



Ethics in action

Code of Ethics and Conduct





Ethics. in action

Doing the right
thing is everyone's
commitment



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Message from the leadership

In the heart of the Amazon, the Lago do Janauacá community was the birthplace of the ATEM brothers, the founders of one of the largest economic groups in Brazil's Northern region.

The Atem family has a long history of entrepreneurship in the Amazon, always valuing its people, generating jobs and income in the Amazon region and providing opportunities for progress in the Brazilian states in which it operates. Grupo Atem is the pride of the people of Amazonas and is undoubtedly one of the greatest examples of success in the fuel industry in Brazil.

The Group believes that its success is due to its respect for people and the environment, governance, ethics, transparency, entrepreneurial vision, and constant innovation.

We therefore present in our Code of Ethics and Conduct the

guidelines and provisions that represent our commitments to always act ethically and with integrity when performing our activities, complying with all applicable internal and external laws and regulations, which is a fundamental element for our operations to be successful.

Through this Code, employees, third parties, suppliers, customers, and everyone who is part of Grupo Atem's relationship community will know what conduct is expected when conducting their daily activities and how to act in different situations. It is everyone's role to thoroughly understand, incorporate, and disseminate the values and guidelines contained in this Code.

This is a guiding document, so I ask everyone to use common sense in situations that may not be covered by this Code. If you have any doubts, please



check with your line manager or the Compliance department. Finally, please remember that our Ethics Channel will always be available for reporting any violation, even a potential one, or any behavior that represents a violation of this Code, our internal rules and policies, or any regulation or legislation in force.



Fernando Aguiar
Grupo Atem's CEO



GRUPO ATEM

For the purposes of this document, Grupo Atem is made up of the following companies: Atem Participações S.A., Atem's Distribuidora de Petróleo SA, Refinaria de Manaus S.A., Bio Energia da Amazônia Ltda, Navemazônia Navegação Ltda, TAG Distribuidora de Combustível S.A., Amazônia Energia Indústria e Comércio de Combustíveis Ltda, DMN Estaleiro da Amazônia Ltda, 2 AM Construtora Ltda. and Rodoamazonia Transporte Rodoviário de Carga Ltda.





OUR VALUES

- We firmly believe in people and in relationships based on trust and honesty;
- We value ethics and transparency;
- We are committed to the quality of our products, to the sustainable growth of our companies, and we passionately strive for excellence in everything we do;
- We believe in an individual's autonomy and in taking responsibility for our actions;
- We respect and value safety and the Environment, and we take care of it like our own home..

Our
COMMITMENTS

1



PEOPLE



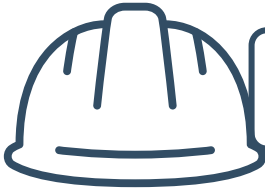


1.1 Respect for people, human rights, diversity, and the work environment

We at Grupo Atem believe that respect for human rights is an essential and non-negotiable practice that should permeate all relationships, whether face-to-face or virtual, inside or outside the workplace. We understand that, in building a harmonious environment, respect for everyone's right to be and exist fosters diversity and inclusion and encourages fairness in business dealings within the Group's companies.

We do not tolerate any kind of violation of human rights in our business units or in our business partners (customers, suppliers, service providers), including, but not limited to, using slave labor (or equivalent conditions), using child labor, or any misconduct through acts of prejudice or discrimination, due to gender, sexual orientation, ethnicity, physical condition, religion or belief, color, age, political conviction, nationality, marital status, socioeconomic condition/income class, and other acts of prejudice or discrimination.

We do not allow possession of weapons or illicit drugs on our premises. Consuming alcoholic beverages is also prohibited, except at celebrations, when duly authorized and supervised by senior management.

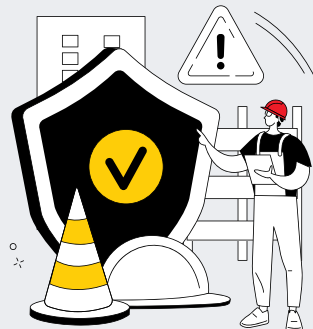


1.2 Occupational health and safety

all of us must ensure a healthy and safe environment in which to perform our activities, taking care of the wellbeing and safety of our co-workers and business partners. No activity can be carried out without adequate safety conditions.

