

SILVEIRA, ROCHA E HELD ADVOGADOS

CODE OF CONDUCT AND PROFESSIONAL INTEGRITY

Introduction

This Code of Conduct and Professional Integrity (the "Code") affirms the commitment of Silveira, Rocha e Held Advogados (the "Firm") and all its collaborators, including partners, lawyers, administrative staff, or interns, without exception, to conducting their activities ethically, with integrity and professionalism, while respecting current laws and regulations.

Our Code is mandatory and serves as a guide for the conduct of all individuals directly or indirectly associated with the Firm. It should serve as the foundation for relationships with clients, suppliers, public authorities, and society at large (Third Parties), with everyone committed to preserving the Firm's reputation.

The Code does not cover every eventuality. If specific situations are not explicitly addressed, the principles and values stated in this Code should be upheld through the exercise of common sense and good judgment, always in compliance with applicable norms. However, nothing in this Code is intended to interfere with established rights or freedoms under the law or in any way restrict them.

All Firm collaborators and third parties should have easy access to and full knowledge of this Code, which is also available at the website www.slvrllaw.adv.br.

This Code is fully applicable, immediate, and enduring, and should be reviewed as needed.

Our Standard of Conduct

The Firm adopts and requires the highest standards of ethics, integrity, and transparency in all activities associated with it. All professionals of the Firm or those associated with it must read and understand this Code, using it as a guiding principle for their actions and decisions. All are equally responsible for its practical application.

No professional of the Firm is exempt from observing these principles and values, and no one is authorized to make exceptions to the content of this Code, regardless of the privilege of the person or situation under review. The responsibility for living by this Code on a daily basis lies with all professionals directly or indirectly linked to the Firm. They are responsible for implementing these principles, acting in accordance with them, and monitoring their compliance.

Any actual or potential violation of this Code must be reported in good faith, and all reports will be thoroughly investigated. In case of proven non-compliance with the principles and values established by this Code, through action or omission of any professional directly or indirectly linked to the Firm, actions proportionate to the breach will be taken. These actions will be decided by the equity partners in accordance with the current legislation and may lead to the separation of the professional from the Firm's activities and the adoption of relevant legal measures against the individual involved, as dictated by the circumstances.

No third party or professional of the Firm will face retaliations for reporting concerns, and no one will be criticized or punished for any adverse situation or loss of business resulting from adherence to the principles and values outlined in this Code.

Compliance with the Law

All professionals of the Firm must act with ethics, integrity, good faith, and in accordance with applicable laws and regulations. The Firm is committed to preventing illegal activities, protecting free competition, respecting human rights, safeguarding the environment, protecting personal and business information, ensuring the inviolability of the attorney-client relationship, rejecting the payment of undue advantages, and avoiding any other violations of corporate ethics and integrity. Whenever any legal or regulatory requirement appears to conflict with the content of this Code, the stricter criterion among the conflicting ones will be applied.

Respect for People and Social Responsibility

The Firm is committed to providing safe and healthy working conditions in an environment free from discrimination, harassment, intimidation, or humiliation, where human dignity and mutual trust are respected.

All those associated with the Firm, whether directly or indirectly, are treated fairly and equally, without distinction based on ethnicity, social class, age, activity, sexual orientation, gender identity, physical appearance, religion, origin, marital status, disability, or political opinion. This principle applies to processes such as recruitment, dismissals, promotions, awards, benefits, or training, which should always be based on individual merit.

The Firm condemns the use of forced or child labor and practices inconsistent with internationally proclaimed human rights. The Firm is committed to nurturing and enhancing the skills of each individual for their full development.

The Firm is committed to protecting and preserving the environment and will always seek to minimize the potential adverse impacts of its activities through the rational, responsible, and sustainable use of resources. The wastage of natural resources or Firm resources, such as water, paper, food, and electricity, will not be tolerated. These resources should be used to have the least possible impact.

Respect for Clients

The Firm fully complies with the regulation of the practice of law, according to the guidelines of the Brazilian Bar Association (Ordem dos Advogados do Brasil - OAB), the Statute of Law Practice and its Regulation, and the Code of Ethics and Discipline of the OAB. In defending the interests of its clients, the Firm's professionals must act with respect, honor, dignity, and an awareness of the essential and indispensable nature of law practice. They must represent the rights of clients with loyalty, independence, transparency, truthfulness, decorum, honesty, dignity, and good faith.

The professionals of the Firm will always work in the most efficient, integrated, and coordinated manner possible, allocating the necessary resources to meet the specific needs of clients with excellence. They must have a deep understanding of clients' business and their unique characteristics.

While associated with the Firm, professionals are limited to acting in acts reserved for lawyers. No professional may act as an administrator of companies at the request of clients or accept powers *ad negotia* or for the representation of the company in acts specific to partners or administrators.

