



Human Rights Policy

 Constellation.

Message from the CEO

Dear Team,

At Constellation, our values are the starting point for the choices we make and for the way we conduct our operations and relationships. It's based on them that we clearly and publicly affirm our commitment to Human Rights across all our activities, locations, and business relationships, including suppliers, contractors, and business partners.

Safety, for us, means placing people's lives and integrity at the center. This commitment translates into safe and healthy work environments, with continuous attention to operational conditions and physical and mental well-being. Safety is also a shared responsibility: from leadership to every individual onboard and onshore, everyone has a duty to act with care and to report risks and deviations.

Trust is built on respect, ethics, and transparency. Therefore, we advocate for decent and fair working conditions, strictly complying with legislation and collective bargaining agreements. On a daily basis, we reinforce an environment where diversity and inclusion go hand in hand with an absolute intolerance of discrimination and harassment. We promote an environment where concerns can be reported safely, responsibly, and without fear of retaliation.

Sustainability means understanding that human rights and the environment are interdependent. We integrate environmental responsibility into our business strategy, employing practices to prevent and minimize impacts and, when necessary, mitigate and remedy damages.

Excellence, in turn, is about ensuring that commitment becomes practice through discipline, governance, and continuous improvement. We are guided by the UN Guiding Principles on Business and Human Rights and, as signatories to the Global Compact, we seek to embed this respect for Human Rights into the way we plan, decide, and execute our activities. This means maintaining a permanent approach to identifying and managing risks and impacts on people, both within our operations and across our business relationships, with transparency and accountability.

Each of you is invited to read and apply the guidelines of our Human Rights Policy in your daily routine. More than a document, it expresses the standard we choose for Constellation: to operate safely, build trust, promote sustainability, and strive for excellence, always putting respect for people first.

Sincerely,
Rodrigo Rodrigues Ribeiro
CEO – Constellation



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I. Purpose

This Policy applies to the Company and all its direct and indirect subsidiaries and must be adopted by these entities in all jurisdictions in which they operate, subject to their governing documents and applicable laws. In the event of any conflict between this Policy and local legislation, the provision offering the highest level of protection shall prevail. All Employees, officers, members of the Board of Directors, and executive management of the Company and its subsidiaries are expected to be familiar with, committed to, and accountable for upholding the principles set forth herein. They are also responsible for promoting and implementing this Policy within their areas of influence.

II. Definitions

Company or Constellation: refers to Constellation Oil Services Holding S.A. and/or any entity directly or indirectly controlled by it.

Employees: Includes all individuals with an employment relationship with the Company. For the purposes of this Policy, it also encompasses temporary workers, interns, and apprentices.

Universal Declaration of Human Rights: foundational international document that defines basic Human Rights standards aimed at ensuring a dignified life for all individuals.

Human Rights: the body of fundamental rights and freedoms articulated in the Universal Declaration of Human Rights, designed to uphold the dignity, freedom, equality, and intrinsic value of every human being.

United Nations Guiding Principles on Business and Human Rights: a framework developed by the United Nations Human Rights Council to assist both States and business enterprises in preventing, mitigating, and addressing adverse Human Rights impacts arising from business activities.

III. Scope

This Policy sets forth the overarching principles and guidelines that govern the Company's commitment to respecting Human Rights across all its operations, business relationships, and geographic locations.

IV. Principles

The Company is committed to respecting and promoting Human Rights, prioritizing the prevention of violations and any potential adverse impacts. When necessary, it will act to mitigate and remediate such impacts across its operations and throughout its value chain, through stakeholder engagement and in alignment with institutional commitments, as well as the international principles and standards referenced in items 7, 8, and 11 of this Policy.

The Human Rights outlined below have been identified through risk assessments and reflect those most likely to be affected by the Company's business activities and relationships.

• Safety and Health

Safety is one of the Company's core values, an uncompromising condition and a top priority across all operations. This commitment is shared throughout the organization, from senior leadership to all Employees.

To promote a culture that prioritizes the safety, health, and overall well-being — both physical and mental — of all Employees, the Company ensures safe and healthy work environments and continuously invests in improving working conditions. It also maintains a set of internal policies, procedures, and programs aligned with applicable legislation to mitigate potential risks and ensure access to medical care and psychological support.

