

**AMIREIA PAJOARA®**

# **CODE OF CONDUCT**



## A MESSAGE FROM OUR DIRECTOR. WE ARE ALL RESPONSIBLE.



Dear colleagues,



We find ourselves at a time of rapid and significant change. Technological advances, geopolitical shifts and changes in the sectors we serve can be challenging on both a personal and professional level. However, one thing remains constant and unchanged: our unwavering commitment to doing business the right way.

Over the years, we have earned the trust of clients, employees and other stakeholders by adhering to ethical standards and by being open and honest in our communications. Our Code of Conduct is a resource and a tool that we can use to make ethical decisions. It is a truly living document; each of us is responsible for bringing it to life every day through our actions. We must all have the moral courage to do the right thing, even in difficult circumstances.

Read our Code of Conduct carefully. Reflecting on your conduct every day can demonstrate your commitment to the principles contained in the Code. Let us know if you have any questions or concerns about the Code of Conduct, as well as any violations you become aware of. The sooner we are informed of possible problems, the quicker we can take the necessary corrective action.

Rest assured that we will not tolerate retaliation of any kind for reporting a possible infraction or problem in good faith. We are proud to work for a company with a legacy built on fulfilling our commitments and doing so with integrity, dignity and impartiality. doing so with integrity, dignity and impartiality.

By acting with integrity, we enhance the reputation we have earned and ensure a bright future for ourselves and Amireia Pajoara.

*João Alberto*

Founding President



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## SCOPE

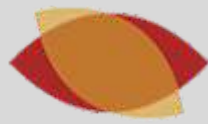
The Code applies to all directors, managers and employees of Amireia Pajoara and all others who act on behalf of or for the company (collectively, "Covered Persons").

You must always act in a manner consistent with the Code, even when local laws and regulations are more permissive than our Code of Conduct.

Amireia Pajoara endorses the principles of the UN Universal Declaration of Human Rights, the relevant Conventions of the International Labor Organization (ILO) and the Guidelines for Multinational Enterprises of the Organization for Economic Cooperation and Development (OECD). Consequently, Amireia Pajoara's Code and Policies are compatible with these guidelines.

Note: The provisions of this Code are not intended, explicitly or implicitly, to create or constitute a legal obligation on the part of Amireia Pajoara.

The provisions of this Code are subject to change and do not create any right to employment.



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## LIVING THE CODE

Amireia Pajoara is committed to standards of integrity in all its internal and external relationships. Our policy is to conduct our activities in accordance with ethical principles and the relevant legislation. All Persons Covered have a deep interest in living the company's Code of Conduct in their routine actions and in enforcing its rules and principles.

These principles are intended to guide the way we treat each other, as well as our interactions with customers, suppliers, partners, public officials and other stakeholders. In our activities, we must foster and be personally responsible for ethical behavior with everyone with whom we interact and personally abide by the highest standards of honesty, integrity and accountability.

Doing business with a contractor, agent, consultant, broker, distributor or other third party who acts in a way that violates relevant legislation or our Code of Conduct undermines our commitment to integrity and creates risks for Amireia Pajoara and other stakeholders.

### QUESTIONS

Who is responsible for compliance in the company?

How can I make ethical decisions when faced with a difficult situation?

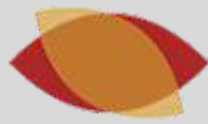
### ANSWERS

Compliance and ethical conduct are part of everyone's professional responsibilities. When considering a decision, ask yourself: Is what I'm thinking legal? Does it comply with the Code of Conduct?

Is it compatible with the Company's values? Is the decision good for the company's reputation? Would it be good if this decision went viral or made headlines?

Would I, my friends and my family be proud of this decision?

If the answer to any of these questions is: "No"->STOP! "Not sure"-> ASK "Yes"->PROBABLY IT IS AN ETHICAL DECISION



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Infringements of relevant legislation, the Code or our Policies create risks not only for the Company, but also for our employees and other stakeholders. The Company and our leaders want to become aware of such infringements (or potential infringements) as soon as possible, so as to enable corrective measures to be taken as soon as possible in order to reduce or eliminate the risk.

