

CODE OF ETHICS

At Sustaineda, we treat our people, business partners and third parties with professionalism, respect, and ethics. We strive to maintaining the highest ethical standards and promoting a culture of integrity in all aspects of our business. We believe that acting ethically and with integrity is critical to our success and to earning the trust of our stakeholders. This Code of Ethics a outlines the standards of behavior and conduct that we expect from our people, business partners and third parties.

1. SCOPE

This Code of Ethics and Conduct applies to all employees, officers, board members, and representatives of Sustaineda, as well as to business partners and third parties we work with, including, among others, sales representatives, distributors, agents, brokers, suppliers, consultants, service providers and vendors in general.

2. OUR COMMITMENTS

2.1 TO OUR PEOPLE AND TO PEOPLE WORKING WITH US

2.1.1 Personal health and safety

Sustaineda is committed to providing a workplace free from discrimination, harassment, violence, and hazard. We do not tolerate discrimination because of gender, gender identity, biological sex, affective-sexual orientation, race, disability, nationality, religion, age, or any other personal identity element. We do not tolerate violence and harassment on any form. Our people are expected to comply with all applicable policies and regulations, and take appropriate measures to ensure the safety of themselves and their co-workers.

2.1.2 Privacy and personal data

Sustaineda recognizes and respects the importance of privacy in all aspects of our operations and interactions. We are dedicated to safeguarding the privacy and personal information of individuals with

whom we engage, including our employees, customers, business partners, third parties and stakeholders in general.

2.1.3 Right to organize

Sustained recognizes and respects the freedom of employees to choose whether to establish, or to associate with, any organization. Sustained recognizes – within the framework of (local) law, regulations and prevailing labor relations and employment practices – the right of its employees to be represented by labor unions and other employee organizations.

2.1.4 Protection of Sustained's assets and resources

All employees, officers, board members, and representatives of Sustained are responsible for protecting Sustained's assets and resources – including information. Company's ¹assets may not be used for personal gain or other improper purposes.

2.1.5 Confidentiality

All employees, officers, board members, and representatives of Sustained must maintain the confidentiality of sensitive Company information, including customer information, trade secrets, and confidential financial information.

2.2 TO THE MARKET

2.2.1 Free market competition

Sustained supports the principle of free market competition as a basis for conducting its business and observes applicable competition laws and regulations.

2.2.2 Relationship with business partners and third parties

Sustained is committed to maintaining transparency and fairness in its relationship with business partners and third parties, including, among others, sales representatives, distributors, agents, brokers, suppliers, consultants, service providers and vendors in general.

¹ “Company” means Bioglycols LLC and its controlled companies.

2.2.3 Relationship with shareholders and related parties

Sustained will strive to ensure that all interactions, transactions, and decisions involving shareholders and related parties are conducted in an open, equitable, and unbiased manner.

2.2.4 No tolerance for corruption², bribery and money-laundering

Sustained is committed to maintaining high ethical standards and preventing corruption in all aspects of our business. Corruption is illegal and unethical, and it undermines the trust of our stakeholders, damages our reputation, and exposes us to significant legal and financial risks. Employees, officers, board members, and representatives of the Company, as well as business partners and third parties working with us, are required to comply with applicable laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the Brazilian Clean Company Act.

Sustained's employees, officers, board members, and representatives, as well as business partners and third parties working with us, must carry out their duties and responsibilities transparently, ethically, in good faith and always in compliance with the applicable laws. This policy requires that:

- Individuals³ are strictly prohibited to offer, promise, or give, directly or indirectly, any advantage, benefit, gift, favor, or reward to a Public Official⁴ or Politically Exposed Person⁵, with the intent to influence their actions, decisions, or behavior related to their official duties.

² **“Corruption”** refers to the abuse of entrusted power or position for personal gain, typically involving the misuse or exploitation of public resources, authority, or influence. Corruption can take various forms, including bribery, embezzlement, fraud, nepotism, favoritism, extortion, money laundering, and abuse of office.

³ **“Individuals”** shall mean Company's employees, officers, directors, representatives, business parties / third parties working with the Company

⁴ **“Public Official”**: A public official refers to any individual holding a public office, including elected officials, civil servants, government employees, members of regulatory bodies, judiciary personnel, or any person entrusted with a public function. This definition extends to individuals serving at any level of government, including local, regional, national, or international entities.

