

CODE OF ETHICS

1. FAS ADVOGADOS' STATEMENT OF PURPOSE:

1.1. Purpose: To be the most complete and relevant legal partner for our Clients; to be a second home for our Internal Stakeholders; and to be a safe haven for our partners (Clients and Internal Stakeholders).

2. PURPOSE OF THE CODE OF ETHICS:

2.1. Guided by the Statement of Purpose of Focaccia, Amaral e Lamonica Sociedade de Advogados ("FAS Advogados"), Brazilian Federal Law 12,846/2013, the Foreign Corrupt Practices Act (FCPA), the Organization for Economic Cooperation and Development (OECD) 'Recommendation on Public Integrity', the UN Global Pact, and the UK Bribery Act, among others ("Anti Corruption Regulation"), and aiming to comply with the highest requirements of corporate governance and compliance, as well as to value diversity and respect in any professional relationship, this Code of Ethics ("Code of Ethics") seeks to ensure that all Internal Stakeholders, Third Parties or Private Entities:

- a) Have full knowledge of the corporate governance and compliance guidelines of the firm, thus acting in accordance with those guidelines;
- b) Do not perform any discriminatory or abusive actions, pursuing a humanized approach and a healthy relationship with all people who have interactions within the scope of the firm;
- c) Adopt preventive practices that favor ethics and fight corruption, while being aware of the sanctions in case of non-compliance;
- d) Prevent prejudiced, abusive, and unethical actions, as well as deviations, fraud, irregularities, and unlawful acts, whether in relation to private individuals or in relation to the Public Administration.

3. DEFINITIONS:

3.1. **Public Administration:** Set of bodies and entities that perform the management and execution of public business or services, through public officials, at the federal, state, and municipal, national or foreign levels.

3.2. **Moral/Psychological Harassment:** Moral or psychological harassment consists of the deliberate repetition of gestures, words (verbally or written) and/or behaviors of a psychological nature, which expose a service provider, employee, or intern (or group of service providers and employees) to humiliating and embarrassing situations, capable of causing offense to their personality, dignity, or psychological or physical integrity, in order to exclude them from their duties or to demean the work environment. Frequency of the conduct and intentionality (the discriminatory purpose) are indispensable components for the characterization of moral/psychological harassment.

3.3. Sexual Harassment: To embarrass someone in order to obtain sexual advantage or favor, with the agent taking advantage of his/her status as a superior, either hierarchically or implicitly through the exercise of a job, position, or function (Brazilian Penal Code, art. 216-A).

3.4. Client: Any individual, legal entity, entity without a legal personality, or a Public Administration body that may hire the legal services provided by FAS Advogados.

3.5. Internal Stakeholder: Any person who directly or indirectly contributes to the activities performed by FAS Advogados, including managing partners, partners, board members, employees of the firm and interns.

3.6. Private Entity: Private company or individual that in some way seeks or is sought by FAS Advogados to be served or that provides services directly or indirectly to the firm or any of its Clients.

3.7. Public Official:

A) Any person who occupies a public position or function, even if temporarily or without remuneration, including a position or function in public companies or mixed-capital companies. International public organizations are considered to be foreign public officials;

B) Anyone who acts for or on behalf of a political party; and

C) The definition includes immediate relatives (spouse, parents, children, and/or siblings) of the Public Official.

3.8. Third Party: includes all individuals or legal entities who act as consultants, correspondents, partners, contractors, service providers, outsourced employees, or suppliers who act on behalf of or for the benefit of FAS Advogados or who represent it before Private Entities or Public Administration.

4. GUIDELINES - ACTS DETRIMENTAL TO THE CODE OF ETHICS:

4.1. Acts that are harmful to this Code of Ethics are all those practiced by Internal Stakeholders, Third Parties, or Private Entities that violate human dignity; national or foreign, public or private property; against the principles of the Public Administration; against FAS Advogados' compliance and ethics rules as established herein; or against national and international commitments undertaken by FAS Advogados. The aforementioned acts can be identified as follows:

a) To behave in a discriminatory manner, including, but not limited to, discrimination based on race, sex, sexual orientation, gender identity, skin color, physical characteristics, origin, social status, age, whether against any Internal Stakeholder, Private Entity, Client, or Third Party;

