

**MOBLY S.A.**

CNPJ/ME nº 31.553.627/0001-01

NIRE 35300561201

**CODE OF ETHICAL CONDUCT**

**1. MESSAGE FROM THE PRESIDENT**

Mobly S.A. ("**Company**") values excellence and quality in all its activities. Its Code of Ethical Conduct is ruled by the Company's values, enabling the relationship with all its stakeholders to be carried out ethically and transparently, thus contributing to upstanding and honest work.

The Company's Code of Ethical Conduct establishes standards of Integrity that go beyond those required by law, using as an example professional practices that demonstrate the Company's moral concern. Our values are present in the decision-making in business and corporate governance and should also guide the decision-making of each of the Company's employees and partners.

All those who carry out activities for or on behalf of the Company must always be guided by the principles, values, and social objectives reflected in this Code of Ethical Conduct and in all of the policies that have brought the Company here. With ethical, responsible and transparent conduct from each one of us, we will continue to write our success story!

Victor Noda

**President of Mobly S.A.**

**2. TO WHOM THIS CODE IS INTENDED**

The application of this Code of Ethical Conduct does not distinguish area, hierarchical level, or type of relationship with the Company and aims to establish the principles of conduct and ethics that should guide internal and external relations. The Company's Code of Ethical Conduct aims to guide the Company's attitudes and actions in its relations with the following stakeholders:

- (i) Collaborators: people/professionals who belong to the Company's economic group in all hierarchical levels (CLT and Statutory Employees), including Members of the Company's Committees and Board of Directors;
- (ii) Clients/Consumers: clients from the corporate and individual categories;
- (iii) Service providers in general, public authorities and others;
- (iv) Partners/Franchisees/Service and Materials Suppliers/Third Party Providers;
- (v) Community: a community where the companies of the Company's economic group are located, including neighbors;
- (vi) Society: in its broadest concept, it encompasses the media, entities representing workers, such as trade unions and professional associations, consumers, NGOs and business sectors, among others;
- (vii) Competitors: companies operating in the furniture retail trade sector;
- (viii) Investors: partners and shareholders.

### **3. MISSION, PRINCIPLES, VALUES AND OUR ROLE IN CONDUCTING BUSINESS**

The Company's history was built from the continuous efforts of each of its members.

An achievement that is conquered every day, based on ethical conduct and supported by our dedication, based on the following pillars:

#### **3.1 MISSION**

Fighting for our customers, knowing them like no one else, developing suppliers, partners and the team to ensure high levels of experience and services, with products and offers suitable for all tastes.

#### **3.2 PRINCIPLES**

Integrity and transparency, respect, meritocracy, search for sustainable solutions, work with technical foundation and financial discipline.

#### **3.3 VALUES AND ATTITUDES**

We act like owners, guided by honesty, we work hard and have fun and we fight for our customers.

When establishing relationships with other companies and their professionals, we must seek those that act exclusively in a lawful manner, that share our values and have ethical conduct.

We must not relate, under any circumstances, with companies that employ labor analogous to slavery or exploit any form of child labor, directly or indirectly. In addition, we must always make sure that these companies do not employ people under the age of 18 in places that are harmful to their physical, psychological, moral and social development, as well as in dangerous or unhealthy places and services, in schedules that do not allow their school attendance and also at night, considered to be the period between 10 pm and 5 am.

It is up to us to build the business environment we want, encouraging the adoption of good practices and respect for free competition. Ethical conduct is reflected in our way of being, acting and our daily decisions. Therefore, we do not tolerate the use of negative discrimination practices and/or limiting access to the employment relationship or its maintenance, such as, but not limited to, reasons of sex, origin, race, color, physical condition, religion, marital status, age, family status or pregnancy status.

As instruments to support us in this task, we have this Code, which must be read, followed by everyone and consulted whenever doubts arise.

If any doubt persists, contact your immediate leader, the Compliance area, by the email [compliance@mobly.com.br](mailto:compliance@mobly.com.br), or the Ethics Channel, via the website <https://contatoseguro.com.br/mobly> or by telephone 0800.700.1818, to clarify your doubts and express your concerns and questions.