• Decent Working Conditions

The Company views its Employees as its most valuable asset and is firmly committed to ensuring fair and dignified working conditions. This includes full compliance with labor laws and applicable collective bargaining agreements, and the formalization of employment contracts for all workers.

Compensation is fair, aligned with the role performed, individual performance, and professional qualifications, and is competitive within the market. It complies with all legal requirements and collective agreements. The Company also adopts transparent practices regarding working hours, overtime compensation, and labor and social security benefits, all of which contribute to employees' quality of life and the well-being of their families, supporting the continuous improvement of the organizational climate.

All individuals within the Company are responsible for ensuring a safe and respectful workplace by reporting any irregularities. The use of forced labor, conditions analogous to slavery, or any form of exploitation is strictly prohibited and will not be tolerated.

• Equality and Non-discrimination

The Company is committed to promoting equal opportunities, respecting diversity, and ensuring an inclusive and discrimination-free work environment, with particular attention to historically underrepresented groups. Continuous efforts are made to support the development of Employees. Decisions related to recruitment, selection, compensation, promotion, and professional development are based on fair and transparent criteria, taking into account merit and, when applicable, affirmative actions aimed at equity and inclusion.

The Company acknowledges the Human Rights implications associated with the use of Artificial Intelligence (AI), particularly in employment-related decision-making processes, particularly in sensitive areas such as hiring, promotions, and employee termination. Therefore, the Company is committed to ensuring that all AI applications are developed and implemented ethically, ensuring transparency and fairness in automated decisions, and avoiding any form of discrimination.

Furthermore, the Company respects and safeguards reproductive rights, ensuring that all Employees are free to make personal reproductive decisions without discrimination or coercion.

Any form of discrimination — whether based on race, color, religion, sex, sexual orientation, gender identity, national origin, age, physical or mental condition, socioeconomic status, or other characteristics — will not be tolerated.

The Company is committed to fostering a diverse, ethical, and transparent workplace grounded in mutual respect and dedicated to building fair and healthy professional relationships. In line with legal requirements and internal policies and procedures, any conduct that may constitute violence, abuse, harassment, intimidation, or any form of physical, moral, verbal, psychological, or sexual misconduct is strictly prohibited.

• **Freedom of Association, Thought, and Expression**

The Company respects the right of Employees to freely associate, including joining labor unions, professional associations, political parties, and other groups. The Company acknowledges the legitimacy of unions and negotiates Collective Bargaining Agreements in a transparent manner, ensuring that relevant matters for Employees are addressed fairly.

The right to strike is also recognized, and the Company ensures that mutual respect is maintained among all parties during any work stoppage, in accordance with applicable laws.

Additionally, freedom of thought and expression is respected, provided it does not involve hate speech or Human Rights violations, thereby preserving an inclusive and diverse work environment.

The Company does not tolerate any form of retaliation, threat, or intimidation against individuals, including Human Rights defenders, who exercise their rights to freedom of expression, association, or peaceful protest in the exercise of their activities, in full respect of the freedoms of expression, association, and peaceful demonstration.

• **Eradication of Child Labor, Forced or Compulsory Labor, and Human Trafficking**

The Company prohibits and rejects all forms of child labor, forced labor, slavery-like conditions, and human trafficking, in accordance with international labor standards and applicable law, and ensures that its operations are free from such abusive practices.

The Company also guarantees workers' freedom of movement and their full right to return to their country of origin, where applicable, safeguarding Human Rights and actively combating any form of exploitation.

• **Right to a Clean and Sustainable Environment**

The Company integrates environmental responsibility into its business strategy, recognizing the interdependence between human rights and a clean, healthy, and sustainable environment, adopting practices that minimize environmental impact. Strict safety protocols and environmental protection measures are a priority to ensure the preservation of local ecosystems.

Moreover, the Company is committed to mitigating any environmental damage resulting from its operations and to remediating affected areas, in full compliance with applicable laws and regulations.

• **Anti-corruption**

The Company condemns all forms of fraud and corruption, including but not limited to bribery, extortion, kickbacks, and money laundering. Suspicions or reports of such misconduct are thoroughly investigated, and disciplinary measures are applied in accordance with internal policies and applicable laws.

