

CODE OF CONDUCT

Summary

Clear rules, procedures, and guidelines on what to do and how to behave in various situations towards our internal and external stakeholders

Helisul Aviação Version 2.0

MESSAGE FROM SENIOR MANAGEMENT

HELISUL AVIAÇÃO has made a commitment to helping build a better business world. This is a collaborative endeavor made possible by our daily interaction with colleagues, customers, authorities, suppliers, communities, and other stakeholders that interact with our company.

This Code of Conduct and the values of **HELISUL AVIAÇÃO** support this objective, as they are tools that shed light on how we are supposed to behave, as employees at **HELISUL AVIAÇÃO**, when faced with various themes and situations, thereby reaffirming our commitment to a culture of ethics and respect for norms and laws.

Every day, each of us needs to make challenging and difficult choices. This is part of the context in which we live and work, namely a globalized, complex, and demanding business environment. However, our reputation is defined by how honestly and professionally we rise to these challenges.

Whenever we are caught in an ethical dilemma, each of us is responsible for behaving in a way that reflects our values. If you are not certain about what the most appropriate conduct must be, please contact the Compliance Committee and use the Reporting Channel. They are both meant to help you clarify your questions and, if applicable, report behaviors that violate this Code of Conduct.

It is imperative that all persons at **HELISUL AVIAÇÃO** are fully compliant with the Code. We rely on you to convey the message that we are committed to an ethical behavior and to the quality of our services.

In this way, we can protect and enhance the reputation of **HELISUL AVIAÇÃO**, and play our role in building a better business world for our employees, our customers, and the communities where we live.

HELISUL AVIAÇÃO is releasing this new version of the Code of Conduct, which was revised and updated to reinforce our commitment to ethics, integrity, and compliance in daily operations.

Best Regards,

HELISUL AVIAÇÃO

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INTRODUCTION

This Code of Conduct was developed to help the company achieve its values and principles. To this end, it brings together a series of standards that must be understood and complied with by all employees, suppliers, as well as business partners.

In brief, it sets out clear guidelines on how to act and behave in a wide range of situations. Please take time and read through the Code patiently and attentively. Adhere to the rules described herein, clarify any doubts you may have, help ensure that the company's rules are followed, and understand that you are part of an organization where ethics and good conduct are highly appreciated and valued.

OBJECTIVE

The objective of this Code of Conduct is to create an environment of transparency in the business and procedures of **HELISUL AVIAÇÃO** and guide its working relationships with internal and external stakeholders.

OUR ESSENCE

What we do and how we do it inside and outside the organization. Our values are present in the daily work of our team and represent our focus on responsibility and respect for all persons that we interact with.

OUR ENVIRONMENTAL, SOCIAL, AND CORPORATE GOVERNANCE VALUES

This Code represents **HELISUL AVIAÇÃO**'s unequivocal commitment to pursue sustainable development and corporate responsibility in all its activities.

We acknowledge the importance of acting ethically and transparently while promoting respect for human rights, environmental preservation, and the creation of social value. Our employees play a crucial role in the organization's risk management, and we encourage each of them to adopt best practices and make informed decisions, taking into account the social and environmental impacts of our activities. By committing to integrity and complying with this Code, we can contribute to a sustainable future for our company, local communities, and the whole planet.

Together, we can build a lasting legacy based on good conduct and shared responsibility.

DEFINITION OF ETHICS

Ethics is the set of principles and values that serve as a guide to human conduct, promoting fair, honest, and respectful decisions in our relationship with others and with society. In the organizational context, it is the basis for responsible and transparent behavior in line with legal and moral commitments. This Code of Conduct reflects these principles while guiding the behavior of all employees.

MISSION

To work responsibly, respecting our customers and the environment, offering full-time safe and high-tech solutions with honesty and integrity.

VISION

To be a market-leading provider of advanced services in the aviation industry, with a high level of technology, safety, and quality to meet the needs of our customers.





1. AWARENESS AND USE

This Code of Conduct is an instrument of guidance and must be known and complied with by all persons who have a relationship with **HELISUL AVIAÇÃO**.

Therefore, this Code is intended for use by employees, suppliers, business partners, customers, public agencies, competitors, financial institutions, the press, groups, and organizations interested in the company's activities, and other unspecified partners.

The Code must be applied in **HELISUL AVIAÇÃO**, in its affiliated companies and subsidiaries, not only inside the company's facilities, but also outside its boundaries, both in the physical and the virtual environments.





2. CONDUCT IN WORKING RELATIONSHIPS

2.1 INTERNAL RELATIONS AMONG EMPLOYEES

The human capital of **HELISUL AVIAÇÃO**, represented by its employees, is responsible for maintaining the high quality of the company's business and services, as well as creating its institutional image. To this end, our employees must:

- seek to maximize **HELISUL AVIAÇÃO**'s resources;
- work as a team;
- always pursue the best results for **HELISUL AVIAÇÃO**, and aim at increased technical improvement;
- help to protect the name and image of **HELISUL AVIAÇÃO**, and work towards making them stronger and more solid.

Employees must act in accordance with the mission, vision, and values of **HELISUL AVIAÇÃO**, as well as:

- respect internal policies and standards, as well as current laws;
- maintain relationships based on ethical principles of integrity, respect, loyalty, transparency, discretion, and efficiency;
- promote the continuous improvement of the organization as a whole;
- avoid spreading slander, rumors, and other information without evidence;
- inform the company's managers immediately about **risk situations that may affect** people, the community, and the organization.