If you have reason to believe in good faith that any employee - including your manager - has violated, may violate or is acting in a manner that appears to violate any law or the Code, you are expected to inform us immediately.

If you have concerns or need clarification on the interpretation of the Code, or wish to report a possible infringement, please contact our Whistleblowing Channel directly at the following link: [amireia.com.br/eng/reportingchannel](https://amireia.com.br/eng/reportingchannel)

## ON THE MARKET

Amireia Pajoara conducts its business in a manner consistent with its business conduct values and requires all Covered Persons to do the same.

Amireia Pajoara's policy is to promote high standards of integrity by conducting its activities ethically and honestly.

All Covered Persons must act with integrity and observe ethical standards of business and professional conduct in their interactions with the Company's customers, suppliers, partners, service providers, competitors and employees, and with anyone with whom they come into contact in the course of their duties.

### **We avoid and manage actual and potential conflicts of interest**

We all have a responsibility to safeguard the integrity of the Company's decisions, ensuring that they are made solely on the basis of what is best for the Company and are not unduly influenced by personal interests. A conflict of interest arises in any situation where there is a possibility that you will be put in a position where you have to choose between your personal interests and your obligations to Amireia Pajoara. Activities that constitute actual conflicts of interest will never be acceptable. Likewise, activities involving a potential conflict of interest and even the appearance of such a conflict should be avoided.



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In addition, you cannot circumvent this Policy by using other people to indirectly do what you would be prevented from doing yourself, such as making an unsuitable investment through a friend or relative. Not all conflicts of interest are inherently a problem. The problem arises when someone with a conflict fails to inform you and withdraws from the activity or decision-making process.

Although it is difficult to list the various ways in which a conflict of interest can arise, here are some examples:

- Having an employment or consultancy relationship with a competitor, supplier or client;
- Having a financial interest in any transaction involving the purchase or sale of any Amireia Pajoara products, materials, equipment, services or property;
- Use Company assets, including equipment, materials or proprietary information, for personal purposes or for outside work unrelated to your duties;
- Accepting, from any competitor, supplier or client of the company, money, gifts, entertainment or benefits whose value is not merely symbolic.

### QUESTION

My brother runs a company that produces equipment and technology that we use in our company. Can I be involved in hiring my brother's company as a supplier to the company?

### ANSWER

No. It is not advisable to make a purchasing decision when there is a personal or family relationship involved. This also creates a conflict of interest between your desire to help your brother and your objectivity in selecting the best supplier for the Company.

However, if you disclose your relationship and remove yourself from the selection process, your brother's company can compete with other qualified suppliers in obtaining contracts from Amireia Pajoara.

If you have any questions or concerns, please contact us so that we can look into the matter together!



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### **We encourage compliance with relevant legislation**

All Covered Persons must comply with the letter and spirit of all relevant laws, rules and regulations in the locations where the Company operates. While Covered Persons are not expected to know in detail all relevant laws, rules and regulations, it is important to know enough about them to determine when to seek guidance from appropriate personnel. Questions about the interpretation of a law or professional regulation and its application to the Company should be resolved in conjunction with our Legal Department. Remember that compliance is the responsibility of all employees.

### **We do not participate in bribery or corruption**

Anti-corruption laws, such as the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and the US Foreign Corrupt Practices Act, among others, prohibit a company, its employees and third parties acting on its behalf from directly or indirectly paying or promising to pay anything of value to any foreign public servant/authority, political party, official/candidate or political party official for the purpose of influencing an official act or decision in order to win business.

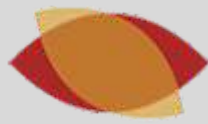
In addition, anti-corruption laws prohibit us from ordering or instructing anyone to pay a bribe, commission or other improper payment on our behalf. Furthermore, we cannot allow anyone acting on our behalf to do so, nor can we ignore indications that someone may be doing so.

