

CERTIFICATE 2026

ETHICS AND COMPLIANCE



SETRAM (from now on, "the Company") has incorporated an ethical behavior and corporate responsibility program in the area of Criminal Prevention and Regulatory Compliance with the following scope and benefits:

1 COMPLIANCE PROGRAM

The Company has developed a Compliance Program, with the identification of criminal risks, prevention and control elements, development areas and those responsible for their monitoring and control.

2 CODE OF ETHICS AND COMPLIANCE

The Company has implemented a Code of Ethics and Prevention / Action Protocols to define the guidelines and framework to be followed by all employees and relevant third parties in their activities..

3 SUPERVISORY BODY / COMPLIANCE OFFICER

The Company has appointed a supervisory body and has delimited its functions and responsibilities in terms of implementation and monitoring of the Compliance Program.

4 TRAINING

General training program for employees and specific training program for Executives and Administrators in the areas of Criminal Prevention and Regulatory Compliance.

5 INTERNAL INFORMATION SYSTEM

Internal Information System and Internal Information Channels with the requirements of Compliance and elements of independence, confidentiality, registration, communication and protection/attention of the informant and those involved. Protocols and mechanisms for action, follow-up and reporting.

6 EXTERNAL EXPERT SUPPORT

Access to a specialized External Expert in the event of incidents, complaints or requirements of independence and expertise.

7 AUDIT / UPDATE

Annual Supervision and Control Plan with collaboration of an External Expert for the proper implementation, follow-up and update of the Compliance Program.

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Certified and audited by:

BONET

Registration Code
IOE25032600002

Validity year: 2026