2.2 RELATIONSHIPS OF SENIOR LEADERS WITH THEIR TEAMS

Leaders at **HELISUL AVIAÇÃO** must foster a fair and ethical environment. Thus, they are supposed to:

- clearly understand their responsibilities and organizational goals and pass them on to their teams clearly and objectively, delegating tasks and creating synergy among employees to ensure that everyone feels committed and motivated to achieve the best results possible;
- earn the trust of employees, advise them to perform their tasks with excellence, and provide fair, unbiased feedback on a regular basis (and when requested) on their performance in the company;
- ensure the appropriate handling of slanderous accusations and situations where there is evidence of a breach of conduct, ensuring the fair and prudent use of administrative sanctions when applicable.
- encourage and develop the employees' potential and proactive behavior to prevent them from falling into a routine that could make them feel discouraged, unproductive, or unimportant;

- inform the company's managers immediately about risk situations that may affect people, the community, and the organization.

2.3 FAMILY TIES AND CLOSE RELATIONSHIPS BETWEEN EMPLOYEES

HELISUL AVIAÇÃO, in line with its ethical values and integrity principles, adopts a strict policy on hiring employees who have family ties or close relationships with other employees. This measure aims to ensure impartiality and transparency, and avoid potential conflicts of interest in the work environment.

HIRING POLICY:

HELISUL AVIAÇÃO does not allow the hiring of people who have consensual romantic relationships or family ties with employees of the company, including any degree of kinship. Exceptions to this rule may be assessed on a case-by-case basis upon communication from the applicant to the immediate Manager and Area Director. If agreed, the Area Director is responsible for submitting the case for analysis and approval by the Area Superintendent, who may approve it or not upon consideration of the guidelines set out in this Code.

DEFINITION OF KINSHIP:

For the purposes of this Code, “relatives” are defined as:

- parents, siblings, children, spouses, domestic partners, grandparents, uncles, aunts, nephews, nieces, and first- and second-degree cousins, as well as cousins of their spouses or domestic partners.

Please bear in mind that these relationships can affect organizational dynamics and must therefore be treated with transparency and rigor with a view to preserving the integrity of the work environment and fulfilling the company's values.

2.4 RELATIONSHIPS WITH OUR CUSTOMERS

Our customers are our greatest asset, and we must always build a relationship of mutual trust throughout their journey by communicating our services in a clear and transparent manner. As employees, our duty is to always relate to customers and serve them with kindness, politeness, promptness, efficiency, respect, ethics, and integrity, seeking to achieve excellence as we perform our business activities.

WHAT MUST BE DONE:

- Practice active listening. Listen to what our customers have to say and consider their views when making decisions.
- Anticipate, respond to, and meet or exceed their expectations.
- Fulfill our contractual commitments and obligations.
- Meet the needs of customers with empathy, seeking solutions that take into account the interests of the parties.
- Ensure that **HELISUL AVIAÇÃO**'s business activities are conducted with objective and transparent rules.
- Respect the internal process of formalization of contracts with customers.

2.5 RELATIONSHIPS WITH OUR COMPETITORS

We compete fairly, based on price, quality of services, customer knowledge, innovation and, above all, respect for the reputation of our competitors. We preserve free competition by not engaging in price-fixing agreements with competitors or creating obstacles to the entry of new companies into the market. We believe that free competition stimulates creativity and continuous improvement, increases productivity, and motivates companies to keep fostering innovation in the market.

WHAT MUST BE DONE:

- Do not provide competitors with any information that is strategic, confidential, or harmful to **HELISUL AVIAÇÃO**'s business.
- Encourage competitiveness based on free and fair practices.
- Report to the Compliance Committee if you are aware of any dishonest competition practice that may harm **HELISUL AVIAÇÃO**.

2.6 RELATIONSHIPS WITH THIRD PARTIES (SUPPLIERS, SERVICE PROVIDERS, BUSINESS PARTNERS)

We highly appreciate ethics, transparency, impartiality, and professional attitude in establishing relationships with third parties, and we reject attitudes or opinions that could damage our reputation and credibility.

We are impartial when selecting suppliers and service providers. We always choose our partners based on technical and objective criteria. Both the procurement department and the requesting department are supposed to make a thorough analysis of potential suppliers prior to hiring services and purchasing products.

They analyze operational, financial, and legal capacity, the formalization of contracts, or the general conditions of supply with regard to purchase orders to prevent and/or mitigate risks, as the chain of suppliers and service providers directly affects our reputation, as well as our business.

Our relationships with suppliers and third parties are a key component of our business. We build these relationships and are aware of the importance of fostering them. With a spirit of collaboration, we strive to build mutual trust and respect for all third parties.

2.7 RELATIONSHIPS WITH PUBLIC AUTHORITIES

Our relationship with public agencies, their officials or related third parties is guided by transparency, ethics, and morality.

We do not tolerate, while maintaining such a relationship, any act of corruption and bribery, either directly or indirectly. Thus, we do not offer money or any other benefit, not even through third parties, to any governmental authority to influence decisions, obtain or maintain business, or to ensure any inappropriate advantage, as we are convinced of our role in building a more ethical, honest, and transparent society.

WHAT MUST BE DONE:

- Be cautious in maintaining any kind of relationship with public officials. Follow the guidelines of the Executive Board.
- Immediately stop an interaction with a public official who attempts to take undue advantage.
- Inform both the Executive Board and the Compliance Committee of any kind of improper request by public officials.

2.8 RELATIONSHIPS WITH TRADE UNIONS

HELISUL AVIAÇÃO recognizes and respects the association between employers and trade unions, and considers them as legal representatives of employees. Therefore, the company is always open to dialogue whenever necessary.

Any contact between **HELISUL AVIAÇÃO** and trade union associations must be made by authorized employees with prior training in such matters.

HELISUL AVIAÇÃO respects trade union associations, councils, and other types of associations; however, it chooses not to be affiliated with political parties.

2.9 MEDIA RELATIONS

The information made available for the use of press agencies must be accurate and transparent, in line with the mission, vision, and values of **HELISUL AVIAÇÃO**, and in accordance with the current legislation.

Only employees duly trained and authorized by **HELISUL AVIAÇÃO** can liaise with the media, speak on behalf of the company, and make comments about it.

