bribery Compliance Function or reported through the organization's whistleblowing channels.

8. “RED FLAG” – “WARNING SIGN”

“Red Flags” are warning signs, indications, or situations that may indicate a compliance risk, bribery risk, fraud, corruption, conflict of interest, or any conduct incompatible with the ethical and legal principles of SEEPIL VALVES.

The identification of a “Red Flag” does not necessarily mean the existence of an irregularity, but it requires attention, analysis, investigation, and appropriate handling in accordance with the procedures of the Compliance and Anti-Bribery Management System (SGAS).

Examples of “Red Flags” include, among others:

- requests for cash payments or payments without adequate documentation;
- requests for payment to third-party bank accounts or in countries unrelated to the operation;
- resistance to providing information, documents, or records;
- undue relationships with Public Authorities;
- requests for excessive or unusual commissions;
- a history of involvement in illicit practices, fraud, or corruption;
- refusal to accept compliance, anti-bribery, or contractual audit clauses;

- requests for unjustified urgency in approvals or payments;
- incompatible, excessive, or unjustified expenses;
- indications of conflict of interest;
- apparent lack of technical capacity to perform the contracted services;
- attempts to conceal information or avoid internal controls.

All employees, third parties, and business partners must remain attentive to possible “Red Flags” and immediately report any suspicious situation to the Anti-Bribery Compliance Function or through the organization's whistleblowing channels.

No employee should ignore, conceal, or fail to report suspicious situations related to compliance or bribery risks.

9.1 COMMITMENT TO HUMAN RIGHTS

SEEPIL VALVES reaffirms its commitment to the respect, promotion, and protection of human rights in all its activities, commercial relationships, and work environments, acting ethically, responsibly, and in accordance with applicable legislation.

The organization does not tolerate any form of discrimination, harassment, violence, child labor, forced labor, exploitation, degrading treatment, or any practice that violates the dignity or physical or moral integrity of individuals.

SEEPIL VALVES undertakes to promote a safe, respectful, inclusive work environment free from abusive practices, ensuring equal opportunities, respect for diversity, and the valuing of individuals.

All employees, third parties, suppliers, business partners, and other interested parties must act in accordance with the principles of respect for human rights, ethics, integrity, and social responsibility established by the organization.

SEEPIL VALVES encourages the raising of concerns related to human rights violations, ensuring confidential treatment, protection against retaliation, and adequate communication and reporting mechanisms.

Any suspicion or evidence of a human rights violation must be immediately reported to the Anti-Bribery Compliance Function, the responsible leadership, or reported through the organization's whistleblowing channels.

9.2 PRIVACY AND PERSONAL DATA PROTECTION – LGPD

SEEPIL VALVES undertakes to ensure the privacy and protection of personal data processed in the course of its activities, observing applicable legislation, especially Law No. 13,709/2018 – General Personal Data Protection Law – LGPD.

Personal data must be processed for legitimate and authorized purposes, observing the applicable requirements of confidentiality, security, necessity, and restricted access.

It is prohibited to use, access, share, disclose, alter, or delete personal data improperly or without authorization.

Suspicions of unauthorized access, loss, leakage, misuse, or other incidents involving personal data must be immediately reported to the persons designated by the organization for assessment and handling.

9.3 FULFILLMENT OF COMPLIANCE OBLIGATIONS

SEEPIL VALVES undertakes to identify, access, understand, and fulfill the compliance obligations applicable to its activities, including legal, regulatory, contractual, and normative requirements, and commitments voluntarily assumed by the organization.

All employees must fulfill the compliance obligations pertinent to their functions and report to leadership or the Compliance Function situations that may represent non-compliance, a relevant change in requirements, or a need to adapt internal processes and controls.

Changes in compliance obligations must be assessed regarding their impacts and, where applicable, result in the updating of risks, controls, procedures, training, and other elements of the Compliance and Anti-Bribery Management System.