#### **3.4 LEADERS' RESPONSIBILITY, INTEGRITY AND DIRECT LINE WITH THE COMPANY**

Leaders, especially for the dedication of their time, presence, responsibility, experience and, above all, for their example, have a duty to contribute so that their subordinates know and fully comply with this Code of Ethical Conduct, by:

- (i) disclosing its content to the team members, guiding and answering questions, preventing violations due to lack of information;
- (ii) identifying the possible occurrences of non-compliance with this Code, escalate it to its hierarchical superior and to the Ethics Channel specially designed to receive and handle complaints.

**Leaders' Responsibilities:** All attitudes and behaviors of the leaders must reflect personal and professional integrity compatible with the Company's values. No leader can be negligent, nor collude with reprehensible attitudes.

**Integrity:** No employee, regardless of their hierarchical level, can put the safety and integrity of the Company at risk. No act that is prohibited by the Company's policies will become permissible merely because it is customary in a particular place or area of operation of the institution.

It is expected that each employee, in case of doubt, seeks guidance and help from their immediate superior or through the Compliance area, by the email [compliance@mobly.com.br](mailto:compliance@mobly.com.br). In case the employee prefers to carry out an anonymous consultation, they can also use the Ethics Channel, through the website <https://contatoseguro.com.br/mobly> or by calling 0800.700.1818.

Complaints can be made through the Ethics Channel, through the website <https://contatoseguro.com.br/mobly> or by calling 0800.700.1818. No employee shall be silent when identifying any activity or behavior that deviates from what is described in this Code of Ethical Conduct or which is in any way unlawful or may harm the integrity and reputation of the Company, and it is their role to inform the Compliance area.

The Ethics Channel is operated by a specialized and independent external company, that uses mechanisms that guarantee confidentiality and reliability in the process. Complaints can be made anonymously or be identified, at the sole discretion of the complainant.

The responsibility for monitoring and investigating the facts reported, clarifying doubts and analyzing and incorporating suggestions will be the Company's Ethics Committee, and the Audit Committee will report the most relevant matters to the Board of Directors, as well as monitor the process of examining the facts. The verification procedures will run confidentially and the processes must remain filed under the responsibility of the Compliance area.

The Company will not allow any informant in good faith to suffer any type of retaliation. Nor will anyone who helps through the investigation process of a report by providing documents or information suffer any retaliation.

For each record or case, there will be a protocol of the matter, which can be followed within the legal and internal limits of information.

The investigations may lead to recommendations for improving processes, training, action plans, as well as possible internal disciplinary sanctions and possible communications to the competent authorities.

#### **4. OUR COMMITMENT TO ETHICS IN ALL RELATIONSHIPS**

It is everyone's role to ensure ethical conduct in all relationships maintained by the Company, whether internally with its employees, managers, customers, our business partners, our franchisees, the government and our community. We want a work environment where physical

and mental health and safety are a priority. Respect for internationally recognized Human Rights, laws and diversity, ensuring relationships free from harassment of any kind.

We understand that any attempt to gain unlawful advantages, whether for you or the Company, is harmful and unacceptable. In order to address this issue, Mobly is firmly against corruption and understands that it is essential that its Members do the same.

Under no circumstances are Members authorized to pay or receive any form of kickback or bribe, or any other undue advantage, inside or outside Brazil.

#### **What is bribery?**

Bribery is offering or charging money from someone in order to get something illegal or reprehensible.

#### **What is a bribe?**

A bribe is an amount that is offered or paid to someone to induce them to perform illegal or reprehensible acts.

#### **What is an undue advantage?**

An undue advantage is any gain, profit, privilege or benefit obtained illegally or contrary to good practice. Such advantage is not limited to cash payments and may include, depending on the circumstances, for example, gifts, meals, employment offers, among others.

#### **Who is considered a relative?**

For all purposes of this Code, the following are considered to be relatives of a person: their ascendants and descendants in a straight line, their siblings, their spouse or partner, their brothers and sisters-in-law, and also the ascendants and descendants in a straight line of their spouse or partner.

**ATTENTION:** Do not offer, request or accept, under any circumstances, directly or indirectly, any form of bribe, kickback or any other undue advantage, as you will be putting Mobly and yourself at risk.

### **4.1 Relationship with Suppliers and Partners**

Our suppliers and business partners are an essential part of our business and, therefore, we must seek partners who are ethical and upright, both in carrying out their activities with the Company and in complying with the law.

The relationship with partners and suppliers must, from their selection and hiring, be guided by respect and cordiality and recognition without discrimination of any kind. The selection and hiring will be based on objective criteria, always taking into consideration the best available offers in terms of cost, term, quality and reliability.

