



Code of Conduct & Compliance Manual

Version: 1.0

Approver: Administrative Council

Approval date:
11/11/2020

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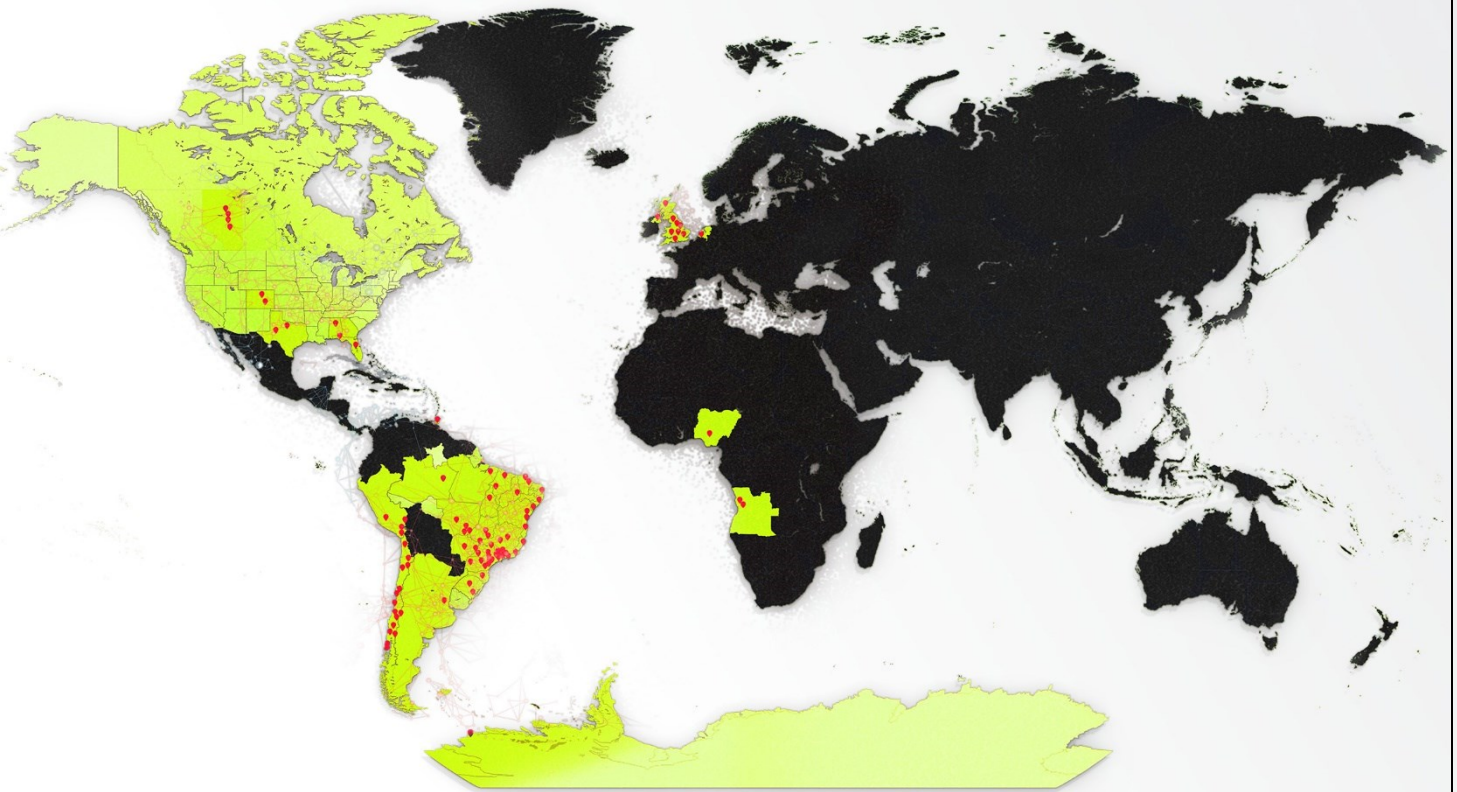
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16 countries, 200 bases and one goal: **Caring for the Planet**





Code of Conduct & Compliance Manual	Version: 1.0
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1. WORD OF THE CHAIRMAN

The Ambipar works to improve its Compliance Program, permanently seeking to achieve the highest standards of integrity, transparency and reliability in all its business and relationships.