This procedure is meant to help the company maintain a good relationship with the media, building trust and strengthening the image of **HELISUL AVIAÇÃO** in the eyes of the public.

The facts to be disclosed must be about relevant situations, and clarification must be provided, when necessary, about the business and activities of **HELISUL AVIAÇÃO**. The relationship with the media must not be treated as a commercial activity. Exchanges of favors must not be either offered or accepted, and payments must not be made in exchange of advantages.

2.10 RELATIONSHIPS WITH THE ADVERTISING MARKET

The company's relationships with the advertising market, represented by advertising agencies, must be developed by employees who are part of the marketing department of **HELISUL AVIAÇÃO**. Such employees are skilled and trained to conduct this type of activity.

This relationship must be transparent, and the information disclosed must be true and reflect the principles of the mission, vision, and values of **HELISUL AVIAÇÃO**, without any exaggeration, avoiding value judgments, that is, judgments out of individual convictions based on cultural, sentimental, and ideological aspects, prejudice, and other moral values.

The advertising campaigns of **HELISUL AVIAÇÃO** must be carried out while respecting competitors and the current legislation.

The voluntary participation of employees in promotional campaigns, graphic materials, institutional videos, folders, etc., does not imply that they have the right to be paid extra remuneration, regardless of type. Employees must be aware of this at the time of their admission when reading, agreeing to, and signing the Release & License to Use Image, Name and/or Voice.

2.11 RELATIONSHIPS OF EMPLOYEES ON SOCIAL MEDIA

HELISUL AVIAÇÃO respects the rights to freedom of speech of all its employees, but it must be noted that customers, colleagues, and supervisors often have access to online content on social media. Thus, employees must be aware that expressing opinions online that are against the interests of **HELISUL AVIAÇÃO**, may cause conflicts.

HELISUL AVIAÇÃO employees shall act conscientiously, and must keep their personal and professional lives separate. Also, they must:

- not disclose non-public company information (including confidential information);
- not use the company's logos or trademarks unless authorized;
- not discuss the business performance of **HELISUL AVIAÇÃO** or other publicly sensitive topics;
- not mention or refer to customers, partners, or suppliers without their approval;
- not publish any content that may embarrass customers;
- respect the public and their co-workers;
- not be involved in quarrels, and correct their own mistakes;
- attempt to add value;
- use common sense;

- not allow online activities to interfere with their work or appointments with customers.

2.12 RELATIONSHIPS WITH THE COMMUNITY

We are committed to social responsibility and seek to carry out actions that promote leisure, culture, well-being, and solidarity in the life of employees and in the community where we carry out our operations. We believe that, in this way, we can put our purpose into practice and contribute to a better world, acting with transparency, a constructive attitude, courtesy, partnership, benefaction, and mutual respect.

2.13 SUSTAINABILITY AND SOCIAL RESPONSIBILITY

HELISUL AVIAÇÃO is committed to sustainability and the preservation of the environment in all its operations, seeking to minimize the environmental impacts that are typical of the aviation industry. The company adopts energy efficiency practices, responsible waste management, and preservation of natural resources, always aiming at sustainable development and compliance with environmental laws.

The company focuses on three pillars: **operational efficiency, emission reduction, and biodiversity conservation**. Through these pillars, **HELISUL AVIAÇÃO** undertakes to reduce fossil fuel consumption, optimize its air operations, and adopt technologies that promote energy efficiency and environmental conservation.

To manage environmental impacts, **HELISUL AVIAÇÃO** implements a rigorous program for waste management and water efficiency, as well as noise and air pollution minimization. The company also encourages recycling and reuse of materials in its operations.

In addition, **HELISUL AVIAÇÃO** raises environmental awareness among employees and partners through training programs and engagement campaigns. The company also requires its suppliers to adopt sustainable practices, increasing the positive impact of its actions throughout the value chain.

The company recognizes its responsibility in addressing climate change and commits to adopting sustainable practices in all its operations. In addition, all employees must develop environmental awareness, contributing to minimize impacts and promote sustainability in the civil aviation industry.



3. CORPORATE CONDUCT AND EMPLOYEE CONDUCT

3.1 CONFLICT OF INTEREST

A conflict of interest is characterized by any opportunity for an employee's personal gain that may conflict with the interests, activities, and/or image of **HELISUL AVIAÇÃO**.

Our employees must not use their position or duties, or information on **HELISUL AVIAÇÃO**'s business and affairs to influence decisions that may favor their own interests or third-party interests.

Our employees have the right to participate in external activities as long as they do not enter into conflict-of-interest situations with **HELISUL AVIAÇÃO**.

When signing the term at the end of this Code, employees must be aware that they must report conflict-of-interest situations formally and immediately to the Human Resources Department, which will forward their reports to the Compliance Committee, which, in turn, will analyze them on a case-by-case basis.

Below are the main situations involving conflict of interest:

- consensual romantic relationships or family ties between employees;
- consensual romantic relationships, family ties, or friendship between employees and customers,
- consensual romantic relationships, family ties, or friendship between employees and suppliers of products and services;
- consensual romantic relationships, family ties, or friendship between employees and competitors;
- consensual romantic relationships, family ties, or friendship between employees and public officials;
- other relationships that may compromise our principles of impartiality.

While the situations described above, alone, are not an impediment to doing business, or to hiring employees, they must be reported to the Compliance Committee of the company for assessment.

3.1.1 USE OF ALCOHOL, DRUGS, AND WEAPONS

The use, possession, or sale of alcoholic beverages, illegal drugs and weapons is prohibited on **HELISUL AVIAÇÃO**'s premises, as well as in the companies and other places where **HELISUL AVIAÇÃO** provides services, including the company's vehicles and aircraft, or during working hours.