Therefore, we must:

- be committed on a daily basis to maintaining a healthy working environment and complying with applicable laws and regulations;
- be vigilant to avoid accidents, injuries and illnesses;
- act responsibly, identifying and preventing health and safety risks;
- provide safety equipment to our employees, requiring our employees and Third Parties (suppliers, service providers) to use them on our premises at all times, thus complying with the safety rules established in each of the Group's companies and providing training, campaigns, and actions aimed at raising awareness and improving safety conditions at work.





SOCIETY
and the
ENVIRONMENT





2.1 Corporate social responsibility

We believe that an ethical commitment to our employees and society encourages the creation of an increasingly better corporate environment of people who are positively impacted and who impact their reality.

We respect the communities around the regions in which we operate, their needs and characteristics, and establish a mutually harmonious, respectful and ethical relationship wherever we operate.

We organize and support campaigns and actions that encourage social and environmental development, helping to raise people's standard of living while respecting cultural and social characteristics and the environment.

We encourage the participation of all employees and partners towards a more humane, fair and sustainable society.

We strive to inform and listen to the wishes of the communities in which we operate, establishing and maintaining effective communication channels.



2.2 The Environment

We are committed to preventive actions in order to reduce possible impacts on the environment associated with our activities, whether they come from internal services or third parties. Our DNA includes the pursuit of sustainable results, which continually encourage protecting the environment and its surroundings.

We do not tolerate any situations that involve recklessness or malpractice and that place the integrity of our employees or the environment to which they are exposed at risk.



ACTING
RESPONSIBLY



3.1 Combating corruption

We believe that honesty is an ethical guideline for our business and therefore we do not tolerate any situations involving acts of bribery, fraud, corruption, or kickbacks. As such, our activities fully comply with Brazilian anti-corruption legislation.

Fraudulent corporate practices comprise actions or omissions by individuals and/or legal entities, in order to obtain benefits that are contrary to Grupo Atem's interests, and/or to cause any tangible and/or intangible damage to the Group - using deceptive practices, breach of trust, false statements, or any other way of deceiving, harming, or misleading third parties. Grupo Atem takes preventive measures against all forms of corporate fraud, corrupt practices, and other improprieties relating to its companies' assets and activities.

Corruption practices include, but are not limited to:

- Offering, giving, promising, soliciting, receiving or accepting bribes, bribe brokering, or payments
- in any form, including money, valuables, services or providing/receiving any unjustified advantages
- to/from any public officials, with any intention of influencing conduct or obtaining or facilitating undue advantages
- whether they are administrative, bureaucratic, formal, commercial, or economic.



Employees and third parties are forbidden to:

Directly or indirectly receive, accept or offer, promise, enable, authorize, provide, pay any undue advantage, either from/to public officials or bodies, public agents, political parties, candidates to public office or any Politically Exposed Persons (PEP), their family members, spouses; or from/to any individuals or legal entities in the private sector, their family members, spouses; or from/to any individuals or legal entities in the private sector.



3.2 Interaction with the public administration and its agents

Grupo Atem's relations with the public administration shall be strictly institutional, ethical, transparent, upright, and conducted in an official manner, in compliance with the legislation.

It is expressly forbidden:

to directly or through third parties, receive, offer, promise or authorize any undue advantage of any kind, whether in money, goods or services of value, to public officials, political parties, candidates running for public office or any Politically Exposed Persons (PEP), in Brazil or abroad, in order to obtain a personal benefit or benefit for Grupo Atem.



3.3 Third-party relations



Grupo Atem's relations with third parties shall be guided by respect, professionalism, transparency, and integrity, applying fair and transparent procedures in evaluating, selecting and contracting processes.

All third parties shall be assessed on the basis of criteria that take into account technical, legal, economic and suitability aspects, not allowing any kind of favoritism or discrimination, in accordance with internal guidelines provided for in the Group's regulatory instruments.

Grupo Atem acts and requires third parties to act in accordance with this Code and to comply with the anti-corruption clauses contained in the legal instruments signed with the Group's companies.



