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FCC S.A. CONFLICT OF INTEREST POLICY

1. INTRODUCTION:

This policy applies to everyone who acts on behalf of Fábrica Carioca de Catalisadores S.A. and its main objective is to prioritize the best interests of the company on all occasions and situations, ensuring that the organization's obligations are met with honesty and transparency. This requires that employees, members of the Board of Directors and Senior Management and third parties, such as partners, suppliers and customers, avoid conflicts of interest or declare, in a timely manner, personal and private interests, external activities, relationships, investments and commitments that may adversely affect its transparency and credibility in the conduct of FCC S.A.'s business.

2. POLICY

It is the duty of Fábrica Carioca de Catalisadores S.A. employees, directors, managers, third-party collaborators and/or any natural or legal person hired acting on their behalf to avoid direct and/or indirect interests, external activities, relationships, investments, commitments and influences (not associated with the company's interests) that, in fact or potentially, may be in conflict with the organization's interests and harm the effectiveness, transparency and credibility of its actions.


3. OBJECTIVES AND APPLICATION

The Conflicts of Interest Policy aims to:

- Promote organizational transparency and an ethical environment in the Company
- Guarantee the honesty and integrity of employees and third parties in the performance of their duties
- Guide the identification and resolution of situations that may present real or potential conflicts of interest

This Policy applies to the entire workforce on a full-time, part-time or temporary basis.

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4- PRINCIPLES AND DUTIES

The administrators and collaborators/employees of FCC S.A must, among other commitments set out in its Code of Conduct and other internal rules of the Company (Code of Conduct, Anti-Corruption Policy, Consequences and Disciplinary Measures Policy, Related Party Transactions Policy, and others), be guided by the following principles guiding their duties:

- a) Guide your decisions and actions by ethics, integrity, transparency, loyalty, impersonality, professionalism and efficiency, considering the interests of FCC S.A and all its stakeholders, and the application of disciplinary measures must be guided by the clarity of your information defined and registered.
- b) Not obtain personal advantages and privileges from any interested party (supplier, business partner, customers, among others) of the company, as referred to in the Related Party Transactions Policy due to the position held in the company;
- c) Select and contract suppliers of goods or service providers through a regular public process, based on objective criteria of a technical nature/due diligence, avoiding favoring any interested company or manipulating proposals and prices.
- d) Act to avoid and prevent situations of conflict of interest, such as those set out in the Conflict of Interest, Related Party Transactions, Consequences and Disciplinary Measures Policy and the FCC S.A. Code of Conduct;
- e) Repudiate any form or attempt of corruption, bribery, kickbacks, personal advantage and influence peddling, acting without concessions to the intervention of private, partisan or personal interests and favors, and encourage your colleagues, regardless of position and hierarchical level, to report eventual occurrence of these acts through appropriate channels, as stipulated in the FCC S.A. Code of Conduct and its anti-corruption policy;
- f) Act in accordance with internal legislation (anti-corruption policies, related parties, Code of conduct and policy of consequences and disciplinary measures) and external national legislation (National Laws with Anti-Corruption Legislation and Labor Laws, the Federal Constitution, the Code Civil and Criminal and others), not contradicting its principles and guidelines.

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- g) Guide your business decisions and actions by ethics, integrity, transparency, loyalty, impersonality, professionalism and efficiency, considering your legitimate interests and those of all your stakeholders.
- h) Maintain confidentiality of privileged, strategic and confidential information;
- i) Act honestly, with respect, civility, respect and integrity when dealing with people, with those involved having the duty to maintain an open and integral stance and, always in the best interest of the organization's policies, avoiding questionable conduct, contradictory or contrary to the good customs of society, seeking to maintain the good reputation and credibility of the FCC.
- j) Act with justice, equity and impartiality in the application of disciplinary measures, in strict compliance with broad defense and due legal process;
- k) Combat the practice of insider trading and not associate with other companies that intend to manipulate prices or operate in the market using unfair or anti-competitive practices, defending the rules of free competition, regardless of where they operate.
- l) Monitor corporate actions in order to preserve the legitimate interests of the FCC and its partners and ensure that the conduct of employees that may represent a conflict is investigated.
- m) Act in good faith in carrying out the tasks provided for in employment contracts and in fulfilling obligations arising from the Code of Conduct and other standards, policies and procedures;
- n) Report any and all risks to the integrity of the business, image, reputation and assets of the company, acting in a preventive manner;
- o) Attend and participate in mandatory training as per standard and in all others were called upon by the Company

4. GENERAL CONSIDERATIONS

Conflict of interest arises in situations in which the private interests of an employee or third party, unrelated to the interests of the company, interfere, or may interfere, in the legal, transparent, reliable and honest performance of their functions, which may

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compromise their independence and freedom from judgment in the practice of an act, carried out to the detriment of the company, in addition to reducing the degree of professionalism with which the person acts on behalf of the organization, harming the interests, values and ethics of FCC S.A., in addition to exposing (or potentially exposing) the company to obligations, debts or even tarnish its reputation.