The Code of Conduct is applicable to all employees, suppliers, administrators, representatives, service providers and other commercial partners of the companies, and must be a parameter for all decisions and actions developed in the business environment and related, directly or indirectly, to the companies of the Ambipar.

We know that good practices are not exhausted by the conduct recommended in the Code of Conduct, since we must also be in strict adherence to the laws of our country, but it indicates the minimum and non-negotiable standards of behavior that must be observed based on beliefs and values of the Ambipar.

In this sense, we believe that our sustainable growth continues connected with the ethical and transparent posture that we conduct the Group's business.

2. ORGANIZATIONAL PRINCIPLES

MISSION: Contribute for companies and society to be sustainable, preserving the world for future generations

VISION: To be recognized as a global reference in integrated Environmental solutions.

VALUES: To Believe, realize and undertake, basing the Group's businesses on professionalism, sustainability and transparency.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

3. RELATION WITH THE ENVIRONMENT

With a strong presence in the market for integrated environmental solutions and emergency response, the commitment and respect for the environment and sustainability are part of the Ambipar's mission and values, which has always been sensitive to society's demands in the regarding ecological concerns that affect the entire planet.

Its trajectory reveals the technological evolution in the integration with the environment and focuses on the search for sustainable environmental solutions.

We base our activities on strict compliance with legislation and environmental standards, seeking to optimize the use of natural resources, sustainable development and the preservation of nature and biodiversity.

We communicate eventual environmental damages resulting from incidents or emergency situations to the competent entities, customers, and other interested parties, adopting a collaborative posture in the forwarding of solutions.

4. MISSION AND VALUES

The Ambipar bases its business conduct on strict ethical principles, built with respect for the laws and values that inform and affirm the Group's reputation. The Ambipar's ethical principles and values are:

- Commitment to excellence in carrying out its activities and customer satisfaction.
- Correct and transparent relationship with its employees, third parties, customers, and society in general.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Commitment to the quality of the work environment, ensuring the physical and moral integrity of its employees.
- Integrity and honesty in conducting its business.
- Prohibition and zero tolerance for acts of corruption.
- Good corporate governance practices, good accounting and management principles and practices, clear, objective and timely communication to its investors and with the capital market.
- Respect for people regardless of their hierarchical position, origin, color, ethnicity, culture, age, social level, physical capacity, religion and sexual orientation, with any discriminatory practices being rejected.

5. OBJECTIVES OF THE CODE OF CONDUCT

The Code of Conduct is an instrument for realizing the Group's values and philosophy. It must be widely publicized so that its precepts are extended and effectively observed on a daily basis by its employees, maintaining coherence and consistency between what is written and what is practiced.

This Code of Conduct has the primary objective of guiding the conduct of all parties involved, in the adoption of good practices in relationships and in doing business, such as:

- Adopt measures and behaviors that ensure the adherence of corporate values to business practices and corporate relationships in the day-to-day activities of the Group's companies and their administrators, managers, and employees, in order to ensure responsible and ethical conduct.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Ensure that the Group's vision and mission are developed in line with the public interest and that the actions, conduct, and attitudes of our employees are perceived as appropriate, correct, and inspired by the common good.
- Direct relations with shareholders, customers, suppliers, employees, communities in which it operates, competitors, controlled and affiliated companies, the environment, and other interested parties, within the highest level of corporate responsibility.
- Contribute so that each employee incorporates the values of the organization into their individual values.

APPLICABILITY OF THE CODE

All employees, suppliers, administrators, representatives, service providers, and other business partners of the companies, should be a parameter for all decisions and actions developed in the business environment and directly or indirectly related to the companies of the Ambipar, within the scope of their functions and competencies, while at the service of the Group, whether in internal or external relations, they must observe the precepts of this Code.

This Code applies to the holding company and its controlled and affiliated companies.

Ignorance of a legal or normative obligation cannot be used as a defense against the possible consequences of misconduct, therefore, it is the responsibility of all audiences covered by this document to know and ensure compliance, in addition to this Code, with the laws and rules in force and applicable to the professional activities they perform, presenting conduct aligned with the highest standards of integrity.

The central element for the proper functioning of this Code is the Conduct Committee, described on pages 8 and 9 of this document.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

All companies in the Ambipar must have instruments and tools, when necessary, to ensure compliance with the provisions of this Code.

