

Title  
**ETHICAL CONDUCT FOR SUPPLIERS**

Revision  
**01**

Page  
**1/7**

Date of Issue  
**02/03/2025**

This document is an integral part of the **BLUEDGE HYDRAULICS** Quality Management System, and is subject to internal distribution and dissemination controls. Without proper authorization, the disclosure, reproduction, distribution or any other action in violation of BLUEDGE HYDRAULICS' internal rules are prohibited and subject to disciplinary, civil and criminal sanctions.

**REVISION CONTROL**

<b>REV.</b>	<b>DATE</b>	<b>DESCRIPTION</b>	<b>ELABORATE</b>	<b>REVISED</b>	<b>APPROVED</b>
00	02/10/2023	Emissão Inicial;	Mariana Braga	Haroldo Mendes	João Araújo
01	02/03/2025	Revisão do Documento	Mariana Braga	Haroldo Mendes	João Araújo

# **ETHICAL CONDUCT FOR SUPPLIERS**

Title  
ETHICAL CONDUCT FOR SUPPLIERS

Revision  
01

Page  
2/7

Date of Issue  
02/03/2025

## 1 OBJECTIVE

Respect for life, people and the environment, integrity, transparency, meritocracy and value generation are the principles that support the guidelines of this Guide of Ethical Conduct for Suppliers ("Guide").

**BLUEDGE HYDRAULICS** is committed to the highest standards of integrity, social responsibility and ethical conduct. Our suppliers must provide safe working conditions, treat their workers with dignity and respect, act with integrity and ethics, in compliance with the principles and requirements of this Guide, and be in full compliance with applicable laws and regulations.

Compliance with this Guide by all suppliers is critical for **BLUEDGE HYDRAULICS** to achieve its goals and objectives in an ethical and transparent manner.

## 2 REFERENCE DOCUMENTS

ABNT NBR ISO 37001:2017 – Anti-Bribery Management System – Requirements  
BLU MAN SGA 001 – Anti-Bribery Management System Manual

## 3 APPLICATION

This Guide applies to all suppliers, regardless of whether or not they are resident in Brazil, including their affiliates and subsidiaries, who are involved in business processes with **BLUEDGE HYDRAULICS**, such as: pre-qualifications and direct contracting procedures.

## 4 DESCRIPTION

### 4.1 Ethics and Integrity

#### 4.1.1 Prevention of fraud, corruption, money laundering

**BLUEDGE HYDRAULICS** is committed to promoting integrity in the public and private business environment and acts in compliance with national and international Anti-Corruption Legislation and other applicable standards.

In this sense, as provided for in its Code of Ethical Conduct, **BLUEDGE HYDRAULICS** has zero tolerance for all forms of fraud and corruption, including bribery, extortion, money laundering or insider trading, throughout its supply chain, and is therefore absolutely forbidden to all suppliers, requiring a similar posture from its (sub)suppliers.

#### 4.1.2 Integrity and transparency in relationships

Suppliers must, by requiring a similar stance from their (sub)suppliers:

1. a) To act with integrity, honesty, innovation, cooperation, trust, responsibility, continuous improvement, results, reputation and transparency;
2. b) Adopt transparent, truthful, easily understandable and accessible communication to all interested parties, in all business relationships with **BLUEDGE HYDRAULICS**, always observing issues related to information security;
3. c) Report to the **BLUEDGE HYDRAULICS** Whistleblowing Channel, in a timely, honest, reasonable and responsible manner, any deviation of which it becomes aware.

#### 4.1.3 Conflict of interest prevention

The conflict of interest, provided for in Federal Law No. 12,813/2013, is harmful to **BLUEDGE HYDRAULICS'** business and to the internal control environment, as it may improperly influence the conduct of our employees by intending to achieve private interests, contrary to the interests of **BLUEDGE HYDRAULICS**, or even cause any type of damage to **BLUEDGE HYDRAULICS** and its equity interests.

It is the duty of suppliers, demanding a similar posture from their (sub)suppliers:

1. Refrain from performing any act that may place **BLUEDGE HYDRAULICS** employees in a situation of actual or potential conflict of interest;
2. Act diligently preventing or preventing any situation of conflict of interest, actual or potential;
3. Communicate any type of private relationship between suppliers and employees of **BLUEDGE HYDRAULICS** who are acting in the supply relationship, such as, for example, family relationships between the supplier and its employees with employees of **BLUEDGE HYDRAULICS** and its managers.

#### 4.1.4 Offering gifts, gifts, hospitality and sponsorship counterparts to **BLUEDGE HYDRAULICS** employees or contractors

The occasional receipt or offering of gifts, gifts or hospitality must comply with the strict provisions of the law, the internal rules of **BLUEDGE HYDRAULICS**, in addition to the normative acts issued by public authorities, as it has the potential to represent an opportunity for the occurrence of corruption fraud. Thus, this practice is prohibited in exchange for any personal benefit or favor to the offeror or third parties.

#### 4.1.5 Competition and competitiveness in contracting processes

BLEDDGE HYDRAULICS observes, in its operations in the economic segment, the principles of free enterprise and free competition and, at the same time, does not condone any practices that seek cartelization or market concentration, which it understands to be absolutely incompatible with the economic order established by the Brazilian Constitution.