All persons must follow the rules below:

- Working under the influence: Employees are not allowed to work under the influence of alcohol, drugs, or any substance that may affect their behavior or performance, even if they consume them outside the office or away from the company's facilities.
- Missions and business travel: During missions or work trips, employees must ensure that they will maintain full physical and mental fitness at the beginning of the next day. Therefore, it is

forbidden to consume alcohol at times that may compromise one's readiness for work the next day. Non-compliance may result in warnings, internal sanctions, or employment termination.

- Corporate events and business meals: On occasions such as business dinners and company events, consumption of alcohol must be moderate and sensible, provided that no professional activity is to be performed shortly afterwards or the next day.
- Smoke-free environments: Smoking, including the use of electronic cigarettes or the like, is prohibited in closed areas of the company or in places where this poses a risk to safety, in accordance with Brazil's Federal Law 9.294/1996.
- Dangerous weapons and articles: It is prohibited to carry firearms, knives, pepper sprays, or any object that may jeopardize security on the premises of the company or on its vehicles and aircraft, except when one is legally authorized to do so.

3.2 ACCOUNTING, FINANCIAL, AND COMMERCIAL OPERATIONS

We follow the Brazilian and international norms and standards of accounting, financial controls, and internal and tax reporting. Thus, **HELISUL AVIAÇÃO's books, records, and accounting, financial and fiscal accounts** must accurately reflect the existing operations and events, and comply with the required accounting principles, the company's internal controls systems, and applicable national and international laws. In this respect, it is prohibited and illegal to distort or manipulate, either directly or indirectly, accounting, financial and tax data to hide, disguise, or change the financial position and results of the company, which must be real, complete, and accurate. All payments and monetary obligations must be authorized by the person-in-charge at a higher hierarchical level, and must be supported by legal documentation.

WHAT MUST BE DONE:

- Never falsify a record or try to hide the real nature of a transaction.
- Do not try to circumvent internal controls and procedures, even if you believe it will cause no harm or will be time-saving.
- Always cooperate with audits, and be clear and honest.
- Fulfill the functions and responsibilities established for your job position. Always behave with ethics, integrity, and transparency.
- Preserve the integrity of the financial resources of **HELISUL AVIAÇÃO** and of its partners/shareholders.
- Inform the parties in charge and the Compliance Committee when detecting errors in processes and/or inaccurate information.
- Protect the veracity and accuracy of **HELISUL AVIAÇÃO**'s data.

IT IS UNACCEPTABLE TO:

- Fail to perform data registration and implementation of controls as required by your work activities, duties, or position.
- Omit or modify, without any justification, information relevant to the company and that may affect strategic decisions to be made by senior management.

3.3 CONTROL OF THE COMPANY'S PROPERTY

All employees at **HELISUL AVIAÇÃO** are responsible for protecting the company's property, which is represented by the set of its tangible and intangible assets, as noted below:

- Financial assets;
- Real estate and furniture;

- Hardware, software, tools, and utensils;
- Machinery, vehicles, and equipment;
- Raw material, stocked products, and stocked parts;
- Company name, brand, and logo;
- Registration information about customers and suppliers;
- Intellectual production, patents, technical information, trade secret, and strategic business information.

In the case of process improvements, product development, and other ideas and situations created internally by employees, it is established that such improvements belong to **HELISUL AVIATION**.

To protect the company's assets, it is essential to maintain secrecy and confidentiality while using company information, which must be used and shared only internally by authorized persons for the purpose of performing work activities. In this sense, employees must be careful when talking about sensitive issues, always looking for safe environments and speaking only to authorized people.

For the effective control of its assets, **HELISUL AVIAÇÃO** has control mechanisms, audits, and other processes to regularly verify the adequacy, effectiveness, and accuracy of the assets that make up its property.

3.4 RESPECT FOR HUMAN RIGHTS

We fight the use of slave and child labor and do not engage in relationships with suppliers and service providers who may exploit child labor or slavery-like labor. Our role is to encourage inclusive and sustainable economic growth by promoting a decent labor market within Brazilian and international labor standards. We do not allow activities with minors that may be characterized as employment or child labor, except for the hiring of apprentices under the current applicable laws.

3.5 HEALTH AND SAFETY AT WORK

For **HELISUL AVIAÇÃO**, the health and physical integrity of its employees is a priority; therefore, it offers its employees capacity-building training and seeks to ensure a safe and healthy work environment, based on principles of hygiene and safety. For this purpose, all persons must maintain a safe and healthy working environment, as well as raise awareness of safe practices that can prevent any type of incident or accident at the company.

To preserve the integrity of all employees at **HELISUL AVIAÇÃO** and to maintain a safe and healthy working environment, all persons are advised to develop their daily work activities within health and safety standards, and care for others.

The health and safety guidelines must be known, respected, and complied with by all persons.

3.6 DIVERSITY AND INCLUSION

HELISUL AVIAÇÃO respects the diversity of its workforce and fights any prejudiced and discriminatory practices, whether related to race, color, religion, sexual orientation, nationality, age, physical or mental condition, ethnicity, sociocultural status, and marital status, or any other practice meant to disrespect, humiliate, threaten, assault (verbal and/or physically), denigrate the dignity of any person, and create a hostile work environment.

Respect must be at the core of relationships between employees, and between employees and other stakeholders who interact with **HELISUL AVIAÇÃO**, namely suppliers, business partners, service providers, customers, community members, etc. Thus, the use of pejorative words, stalking, or other types of “bullying” practices will not be allowed or tolerated, whether among the members of a team, from a superior to a subordinate, or from a team to their manager or leader.

WHAT MUST BE DONE:

- We welcome our diversity, which brings us together and makes us stronger; therefore, respect and transparency are the basis of all our relationships.
- We pride ourselves on the inclusive and diverse community that we are building. This way, we become a more powerful and more competitive company.
- Each of us is responsible for supporting the community by respecting the various origins and cultures of other people and doing what is fair in all decisions and interactions.
- We care for cordial, respectful, and transparent treatment, ensuring that everyone feels included and everyone's rights are safeguarded.
- We work collaboratively, encouraging the diversity of ideas and constructive debate.
- We respect the freedom of choice, origin, preferences, differences, and lifestyle of every individual who is somehow related to **HELISUL AVIAÇÃO**.
- We promote an environment of collaboration and trust, where people are encouraged to work together in diverse teams while respecting different individual experiences.
- We give honest and transparent feedback.