No people or organizations that notably disrespect the country's legislation will be hired or, even, that do not respect their legal obligations, such as respect for labor laws, payment of taxes, environmental law and general data protection law.

It is allowed to receive or give institutional gifts of a general nature that have no commercial value or are distributed by an entity of any nature as a courtesy, advertising, customary disclosure or on the occasion of events or commemorative dates of a historical or cultural

nature, such as office supplies, personalized mugs, calendars, among others, that are part of the communication strategy of the Company or Partners and Suppliers.

In the event of offering freebies or presents with commercial value, which means items of any nature available on the market for sale, the Compliance area must be consulted.

Franchisees are also our business partners and we must ensure and contribute to everyone's success, properly transferring knowledge about the business, as well as our Ethics and Conduct Policies.

## **4.2 Labor Relations**

All people must show, through their actions, that they are committed to the Company's values. They must also contribute to the creation of a harmonious and respectful environment. Leaders must encourage freedom between leaders and subordinates. Everyone can give their opinion and suggest actions and strategies to improve the team's or the Company's performance.

Regardless of the situation, the positive image passed by the leader is indispensable. No type of harassment or abuse of power shall be committed in the Company. Likewise, the relationship between peers and employees from other areas must always be respectful, and personal insults, screams, threats or physical aggression are not accepted.

Hence, the Company reiterates that any conduct of moral or sexual harassment is intolerable. Moral harassment is characterized by an abusive conduct practiced by an employer or co-worker that aims to affect the morale, dignity and self-esteem of an employee, without any cause for it, causing physical harm, psychological and/or moral harm to that employee. Sexual harassment is the act of constraining an employee, intending to obtain sexual advantage or favor.

Respecting the work environment, the Company's furniture and objects, ensuring hygiene and safety is everyone's obligation. Respecting work safety rules is also essential and disrespecting these rules can jeopardize not only your safety but also of other colleagues.

The use of narcotic drugs during the performance of their professional activities is not allowed, whether carried out in any of the Company's units or any other place. Any risky situation must be avoided and communicated to your immediate manager, including the use of medications that may reduce cognitive capacity without medical guidance, the use of alcohol or illegal drugs.

It is the duty of the Company and each of its employees to offer equal employment opportunities and conditions, regardless of gender, color, nationality, age, religion, appearance or physical condition. Creating a respectful and inclusive environment is everyone's obligation.

The Company respects the freedom of each employee to join or not legally constituted associations or organizations. However, political party or class association activities, as well as any propaganda or political manifestation in the Company's headquarters, facilities, vehicles and internal and external publications, are not allowed in the work environment.

The Company respects, defends and encourages the freedom of each employee to take a stand and reveal their points of view. However, it is the employee's duty to ensure the responsible use of their social networks, always with respect, ethics and common sense, and the use of the Company's institutional e-mail for account registration on social networks is not allowed. In addition, other employees of the Company may have access to publications, so it is important to be careful and responsible not to post any content that could harm your image.

The Company does not allow profiles to be created on social media, blogs or hotspots using its name without the express authorization of the Executive Board. Furthermore, it is not allowed to speak on behalf of the Company, except when expressly authorized to do so. Watching over your image and the Company's on social media is everyone's duty to ensure good relationships in the workplace. Therefore, the Company does not tolerate the publication of defamatory, libelous and/or prejudiced comments concerning itself or third parties.

In the companies of the Company's economic group, employees are allowed to have relatives or friends working or providing services for the Company. These relationships must be declared before hiring the employee or service provider and submitted for evaluation by the Human Resources department and the Compliance area.

- (i) These employees must update, through a corporate declaration form, the relationships initiated after their hiring. If, at any time, the existence of a potential conflict of interest is observed, that is, when personal interests of any nature may interfere with the employee's judgment and decision-making during the exercise of their obligations or activities, the Executive Board will establish with those involved in the direct commercial or operational relationship the most appropriate adjustment for the situation in order to preserve the Company's interests;
- (ii) In these cases, work situations that create a relationship of direct and/or indirect subordination between family members or people with very close relationships will always be avoided, even if not subordinated in the same place/sector of work.

Every employee must inform the Company, by the e-mail [compliance@mobly.com.br](mailto:compliance@mobly.com.br), if in the last 5 (five) years they have worked or still works in a position, employment or relevant function in public agencies, public companies, government-controlled companies, concessionaires or licensees of public services, autarchies and public foundations, including class councils, as well as if you have a blood relative or by affinity in the same condition.