#### 4.1.6 Integrity Due Diligence

**BLUEDGE HYDRAULICS** adopts the Integrity Due Diligence procedure to support decision-making on the beginning or continuation of the business relationship and to define the level of monitoring of the potential risks of fraud and corruption identified.

To meet the Integrity criterion, suppliers must provide information about their organizational and business structure, relationship with public officials, integrity history, relationship with third parties and integrity program.

This information subsidizes the Supplier Qualification form. And failure to meet the requirements, the supplier must be the principles mentioned in this procedure.

#### 4.2 Commitments to operational excellence

**BLEDDGE HYDRAULICS** has as its permanent objective the excellence in the execution of its activities and, to this end, it has the same commitment on the part of its suppliers.

**BLUEDGE HYDRAULICS** monitors the performance of suppliers using the Supplier Performance Index (IDF), where compliance with obligations related to time, quality, management and safety, environment, health and Anti-Bribery requirements are evaluated.

The data resulting from the performance evaluation can be consulted by the supplier, contributing to the improvement in the contractual execution and in the supplier's performance in its market of interest.

#### 4.3 Protection of personal data and corporate information

It is the supplier's duty, requiring a similar posture from its (sub)suppliers, to ensure its compliance with the provisions of the data protection and privacy legislation in force, especially Law No.

13,709/18 (LGPD), as well as to observe the rules, guidelines and policies for the protection of personal data and privacy of BLUEEDGE HYDRAULICS.

#### **4.4 Human Rights and respect for legislation**

The supplier, requiring a similar posture from its (sub)suppliers, undertakes to:

1. Respect internationally recognized human rights, as established in the International Bill of Human Rights, the International Labor Organization Declaration on Fundamental Labor Principles and Rights, the UN Guiding Principles on Business and Human Rights, and Decree No. 9,571 of November 21, 2018 and other applicable legislation;
2. Repair any damage it causes to communities as a result of its activities;
3. Do not practice acts that constitute excessive force in the interaction between security forces, communities and workers.

##### **4.4.1 Diversity**

Honesty, integrity, justice, equity, truth, coherence between discourse and practice refer to BLUEEDGE HYDRAULICS' relationships with people and institutions, and are manifested in respect for differences and diversities of ethnic, religious, social, cultural, linguistic, political, aesthetic, age, physical, mental and psychic conditions, gender, sexual orientation, gender identity and others.

In this way, the supplier is committed to promoting diversity, ensuring respect for difference and equal opportunities in access, remuneration and job advancement, requiring a similar posture from its (sub)suppliers.

##### **4.4.2 Inclusion of people with disabilities**

Every person with disabilities has the right to equal opportunities with other people and will not suffer any kind of discrimination. In this way, the supplier must contribute to the realization of equal employment opportunities including, to the extent possible, or as determined by law, people with disabilities in its workforce, promoting, under equal conditions, the exercise of the fundamental rights and freedoms of these people, aiming at their social inclusion and citizenship, requiring a similar posture from its (sub)suppliers.

#### 4.5 Ombudsman

It is everyone's duty to protect **BLUEDGE HYDRAULICS** from any and all deviations of which they are aware, even if it is a simple suspicion. Thus, situations that may constitute non-conformities must be reported to the **BLUEDGE HYDRAULICS** Whistleblowing Channel, in a timely, honest, reasonable and responsible manner, detailing attitudes or practices that do not comply with the guidelines of this procedure, the Company's internal rules or the legislation.

**BLUEDGE HYDRAULICS** provides safe and reliable communication channels, including an external and independent Whistleblowing Channel, which covers its subsidiaries, and which has security mechanisms to ensure the anonymity of the whistleblower and allow it to monitor the progress of its complaint.

**The Whistleblowing Channel can be accessed by e-mail:**

1. Site: <http://www.bluedge-svc.com/home>
2. E-mail: [compliance@bluedge-svc.com](mailto:compliance@bluedge-svc.com)

#### 4.6 Audits and Evaluations

The supplier, requiring a similar posture from its (sub)suppliers, undertakes to cooperate and assist audit, verification or investigation processes conducted by **BLUEDGE HYDRAULICS** or a third party designated by it, in relation to any alleged, suspected or proven non-compliance either with the applicable national and international Anti-Corruption Legislation, or in relation to its contractual obligations to **BLUEDGE HYDRAULICS**.

The supplier, requiring a similar posture from its (sub)suppliers, must make the necessary efforts to correct any deficiencies or violations identified by an internal or external audit, evaluation, inspection, investigation or analysis.

#### 5 ADDITIONAL PROVISIONS

Failure to comply with the principles and commitments expressed in this procedure may result in the adoption of measures by **BLUEDGE HYDRAULICS**, such as contractual consequences, as well as administrative sanctions, which may culminate in the blocking of the supplier for new contracts and



Title  
ETHICAL CONDUCT FOR SUPPLIERS

Revision  
01

Page  
7/7

Date of Issue  
02/03/2025

even in the termination of current contracts, in accordance with the current requirement of **BLUEDGE HYDRAULICS**.