Given the complexity, relevance and severity of a given conflict of interest situation, it must be analyzed on a case-by-case basis.


As a rule, the conflict of interest can be:

- **Real**- a situation in which there is, in fact, a clear conflict of interest.
- **Potential** - a situation that could evolve and become a real conflict of interest in the future.
- **Apparent/perceived** - a situation in which a person could reasonably conclude that the employee or third-party collaborator did not act with honesty or integrity in fulfilling their obligation to act in the best interests of the company, which could weaken confidence in the company or the employee or representative, and should, therefore, be this, avoided or declared, so that it can be dealt with appropriately.

The types of situations presented below generally generate conflicts of interest and should be avoided.

- 1- Act, without prior authorization, as a director, employee, consultant, supplier, service provider or agent of a competitor, direct or indirect, or of an organization that has or is interested in doing business with the company; participate in external activities that affect your ability to satisfactorily perform your duties, as an employee or representative of the company.
- 2- Improperly using a position in the company for personal purposes or those unrelated to the interests of the company and taking advantage of business opportunities;
- 3- Illegally or improperly use confidential, privileged or proprietary information for personal benefit or the benefit of members of your family or third parties.

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- 4- Have a personal or family financial interest, equity interest or profit-sharing interest in a competitor or in a company that has relations or wishes to do business with FCC S.A.
- 5- Granting, without approval, a contract to a close relative or to a company controlled by a close relative or close friend.
- 6- Get involved, directly or indirectly, or influence the hiring of commercial entities in which the employee has a direct or indirect financial interest, or that employ close relatives or close friends in positions with decision-making power;
- 7- Be involved, directly or indirectly, in the management or administration of contracts and other transactions with the company in which you have a direct or indirect financial, family or social interest;
- 8- Employing, or being involved in or influencing the hiring, placement or promotion of a close relative or close friend;
- 9- Participate in external activities that affect your ability to satisfactorily perform your duties as an employee, representative or even as a member of the governing body of FCC S.A
- 10- Working directly in the same hierarchical line with a close relative or with someone with whom the employee, collaborator or other contracted third party maintains an emotional relationship; or, even, a situation in which, even if there is no direct hierarchical relationship, the affective relationship could weaken the company's internal controls and cause a loss of trust in one of the two - or both - or cause embarrassment to the company.
- 11- Sign a contract Renting or leasing facilities or equipment for the company by an employee or close relative, without prior authorization from the Ethics Committee.

5- PROHIBITIONS

In order to promote an ethical, honest, democratic and transparent work environment,


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FCC S.A refutes and prohibits, from now on, the following situations:

- 1- Relationships that may cause harm to the company and/or embarrassment to other employees, especially conduct that demonstrates sexual and moral harassment, illegal embarrassment, insult, sexual harassment and other civil and criminal offenses
- 2- Support for candidacy for public office and/or political parties, within or outside electoral periods, electoral donations and sponsorships, as these are prohibited by law and as provided for in the Sponsorship and Donations Policy;
- 3- Carry out political propaganda on company premises - or using the employee's name, logo, trademarks or assets
- 4- Make decisions about professional promotions, admissions and dismissals based solely on personal relationships;
- 5- Contracts with related parties that involve remuneration for charging a management fee or that contain a remuneration clause based on a measure of operational economic performance, such as billing, revenue, operational cash generation, net profit or market value, in order to avoid the undue transfer of company results;
- 6- Granting of loans and guarantees of any kind to controlling shareholders and administrators;
- 7- Any operations, including corporate restructuring, that do not ensure equitable treatment for all FCC S.A. shareholders
- 8- Granting of loans and guarantees of any kind to Controlling Shareholders and Administrators;
- 9- Transactions concluded with companies whose administrator or partner with management power is a family member of an employee of the company in a trust role:
 - (i) responsible for authorizing hiring;