- b) To act in an abusive manner, in any action that may constitute moral harassment, sexual harassment, or abuse of function against any Internal Stakeholder, Private Entity, Client, or Third Party;
- c) To promise, offer or give, directly or indirectly, an undue advantage to a Public Official, or the third party related to him/her, or to a Private Entity;
- d) To demonstrably finance, fund, sponsor, or in any way subsidize the practice of illegal acts provided for in Law 12,846/2013 (“Anti-Corruption Law”) and related legal provisions;
- e) To demonstrably use an intermediary, whether individual or legal entity, to conceal or dissimulate their real interests or the identity of the beneficiaries of the acts performed;
- f) To frustrate or defraud, by means of adjustment, combination, or any Other expedient, the competitive nature of public or private sector bidding procedures;
- g) To prevent, disturb, or defraud the performance of any act of public or private sector bidding procedure;
- h) To remove or seek to remove a bidder or competitor by means of fraud or offering an illicit advantage;
- i) Defrauding a public or private sector bidding procedure or the contract resulting from it;
- j) To constitute, for fraudulent purposes, a legal entity to participate in public or private sector bidding procedure;
- k) To obtain an unlawful advantage or undue benefit from modifications to or extensions of contracts entered into with the Public Administration or Private Entity, without legal authorization, in the call for bids or in the respective contractual instruments;
- l) To manipulate or defraud the economic and financial balance of contracts entered into with the Public Administration or Private Entity;
- m) To hinder the investigation or inspection activity of bodies, entities, or Public Officials, or intervene in their performance, including within the scope of the regulatory agencies or inspection bodies of the national financial system;
- n) Act in such a way as to favor any related person (spouse, children and family members up to the 4th degree) to the detriment of the best measure in favor of FAS Advogados;

o) To adopt any measure that puts other Internal Stakeholders, Private Entities, Clients, or Third Parties at risk, rather than always focusing on health in the work environment;

p) To disrespect the confidentiality that guides the relationship between Internal Stakeholders, Private Entities, Third Parties, FAS Advogados, and its Clients;

q) To fail to observe the guidelines of the Brazilian General Data Protection Law (Law 13,709/2018), which provides for the processing of personal data.

4.2. All Internal Stakeholders, Private Entities, and Third Parties acting on behalf of FAS Advogados or representing it are strictly prohibited from receiving, offering, promising, making, authorizing, or providing (directly or indirectly through third parties) any undue advantage, payments, gifts, or transferring anything of value to any person, whether a Public Official or not, to influence or reward any official action or decision of such person for the benefit of FAS Advogados or its contractors, Private Entity, or Third Parties.

4.3. Any gifts and presents that any Third Party, Private Entity, Public Official, or Client of FAS Advogados may offer to the Internal Stakeholders must not have a commercial value greater than R\$ 300.00 and, furthermore, can only be accepted by the Internal Stakeholder if such a gift or present cannot be seen or interpreted as a bribe, payment, or attempt to exert influence. The same provision is applicable to FAS Advogados' Internal Stakeholders who wish to give gifts or presents to a Third Party, Private Entity, Public Official, or Client.

4.4. If any Internal Stakeholder is offered gifts and presents from a Third Party, Public Official, Private Entity, or Client of FAS Advogados that does not fit the requirements set forth herein, the Internal Stakeholder must contact the Ethics Committee, via the e-mail comitedeetica@fasadv.com.br, which will determine the most appropriate procedure to be adopted in accordance with this Code of Ethics.

5. PREVENTIVE PRACTICES:

5.1. All Internal Stakeholders must carefully read and understand this Code of Ethics, the Anti-Corruption Regulation, and related legislation. In case of doubt, the Ethics Committee should be contacted through the e-mail comitedeetica@fasadv.com.br.

5.2. FAS Advogados will periodically provide mandatory training for its Internal Stakeholders on best practices in combating corruption and best compliance practices as expected by FAS Advogados from its Internal Stakeholders.

5.3. As of the date of the publication of this Code of Ethics, all contracts signed by FAS Advogados must contain anticorruption clauses to ensure compliance with the terms contained herein, indication of and reference to this Code of Ethics, as well as clauses in compliance with the Brazilian General Data Protection Law. The Ethics Committee will guide the firm's administrative

department to enforce compliance with this clause through the assessment, whenever necessary, of all contracts that have been signed.

5.4. All Internal Stakeholders must abide by a duty of vigilance, communicating to the Ethics Committee whenever they identify behavior that may result in violation of any of the precepts of this Code of Ethics.

5.5. No Internal Stakeholder will be retaliated against or penalized for the delay or loss of business resulting from his/her refusal to move forward as a result of identifying a situation that would violate the guidelines of this Code of Ethics.

6. REPORTING CHANNEL FOR INFRINGEMENTS TO THE CODE OF ETHICS:

6.1. The Code of Ethics Reporting Channel is the means by which Internal Stakeholders, Private Entities, Clients, and Third Parties may report unethical behavior or non-compliance with this Code of Ethics, the Anti-Corruption Regulation, the Brazilian General Data Protection Law, or any other law that violates the ethics of FAS Advogados.

6.2. The Code of Ethics Reporting Channel can be accessed through the FAZ Advogados website: <https://fasadv.com.br/codigo-de-etica/>.