6. THE INTERNAL PUBLIC AND THE WORKING ENVIRONMENT

We spend a great deal of time in our lives devoting ourselves to work. A precious time that must be lived in a healthy environment, inspired by integrity and harmony. An environment free from fear, disorder, intimidation, injustice, and distrust. The Ambipar respects cultural plurality, diversity and believes that everyone is equal.

That is why it is essential for the organization and its employees:

- Know and comply with the current legislation and regulations, in particular the rules for protecting the confidential information of the Ambipar, combating corruption, in addition to the internal policies of the Ambipar.
- Know, accept and comply with this Code of Conduct.
- Act with honesty, integrity, respect, loyalty, efficiency, transparency, and impartiality with internal and external customers, respecting any individual differences.
- Exercise professional secrecy and keep confidential the strategic information to which they have access, as well as the relevant undisclosed acts or facts, except when authorized by the company, or by legal determination.
- Make a commitment not to use any strategic information to your benefit or that of others.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Adopt an adequate posture and presentation for the respective insertion in the work environment and for the exercise of their function, in accordance with the guidelines established by the GrupoAmbipar. Do not incur situations or acts that characterize a conflict of interest, that is, use your influence in order to benefit particular interests that are in opposition to the interests of the company, which may cause damage or injury to it.
- Ensure the proper use of the Group's assets entrusted to it.
- Use electronic mail and Internet access systems within the moral and ethical principles set out in this Code. Electronic mail can be monitored.
- Treat confidentially the information on intellectual property to which you have access as a result of the relationship with the Ambipar.
- Limit the receipt of gifts in favor of employees to gifts of non-significant value, which do not have any influence on the decisions related to their activities and functions.
- Respect the freedom of association with unions, churches, civil society entities and political parties.
- Do not use the assets and resources of the Ambipar for private, political, trade union matters, or religious.
- Refrain from activities or attitudes that conflict with the Ambipar's objectives and business. In case of doubt, always consult your immediate superior or the Conduct Committee.
- Communicate to the immediate superior the qualification of a company to provide services or conduct business with the Ambipar, which has a member of its family in its corporate structure or as an employee / collaborator.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Report any violations of this Code to the Conduct Committee.
Conduct that may imply the termination of the employment contract or the termination of a commercial relationship:
- Practice acts of rejection motivated by prejudice, violence or any discriminatory attitude of people based on sex, ethnicity, race, religion, social class, age, sexual orientation, physical disability or reduced mobility.
- Practicing threat, blackmail, false testimony, moral harassment, sexual harassment or any other act contrary to the principles and commitments of this Code.
- Promising or offering a bribe, commission, gift or advantage of any kind, due to their duties within the Ambipar.
- Obtain undue advantages arising from the position or position he holds in the companies of the Ambipar, through the acceptance of gifts or advantages in his name or family.
- Exposing colleagues and / or subordinates to humiliating and embarrassing situations during the workday and in the exercise of their function, contaminating the organizational climate and destabilizing their relationship with the work environment and the Ambipar.
- Disclose confidential information, documents or photos, without express authorization from the company and without the proper support of the Legal Counsel in the company, including social media.
- Allow unauthorized persons to access the Group's computer systems, either through fraud or through the use of their personal password.
- Install programs on the company's computers without authorization from the competent areas of the Ambipar.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Compromise the business and partisan character of the organization.
- Perform any task under the influence of alcohol, psychotropic substances, illegal substances or any form of narcotics.
- Practicing games of chance and/or selling goods in the workplace.
- To carry out political or religious proselytism within the work environment and working hours, as well as to request the resources of other collaborator (s) from any candidate, political party or religious institution.
- Use information obtained from shareholders for personal gain.
- Provide untrue information or official data.

The Ambipar’s commitments to its employees are:

- Promote working conditions that provide a balance between professional, personal, and family life for all its employees.
- Ensure safety and health at work, providing all conditions and all necessary equipment for the purpose
- Ensure the right of refusal of its employees, accepting the suspension of their activities, in the event of a situation of serious and imminent risk to life or to their physical integrity and / or that of others.
- Respect diversity and combat all forms of prejudice, not admitting any type of discrimination, whether by race, nationality, sex, sexual orientation, age, religion, social position, opinion, political conviction, function or any other factor of individual differentiation.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Protect confidentiality and prevent the retaliation of all those who identify and report behavior that is in disarray with this Code, in order to preserve rights and protect the neutrality of decisions.