Protection of Client Information

By default, the Firm treats all information related directly or indirectly to its clients as confidential, regardless of the tangible or intangible medium that contains it. Only information explicitly classified as non-confidential by clients will be treated as such.

The Firm commits to adopting the best market practices and appropriate technology for the protection of information in its circulation, retention, protection, and disposal procedures. Information that is strictly necessary may be shared with authorized individuals for genuine needs.

Professionals associated with the Firm are prohibited from using client-related information for any purpose other than legitimate purposes specified by the client or required by law.

Protection of Data and Personal Information

The Firm respects the privacy of data and information related to natural persons, adopting the view that any information related to an identified or identifiable person constitutes personal data. Therefore, the Firm only collects personal information within legal terms and only when absolutely necessary for its professional activities. Such information will only be made available to those who have a legitimate purpose to hold or use it and requires secure storage for only the time strictly necessary.

For the protection of the Firm's interests and all those associated with it, electronic equipment of any kind, physical or electronic storage media, and data traffic networks adopted solely for professional purposes may be inspected and have any inappropriate

content removed at any time. Professionals should not expect privacy or confidentiality in the use of equipment, communication means, and information systems provided by the Firm for their activities, which use must be strictly for professional purposes.

Prohibition of Improper Use of Insider Information

Professionals directly or indirectly related to the Firm are prohibited from using insider information to buy or sell securities (stocks, shares, derivatives, or related spreads), suggesting to others to do so, or disclosing information, true or false, with the intent of manipulating the price of publicly traded securities.

Insider information refers to sensitive information not available to the public and that an investor would consider important in deciding to buy or sell securities, such as projected results, business forecasts, relevant new products, incidents, relevant litigation, dealings with regulatory authorities, executive replacements, new business acquisitions, mergers, sales, or restructuring, among others.

Anti-Corruption Efforts

The Firm and all professionals associated with it do not offer or accept, directly or indirectly, any type of payment that may constitute bribery or undue advantage, whether in the public or private sphere, in order to influence decisions or gain benefits or gains for themselves, their clients, or third parties. No behavior that could even be mistaken or interpreted as bribery is accepted or authorized. Improper, explicit, or implicit offers must be rejected outright and immediately reported.

In their interactions, all individuals should make it clear, internally and externally, that the Firm does not tolerate corruption at any level or under any pretext. Situations involving public officials are particularly delicate, and the offering of gifts, benefits, favors, or payments of any kind to public officials for acts not provided by law or for the facilitation or acceleration of procedures under their responsibility is prohibited.

Combating Money Laundering

Professionals of the Firm commit to constantly monitoring signs that relate to money laundering during their activities, such as unusual requests from clients or third parties regarding the movement of funds or assets, financial transactions involving tax havens, constant alternation of owners and bank accounts for the repetition of identical financial or commercial transactions, payments made in an unusual manner or in cash, receipt of amounts beyond those stipulated or contracted, discrepancies in data between documents and the value of the transactions they refer to, payments made in full or in advance when not foreseen in the normal terms of the business, among others. Any of these signs or similar ones should be reported immediately.

The Firm is committed to verifying the financial and corporate status of the third parties with whom it interacts to achieve its contractual objectives. Those with ties to illicit practices will be excluded from the list of partners.

Combating Conflict of Interest

No professional directly or indirectly linked to the Firm should seek gains or advantages for themselves or third parties through the misuse of their positions and activities. They should always act in the legitimate interest of the Firm, its clients, and other relevant parties.

Any professional who does not feel sufficiently independent, impartial, or unencumbered to make the best possible decision for a given situation should pass that activity to another professional of the Firm. If that is not possible, the activity should be declined.

Loss of independence to decide in the best interest of the Firm, its clients, and other relevant parties can arise from situations such as financial interests, relationships, friendships or enmities, personal business, ownership interests, romantic interests, political positions, and other similar factors. These factors should be identified and avoided.

The hiring of third parties or suppliers by the Firm must be based on technical and professional criteria, free from real or potential conflicts of interest.

Combating Unfair Competition

The Firm does not condone the violation of intellectual property and the use of confidential information belonging to third parties, including competitors, suppliers, and clients. When necessary, the Firm collects and uses information that is publicly available and is recognized as permissible for use. Any inadvertently obtained confidential information should be treated with confidentiality, transparency, and exclusively and directly with its owner.

Professionals associated with the Firm are prohibited from plagiarizing the work of other professionals, making unauthorized use of software, or engaging in any violations of intellectual property. All intellectual property generated through the activities of professionals associated with the Firm belongs to the Firm and should not be shared with third parties without permission.

When collaborating with third parties, the Firm will require contracts that establish and protect intellectual property rights and ensure freedom of use of results.