• Privacy and Data Protection

The Company respects the right to privacy of its Employees, clients, suppliers, partners, and other stakeholders. We adopt practices that ensure the appropriate, secure, and transparent processing of personal data, in compliance with the European Union's General Data Protection Regulation (GDPR), Brazil's General Data Protection Law (LGPD), and other applicable regulations. The Company safeguards that data is used for legitimate purposes and is protected against unauthorized access, misuse, or leaks.

The Company guarantees that the use of monitoring and surveillance technologies in the workplace is carried out responsibly and transparently, with the purpose of ensuring the security of Employees and operations, without infringing on personal privacy and in full compliance with the law.

• Local Communities

The Company recognizes that its activities, particularly large-scale operations, may have social and economic impacts on local communities located in or near its areas of operation.

Accordingly, the Company is committed to establishing ongoing and transparent dialogue with these communities, promoting partnerships and supporting local socioeconomic development, including initiatives focused on education, income generation, and community empowerment. Additionally, it is committed to adopting measures to prevent and/or minimize negative impacts, as necessary.

V. Operational Guidelines

The content of this Policy is communicated to all Company Employees through training programs, communication materials, discussions, and other activities, ensuring full understanding and commitment to its principles.

• Human Rights Due Diligence

Consistent with the UN Guiding Principles on Business and Human Rights, and the corporate responsibility to respect Human Rights, the Company maintains mechanisms for:

- a) Identifying actual and potential adverse impacts and risks to Human rights linked to its operations or through the activities of entities within its supply chain;
- b) Integrating the findings of assessments into Company processes, including policy reviews, procedures, budgeting, and other operational decisions;
- c) Monitoring internal controls and evaluating their effectiveness across Company activities and supplier relationships;
- d) Remediating identified adverse impacts by engaging stakeholders in such processes and ensuring the principle of non-repetition;
- e) Communicating with stakeholders regarding the Company's performance in managing Human Rights risks and impacts.

• **Clients, Suppliers, and Business Partners**

The Company's commitment to respecting and promoting Human Rights, as established in this Policy, extends to its relationships with suppliers and business partners, who are expected to apply the principles of this Policy within their own operations and demand the same from their supply chains.

To ensure compliance, the Company conducts risk assessments, audits, and periodic reviews in accordance with its Supplier Qualification and Evaluation Procedure (EP-020-OPER), taking into account respect for Human Rights, integrity, legal and technical compliance, and standards related to environmental management, health, and safety.

Moreover, the Company requires that its suppliers, through contractual clauses, respect Human Rights, anti-corruption laws, and personal data protection regulations in all their activities.

Clients and other business partners are encouraged to adopt similar practices within their own operations.

In cases where Human Rights violations are identified, the Company reserves the right to suspend or terminate the relationship with the supplier or partner, as well as require the implementation of corrective and remedial measures.

• **Communication and Grievance Mechanisms**

The Company maintains a Whistleblower Channel operated by an independent third party, to receive complaints or reports, either anonymous or identified, from stakeholders (employees, suppliers, business partners, clients, and any individuals impacted by its operations) concerning misconduct, discrimination, unlawful practices, and/or any negative impacts on Human Rights caused by its operations, suppliers, or partners.

This grievance mechanism is designed to be legitimate, accessible, predictable, equitable, transparent, and human rights-compatible. It ensures appropriate intake, investigation, and protection of all parties involved, with zero tolerance for any form of retaliation.

VI. General Provisions

This Policy is a public document, available on the Company's website. Its most recent version was approved by the Company's CEO and Executive Board and presented to the Board of Directors.

Any non-compliance with this Policy constitutes a breach of the Company's Code of Ethical Conduct and may trigger disciplinary or remedial action and are subject to the disciplinary measures outlined therein.

This Policy is subject to ongoing review and may be updated as needed.

VII. Institutional Commitments

- United Nations Global Compact;
- "Empresa Amiga da Mulher" Seal – State of Rio de Janeiro.

VIII. Key International Human Rights Standards Reference

- Universal Declaration of Human Rights;
- International Covenant on Civil and Political Rights;
- International Covenant on Economic, Social and Cultural Rights;
- United Nations Guiding Principles on Business and Human Rights;
- United Nations Global Compact;
- Sustainable Development Goals (SDGs);
- Core Conventions of the International Labour Organization (ILO).

Note: Legal technical review carried out within the scope of the extension project "Human Rights Pills", linked to the Postgraduate Program in Law (PPGD) of UNIRIO (Federal University of the State of Rio de Janeiro).





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