Other activities or services outside the Company may not interfere with the work to be performed for the Company. It is not acceptable that external activities/services, in any way, create conflict with the work that is performed for the Company.

The practice of selling any products on the premises of the Company's companies is not allowed without the prior authorization of the Executive Board.

All services must be provided by employees and other members, undertaking respect, care, humanization, quality, technical security, attention and privacy, as well as promoting their well-being, secrecy and confidentiality of information and reinforcing professionalism.

It is the duty of all employees to respect the laws and participate in the training carried out by the Company, including training on data protection and the Anti-Corruption Law.

#### **4.2.1 Conducts related to the Company's resources**

All employees have the duty to protect the Company's assets, such as equipment, inventories, supplies, values, data and information, facilities, copyrights, software, computer programs, inventions, literary works, trademarks or patents.

The Company has internal controls, internal audit, Audit Committee, policies and processes in order to prevent, detect and correct any threats or fraud. Even so, many

different forms of fraud can arise. The Company has zero tolerance on the matter and communicates any cases to police and judicial authorities.

In carrying out activities, everyone must maintain processes and procedures capable of avoiding predictable risks, fraud, simulations or other forms of resources evasion from the Company or even against third parties. If there is a suspicion or materialization of any fact that constitutes fraud, the fact must be immediately communicated and registered with the internal bodies for investigation, urgent measures, improvement plans and communication to the authorities.

The Company's assets, not only those entrusted to each employee to perform their duties, must be treated with the same care as your own assets.

Waste is a form of resource evasion and should be considered as such.

Materials elaborated or produced and used in the course of work or as a result of this work are protected by copyright, whose legal property belongs to the Company, and it is not allowed to reproduce, distribute or alter any material from the Company or third parties whose copyrights are protected by law, except with prior authorization. Examples of materials commonly protected by copyright law are software, audio and video recording, books and magazines and specialized publications, materials used in presentations.

As they represent competitive advantages, all internal information that is not in the public domain constitutes confidential information and, therefore, property of the Company, and the Company may monitor any information that passes through its proprietary information systems, such as computers, notebooks, cell phones, etc. Lack of care with information can turn competitive advantages into risks for the Company. Among them, the following stand out:

- (i) customer information;
- (ii) records and database in general;
- (iii) financial, technical, administrative and market information;
- (iv) business plans and strategies;
- (v) financial models and products;
- (vi) contracts;
- (vii) tables, such as freight price tables, price tables negotiated with suppliers, technical specification tables, etc.;
- (viii) relevant acts and facts to which employees had access;
- (ix) activities carried out in the market by the companies of the Company's economic group;
- (x) applications, technologies and methodologies developed or in use by the Company;
- (xi) exchange of routine emails.

Regarding the treatment of information owned by the Company, employees must pay attention to the confidentiality of information and thus:

- (i) not use confidential and privileged information for their own benefit or third parties, in order not to create a conflict of interest;
- (ii) keep customer information confidential;

- (iii) not transfer or transmit confidential and privileged information to other employees or third parties, by any physical or digital means.

Everyone must request prior authorization from their immediate superior for any activity that is not part of their duties, such as:

- (i) upload any material that contains customer information outside the Company's premises;
- (ii) copy or reproduce any type of file that concerns the Company's clients or activities;
- (iii) transfer or transmit information about the Company's customers or operations to any other person by any means of communication.

The care for the safekeeping of documents and information is everyone's responsibility. We must always make sure:

- (i) that documents of any kind are not left on tables, copying machines or otherwise exposed to other employees or third parties in transit through the Company, during or at the end of working hours;
- (ii) that documents with sensitive information are kept in locked files;
- (iii) that disposable papers and documents are completely destroyed;
- (iv) to protect access to the Company's facilities by strictly observing the restrictions on access to the Company's facilities;
- (v) to not use the access to allow unauthorized persons to enter the Company's premises, even employees from other companies or areas;
- (vi) to notify your immediate superior of the presence of unauthorized persons on the Company's premises;
- (vii) to not to transfer the badge to third parties, under any circumstances, the functional access to the Company's facilities;
- (viii) to immediately report the loss or loss of your access badge;
- (ix) to be responsible for the visitors whose entry into the Company they authorize;
- (x) keep all information and data filed electronically on the network;
- (xi) when away from the workstation or away from the computer, use screen and password lock.