The Ambipar's commitments to its shareholders are:

- Promote open and direct communication with all shareholders, regardless of their shareholdings, providing information to monitor the activities and performance of companies, in a transparent manner, enabling decision making.
- Treat confidential information with complete secrecy, safeguarding the company's market image.
- Provide support to shareholders in the understanding of investment proposals, capital increases and other topics that should be evaluated and resolved by them.
- Make accountability based on qualitative and quantitative elements, identifying economic, financial, social, environmental and sustainability risks, while also committing to the defense, proposal and application of appropriate measures to eliminate or mitigate the risks involved.

The Ambipar's commitments to related parties are:

- Ensure transparency and balance in the relations between the companies of the Group, so that the information transmitted between them is exact and true.
- Allow equal opportunities for all employees.
- Adopt strict and transparent procedures when hiring companies/suppliers that have, directly or indirectly, a shareholding or family link with professionals from the Ambipar.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

7. EXTERNAL RELATIONSHIPS

The Ambipar commitments to its customers are:

- Safeguard sensitive, private, or confidential customer information.
- Provide the services in a safe manner, alerting and proposing preventive measures in situations of exposure of the customer's risk.
- Maintain transparent relationships with your customers.

The Ambipar is committed to the communities in which its companies operate:

- Encourage attitudes of respect for people, their traditions and values.
- Adopt and maintain a transparent process for defining social actions.
- Respect the interests and needs of the communities in which it operates.
- Collaborate with knowledge and technical information that can bring public benefits.
- Preserve and guarantee the political freedom and expression of employees.
- Guide the relationship of the Ambipar with authorities, politicians and public agents by transparent, professional and correct attitudes, and any form of pressure or request by public agents, which does not meet this definition, must be immediately rejected and communicated to management from the company.
- Guide the relationship by respecting the laws and conventions that deal with fundamental human rights and the protection of sustainability. In all its relations, the Ambipar must observe ethical, health, safety and respect for human rights and socio-environmental responsibility standards.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

The Ambipar’s commitments to its suppliers are:

- Select and contract suppliers and service providers based on strictly legal, technical, quality, cost, and punctual criteria, and demand an ethical profile in their management and social and environmental responsibility practices, refusing suppliers that use unfair competition practices, child labor, forced or compulsory labor and other practices contrary to the principles of this Code.
- Carry out transparent price-making processes, through comparative and fair practices, such as: bidding, price quotation, reverse auction, etc.
- Provide the same healthy and safe conditions at work to employees of service providers, when they are active on the premises of the Ambipar companies, offered to their employees.

The Ambipar’s commitments to its competitors are:

- Guide the company’s performance based on the continuous improvement of the quality of services and technological advances.
- Perpetuate the company as a contributing agent to raise the standards of services provided in the markets in which it operates.
- Repudiate actions considered anti-competitive, monopolistic or contrary to good market practices.

Ambipar’s commitments to the environment:

- Guide all activities in strict compliance with legislation and environmental standards, seeking optimization in our natural resources.
- Sustainable development, the preservation of nature and biodiversity.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

- Communicate possible environmental damage resulting from emergency situations to the competent entities, customers and other interested parties, adopting a collaborative attitude in the forwarding of solutions.

8. POLITICAL RELATIONSHIPS

The Ambipar may participate in the discussion of public policies related to the activities it develops and other topics of relevant interest to society, provided that its Board of Directors so decides, and that such support is made in strict compliance with the current legislation. The Ambipar will not make financial contributions to political parties or political campaigns.

CONDUCT COMMITTEE

The Conduct Committee is responsible for defining and disseminating the ethical values and principles that guide the professional conduct of the Ambipar and its employees. This Committee is responsible for evaluating the occurrences of violations of the established principles, determining the most appropriate corrective action and reducing the subjectivity of personal interpretations about the moral and ethical principles.

The Committee will disclose to all interested parties the content of this Code, encouraging them to respect ethical principles and to fulfill the commitment to conduct defined therein. In addition, it will guarantee the confidentiality of the information received and ensure that responses to complaints are sent.

The members of the Conduct Committee are responsible for the application and legitimation of this Code. The Committee will meet regularly to review this Code, as well as to evaluate quantitatively and qualitatively the occurrences analyzed in the period, seeking its continuous improvement. The cases will be analyzed in extraordinary meetings, specifically scheduled for the analysis of the complaints received, and their recommendations or determinations will be forwarded for the proper implementation in the appropriate instance (s) of the company (ies) involved.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

The Code, its updates and changes must be made widely available to all employees, being made available in an electronic version.