10. REPORTING OF CONCERNS

SEEPIL VALVES encourages all employees, service providers, business partners, suppliers, third parties, and other interested parties to report, in good faith or on reasonable grounds, any suspicions, concerns, irregularities, or violations related to the Compliance and Anti-Bribery Management System (SGAS), the Code of Ethics and Conduct, applicable legislation, or the organization's ethical principles.

Reports may involve, among others:

- bribery or corruption;
- fraud;
- conflict of interest;
- undue payments;
- harassment or discrimination;
- human rights violations;
- non-compliance with internal controls;
- financial or accounting irregularities;
- unethical conduct or conduct incompatible with the organization's values.

SEEPIL VALVES provides accessible, confidential, and, when requested, anonymous whistleblowing channels, ensuring protection against any form of retaliation for persons who make reports in good faith.

No employee or third party will suffer punishment, discrimination, or retaliation for reporting concerns, requesting guidance, or participating in investigations related to the SGAS.

All complaints and reports received will be analyzed and handled ethically, impartially, confidentially, and proportionally to the nature of the occurrence, in accordance with the internal procedures of SEEPIL VALVES.

In case of doubt about a particular conduct, situation, or decision, employees are encouraged to seek guidance from the Compliance Function whenever they have doubts about the legality, ethics, or compliance of a particular conduct or decision.

No person will suffer retaliation, punishment, or unfavorable treatment for refusing to participate in conduct that, in good faith or on reasonable grounds, they consider incompatible with compliance obligations, anti-bribery guidelines, or the organization's ethical principles.

10.1 Whistleblowing Channels

SEEPIL VALVES provides accessible, confidential, and independent whistleblowing channels so that employees, service providers, business partners, suppliers, third parties, and other interested parties can report suspicions, irregularities, ethical violations, bribery practices, fraud, or any non-compliance with the requirements of the Compliance and Anti-Bribery Management System (SGAS).

Reports may be made on an identified or anonymous basis, with the confidentiality of the information and protection against any form of retaliation ensured for persons who make reports in good faith.

The official channels provided by SEEPIL VALVES are:

Institutional website: Compliance > Whistleblowing Channel
E-mail: compliance@seepil.com
Physical Whistleblowing Box available at the organization's units (via a form completed and deposited in the box by the whistleblower).

All complaints received will be analyzed and handled ethically, impartially, confidentially, and in accordance with the applicable internal procedures.

SEEPIL VALVES encourages any suspicions, concerns, or irregularities to be reported immediately, contributing to the maintenance of an environment of integrity, transparency, and compliance with the ethical principles of SEEPIL VALVES.

11. TRAINING, AWARENESS, AND CULTURE OF COMPLIANCE AND ANTI-BRIBERY

SEEPIL VALVES promotes training and periodic awareness actions related to the Compliance and Anti-Bribery Management System (SGAS), with the aim of strengthening the culture of integrity, ethics, transparency, and prevention of bribery.

Training is planned according to the annual schedule established by the Anti-Bribery Compliance Function, with the participation of Top Management and/or a designated representative, considering the compliance risks, the activities carried out, the target audience, and the requirements applicable to the organization.

Training may be directed at employees, managers, third parties, business partners, and other relevant interested parties, especially at areas and functions that have interaction with Public Authorities, commercial partners, suppliers, or activities considered sensitive to compliance and bribery risks.

Where applicable, training may cover topics related to:

- compliance and anti-bribery;
- ethics and professional conduct;

- conflict of interest;
- fraud and corruption prevention;
- whistleblowing channels;
- human rights;
- internal controls;
- legal and regulatory responsibilities;
- identification of risks and “Red Flags”.

All training participants must comply with the guidelines, policies, procedures, and controls established by the organization related to compliance and anti-bribery.

SEEPIL VALVES may request participation records, comprehension assessments, acknowledgment forms, or formal confirmations related to the training carried out, where applicable.

Training and awareness actions are kept as documented information, in accordance with the internal controls of the SGAS.

The organization must periodically assess the need for and effectiveness of training and awareness actions, considering compliance and bribery risks, compliance obligations, the responsibilities carried out, and relevant changes applicable to the organization's activities.

