

Code of Conduct

Fibra Oeste Comércio de Produtos Agrícolas Ltda (CNPJ 35.927.480/0001-15)

Agrosul Comércio de Produtos Agrícolas Ltda (CNPJ 45.047.501/0001-61)

Version 1.0, effective 29 September 2026

1. Purpose and scope

Fibra Oeste and Agrosul (together, "the Group") trade raw cotton (lint and ginning by-products) and other agricultural raw materials in Brazil. This Code sets the minimum social, environmental and ethical standards that apply to:

- the Group's own partners, managers and employees;
- the producers and ginners we buy from ("suppliers");
- the carriers, warehouses and service providers we hire ("service providers");
- and, where stated, the clients we sell to.

Where Brazilian law sets a higher standard than this Code, the law prevails. Where this Code is stricter, the Code applies. It formalises the ESG commitments the Group has published at fibraoeste.com since 12 May 2026. The Code is aligned with the ILO Fundamental Principles and Rights at Work and with the principles of the Better Cotton Initiative.

2. Labour and human rights

2.1 No child labour. No person under 16 may be employed, except as an apprentice from age 14 under the conditions of Brazilian law. No person under 18 may perform night, hazardous or unhealthy work, including the application or handling of pesticides.

2.2 No forced or degrading labour. We do not accept forced labour, debt bondage, retention of identity documents or wages, restriction of movement, or any condition analogous to slavery as defined in article 149 of the Brazilian Penal Code. This is a zero-tolerance requirement.

2.3 Fair wages and working hours. Workers must receive at least the legal minimum wage, formal registration (CTPS or legal equivalent), and legally required benefits. Working hours, overtime and rest periods must follow the CLT and applicable collective agreements.

2.4 Health and safety. Workplaces must be safe and healthy. Rural operations must comply with Regulatory Standard NR-31, including suitable protective equipment, training for pesticide handling, drinking water, sanitary facilities and, where provided, decent housing.

2.5 Non-discrimination and dignity. No discrimination based on gender, race, colour, religion, origin, age, disability, sexual orientation, political opinion or union membership. No harassment, abuse or corporal punishment.

2.6 Freedom of association. Workers are free to join or not join trade unions and to bargain collectively, without retaliation.

3. Environment

- Supplier farms must hold an active Rural Environmental Registry (CAR) and comply with the Brazilian Forest Code, including Legal Reserve and Permanent Preservation Areas.

- We do not buy cotton from areas under environmental embargo (IBAMA or state agencies), from illegal deforestation, or from protected areas and indigenous lands.
- Pesticides must be registered with the Ministry of Agriculture (MAPA), used according to agronomic prescription, and their empty containers returned under the legal reverse logistics system.
- Suppliers are encouraged to use water efficiently, protect soil health and reduce pesticide use, in line with the Better Cotton principles.
- In our own logistics we plan loads and routes to avoid unnecessary mileage and emissions.

4. Business integrity

- **Anti-corruption.** We do not offer, promise, give or accept bribes or improper advantages, directly or through third parties, in compliance with the Brazilian Anti-Corruption Law (Law 12,846/2013).
- **Fair competition.** We do not agree prices, share markets or exchange competitively sensitive information with competitors.
- **Fiscal compliance.** Every sale and purchase is documented with a valid invoice (NF-e) and the applicable phytosanitary and transport documents.
- **Conflicts of interest.** Employees must disclose any personal interest in a supplier, client or service provider.
- **Truthful claims.** We make no sustainability or Better Cotton claims that are not supported by documentation, in line with the Better Cotton Claims Framework.
- **Data protection.** Personal data of workers and partners is handled according to the LGPD (Law 13,709/2018).

5. Traceability and supplier due diligence

Before the first purchase, and at least once a year after that, we check each supplier against:

- the federal register of employers found to have used labour analogous to slavery (Cadastro de Empregadores, Ministry of Labour);
- the IBAMA register of embargoed areas;
- the farm's CAR status;
- the company's registration status (CNPJ or rural producer registration);
- for Better Cotton purchases, the supplier's valid Better Cotton or ABR licence.

A supplier listed in the first two registers is not approved. Each bale we trade is linked to its origin through invoices and origin documents, which we keep for at least five years.

Carriers must hold a valid ANTT registration and respect the legal driving and rest times of Law 13,103/2015.

6. Grievance channel

Anyone, including workers of our suppliers and service providers, may report a breach of this Code, in Portuguese or English, to comercial@fibraoeste.com or to the compliance contact below. Reports may be anonymous. Every report is recorded, investigated, and answered within 30 days

where the reporter can be contacted. We do not tolerate retaliation against anyone who reports in good faith.

7. Implementation and consequences

- This Code is shared with every supplier and service provider, and acceptance is a condition for doing business with the Group. New contracts include a clause referring to it.
- The compliance analyst is responsible for the due diligence checks, the grievance channel, and an annual review of this Code.
- When a breach is found, we require a corrective action plan with a deadline. Breaches of sections 2.1 or 2.2, a listing in the registers of section 5, or a refusal to correct a breach lead to the immediate suspension or end of the business relationship, and, where required, notification of the authorities.

8. Company details

Fibra Oeste Comércio de Produtos Agrícolas Ltda

CNPJ 35.927.480/0001-15

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Agrosul Comércio de Produtos Agrícolas Ltda

CNPJ 45.047.501/0001-61

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Compliance contact:

Pedro Oliveira, Compliance Analyst