9. ADMINISTRATION OF THE CODE OF CONDUCT

Approval:

This Code of Conduct and its amendments must be approved by the Board of Directors.

Management:

The management and application of this Code is the responsibility of the Conduct Committee, responsible, within the Ambipar and other controlled companies, for evaluating its use and relevance, promoting its updating and improvement, when applicable. The revision of this Code

should be done at least every two years, or whenever it is deemed necessary, through the coordination of the Committee.

The Conduct Committee must guide and monitor the actions necessary for its disclosure and dissemination, in addition to judging cases of violations of this Code, forwarding reports to the Board of Directors. In addition, you must resolve any doubts regarding its interpretation, when requested. The members of the Conduct Committee must be appointed by the Board of Directors of the Ambipar.

The composition of the Committee and the form of contact with its members must be widely and formally disclosed, ensuring that all interested parties have knowledge.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

Trainings:

The Ambipar will conduct, at least once a year, mandatory training and other initiatives to raise the awareness of all workers for qualification and awareness about the conduct, principles and rules established in this Code and other norms and policies of the Group.

Doubts and situations of violation:

The provisions of this document make it possible to assess most situations, but they do not necessarily detail all the problems that may arise during the day-to-day activities of companies. Thus, there may eventually be doubts as to which should be the most correct conduct to be adopted.

The immediate superior must be notified whenever there is doubt or knowledge of facts that violate the provisions of this Code or that may violate. When, for any reason, it is not possible or convenient to communicate to the immediate superior, or when this has already occurred without effect, contact must be made directly with the Conduct Committee, through the Ambipar Ethics Channel, via e- mail: canaldeetica@ambipar.com.

The Group's Ethics Channel is open to receive internal and external complaints regarding noncompliance with the Code, policies, legislation and regulations applicable to the Group's activities. The Ethics Channel will be widely disseminated to the internal and external public, via intranet, website and / or own document.

The Ambipar's Ethics Channel is managed internally, ensuring the secrecy and confidentiality of the contact and the report, when requested, and any form of retaliation or retaliation is not allowed to anyone who reports a suspected violation of this Code.

Any reprisal or retaliation against the whistleblower in good faith characterizes an express violation of Ambipar's Code of Conduct & Compliance and must be promptly reported to the Group's Ethics Channel.



Code of Conduct & Compliance Manual	Version: 1.0
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Once the reprisal or retaliation is proven, the offender will be subject to the disciplinary measures of this Code, and may thus have his employment contract or eventual partnership maintained with the Group motivatedly terminated.

Consequences of the violation and disciplinary measures:

Failure by employees to observe the principles and precepts of this Code exposes the infringer to disciplinary actions that may lead to the application of disciplinary measures (such as (i) oral and written warning; (ii) suspension; (iii) dismissal; (iv) legal measures related to reimbursement of damages), without prejudice to civil and criminal liability arising from applicable legal provisions.

Failure to comply with the principles and precepts of this Code by suppliers / partners / service providers may result in the justified termination of the existing contract between the parties.

10. FINAL CONSIDERATIONS

The implementation of this Code is based on the relationship of mutual trust, cooperation, and solidarity that exists between all stakeholders and it is expected that everyone will act in an integrated and coherent way in the conduct of their relations and their businesses with different interest groups, ensuring articulation for common success.



Code of Conduct & Compliance Manual	Version: 1.0
Approver: Administrative Council	Approval date: 11/11/2020

LIABILITY AND COMMITMENT

São Paulo, ____ de _____ de 2021.

Name: _____ ID: _____

Company: _____ Registration: _____

I declare, for due purposes, to be aware of all the conditions and information contained in the Ambipar Group Code of Conduct, and that I was instructed by HR, my immediate superior or contractor to read it carefully, respect it and comply with it faithfully in full, always checking for future updates available on the company's intranet.

In case of total or partial non-compliance with the established rules and / or any of the obligations presented in the Code of Conduct, disciplinary sanctions, including dismissal, may be generated. For service providers / partners, inattention to the rules contained in this Code may result in the termination of the existing contract between the parties. Assinatura do colaborador/parceiro/fornecedor

Signature of the collaborator, associate or supplier.