3.4 Gifts, courtesies, entertainment, meals and hospitality

Gifts, courtesies, entertainment, and hospitality are part of the business environment and can strengthen business relations. However, such practices must not influence corporate decisions, which could result in a conflict of interest or undue advantage for the Group, its employees, and/or third parties.

It is therefore strictly forbidden to:

- receive or offer/promise gifts, presents, courtesies, entertainment, meals and hospitality aimed at exchanging favors with third parties, clients, public agents; receive or offer/promise gifts from/to third parties, clients, public agents, any amount of money or equivalent, such as gift vouchers, fuel vouchers, exchange vouchers;
- receive gifts, courtesies, entertainment, meals and hospitality where the commercial value exceeds the limit set forth in specific internal regulations;



Receiving gifts with no commercial value, such as pens, diaries, calendars and other items in this category, for example, is allowed. We must not accept and/or receive gifts, presents, hospitality or entertainment with commercial value.

In the event of any receipt that does not comply with this Code and/or specific internal regulations, the line manager must be informed.

If doubts persist, the Compliance area should be consulted in person or via the Ethics Channel.



3.5 Campaigns, donations, and sponsorships

All campaigns, donations and sponsorships made by Grupo Atem follow the precepts of good faith, transparency and integrity, and comply with specific internal regulations and current external legislation.

All donations and sponsorships must be made in such a way as to contribute to developing communities and society.

Supporting campaigns or making donations or sponsorships on behalf of the Group is not allowed without prior authorization from the relevant internal department.



We point out that employees are free to engage personally in campaigns, donations and sponsorships, but they should be careful to assess the seriousness of the cause, action, or institution.



3.6 Political party activities and contributions

We respect free political opinion and/or party association and are cautious to ensure that our actions do not substantiate or appear to substantiate support for political parties, associations, or campaigns. Thus, we strive for impartiality and for maintaining a neutral and independent relationship with these ideals.

Therefore, it is forbidden:

- for employees or third parties to campaign for, donate to, endorse, or support parties, party associations or politicians on behalf of the Group, or conduct party campaigns or support politicians on the Company's premises, during or outside working hours.



3.7 Conflicts of interest

Conflicts of interest arise in situations or circumstances in which the private interests of an employee/third party (their relatives/close associates) interfere or may interfere with Grupo Atem's objectives, so that the employee's/third party's decisions are influenced in order to obtain an advantage or undue favor. Such a conflict can damage Grupo Atem's results and reputation.

Even when they do not materialize, their apparent or potential existence can have a negative impact on the credibility and suitability of those involved. Therefore, we expect all choices made by our employees and business partners to be beneficial to Grupo Atem's interests and legally provided for.

Examples of some situations that may configure real, potential or apparent conflicts are:

- direct or indirect subordination between relatives¹ or between persons who are in an affectionate relationship²;
- corporate shareholding or having a signed contract, either for providing or obtaining services, with competitors, third parties (suppliers, providers), clients or other employees;



- kinship or emotional relationships with PEP², the Group's market competitors, clients; performing work or activities that are not compatible with their working hours at Grupo Atem.

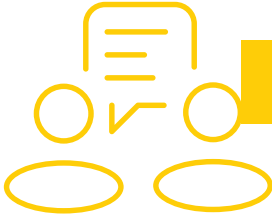
In the case of employees and third parties facing real, potential, or apparent conflicts of interest, it is their duty to inform their line manager (as applicable) and/or the Compliance Area, via the Ethics Channel or the internal Conflict of Interest Declaration, as well as refraining from taking part in any decision related to the conflict of interest situation or in any way influencing such a decision.

Remember: transparency and common sense are essential factors in preserving good faith.

¹ Under the terms of this Code, relatives are: mother, father, child, cousin, sister, grandparent, grandchild, uncle, niece, brother-in-law, father-in-law, son-in-law, daughter-in-law, among other kinship configurations. Family members up to the 4th degree are considered

² Under the terms of this Code, affectionate relationships are: spouse (husband, wife), partner, boyfriend or girlfriend, romantic involvement, stepson or stepdaughter, godmother or godfather;

³ (Politically Exposed Persons) are public officials who hold or have held relevant public positions, jobs or functions in the last five (5) years in Brazil or in foreign countries, territories or dependencies, as well as: (I) their representatives or attorneys, (II) their Family Members, and (III) legal entities in which they are shareholders.