#### **QUESTION**

I do my job and obey the rules. Frankly, I think we are all ethical employees. Why do we keep getting reminders to be ethical? Does anyone think we're not? I'm presenting a proposal to a state-owned company in a developing country. A civil servant insinuated that if I receive personal fees, it will ensure that my proposal receives "special consideration". She said that this is common practice. Although it doesn't seem right, I want to close the contract. Should I make the payment?

#### **ANSWER**

Not at all. But it's important to always remember that it's fundamental to our success that everyone acts in accordance with the Code, our Policies and the relevant legislation. We are all under pressure to do our jobs. In the face of these pressures, we must remember that we must never take shortcuts, ignore Company Policies or infringe relevant legislation. Familiarize yourself with the Policies and laws relevant to your work and ask for help if you don't know them or if you have any doubts. No, this is an improper payment - it is a breach of our Code and the law.



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You must not offer anything of value to anyone, including public officials, in order to gain a commercial advantage.

You must inform us immediately if you believe that someone acting on our behalf may be making improper payments.

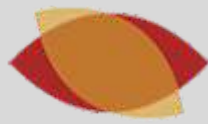
### **We comply with anti-money laundering laws**

Money laundering is the process of making the proceeds of criminal activities appear to have a legitimate origin. Money laundering can facilitate crimes such as fraud, drug trafficking and terrorism, adversely affects the global economy and is illegal. Relevant legislation and our Policies prohibit us from participating or engaging in any way in any activity that involves or may appear to involve money laundering. All Covered Persons are responsible for complying with all anti-money laundering legislation and related Policies. Before entering into any business relationship with a third party, we must conduct an appropriate check of available information (including financial information) about them to ensure that such person or entity is reputable, qualified, engaged in legitimate business and has no history or reputation of participating in money laundering or other illicit activities.

### **We do business with and through reputable third parties**

In some areas of our company, we hire third parties to act on our behalf. Our contracts with these third parties include the requirement that they follow the same standards of ethical conduct practiced by us. In order to mitigate the risks arising from providing services through third parties, we must always exercise caution when hiring these types of professionals. Legal violations by third parties can damage the company's reputation, create legal risks for the company and result in fines from government authorities. It is also important to understand that even our employees can be held personally liable for such infractions. Because these third parties represent us, and because of the way we provide services, we use a risk-based approach to conduct the initial approval and ongoing due diligence of such third parties. In addition, as part of this approval and due diligence process, these third parties are required to provide us with accurate information on a timely basis and update it when it becomes outdated or no longer accurate.





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## PEOPLE

We recognize that the motivation and professionalism of our workforce are essential factors in maintaining competitiveness, generating value for our stakeholders in the long term and guaranteeing the satisfaction of our customers. The following principles, in accordance with the UN Universal Declaration of Human Rights and the relevant Conventions of the International Labor Organization, confirm the importance of our respect for the individual, guarantee equal treatment and exclude discrimination of any kind. We support the protection of fundamental human rights.

### **We don't use child labor or forced labor**

Amireia Pajoara does not use child labor, does not employ people under the age permitted by the legislation of the place where the work is being carried out and does not employ anyone under the age of fifteen, subject to the exceptions expressly provided for by international conventions and local legislation.

The company is also committed to not establishing or maintaining working relationships with third parties that use child labor. Amireia Pajoara does not tolerate the use of forced or compulsory labor, slavery, involuntary or coerced labor, human trafficking or sex trafficking by any Covered Person. Human trafficking is the organization or facilitation of the travel of any person with a view to their exploitation. This practice is criminal and wrongful. It is irrelevant whether or not the person agrees to the journey.

### **We don't discriminate and we treat others with respect**

We are committed to offering equal opportunities to all our employees, at work and in their career progression, and to complying with all legislation relating to acts of discrimination.