IT IS UNACCEPTABLE TO:

- Use your role or position at **HELISUL AVIAÇÃO** to favor, harm, or disrespect anyone.
- Adopt any type of discriminatory conduct, in disrespect of persons with disabilities or their gender identity, sexual orientation (LGBTQI+), race, color, religion, marital status, age, or nationality.

- Make, disclose, or share false, insulting, or offensive comments or statements in the workplace or on social media.
- Conduct political, religious or any kind of campaign that may negatively affect the image of **HELISUL AVIAÇÃO**.
- To censor or suppress the free expression of thought of fellow workers when it does not affect the reputation of **HELISUL AVIAÇÃO**.

3.7 MORAL HARASSMENT

We disapprove of all kinds of offensive, humiliating or abusive, verbal or physical behavior, and we respect all persons in the workplace, in business meetings and social events related to our professional activity. Trust and respect among our employees and service providers are fundamental values, because we aim at a healthy and productive environment.

BEWARE!

- **MORAL HARASSMENT:** It is characterized by behaviors repeated on a regular basis, such as: overloading an employee with too much work, unassigning tasks from an employee without a good reason; treating an employee in an offensive manner, using profanity and words that must not be used in the labor environment; assigning humiliating tasks; spreading rumors; physically isolating an employee by preventing them from communicating with their colleagues.
- Harassment can occur face-to-face or online (for example, cyberbullying, cyberstalking, and online harassment) through the Internet, text messages or messaging applications, email, or social media.
- Moral harassment is a serious practice that deeply jeopardizes work relations and the collaborative environment; thus, it must be fought in all its forms.

HOW TO TELL MORAL HARASSMENT APART FROM MANAGEMENT ACTIONS?

Management actions are part of work routines and relationships between co-workers, especially of different hierarchical levels. They are always linked to the interests of the company and must be reasonable and justifiable. Here are a few examples:

- Expecting employees to achieve results and goals;
- Making assessments and giving feedback on behaviors or deliveries;
- Increasing the volume of activities;
- Transferring employees to other location;

It must be noted that management actions cannot be performed on the basis of discriminatory behavior or humiliation or intimidation practices.

3.8 SEXUAL HARASSMENT AND SEXUAL ASSAULT

We reject any form of sexual harassment and assault, and acknowledge that such behaviors are unacceptable and contrary to the core values of our company. We encourage awareness-raising and education about the rights, responsibilities and consequences related to such acts, provide reporting tools, and make regular assessments of the work environment so that any behavior that is characterized as harassment and/or sexual harassment can be reported. In addition, our In-Company Committee for Accident and Harassment Prevention (CIPA+A) works together with the Compliance Committee to prevent and devise strategies to fight harassment, as well as advise and raise the awareness of employees and other people who interact with [HELISUL AVIAÇÃO](#).

We recognize that an environment free from sexual harassment and assault is essential to the well-being of our employees, the productivity of our team, and the ethical reputation of our company. We are committed to maintaining a healthy organizational culture in which everyone feels safe and appreciated.

BEWARE!

Sexual harassment is any unwanted behavior of a sexual nature, which has an unfavorable effect on the work environment or harmful consequences for the professional development of victims. It may be characterized by pick-up lines and insinuations with the aim of obtaining sexual advantages or favors.

- Sexual harassment is a form of abuse of power and can occur through intimidation (environmental sexual harassment, whereby the harasser seeks to create unacceptable working conditions in an intimidating process of harassment) or blackmail.
- Physical contact is not necessary to characterize sexual harassment because it can occur through verbal or written content or even in more subtle forms, such as comments, gestures, images, etc.
- Sexual assault is an unwanted and inappropriate behavior of a sexual nature, carried out by one person against another, without explicit consent or violation of the victim's personal boundaries and personal space.
- A practical example of sexual assault is unwanted touching in an invasive and non-consensual manner with the aim of causing embarrassment.
- Work-related sexual harassment and sexual assault do not occur only within the company; therefore, behaviors outside the work environment and in online environments must also adhere to the rules laid down herein.
- If you are a witness or a victim of behaviors that are characterized as sexual harassment or sexual assault, do not be afraid to report such situations. Use our Reporting Channel to weaken the harasser's power.

3.9 SECURITY ON THE PREMISES

To ensure physical security on its premises for employees, service providers, and business partners, **HELISUL AVIAÇÃO** has its own administrative procedures and other internal rules that must be followed by all persons who enter the company's premises.

The company's premises are monitored by CCTV surveillance to ensure and improve the security of facilities, thus protecting employees and visitors. Our premises are CCTV-monitored 24 hours a day.

3.10 MARKETING OF PRODUCTS AND SERVICES

When hiring and paying wages to its employees, **HELISUL AVIAÇÃO** expects them to work diligently and carefully while performing their duties. Therefore, they must not perform non-work-related activities on the company's premises. Examples of non-work-related activities include:

- regular sales on an employee's own behalf or on behalf of others without the employer's permission;
- marketing of products and services by an employee, which compete with the company's business, or are detrimental to the performance of the company's business activities.

3.11 GAMBLING, BETTING, AND SELLING RAFFLE TICKETS

Betting pools, sales of raffles, betting in sports championships and lotteries, when done on the premises of **HELISUL AVIAÇÃO**, must not jeopardize employees' work activities, nor must be done with the company's tools or resources, such as email accounts, internal communication applications, corporate phones, landline phones, etc.

3.12 USE OF THE BRAND AND THE LOGO

The name “**HELISUL AVIAÇÃO**” can only be used upon prior written authorization by the company’s Marketing and Communication Department.