The provisions related to the confidentiality of information that employees, directly or indirectly, may have access to, remain in force even with the termination of their labor or commercial relationship with the Company.

Restricting the flow of information may be necessary even between departments, internal services and people to prevent confidential information from being shared and misused, generating insecurity, a climate of expectation, negative organizational climate or risks of damage, and it is essential to exercise due judgment to such filtering and selection of information.

Further information on the use of the Company's equipment and resources and what should be reported to the Executive Board can be found in the Information Security Policy and in the Relevant Act or Fact Information Policy, which deal specifically and in detail with such matters.

#### **4.3 Relationship with Government Agencies**



The relationship of all Company employees with government agencies must be guided by ethics, honesty, transparency, morality and integrity and in strict compliance with Law 12,846, of August 1, 2013 (Anti-Corruption Law), regulated by the Decree 8.420/ 15, and updates and additions that may be edited.

The Company shall maintain a professional relationship with government entities and representatives, dealing with the Company's matters and interests in an impersonal manner, without any political connotation and following the precepts established in the Company's Anti-Corruption Policy.

The Company does not make contributions to political parties and candidates for political office. Its employees, although being free to, in their personal lives, associate or collaborate with contributions to political parties and/or candidates, are guided and fully aware that they should not use payment practices to public authorities, political parties, representatives of a political party or candidate for political office or the like on behalf of the Company.

Employees have the duty to immediately report on the Ethics Channel, through the website <https://contatoseguro.com.br/mobly> or by calling 0800.700.1818, any signs of irregularities or mistrust that they may identify in their routines, preventing acts of corruption and bribery.

Employees must be aware that their business relationships with the Company are not used to engaging in illegal business such as money laundering and terrorist financing. If the Company is sued by the competent authorities to collaborate with any investigation, it must do so with commitment and transparency.

#### **4.4 Customer Relationship**

The commitment to meeting the needs of our customers well must guide the Company's daily activities. Fighting for our customers is one of our missions and here it is also a premise.

Cordiality, respect and transparency in customer services are an obligation of all employees, as well as complying with all the conditions offered and negotiated. In case of unforeseen events or situations that are beyond the rule, the customer must always be communicated transparently, aiming to solve the problem and offering alternatives to serve the customer.

#### **4.5 Relationship with Competitors**

The Company promotes a fair competition policy. Therefore, it respects its competitors and works ethically and legally, seeking the protection and development of the markets in which it operates. The Company does not practice acts or operations that harm free competition, through anti-competitive conduct.

In addition, no oral or written statements that could affect the image of competitors shall be made, as they must be treated with the respect we expect to be treated.

It is expressly prohibited to provide any third party with strategic, confidential or otherwise harmful to business information. Any visit required to get to know the Company's facilities and buildings must be monitored by a representative of the respective area, during the entire period of stay, but always involved in an atmosphere of cordiality, and must be previously informed to the Executive Board for the respective approval of the visit.

Espionage of any kind is intolerable.

#### **4.6 Press Relations**

All members of the Company must look after the reputation and image of the organization. The relationship with the press must be transparent, truthful and objective.

Interviews with the media must only be granted by the official spokespersons defined by the Company. If any employee or partner is contacted to talk about any topic involving the Company, they must contact the Communication area via e-mail: [comunicacion@mobly.com.br](mailto:comunicacion@mobly.com.br).

Any information related to a relevant act or fact, sales of assets and portfolios, acquisitions of assets and portfolios, goals, indicators, strategies, performance, plans, data, among others, to which employees and other members of the Company have privileged access due to their position or job title, until their official disclosure, publicly and by a person authorized by the Company, must be preserved in complete secrecy and confidentiality. Leaders must also ensure that subordinates and third parties also do so, responding jointly with them in the event of non-compliance;

The Company's Relevant Act or Fact Information Policy complements these guidelines.

#### **4.7 Relationship with the Society**

The Company acts with social responsibility, continuously promoting disease prevention campaigns, healthy habits, practicing sports and social actions.

In the locations that it operates physically, the Company and all its employees must respect the community, local culture and the routine of the people around us, by taking care of hygiene, respecting environmental laws and anti-noise, visual and environmental pollution, and always adopting an ethical conduct.