3.8 Customer relations

We honor the commitments we make to our clients, ensuring the best cost-benefit ratio and the effectiveness of our deliveries. Our relationship is based on transparency, trust and respect for each other's culture, without any discriminatory activity.

We do not accept or grant commissions or gratuities to our clients and we reserve the right to terminate any business relationship in which non-compliance with the Code of Ethics, Internal Policies and/or current external legislation is identified.



3.9 Anti-trust and fair competition

Grupo Atem's business is carried out in accordance with the Anti-Trust principles and legislation, based on free competition and maintaining a competitive environment, the main beneficiaries of which are consumers. To ensure compliance with this legislation:

- Our employees must not provide or receive confidential or commercially sensitive information from competitors (e.g.: pricing strategies, commercial strategies, production costs);
- We do not agree with cartelization practices, price combinations, market division, industrial espionage or any other illegal measure for obtaining commercially sensitive information from competitors or undue commercial advantages
- Membership in associations and trade associations should be for the sole purpose of cooperating in developing the industry and the market, fostering understanding of issues affecting the whole industry and enabling lawful initiatives that benefit all;

Any cartelization initiative is strictly forbidden and, if they come across any such situations, our employees shall explicitly oppose them.



3.10 Labor documents and records

For the purposes of this Code, any virtual or physical instruments required for operating the activities that drive Grupo Atem's business are considered to be Labor Documents and Records.

Whether they are contracts, proposals, payment slips, reports, and commercial, accounting, financial or tax records, for example, they must all correspond to reality, as they ensure that the Group fulfills its obligations properly. This information affects Grupo Atem's credibility, as it is susceptible to legal sanctions and reputational damage.

No operation of an economic, financial or asset nature involving any Grupo Atem company may be conducted without proper registration in the commercial, accounting, or tax books.

All operations and payments made by Grupo Atem shall be properly informed to the relevant areas, so that they are duly ascertained, justified, and entered in the accounting records from the outset.

All supporting documentation for operations shall be kept and filed in accordance with legal deadlines.



3.11 Using assets, intellectual property, and confidentiality

Grupo Atem's assets include tangible assets such as work premises, vehicles, electronic devices, computers, and intangible assets such as working hours, systems and our companies' registered brands.

All employees and service providers are responsible for making conscientious, honest and safe use of our assets, which are liable to be monitored at any suspicion of illegal or unethical conduct involving their utilization. With regard to our systems and networks, any discrimination and moral or sexual harassment practices are prohibited. Working hours, in turn, must be used for performing the services for which they were hired.



The information, documents and processes developed internally for carrying out our activities are Grupo Atem's intellectual property and may not be used for any purposes that are outside the company's objectives.

It is strictly forbidden to leak, transfer, or sell information or intellectual property in order to obtain any personal advantage or self-interest. It is the employees' duty to maintain company confidentiality.

If there is evidence of situations involving unethical conduct or non-compliance with this Code, other normative instruments and current external legislation, the employees or third parties will be subject to the appropriate measures.



3.12 Privacy, Data Protection, and Information Security

We have established internal mechanisms for ensuring that treating personal data complies with the applicable legislation. Thus, in compliance with the provisions of the General Data Protection Law (Law No. 13.709/2018), we are committed to preserving the confidentiality and security of sensitive personal data or information that may pass through our internal networks, systems or equipment, preventing accidental or unlawful destruction, loss, alteration, or sharing and disclosure.

All information produced on systems, computers and/or shared via emails, corporate telephones, for example, is Grupo Atem's property. Systemic access, in turn, is granted through segregation of positions/functions, following the standards of our Information Security policy. Passwords are confidential and non-transferable.

Good practices shall be observed when handling personal and confidential information. In the event of violations of internal rules or current legislation, disciplinary and/or legal measures may be imposed.