The **HELISUL AVIAÇÃO** logo must be applied in accordance with the guidelines set out in the brand manual.

3.13 USE OF PERSONAL CELL PHONES

Employees must avoid using personal cell phones during working hours. When essential, that must be done sensibly, without jeopardizing the work routine of employees and other people in the surroundings.

No pictures or videos can be taken with cell phones inside **HELISUL AVIAÇÃO**’s premises without prior authorization from the company’s senior management.

Employees must not use instant messaging service, social media platforms, or any other non-work-related applications during working hours.

3.14 PERSONAL CARE AND HYGIENE

Employees performing their work activities represent the image of **HELISUL AVIAÇÃO**. Therefore, **HELISUL AVIAÇÃO** expects its employees to take care of their appearance, adopting socially accepted patterns of clothing, personal care, and hygiene.

3.15 CLEANING AND ORGANIZATION OF THE WORK ENVIRONMENT

All employees are expected to maintain the workplace clean and tidy, because a clean and tidy environment promotes good health, prevents accidents and occupational diseases, and shows that all employees are committed to making their workplace reflect the values of **HELISUL AVIAÇÃO**.

3.16 POLITICAL ACTIVITIES

HELISUL AVIAÇÃO does not restrict the political-party activities of its employees; however, they must always act on their own behalf and must never allow such activities to interfere with their professional responsibilities. Any employee participating in political activities shall do so on their own behalf as a citizen, but never in the name of **HELISUL AVIAÇÃO**.

It is strictly forbidden to engage in party political activities in the work environment and use any resource of **HELISUL AVIAÇÃO** for such purpose, including advertisements on the company's premises, fleet, publications, etc.



4. *INFORMATION SECURITY*

HELISUL AVIAÇÃO's employees must adhere to our Information Security Policy, available to all persons in the company's network and during the hiring procedures. The policy sets standards of behavior towards information security and the use of technological resources, which are appropriate to the business needs of **HELISUL AVIAÇÃO**, its legal protection, as well as the protection of its employees and all persons who interact with the company. In this way, the policy establishes norms, processes, and controls to:

- protect **HELISUL AVIAÇÃO**'s data, both in terms of storage and broadcast, against intentional or accidental changes. All employees, service providers and partners must have access only to the information required for the performance of their activities, and they are responsible for using and protecting such information;

- restrict access to systems, directories, emails, and other sources of information only to formally authorized users. These users must be granted access to information whenever necessary;
- assign each manager the responsibility to share and protect information about the activities of his/her department, ensuring that his/her subordinates make a responsible use of the technological resources provided by the company;
- hold users criminally liable to the company, service providers, partners, and the community for any damages caused by non-compliance with the rules laid down in the Information Security Policy.

HELISUL AVIAÇÃO has means to monitor and record all use of computers, the Internet, emails, and corporate systems.

HELISUL AVIAÇÃO reserves the right to inspect all computers, files stored on the network or devices and to remove any non-work-related content without prior notice, with the purpose of ensuring compliance with the Information Security Policy.

Users are responsible for any activity from their account and for their actions when using the technological resources available. Thus, users will be held accountable for any lawsuit filed against the company and that involves them.

In the event of violation of the rules, the direct manager of a given user will be responsible for analyzing and suggesting the penalty, and formally notifying the employee.

4.1 CONFIDENTIAL INFORMATION

Employees or third parties who have access to confidential, restricted, and internal use information must not disclose it to external parties, including information obtained while performing their duties.

All persons must take the utmost care when handling confidential information to ensure that such information is shared and/or disclosed only to those who need such access.

It is prohibited to use information and content obtained while performing work activities for private use or any use other than the company's objectives, without proper approval.

Personal data may be collected and used only for lawful purposes and in accordance with applicable data protection laws and regulations, in particular the General Data Protection Law - LGPD (Brazil's Federal Law 13.709/2018).





5. FIGHTING MONEY LAUNDERING AND TAX EVASION

HELISUL AVIAÇÃO adopts a zero-tolerance approach to money laundering and tax evasion. These practices are considered serious and harmful to the integrity of our business and to society. Therefore, all employees, suppliers, business partners, and third parties that interact with the Company must ensure compliance with all applicable Brazilian and international laws and regulations.

DEFINITION OF MONEY LAUNDERING:

Money laundering is the process of concealing the origin of money obtained from illicit activities, making them appear to have a legal source. This process involves several steps, for example, placement, layering, and integration of proceeds into the financial system.

DEFINITION OF TAX EVASION:

Tax evasion consists of illicit practices that aim to reduce, eliminate, or postpone the payment of taxes due to the government, by omission of information, falsification of documents, or other fraudulent ways of circumventing tax legislation.

WHAT MUST BE DONE:

- **Prohibition of illicit activities:** No employee or third party representing **HELISUL AVIAÇÃO** is allowed to participate in activities involving money laundering or tax evasion.
- **Financial Transactions:** All financial transactions must be carried out transparently and recorded in accordance with applicable accounting and tax principles. Any payment or receipt that is suspicious or involves atypical amounts must be reported to the Compliance Committee.
- **Duty of Diligence:** Each employee and business partner is responsible for ensuring that customers, suppliers, and partners engaged in transactions with **HELISUL AVIAÇÃO** comply with anti-money laundering and tax evasion laws.
- **Duty to Inform:** Any activity or transaction that appears to be suspicious must be promptly communicated to the Compliance Committee or through the Reporting Channel. Examples of suspicious transactions include, but are not limited to:
 - cash payments of large amounts.
 - requests for payments to third parties that are unrelated to contracts.
 - transfers of funds between accounts in countries where tax legislation is less strict.

CONSEQUENCES AND SANCTIONS:

Participation or connivance with money laundering or tax evasion activities will result in severe administrative sanctions, which may include employment termination, in addition to civil and criminal liability, as provided for in current applicable legislation. Business partners, suppliers, or service providers involved in such practices will have their contracts terminated immediately.