The neighbors of the headquarters or any branches of the Company and its subsidiaries must have the attention and respect of its members, who must maintain respect, good relations, good noise, visual and environmental pollution practices, in order to avoid, mitigate or resolve adverse events impacts as a result of the Company's operations.

#### **4.8 Relationship with Shareholders**

The Company's relationship and communications with shareholders are based on transparency, ethical principles, compliance with the law and equal treatment between all investors and the capital market in general.

The communication and relationship with shareholders will always be objective, transparent, truthful, so that they can monitor and evaluate the Company's activities.

All relationships with shareholders will be carried out by the Investor Relations area, any employee who is contacted by a shareholder must forward the contact to the area via e-mail: [ri@mobly.com.br](mailto:ri@mobly.com.br).

Employees may trade the securities, that is, buy and sell shares on the market, as long as they do not use privileged inside information and respect the trading impediment periods communicated by the Investor Relations area. In case of doubt, Mobly's Trading Policy should be consulted.

### **5. CONFLICTS OF INTEREST AND RELATED PARTIES**

Company members must act ethically and fairly in all transactions and operations, demanding that the Company's interests always overlap the particular interests of decision-makers.

A conflict of interest occurs when business, finance, family, political or personal interests can interfere with people's judgment when performing their duties to the Company.

In addition, it is essential to ensure that relationships with related parties do not compromise the Company's transactions. A related party can be defined as:

- (i) a person, or a close family member, who:
  - a. has full or shared control of the Company;
  - b. has significant influence over the Company; or
  - c. is a member of the key management personnel of the Company or its parent company.

- (ii) an entity that:
  - a. belongs to the same economic group as the Company;
  - b. is a parent, subsidiary or affiliate of the Company, considering that an affiliate includes the subsidiaries of that affiliate;
  - c. is, together with the Company, under joint control (joint venture) of a third entity;
  - d. is under joint control (joint venture) of a third company and the Company is an affiliate of that third company, considering that an entity under joint control (joint venture) includes subsidiaries of an entity under shared control (joint venture);
  - e. is a post-employment benefit plan whose beneficiaries are the employees of the Company and an entity related to the Company;
  - f. is controlled, fully or under joint control, by a person identified in item (i) above; and
  - g. is under significant influence of any person identified in (i)(a) above, or if that person is a member of the key management personnel of the entity (or the entity's parent).

All rules related to conflicts of interest and relationships with related parties are defined in the Related Party Transactions Policy.

## **6. VIOLATIONS**

Employees, managers, interns, temporary workers, young apprentices and internal service providers who violate the Code of Ethical Conduct or its essence will be subjected to the applicable legal and administrative consequences, as provided for in civil, criminal and labor legislation.

The application of sanctions due to violations of the Code of Ethical Conduct will be considered on a case-by-case basis and should consider: (i) the nature and seriousness of the violation; (ii) the offender's position and responsibilities; (iii) the offender's background and mitigating circumstances; (iv) the means used and the intended ends; (v) the risks involved; and (vi) the possible consequences of the sanction.

The Compliance area will be responsible for analyzing the specific case, and the application of any sanctions must be validated by the Legal Department. Among the sanctions, the following are listed: (i) verbal guidance; (ii) written warning; (iii) suspension with or without loss of remuneration; or (iv) dismissal with or without cause.

Under no circumstances will the application of this Code be a justification for violating precepts and rules issued by legally competent authorities, as the aforementioned material is not intended for this type of sovereignty and is not intended to replace such authorities.

Any non-compliance with this Code or with the Company's values and principles by business partners, suppliers and franchisees may lead to contractual termination and eventual compensation for damages.

## **7. GENERAL PROVISIONS**

This Code of Ethical Conduct will be in force for an indefinite period and may be updated at any time.

The guidelines and directives contained in this Code will be permanently available on its homepage ([www.investors.mobly.com.br](http://www.investors.mobly.com.br)), and will be made known to all employees, managers, interns, temporary workers, young apprentices and internal service providers of the Company, as well as to other relevant audiences, with periodic training being carried out on the need for its compliance.

Any matters addressed more succinctly in this Code and others that might not have been addressed do not reduce the importance and observance of the application of general rules of good conduct and socially accepted ethical policies. Any tolerance by the Company shall not be understood as a permanent renewal or disregard of the rule.

This Code of Ethical Conduct may be distributed electronically and/or physically.