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- (ii) responsible for signing the contract;
- (iii) responsible for demand;
- (iv) responsible for hiring;
- (v) hierarchically immediately superior to the person responsible for the demand;
- (vi) hierarchically immediately superior to the person responsible for hiring;

10- Transactions carried out under conditions other than market conditions and/or in a way that harms the interests of FCC S.A.;

11- All practices prohibited in section VIII of the Related Party Transactions Policy

6. GENERAL GUIDELINES

Other situations not exemplified in this policy may generate conflicts for the business of FCC S.A. If the employee is faced with a potential situation of conflict of interest and is not sure about the existence of such a conflict, he or she should seek assistance from the Reporting Channel available by FCC S.A and the Compliance Department.

Relationships between employees, whether of a family or emotional nature, are not prohibited. However, it is worth noting that this liberality encounters obstacles in the ethical limits defended by FCC S.A. and in the preservation of its material and immaterial interests, in accordance with the provisions of the FCC S.A. Code of Conduct, item - Relationship with the Workforce.


The consequences and disciplinary measures to be applied to the individual(s) who knowingly acted in a conflicting manner with the interests of FCC S.A. will be decided by the Ethics Committee and, as a rule, in conjunction with the Human Resources and Legal/Compliance areas of FCC S.A.

7. DECLARATION

In all cases where an employee or representative discloses a conflict of interest or is in conflict, he or she must, unless otherwise instructed:

- Refrain from participating in any debate, negotiation and decision related to the subject of conflict
- Refrain from influencing other people, directly or indirectly, in discussions or decisions associated with the declared conflict
- Refrain from participating in the management or administration of any contract,

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transaction, project, relationship, or other activity related to or associated with the declared conflict.

8. CONFLICT OF INTEREST SITUATIONS WITHIN THE CONTEXT OF MANAGEMENT POSITIONS OF SHAREHOLDER PETROBRAS

In accordance with the Third Party Hiring Policy of FCC S.A. (PCT) and in accordance with law 12813, which deals with cases of conflict of interest in the exercise of office and president, vice-president and director, or equivalent of an economic company mixed, as is the case of shareholder Petrobras, Directors, president and vice president and other members of Senior Management must act in order to prevent or prevent possible conflict of interests, read: situation generated by the confrontation between public and private interests, that may compromise the collective interest or improperly influence the performance of its functions and to protect privileged information that concerns confidential matters or is relevant to the decision-making process and that has economic or financial repercussions and that is not widely known public.

In this sense, the following situations could constitute conflicts of interest when exercising the positions or after them:

I - Disclose or make use of privileged information, for one's own benefit or that of third parties, obtained as a result of the activities carried out;


II - Carry out an activity that involves the provision of services or the maintenance of a business relationship with an individual or legal entity that has an interest in the decision of the public agent or the collegial body in which they participate;

III - Carry out, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or job, considering as such, including the activity carried out in related areas or matters;

IV - Act, even informally, as an attorney, consultant, advisor or intermediary for private interests in bodies or entities of direct or indirect public administration of any of the Powers of the Union, the States, the Federal District and the Municipalities;

V - Carrying out an act for the benefit of the interest of a legal entity in which the public agent, his or her spouse, partner or relatives, blood or similar, in a direct or collateral line, up to the third degree, participate, and which may be benefited by him or influence his actions management;

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VI - Receiving a gift from anyone who has an interest in the decision of the public agent or the collegial body in which he or she participates outside the limits and conditions established by regulation; and

VII - Provide services, even if occasional, to a company whose activity is controlled, supervised or regulated by the entity to which the public agent is linked.

I - at any time, disclose or make use of privileged information obtained as a result of the activities carried out; and

II - within a period of 6 (six) months, counting from the date of waiver, resignation, removal, dismissal or retirement, except when expressly authorized, as the case may be, by the Public Ethics Commission or the Comptroller General of the Union:

a) provide, directly or indirectly, any type of service to an individual or legal entity with whom they have established a relevant relationship due to the exercise of their position or employment;

b) accept a position as administrator or advisor or establish a professional relationship with an individual or legal entity that performs activities related to the area of competence of the position or job held;

c) enter into service, consultancy, advisory or similar activity contracts with bodies or entities of the federal Executive Branch, linked, even if indirectly, to the body or entity in which they held the position or job; or

d) intervene, directly or indirectly, in favor of a private interest before a body or entity in which he or she has held a position or job or with which he or she has established a relevant relationship due to the exercise of the position or job.