Combating Anti-Competitive Practices

No activity that may result in restrictions on free competition or free enterprise will be tolerated by the Firm. Professionals associated with the Firm should not engage in

information exchanges, conversations, or work that has the potential to transmit or improperly obtain confidential and commercially sensitive information from third parties.

The Firm does not participate in activities that tend to set or limit fee values or divide clients by categories or territories, nor accept suggestions of boycotts of clients or suppliers. If a professional associated with the Firm becomes involved in a situation where sensitive competitive issues may be improperly discussed, they must immediately interrupt the situation or leave the place ostentatiously and make a note of their departure in any possible records.

Work done in collaboration with competing firms should be detailed in contracts, and the exchange of information between involved professionals should only occur within stated objectives.

Gifts and Entertainment

The Firm understands that hospitality plays a positive role in building relationships with clients, suppliers, and third parties. However, it should not allow abuses, generate conflicts of interest, or be used as a means of exerting undue influence to receive reciprocity. Thus, gifts and entertainments, such as meals, participation in events, training, trips, among others, should be used sparingly, exclusively within a legitimate commercial or professional context and not as a routine.

The Firm does not offer or receive gifts or entertainment involving public officials or their families, nor does it accept high-value, extravagant, monetary, or equivalent gifts from any individual or legal entity associated with it. The offer and receipt of corporate courtesies should be symbolic, simple, and never linked to favors, rewards, undue advantages, or intent for reciprocity.

Before offering or accepting gifts or entertainment, professionals of the Firm should ensure that such acts do not violate laws, regulations, or codes of ethics and conduct applicable to the involved parties, and no offer should be made or accepted in conjunction with contract negotiations or fees. All professionals of the Firm are authorized to reject offers of gifts and entertainment that cause them discomfort, even if adverse consequences or business losses result from such rejection.

Accuracy in Records and Information

The Firm is committed to maintaining accurate, valid, correct, and complete records of its professional and financial activities. Thus, its professionals should promptly and accurately record information about their activities in the appropriate systems, including all supporting documentation available. Fraud or improper manipulation of information in the Firm's systems will not be tolerated, regardless of interest or value involved. Physical and electronic records should accurately describe and reflect the nature of the corresponding transactions.

The provision of reports and information by the Firm to its clients, auditors, regulatory bodies, or other stakeholders will always be done in accordance with legal requirements, with transparency, accuracy, and completeness. All data and information will be kept intact and protected for the period determined by law.

Relations with Third Parties

The Firm is committed to establishing mutually beneficial and lasting business and professional relationships and expects individuals or companies with whom it interacts to adopt principles and values compatible with those declared in this Code. Business and professional relationships of the Firm will always be formal and covered by a contract that includes the observation of the content of this Code. The Firm does not make payments to third parties on behalf of its clients or that are not covered by an explicit contractual clause.

Ethical Marketing and External Communication

The Firm is committed to complying with legal rules on advertising and marketing of law services, producing only discreet, informative advertising, and maintaining sobriety in its advertising activities.

Misleading or sensationalist advertising that may lead clients astray, use of expressions or images that undermine the dignity of the law practice, promises of results, or that serve for improper client solicitation, including the release or undercutting of fees, is not allowed.

No professional associated with the Firm may publicly comment on internal issues or situations involving clients, suppliers, or third parties related to the Firm without express authorization to do so. When using social media or virtual spaces and expressing personal opinions, the professional associated with the Firm should make it clear that their views are personal and unrelated to their professional activities.

Political Activities, Donations, and Sponsorships

The Firm does not support or contribute to political parties or agents. If its professionals wish to do so, they must do it personally, with their own resources, in their private sphere, without involving the name of the Firm and always outside its premises, avoiding any suggestion of a connection with their professional activities.

No donation or sponsorship of any kind, made by professionals of the Firm, regardless of the recipient, can be linked to the Firm without express authorization. The Firm rejects the use of donations or sponsorships to unduly influence the action or omission of public or private entities.

Means to Solve Doubts and Report Concerns

Professionals of the Firm have an obligation to report violations or potential violations of this Code, even if there is no certainty of facts or documentary evidence, and they can also do so anonymously. No one will be criticized or face retaliations for taking this initiative. Clients, suppliers, and third parties can also report their doubts and concerns about the compliance with this Code.

To report a situation, send an email to compliance@slvrlaw.adv.br or speak to one of the Firm's partners, the one with whom you feel most comfortable.

All information received will be thoroughly verified, and if proven, improper conduct will be duly sanctioned in accordance with the law.

If so desired, any professional of the Office may, without prior authorization, report to the competent authorities any situations that they believe to be contrary to the principles and values declared in this Code, being free from any criticism or reprisal for doing so.

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