⁵ **“Politically Exposed Person”**: An individual who holds a public position or has held such a position in the recent past. PEPs can include individuals such as government officials, heads of state or government, members of parliament, high-ranking military personnel, senior executives of state-owned enterprises, and senior officials in political parties. The definition may also extend to the immediate family members and close associates of such individuals, as their involvement in financial transactions could potentially pose similar risks.

- Individuals are also strictly prohibited to receive, directly or indirectly, any advantage, benefit, gift, favor, or reward, with the intent to influence their actions, decisions, or behavior related to their duties with Sustained.

These prohibitions apply to all forms of advantages, including but not limited to cash, gifts, loans, services, favors, employment opportunities, travel, entertainment, or any other pecuniary or non-pecuniary benefits.

2.2.5 Illegal gratuities and entertainment

Sustained strictly prohibits its employees, officers, board members, and representatives, as well as business partners and third parties working with us, from offering, giving, soliciting, or accepting any illegal gratuities, kickbacks, or improper benefits to or from any individuals or entities.

2.2.6 Interactions with governmental entities and officials

Sustained values transparency, honesty, and ethical behavior in all business operations, including interactions with government entities and public authorities/agents. We are committed to conducting these interactions within full compliance with all applicable laws, regulations, and ethical standards.

2.2.7 Conflicts of Interest

All employees, officers, board members, and representatives of Sustained must avoid any actual or potential conflicts of interest that may interfere with their ability to act in the best interests of our Company. If a conflict of interest arises, it must be disclosed promptly to the Compliance Team.

Individuals must promptly disclose all actual, potential, or perceived Conflicts of Interest to the Compliance Team and when in doubt about whether a situation or relationship represents or creates Conflicts of Interest, individuals should consult the Compliance Team.

Conflicts of interest occur when personal or financial interests of Individuals or a member of their family conflicts with the interests of Sustained. This may include situations where Individuals use insider information to gain personal advantage, accepts gifts or favors that may

influence their business decisions, or use their position within the Company to promote their own interests.

2.2.8 Record-keeping and accounting

Sustained maintains accurate and complete records of all its transactions. We will not maintain off-the-books accounts, use false or misleading accounting entries, or engage in any other improper accounting practices.

2.2.9 Disclosure of non-financial relevant information

Sustained recognizes the significance of non-financial information in providing a comprehensive and accurate representation of our business, operations, and impact. We understand that stakeholders rely on non-financial information to assess our performance, and we are focused in providing information that is accurate and complete.

2.3 TO THE BROADER COMMUNITY

2.3.1 General compliance with laws and regulations

Sustained is committed to complying with all applicable laws, regulations, and industry standards. All employees, officers, board members, and representatives of the Company, as well as our business partners, are expected to comply with all relevant laws and regulations, both in letter and in spirit.

2.3.2 Human rights

Sustained supports and respects human rights and strives to ensure that its activities do not violate such rights. We are committed to upholding the principles of the United Nations Universal Declaration of Human Rights and other internationally recognized human rights standards.

2.3.3 Environmental, Social and Governance (“ESG”)

Sustained is conscientious about integrating environmental, social, and governance considerations into our business practices, decisions, and strategies. We recognize that sustainable development is crucial for the well-being of society and the long-term success of our organization. We conduct our business affairs with the highest standards of ethics and

integrity. We have worked to implement a robust governance framework that ensures accountability, transparency, and effective decision-making. We strive to minimize our environmental impact and promote responsible resource management. We are dedicated to fostering a diverse, inclusive, and equitable workplace that values and respects the rights and dignity of all individuals. We expect our suppliers, contractors, and business partners to adhere to similar ESG principles and practices. We recognize the importance of engaging with our stakeholders, including employees, customers, shareholders, communities, and regulators. We are dedicated to continuously improving our ESG performance and practices.

3. REPORTING VIOLATIONS

Any violation of this Code of Ethics may result in disciplinary action, from warning to termination or disengagement. Our people, business partners and third parties working with us are encouraged to report any suspected or actual violations of this Code of Ethics to immediate leadership or contact, to the Compliance Team (compliance@sustaineda.com) and/or to the Ethics Hotline available in our website. Sustaineda is committed to investigate reported violations, and to protect whistleblowers acting in good faith from retaliation.