6.3. FAS Advogados will ensure the maintenance of this medium as a confidential and secure communication portal, guaranteeing impartiality in the management of the matter, in addition to the anonymity of those who use it and do not want to identify themselves.

6.4. Violations or potential violations reported in good faith will in no way cause retaliation of any kind in relation to the person who made the report.

6.5. Complaints registered in the Code of Ethics Reporting Channel will be submitted to FAS Advogados' human resources manager, who must submit the case to the Ethics Committee for analysis and action.

6.5.1. In the event that the FAS Advogados' human resources manager is a related or interested party, the complaint must be submitted in writing and addressed directly to one of the managing partners, who must submit the case to the Ethics Committee for analysis and action.

6.5.2. In the event that one or more members of the Ethics Committee is(are) a related or interested party, a Special Ethics Committee will be formed, on a confidential basis, by members who have not been directly or indirectly listed in the complaint for analysis and action. The Special Ethics Committee will consist of one managing partner and two partners appointed by the FAS Advogados' human resources manager.

6.6. The Code of Ethics Reporting Channel is accessible to all Internal Stakeholders, Private Entities, Clients, and Third Parties and its use is

encouraged by FAS Advogados as continuation of the evolution of the firm's business, in compliance with current laws and best market practices. Any act by Internal Stakeholders, Private Entities, Clients, or Third Parties that seeks to discourage contact with the Code of Ethics Reporting Channel will be prohibited, and, in case of insistence, the conduct itself may be notified by the Code of Ethics Reporting Channel and subject the applicable penalties.

7. PENALTIES:

7.1. Failure to comply with the provisions of this Code of Ethics will subject the violator to disciplinary measures, which will be Applied according to the nature and severity of the infraction committed.

7.2. The following sanctions may be applied: (a) verbal or written warning; (b) suspension; (c) exclusion from the corporate structure (in case of a partner); (d) dismissal with cause (in case of an employee); or (e) contractual termination (in the case of Third Parties), without prejudice to the applicable civil and/or criminal penalties, as well as the pursuit of losses, damages, and fines provided for in the contract.

8. ETHICS COMMITTEE:

8.1. The Ethics Committee's scope is to uphold this Code of Ethics and compliance therewith. The Ethics Committee has the following duties:

(i) Evaluation and investigation of any acts contrary to the provisions herein, always with respect to due legal process;

(ii) Imposition of sanctions in accordance with the penalties provided for in this Code of Ethics;

(iii) Clarification of questions that arise as to the best way to act in a given situation in order to comply with the Code of Ethics and act in accordance with corporate governance and compliance.

8.2. The Ethics Committee will always be formed by one managing partner, elected according to the vote of the majority of the managing partners, and two partners who apply for and are approved by the Management Committee to occupy the position. In the absence of voluntary candidates, there will be a drawing to determine who among the partners will compose the Ethics Committee.

8.3. The members of the Ethics Committee will be elected for two-year terms and, after this period, two of the three members will be replaced, thus guaranteeing the preservation of the institutional memory of the decisions made and, at the same time, renewal of the participants.

8.4. All of the Ethics Committee's decisions and consultations with this body will be formalized in minutes of each meeting, always maintaining the anonymity of the person who submitted the complaint. The minutes must be filed in a private and secure environment.

8.5. If any member of the Ethics Committee feels prevented from joining or remaining in the group, this fact must be communicated to the managing partners, who, in turn, must appoint a new member on their own initiative and authority.

8.6. The following conditions would prevent a member of the Ethics Committee from completing their committee responsibilities:

- (i) A declaration of unwillingness to participate in the committee;
- (ii) Being away from work;
- (iii) Having a direct or indirect relationship with those reported;
- (iv) Direct or indirect participation in acts that violate this Code of Ethics and/or the Anti-Corruption Laws;
- (v) A conviction in any court level for a crime or civil act that violates these same principles; or
- (vi) Dismissal from FAS Advogados' corporate structure.

8.7. The participation of the Ethics Committee members will not be remunerated and should be considered as a day-to-day function of all partners, whether managing partners or not.

9. FINAL PROVISIONS:

9.1. This Code of Ethics is an integral part of the Internal Regulations of FAS Advogados and will be delivered to all firm's Internal Stakeholders.

9.2. Any questions regarding the interpretation of this policy must be submitted to the Ethics Committee via e-mail to comitedeetica@fasadv.com.br

9.3. The Ethics Committee may propose updates to this Code of Ethics when deemed necessary, giving due notice to all Internal Stakeholders.

9.4. All Internal Stakeholders are individually responsible for knowing, complying, watching out for compliance by others, and disseminating the Code of Ethics.

9.5. All Internal Stakeholders must sign a Term of Commitment to this Code of Ethics, which will be filed in a safe and private environment.