All Company managers must ensure that, in all aspects of the employment relationship, such as recruitment, training, remuneration, promotions, transfers and dismissals, all employees are treated according to their ability to meet the requirements of their jobs, and that all decisions are free from any form of discrimination, including on the basis of race, gender, sexual orientation, social status, physical and health condition, disabilities, age, nationality, religion, political opinion or personal convictions.



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## **We encourage a good working environment**

We will take all necessary measures to maintain a good and cooperative working environment, where everyone's dignity is respected. In particular, all employees of the Company:

- Are prohibited from working under the influence of alcohol or other drugs;
- In places where smoking is not yet prohibited by law, they must be sensitive to the needs of those who may suffer physical discomfort due to the effects of "passive smoking";
- They must avoid behavior that could or is intended to create an offensive or intimidating climate for colleagues or subordinates;
- They are prohibited from engaging in sexual harassment or any other form of harassment.

## **QUESTION**

A coworker often makes personal comments about my appearance that make me feel uncomfortable. I've asked him to stop, but to no avail. What can I do?

## **ANSWER**

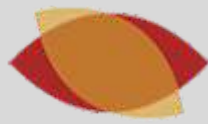
You can - and should - seek help. You can talk to your manager, the Legal Department or the Compliance Helpline. It is important for the company that all employees treat each other with respect and dignity.

## **We do not tolerate bullying or harassment**

The company considers unacceptable any type of harassment, whether racial, sexual or related to other personal characteristics, which has the purpose or effect of violating the dignity of the victim of such harassment, whether it occurs inside or outside the workplace. We are committed to complying with all legislation prohibiting intimidation, threats or harassment (sexual or otherwise).

## **We use the Company's assets and resources responsibly**

All Covered Persons must use the Company's assets and resources to which they have access, or which are under their care, efficiently and exclusively to achieve the Company's goals and objectives. Covered Persons shall use such assets for the purposes and in the manner intended and in a manner appropriate to protect their value. In addition, all Covered Persons are responsible for protecting such assets and resources against loss, theft, unauthorized use, damage or destruction. The use of these assets and resources in a manner contrary to the interests of the Company or in a manner incompatible with their respective purposes is also prohibited.



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All Persons Covered must comply with Amireia Pajoara's Use Policies and General Data Protection Law.

## **We protect our reputation**

Our company's reputation has been consolidated over many years and can quickly be damaged or destroyed by a single careless act.

Our corporate image, our culture and our long history are assets to be cultivated and diligently protected. Consequently, all Covered Persons are expected to respect the Code at all times.

Furthermore, it is essential to share and demonstrate effective commitment to the Code, as well as to cooperate with the Company to enforce its provisions.

### **QUESTION**

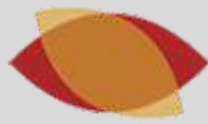
Sometimes I use the company computer for personal purposes. I do simple things like checking my bank account or sending emails to my wife to arrange who will pick up the children. Is that allowed?

### **ANSWER**

Reasonable personal use of the Company's resources is not prohibited. However, you must remember that you may not view or send inappropriate or illegal material, or install unapproved software, even when using the Company's computers for personal purposes. Its use must also not interfere with your routine work. If in doubt, you should check with your manager before using Company resources for personal purposes. Inappropriate use of Company computers may result in disciplinary action being taken.

## **We recognize and respect privacy**

In the normal course of our business we may collect personal data in permitted ways. In collecting such personal data, we are committed to safeguarding the right of each person (job applicants, collaborators, service providers and employees of partner companies) to control when, how and to what extent their data is collected, held and processed by Amireia Pajoara. In addition, all Covered Persons are obliged to maintain the same standards when handling the personal data of our employees and customers. The company complies with all relevant privacy laws, our Data Privacy Policy and Privacy Shield Policy are in line with the relevant legislation and are available on our website.



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In addition, we ensure a robust degree of security in the selection and use of our information technology systems designed to collect, hold and process personal data. In all activities, our policies must be observed in order to only process data in accordance with the specific purpose.