3.13 External communication and social media

The brand and image of the companies that make up Grupo Atem shall be safeguarded by all Grupo Atem employees, third parties and business partners, in physical environments (newspapers, magazines, for example) or virtual environments such as social media (television networks, social networks, electronic reports, podcasts, videocasts, lives). Care must be taken when handling social media, due to the speed and reach of the information, which can unduly expose the Group's image and negatively affect its reputation.

No statements, announcements or posts should be made on behalf of or about Grupo Atem, which should be handled by the Communication Department.



Sharing confidential, strategic information is strictly forbidden. Posting photos or videos of internal meetings whose content could expose confidential projects shall be avoided.

Any information linked to our activities may only be shared if the Group makes public official statements such as announcements of actions, campaigns, results reports; or if they refer to events or activities that are not detrimental to our business.



3.14 Legal and disciplinary measures

All Grupo Atem employees, regardless of position, length of service, age or gender, are subject to disciplinary measures in response to unethical conduct and/or non-compliance with the guidelines of this Code of Ethics, procedures, standards and internal policies.

Based on the internal regulatory instrument for managing consequences, managers and/or the Ethics Committee may apply the appropriate corrective measures, such as verbal or written warnings, or suspensions. Depending on the seriousness of the violation, an employee may have their contract terminated for just cause, as provided for in the current legislation and in the Group's internal rules. It is worth noting that corrective measures such as warnings and suspensions, if recurrent, can also result in termination of the employment contract, as provided for in the current legislation.



Third parties (suppliers, service providers) are not exempt from corrective measures. Unethical conduct or violations of internal rules and the current legislation may result in a breach of contract, the consequences of which will be set forth in the instrument signed between the parties, and may even result in replacing the service provider.

Depending on the nature of the violation, the employee or third party may be criminally liable for the act committed under the terms of the current legislation. In the event of any crime being detected, Grupo Atem will strictly comply with the legislation in force and, within the limits of its capacity, will make the appropriate and enforceable arrangements.

4



SHAREHOLDERS
and INVESTORS





Grupo Atem is committed to providing shareholders and investors with accurate, transparent, and reliable information in a timely manner, based on the best Corporate Governance practices, ensuring that related parties and the market, where applicable, are aware of our activities, objectives, and results, in order to make their decisions.



ETHICS CHANNEL





Grupo Atem's Ethics Channel is a secret and confidential tool that is available to employees, third parties, business partners, and the community in general for reporting situations that violate this Code of Ethics, internal rules, policies and procedures, as well as current legislation applicable to Grupo Atem companies.

Reports made through the Channel can be either identified or anonymous, depending on the whistleblower's choice, and will be received by a third-party company, thereby ensuring that the records are independent and impartial. The Compliance area is responsible for ensuring that the cases are investigated, and the Ethics Committee is responsible for deciding, if necessary, on the appropriate measures, as defined in its internal regulations.

Protecting and not retaliating against bona fide whistleblowers is assured, should they choose to identify themselves, as is the confidentiality of all information reported by the whistleblowers. When reporting to the Channel, whistleblowers must undertake that all the information provided is true. Any attempts to slander or manipulate situations, if proven, could result in disciplinary measures.

To use Grupo Atem's Ethics Channel, simply visit the **www.canaldeetica.com.br/grupoatem** website or call **0800 792 1006** toll free from within Brazil. Access is free and it operates 24 hours a day, 7 days a week.

Any doubts regarding the guidelines and situations set forth in this Code can be resolved by Grupo Atem's Compliance Area, either in person or through the Ethics Channel at the contacts provided above.

TERM OF KNOWLEDGE AND COMMITMENT GRUPO ATEM'S CODE OF ETHICS AND CONDUCT

I hereby declare, to all effects and purposes, that I have read and understood Grupo Atem's Code of Ethics and Conduct and that I undertake to comply fully with the terms and conditions set forth in this document, being aware that failure to do so may result in disciplinary and/or legal measures.

Name: _____

Company: _____

Position: _____

Business Sector: _____

Location: [City, State/Country] : _____

Date: _____ de _____

Signature: _____



Ethics in action