12. REVIEW OF THE ANTI-CORRUPTION PROGRAM

SEEPIL VALVES carries out periodic assessments of the Compliance and Anti-Bribery Management System (SGAS) with the aim of verifying its adequacy, implementation, sufficiency, and effectiveness in meeting the applicable requirements and the organization's objectives.

The Anti-Bribery Compliance Function, together with Top Management, ensures the planning and performance of internal audits at planned intervals, at least annually, in accordance with the criteria established in the organization's audit program.

The purpose of internal audits is to assess:

- the conformity of the SGAS with the applicable internal and normative requirements;
- the implementation and maintenance of compliance and anti-bribery controls;
- the effectiveness of the system in the prevention, detection, and handling of bribery risks and non-conformity;
- opportunities for continuous improvement.

The results of audits, critical analyses, non-conformities, corrective actions, and improvement opportunities are recorded and communicated to Top Management, the Anti-Bribery Compliance Function, and the relevant parties, where applicable.

The information obtained is used to strengthen internal controls, improve processes, and promote the continuous improvement of the Compliance and Anti-Bribery Management System of SEEPIL VALVES.

13. SGAS DOCUMENTATION

SEEPIL VALVES maintains documented information related to the Compliance and Anti-Bribery Management System (SGAS) with the aim of demonstrating the implementation, maintenance, monitoring, and continuous improvement of the organization's compliance and anti-bribery processes, controls, and initiatives.

The Anti-Bribery Compliance Function is responsible for ensuring that the evidence related to the SGAS is adequately recorded, controlled, protected, and maintained in accordance with the applicable internal, legal, and normative requirements.

The SGAS documentation may include, where applicable:

- policies, procedures, and internal controls;
- training records, attendance lists, and certificates;
- reports, minutes, and records of critical analyses;
- risk assessments and Due Diligence;
- internal and external audit records;
- action plans, non-conformities, and corrective actions;
- records of complaints, investigations, and handling;
- internal and external communications related to the SGAS;
- awareness and educational materials;
- monitoring records, measurements, and performance assessments;
- evidence of compliance with legal, regulatory, and contractual requirements.

All SGAS records and documented information must be kept with integrity, and in a traceable, accessible, confidential, and protected manner against loss, undue alteration, or unauthorized access, in accordance with the organization's internal procedures.

14. IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY CONTROLLED ORGANIZATIONS AND BUSINESS PARTNERS

Currently, SEEPIL VALVES does not have any controlled organizations, subsidiaries, or companies over which it exercises corporate or operational control.

For business partners, suppliers, third parties, and other non-controlled organizations that present a compliance risk or bribery risk level higher than “low,” SEEPIL VALVES establishes controls proportional to the identified risks, in accordance with the requirements of the Compliance and Anti-Bribery Management System (SGAS).

Suppliers, Third Parties, and Business Partners

The organization carries out an assessment of compliance risks and bribery risks related to suppliers, third parties, and business partners, in accordance with the applicable internal procedures.

Based on the risk assessment, Due Diligence may be required for registration validation, integrity verification, reputational analysis, and compliance assessment before the engagement, renewal, or continuation of the commercial relationship.

The applicable controls may include, depending on the risk level:

- Due Diligence;
- documentary and registration analysis;
- contractual compliance and anti-bribery clauses;
- periodic monitoring;
- performance and compliance assessment;
- awareness and communication actions related to the SGAS.

Employees and Sensitive Functions

SEEPIL VALVES may carry out Due Diligence for candidates for strategic positions, promotions, internal transfers, or employees who work in functions considered sensitive to compliance and bribery risks.

These assessments are conducted in accordance with the criteria established in procedure PE-RH-001 – Competence, Training, and Awareness, considering the nature of the function, level of exposure to risks, and responsibilities carried out.

All controls adopted by the organization must be proportional to the identified risks and compatible with the ethical and legal principles and requirements of the Compliance and Anti-Bribery Management System.

15. ANNEXES

Anti-Bribery Compliance Commitment Form:

Applicable to all staff and employees of SEEPIL (internal use).

Supplier Anti-Bribery Compliance Declaration:

Applicable to business partners (external use).