## **ENVIRONMENT, HEALTH AND SAFETY**

### **We protect the health and safety of everyone**

We consider health and safety in the workplace to be a fundamental right of our employees and an essential element of the company's sustainability efforts. All our decisions must preserve and respect the health and safety of everyone in the workplace. We adopt and continually improve an efficient occupational health and safety policy, based on individual and collective preventive measures, to reduce the possibility of accidents in the workplace to a minimum.

We also seek to ensure optimum working conditions, in accordance with the applicable principles of hygiene, industrial ergonomics, organizational, operational and individual processes. Amireia Pajoara believes in a culture of accident prevention and risk awareness and actively promotes it among workers, in particular through training and the dissemination of preventive information.

All employees are required to be personally responsible for and adopt the preventive measures implemented by Amireia Pajoara to protect health and safety, communicated through internal guidelines, instructions, information and specific training. Each of us is responsible for the proper management of safety and must not expose ourselves or other employees and collaborators to dangers that could cause injury or damage.

### **QUESTION**

I've noticed an unidentified person entering a factory to which they shouldn't have access. What should I do?

### **ANSWER**

Ask who they are and if you can help them. If you feel embarrassed by the situation or the person's behavior, or if you believe that they are not authorized to be there, contact your manager or the local security representative immediately, describing the person and stating where you saw them



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## COMMUNITY

We are committed to conducting and improving our relationships with all stakeholders, acting in good faith and with loyalty, fairness, transparency and due respect for our fundamental ethical values set out in the Code.

### **We aim to provide maximum value to our customers**

We strive to fully meet our clients' needs and exceed their expectations, always observing the internal procedures and instructions for each service provided by the company. All Persons Covered must follow these internal procedures, with the aim of developing and maintaining healthy relationships with our clients, offering safety, service, quality and values underpinned by continuous improvement, as well as complying with all the rules we are required to follow. In all relationships with clients, we must avoid any kind of unfair discrimination and not misuse our knowledge to the detriment of a client.

### **We select our suppliers and employees objectively**

Our team of suppliers and employees play a fundamental role in the success of the company and its perpetuation. In order to always achieve the highest levels of quality and customer satisfaction, we evaluate and select suppliers and collaborators using appropriate and objective methods, based, among other factors, on quality, training, experience and the values defined in this Code. We hope to establish and maintain a stable, transparent, mutually beneficial and cooperative professional relationship with our suppliers, including encouraging open communication and ongoing dialog with the company. As these suppliers and collaborators represent us, we use a risk-based approach to conduct initial approval and periodic due diligence. Furthermore, as part of this approval and due diligence process, these suppliers and collaborators are obliged to provide us with accurate information on a timely basis and update it when it becomes outdated or no longer accurate.



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### **We are fair, honest and frank in our communications**

We recognize the essential role played by clear and effective communications in sustaining internal and external relationships, ensuring the highest standards in the preparation of our reports in order to provide a clear and transparent presentation of our performance. External communications and relations directly and indirectly influence the development of our company. It is therefore necessary for these activities to be organized according to clear and ethical criteria.

Along the same lines, it is important to emphasize that the transmission of information to the media plays a fundamental role in maintaining Amireia Pajoara's reputation. Therefore, all information relating to our Company must be truthful and provided in a uniform manner, exclusively by employees with responsibility for media communications and in full compliance with Amireia Pajoara's Policies.

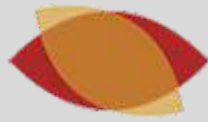
Social media is an increasingly used form of communication. Once disclosed, information cannot be recovered and can have significant and unforeseen consequences. Our Code and related Policies apply to all communications made by Covered Persons on social media that may affect the company or relate to it or its employees. Disclosing confidential, non-public information on social media about the Company, colleagues, competitors, customers or persons acting on our behalf is a breach of the Code and related policies and possibly of relevant legislation..

#### **QUESTION**

I want to post a photo of one of our clients on LinkedIn, with the caption: "The company has the best clients! We will annihilate our competitors with our miracle treatments. Can I post that?"