6. COMPLIANCE WITH ANTI-BRIBERY AND ANTI-CORRUPTION LAWS

Bribery, illegal commissions, or any other improper payment to public or private officials are unacceptable, even if refusal to such practices may result in the loss of a business opportunity. We adhere to the Brazilian Anti-Corruption Law No. 12.846/2013, the Anti-Money Laundering Law No. 9.613/1998, and international anti-corruption laws.

At **HELISUL AVIAÇÃO**, we appreciate truth and operate lawfully, transparently, and honestly, and we do not tolerate illicit practices - including, but not limited to, fraud, bribery, extortion, illegal consideration, facilitation payments, and corruption - by our employees or third parties while doing business on our behalf.

WHAT MUST BE DONE:

- Conduct our business in accordance with the legislation and internal standards of **HELISUL AVIAÇÃO**.

- Contact the Compliance Committee to report any unusual or suspicious transaction that may characterize a money laundering crime, such as requests for atypical payments (a substantial amount of cash, transfer of funds from a third party, etc.).
- Behave with ethics, integrity, and transparency in our relationships, always acting responsibly.

IT IS UNACCEPTABLE TO:

- Accept payment or enable transactions with amounts resulting from illicit activities, thereby allowing the practice of money laundering.
- Receive or offer gifts, amenities, hospitality, or any kind of entertainment outside our standards and/or which is not allowed in our internal regulations.
- Promise, offer, request, or accept undue advantage.

6.1 GIFTS, AMENITIES, CONTRIBUTIONS, DONATIONS, AND GROOMING

6.1.1 GIFTS AND AMENITIES

If employees receive gifts or amenities, whether from suppliers or customers, **HELISUL AVIAÇÃO**'s policy determines that these gifts must have low commercial value, and they must have been given for promotional or institutional purposes. Thus, the amount set as a threshold for acceptance of a gift or amenity is up to 20% of Brazil's monthly minimum wage.

Even when the amount is on or below this threshold, this type of situation must be reported to the Compliance Committee.

Under no circumstances must an employee offer, promise, or accept gifts or amenities to benefit themselves or to benefit customers, suppliers, and service providers, as this characterizes bribery, retribution, or other improper types of payment.

Below are some examples of situations that can be characterized as corruption and must be avoided:

- Offer, promise, or accept expensive gifts.
- Only institutional and promotional gifts - such as pens, calendars, day planners, and other low-cost items - can be exchanged;
- Offer, promise, or accept payment of travel expenses (air tickets and accommodation);
- Offer, promise or accept expensive meals, as this is not acceptable in the company's travel policy;
- Offer, promise or accept tickets for concerts, games, and other types of entertainment;

If an employee receives a suspicious offer of gift or amenity, with the purpose of favoring a third party, he/she must inform **HELISUL AVIAÇÃO**'s Compliance Committee immediately.

6.1.2 GROOMING

Any employee of the company or service provider who is being pressured to conduct an unethical and illegal conduct to favor a third party, whether a public or a private official, must immediately report the situation to **HELISUL AVIAÇÃO**'s Compliance Committee.





7. MANAGING THE CODE OF CONDUCT

7.1 COMPLIANCE COMMITTEE

The Compliance Committee of **HELISUL AVIAÇÃO** consists of a group of employees, shareholders, and internal auditors, who meet on a regular basis to deliberate on issues to:

- develop, improve, update, and approve the standards described in this Code of Conduct;
- disseminate the culture of internal controls in the company's business units, making employees and other relevant stakeholders aware of the need to behave in accordance with the rules of this Code;
- analyze reports to make impartial investigations into any unlawful acts that violate the rules contained in this Code, as well as determine which punitive and mitigating actions will be adopted;

- clarify doubts about the rules described in this Code, respective applications, and administrative sanctions arising from non-compliance.

Whenever necessary, employees other than the regular members of the Compliance Committee may be invited to the meetings to help make more accurate and impartial analyses of the situations.

Similarly, experts and consultants may be hired to assess specific cases.

The Compliance Committee also takes into account the current applicable laws to deliberate on the rules contained in this Code.

7.2 COMMUNICATION CHANNELS

HELISUL AVIAÇÃO maintains communication channels that are permanently accessible because we believe that these are means of improving our processes and relationships. Managers, Human Resources personnel, the Compliance Committee, and the Reporting Channel are the main interlocutors of the company and should be contacted for assistance with conduct-related situations.

Employees can rely on the Reporting Channel, whose purpose is to record and investigate cases of reports of non-compliance of the Code of Conduct. This Channel ensures safety, confidentiality, and identity protection to the maximum extent permitted by applicable law. Whistleblowers are allowed not to identify themselves (anonymous reporting). In this case, they must inform the largest number of facts about a given situation so that it can be forwarded for analysis.

Any report shall be treated confidentially, and whistleblowers shall be protected against retaliation to the maximum extent permitted by applicable law. If you have any questions, please do not hesitate to ask for help.

7.2.1 INTEGRITY PORTAL AND REPORTING CHANNEL VIA WHATSAPP

HELISUL AVIAÇÃO's Integrity Portal is an exclusive platform, managed by a third-party company, available at <https://app.codigoconduta.com/helisul>, where users may consult the rules of conduct and report unethical behavior, deviations, illicit actions, and non-compliance with and violations of the Code of Conduct and Corporate Policies.

- It can be accessed from any electronic device, smartphones, tablets, desktops, or laptops.
- The Reporting Channel is managed to handle reports professionally and confidentially, and avoid conflict of interest.



In addition to the Integrity Portal, HELISUL AVIATION also provides a Reporting Channel via WhatsApp, which you can access through the telephone number (41) 3073-0883, or through the QR CODE below.