9- THE COMPETENCIES OF THE ETHICS COMMITTEE LINKED TO SUPERVISION AND THE ASSESSMENT OF CONFLICT OF INTEREST

The Ethics Committee of Fábrica de Catalisadores S.A. is responsible for the following:

I - Establish standards, procedures and mechanisms that aim to prevent or obstruct possible conflicts of interests;

II - Evaluate and monitor the occurrence of situations that constitute a conflict of interest and determine measures to prevent or eliminate the conflict;

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III - Provide guidance and resolve doubts and controversies regarding the interpretation of the rules that regulate conflicts of interest, including those established in Law 12813/2013

IV - Express their opinion on the existence or not of a conflict of interest in the consultations submitted to them;

V - Authorize the holder of a position or job within the scope of the federal Executive Branch to carry out private activities, when verified that there is no conflict of interest or its irrelevance;

10. ACCEPTANCE OF THE POLICY

With each new hire, whether an employee or a third-party company, the contractor must become aware of this Policy, confirming their understanding and agreeing to its terms and conditions.

As part of the hiring procedures, each new hire must declare all private interests, direct or indirect, not associated with the company's interests, that they, their close relatives or close friends may have, as defined in this Policy.


It is the employee's responsibility to update, with the Human Relations Management of FCC S.A., any new particular interests or any possible changes in the information reported by the employee at the time of hiring.

11. THIRD PARTIES

Third parties who have or will have commercial and/or social relations with FCC S.A. will receive a copy of this Policy for their information and will be asked to consent to it. At the negotiation, renewal or review stage of a contract, project, transaction or engagement, or during the course of the contract, project, transaction or engagement, the third party must disclose any actual or potential conflicts of interest, including conflicts of its employees who occupy positions with decision-making power and also their subcontractors and agents.

The company must guarantee that none of FCC S.A.'s commercial representatives is or has been a national or foreign government official in the last two years, especially in countries where the anti-corruption statute has this criterion clear. This guarantee must be expressed in a statement attached to the Contract signed with FCC S.A.

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Third parties are prohibited from subcontracting the services provided to FCC S.A. without the prior consent of the Board responsible for the contract and the Ethics Committee.

12. RESPONSABILITIES

Directors and managers have the power to make decisions, adopt measures, give instructions and guide, as appropriate to the implementation and application of this Policy, in addition to managing or resolving declared or notified conflicts. This authority will be exercised after considering all relevant facts.

The waiver of any clause, or its suspension, will only be approved by the FCC S.A. Ethics Committee.

Any questions regarding this Policy; guidance or clarification on how it applies to specific situations; case in which the person knows, believes in good faith or suspects a violation of this Policy and knowledge of acts that are being carried out or will be carried out in violation of this Policy must be communicated via the FCC S.A. Reporting Channel (anonymous reports and identified by email at canaldedenuncias@fccsa.com.br, telephone 0800-9400158, form available on the website www.fccsa.com.br (Report Channel link) or letters to the FCC S.A. Ethics Committee).

13. SANCTIONS


Employees, third parties and other individuals or legal entities acting on behalf of FCC S.A. who violate this Policy will be subject to disciplinary measures, which may culminate in the termination of employment or commercial contracts and/or legal measures, as applicable. All disciplinary measures may be taken without prejudice to the civil and/or criminal consequences of the violation.

14. CHANGES IN THE POLICY AND TERM OF THE POLICY

This policy has an indefinite validity period and must be revised to the extent that certain changes in internal procedures or new laws or regulations directly affect the practices established in this and related documents (FCC S.A. Code of Conduct, Anti-Corruption Policy and other documents).

Any change to this Policy must be approved by the Ethics Committee of Fábrica Carioca de Catalisadores S.A. and communicated to interested parties.

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15. RELATED DOCUMENTS

- FCC S.A. Code of Conduct
- Related Party Transactions Policy
- Consequences and Disciplinary Measures Policy
- Third Party Contracting Policy (PCT)
- Anti-Corruption Policy
- Commercial Policy
- Donations and Sponsorship Policy
- Law 12813, of May 16, 2013, which regulates the conflict of interests in the role of president, vice-president and director, or equivalent mixed capital companies, as is the case of shareholder Petrobras S.A
- CPC Technical Pronouncement No. 5, issued by the Accounting Pronouncements Committee and approved by the Securities and Exchange Commission (CVM), in accordance with Resolution No. 642/10.

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