#### **ANSWER**

No. You may not post anything on social media "on behalf" of the Company without our prior written authorization. Remember that everything you say on social media can be "attributed" to the Company; this is particularly true of people in managerial positions. Never post on social media information about our services and their market value, profits, market share, product development plans and sales. Social media posts should be factual and concise, without the use of sarcasm, exaggeration or drawing unnecessary or premature conclusions.



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## REPORTING PROBLEMS AND CONCERNS

The Code of Conduct cannot cover all situations or resolve all doubts you may have regarding the topics covered here. Use the Code and the other Company Policies as a guide. Discuss any doubts or concerns you may have with the directors and your peers. You can also seek guidance or report a possible infraction using our Compliance Helpline.

Everyone is personally responsible for developing and strengthening a culture of compliance in the company. If you suspect a breach of the law, the Code or Company Policies, or become aware of other improper activities in the company, you are obliged to report the situation immediately. You can report the matter to the directors or via the Company's Compliance Helpline. Even if it is difficult to report a concern, it is important to bear in mind that if it is not reported and dealt with properly, it can cause serious damage to our reputation, to the health and safety of our employees and to our customers. The sooner you bring your concerns to the attention of the Company, the sooner they will be investigated and the sooner the appropriate corrective measures will be taken. Where permitted by law, reports can be submitted anonymously. Employees who report suspected wrongdoing in good faith will be protected against any form of retaliation. Reports will be investigated quickly, thoroughly and professionally. Such reports and investigations will be kept confidential to the maximum extent possible.

### QUESTIONS

I've noticed a situation that could be a breach of company policy or even the law, and I think my supervisor has noticed it too. If he chooses to ignore the situation, should I do the same?

### ANSWERS

Reporting infractions or suspected infractions of the law or policies is not only essential for the well-being of the Company, but is also mandatory for all employees. Your supervisor may not be as aware of the problem as you think, and even if he or she is, the situation must be reported so that it can be dealt with properly. If you don't feel comfortable discussing the issue with your supervisor, you should use other internal reporting channels that are available to you..



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Any form of retaliation against someone who, in good faith, has reported possible infringements of the relevant legislation, the Code or the Company's Policies, or requested clarification on the procedures for their application, will be considered an infringement of the Code. Likewise, it is a breach of the Code to falsely accuse other employees of having committed an infraction.

Among other consequences, including legal proceedings, breaches of the Code may lead to the termination of any relationship of trust, business, employment or any other relationship between the company and the Person Covered, with the contractual and legal consequences established in the competent labor legislation.

Any exceptions to the provisions of the Code, even if partial or of a limited nature and term, may be authorized for exceptional and justified reasons.

### QUESTION

What happens when I report a problem via the Complaint Channel?

### ANSWER

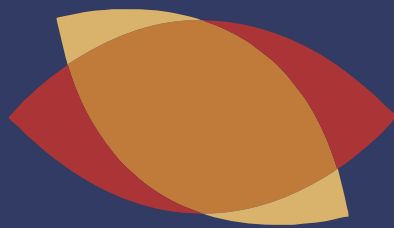
Initially, your complaint can only be seen by Amireia Pajoara's Multidisciplinary Committee, which will analyze the details of the complaint in order to assign the matter to the appropriate person(s) for review and follow-up. We ensure that the people assigned to review your complaint are objective, have not been named in the report and do not present any conflicts. Throughout this review, we make every effort to maintain confidentiality. As we work to resolve your complaint, we may contact you to ask questions or request additional information (if you identify yourself). Once the information-gathering and follow-up activities have been completed, if it was not an anonymous report, you will be notified of the results of our review, although some details may be confidential and cannot be shared.





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**Amireia Pajoara makes the Code of Conduct available to all employees and collaborators of the Company and to all persons subject to it. The Code is available for download on our website ([amireia.com.br](http://amireia.com.br)). Copies of the Code can also be obtained from our units.**



# AMIREIA PAJOARA®

TALK TO AMIREIA

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