7.2.2 REPORTING VIOLATIONS

- Users of the Integrity Portal may make anonymous reports through the Reporting Channel.
- No retaliation to users of the Reporting Channel will be accepted. No one will be harmed for reporting a suspicion of irregularity, even if not proven after the investigation, as good faith reports are a way of protecting **HELISUL AVIATION**'s reputation.
- To report issues that are not related to the Integrity Program, please contact our People and Management Department.

THE REPORTING CHANNEL MUST NOT BE USED TO:

- report personal and interpersonal relationship problems;
- report false facts to harm other persons;
- ask questions about situations related to human resources policies;
- express dissatisfaction with remuneration, workload, or job position.

HELISUL AVIAÇÃO undertakes to treat reports with confidentiality, impartiality, respect, and reasonableness.

7.2.3 SPEAK UP

WHAT TO DO IF YOU BECOME AWARE OR SUSPECT OF IMPROPER CONDUCT?

Each of us has a duty to speak up when:

- We observe or suspect of unethical or illegal conduct.
- We believe that we may have been involved in misconduct.
- We have questions or are unsure about which course of action to take.

HAVE YOU SEEN ANYTHING? SAY SOMETHING!

If you see or suspect of irregularity, be proactive: do the right thing and **SPEAK UP!** You can report your concerns on our Reporting Channel!

SPEAKING UP IS OUR SHARED RESPONSIBILITY!

WE DO NOT TOLERATE RETALIATION!

Reporting illegal or unethical behavior is of vital importance to our culture of transparency and accountability. By seeking guidance, presenting an ethical concern, or reporting suspected misconduct, we are doing the right thing and following the Code of Conduct. At **HELISUL AVIAÇÃO**, employees who make a report in good faith can rest assured that they do not need to fear retaliation. No one can act against you because you asked a question or expressed a genuine concern. If you suspect that retaliation is occurring in response to a good-faith report, speak up immediately. Any person who retaliates someone else for making a report, or who discourages or prevents others from raising a concern, may be liable to disciplinary action under applicable laws.

HOW DOES RETALIATION OCCUR?

Retaliation may include downgrading an employee to a less desirable job or shift, employment termination, negative assessments of performance or discipline that are not backed by facts, denial of training opportunities, threats, or harassment. Retaliation may also include more subtle conduct, such as refusing to talk to someone, spreading offensive rumors, or excluding someone from work activities.

7.3 NOTICE AND ACKNOWLEDGMENT OF RECEIPT

Please fill in and sign the “Notice and Acknowledgment of Receipt” at the end of this document to attest that you, as an employee or partner, have read and understood this Code of Conduct and will adhere to it in its entirety.

The notice will be properly filed in the employee's personnel file (and in the case of partners, in a folder created for this purpose) in the Company's Human Resources Department.

7.4 ADMINISTRATIVE SANCTIONS

Employees who have failed to comply with the rules established by the Company, and the laws provided for in the Labor Code, whether on a single occasion or repeatedly, shall be subject to the following sanctions, depending on the severity of the violation:

- Warning (verbal or written);
- Suspension;
- Employment termination (for cause or for convenience);
- Misconduct or non-compliance by business partners, suppliers or service providers may lead to the termination of the respective contract.

Possible violations of the rules of conduct will serve to improve internal controls and the rules themselves; therefore, the root causes will be properly determined to avoid further occurrences.

The reports will be analyzed, and if information is found to be accurate, it will be discussed by the Compliance Committee, which will take action to resolve each case.

7.5 CORPORATE RESPONSIBILITIES

HELISUL AVIAÇÃO encourages its employees to report potential illegal practices. The company has channels that employees can use to make reports, and carries out an investigation and makes an analysis of reports. We acknowledge and comply with the different laws on confidentiality and protection of whistleblowers in the various locations where we operate and offer our employees mechanisms to report issues confidentially and in accordance with local policies against retaliation, to the extent permitted by local law.

All reports made in good faith about inappropriate conduct by **HELISUL AVIAÇÃO** or its employees or partners will be investigated consistently and appropriate measures will be taken. “Good faith” means that the report made was based on information that is believed to be true and honest.

The Code of Conduct will be reviewed on a regular basis, and the Compliance Committee will be responsible for considering suggestions for improvement.

7.6 EMPLOYEE RESPONSIBILITIES

All employees must respect the guidelines set out in our Code of Conduct while performing their work activities and throughout our chain of relationships, taking responsibility for their actions and maintaining an honest conduct in line with our ethical principles.

Whenever there are cases of non-compliance with this Code, as well as conflict situations, they must be reported to the Compliance Committee and/or to the Reporting Channel to be addressed appropriately. Employees are responsible for making reports in good faith.

The consequences applied to misconduct may include disciplinary actions such as warning, suspension, or employment termination, as provided for in article 482 of Brazil’s Labor Code.





8. *FINAL WORDS*

Thank you for taking time to read our CODE OF CONDUCT. Keep the Code in mind and let it guide you through your daily work activities.

We count on you to fulfill our commitment to excellence, ethics, and integrity by using the Code to guide your actions in every decision and interaction.

Do not ever think for a minute that your actions are of no importance. In all situations, your actions have an impact on **HELISUL AVIAÇÃO**. They are important to us and to our customers, who deserve to receive the best from each of us.

If you have any questions about the Code or if you cannot find the answers you need, do not hesitate to ask for help.

Thank you for being part of this path, with ethics, respect, and integrity.

NOTICE AND ACKNOWLEDGMENT OF RECEIPT

CODE OF CONDUCT

Please fill in the information below, and sign and submit this notice to your local HR department.

Employee Partner Third Party

Name: _____

Company: _____

If you are a Partner, please inform the name of the
Company/Provider: _____

Date of receipt: _____ / _____ / _____

I declare that I have received and read **HELISUL AVIAÇÃO's Code of Conduct**, and understood its content and the responsibilities assigned to me. I undertake to observe and comply with all the rules described herein.

Signature: _____

