



This Ethics Policy is the corporate instrument for explaining the values and principles that underlie the personal and professional conduct among the members of the institution and between them and society.

## ETHICS AND BUSINESS CONDUCT POLICY

In fulfilling its objectives, the Company does not lose sight of the importance of constantly investing in the development of an ethical and socially responsible culture, directing its action to seek the consolidation of recognition by the Client, State and Society for the quality and effectiveness of services provided, in an integrated, participatory, ethical and with citizen responsibility.

The action of directors, employees and all those who carry out activities on behalf of the [Francisco Vaz da Costa Marques, Filhos & C<sup>a</sup> S.A. \(FVCM\)](#) shall be guided by the principles of legality, impersonality, morality, publicity, efficiency and by this Policy of Ethics and Business Conduct. It is the obligation of those responsible for hiring employees, interns, service providers, third parties and agents in general to include in their respective contracts the full observance of the provisions herein.

# 1- ETHICAL PRINCIPLES

The directors and employees of FVCM base their actions on the following principles, in the relationship with the various sectors of society, ensuring:

## 1.1. TO CUSTOMERS

1.1.1. Professionalism, trust and transparency;

1.1.2. The availability of solutions that add value to its customers' businesses, permanently investing in the search for appropriate technologies and in the improvement of business strategies;

1.1.3. Valuing and respecting the fulfillment of agreements and contracts, as well as the rights of its customers;

1.1.4. Valuing business opportunities and partnerships built with its customers, seeking results for the benefit of society.

## 1.2. TO THE GOVERNMENT BODIES

1.2.1. The zeal and transparency in the use of its assets and in the application of public resources;

1.2.2. Recognition of the role and support for the performance of the controlling bodies, providing them with relevant and reliable information at the appropriate time.

## 1.3. ÀS PESSOAS

1.3.1 Maintaining a work environment where the relationship is based on professionalism, trust, cooperation, integration, respect for individual differences and urbanity;

1.3.2. The sharing of their knowledge and experiences, seeking to improve technical skills, methods and processes, in order to achieve a better overall result for the Company;

1.3.3. Valuing people, contributing to their personal, technical and professional development;

1.3.4. The permanent zeal for the adequate and economical use of the Company's material, technical and financial resources;

1.3.5. The preservation and respect for the image, heritage and interests of the Organization;

1.3.6. Recognizing and valuing the Organization's intellectual capital and encouraging the emergence of new leaders;

1.3.7. Valuing and encouraging individual and collective ethical conduct.

## 1.4. TO SUPPLIERS AND SERVICE OUTSOURCING COMPANIES

- 1.4.1. Legality, impersonality, morality, publicity and efficiency in all acts performed;
- 1.4.2. Maintaining a relationship based on mutual respect, preservation and confidentiality of information pertaining to the Company and its customers;
- 1.4.3. Relationship with suppliers and partners who have practices in harmony with the standard of business ethics and social morals;
- 1.4.4. The establishment of partnerships, as long as the image and interests of FVCM are preserved.
- 1.4.5. Rejection of contractual provisions that affront or minimize the dignity, quality of life and social well-being of outsourced employees.

## 1.5. TO THE REPRESENTATION OF EMPLOYEES, ASSOCIATIONS AND INSTITUTIONS

- 1.5.1. Recognition of the legitimacy and maintenance of a permanent dialogue with legally constituted institutions representing workers, maintaining channels of dialogue based on mutual respect, seriousness, responsibility and transparency in relations;
- 1.5.2. Negotiation as an adequate instrument to seek integration and convergence;
- 1.5.3. Compliance with the provisions set out in the instruments that regulate the company's relationship with its employees.

## 1.6. TO THE COMMUNITY

- 1.6.1. The establishment of fair and balanced relationships with the community through encouragement, promotion, support and participation in social responsibility and citizenship actions;
- 1.6.2. Encouragement, support and participation in government actions aimed at social development and combating poverty;
- 1.6.3. Encouraging its employees' sociocultural and sports initiatives.

## 2- CODE OF BUSINESS CONDUCT

The management and employees of **Francisco Vaz da Costa Marques, Filhos & C<sup>a</sup> S.A. (FVCM)** must guide their behaviour in accordance with this Code of Business Conduct, as listed below.

### 2.1. ACCEPTABLE CONDUCT TO FVCM OFFICERS AND EMPLOYEES:

- 2.1.1. Preserve and cultivate the Company's positive image;
- 2.1.2. Sell, on the Company's premises, only products and services owned and of interest to FVCM;
- 2.1.3. Develop conditions conducive to the establishment of a productive and pleasant working environment;
- 2.1.4. Treat people and their ideas with dignity and respect;
- 2.1.5. Proceed with loyalty, fairness and frankness in work relationships;
- 2.1.6. Preserve the well-being of the community, respecting the personal characteristics, freedom of opinion and privacy of each one;
- 2.1.7. Act with clarity and loyalty in defending the company's interests;
- 2.1.8. Present yourself properly for the performance of your duties and activities in the Company;
- 2.1.9. Refrain from using internal or external influences to obtain personal and functional advantages;
- 2.1.10. Refrain from using the position, function of trust held or the status of employee of the company to obtain advantages for themselves or for third parties;
- 2.1.11. Use Company resources only for Company business purposes;
- 2.1.12. Contribute to the proper functioning of the entire Company, refraining from acts and attitudes that impede, hinder or disrupt the provision of services;
- 2.1.13. Refuse gifts and gifts worth more than €25 (twenty five euros).
- 2.1.14. Prepare and present information that reflects actual economic, financial, operational, logistical positions and results, and any other information that affects the Company's performance;
- 2.1.15. Prioritize and preserve FVCM's interests with clients, government agencies, financial institutions, suppliers, entities and other companies with which FVCM maintains a business relationship;

- 2.1.16. Provide strict agreement with the guidelines and strategic business conduct when assuming a position of trust in the Company;
- 2.1.17. Renounce the exercise of the function of trust to which he/she has been assigned, when there is disagreement with the corporate strategic guidelines and guidelines.

### **2.2. UNACCEPTABLE CONDUCT TO FVCM OFFICERS AND EMPLOYEES:**

- 2.2.1. Claim personal benefits or advantages for yourself or third parties, as a result of a commercial or financial relationship signed on behalf of FVCM with clients, government agencies, financial institutions, suppliers, entities and other companies with which FVCM maintains this relationship;
- 2.2.2. Be conniving or silent in relation to errors and violations of this Code of Ethics and current legal and regulatory provisions;
- 2.2.3. Perform other professional activities during working hours, for profit or not, or, regardless of schedule compatibility, perform activities that constitute prejudice, direct or indirect competition with the activities of FVCM;
- 2.2.4. Exercising any type of discrimination against people for reasons of economic, social, political, religious, color, race or gender;
- 2.2.5. Allow personal pursuits, sympathies, antipathies, whims, passions or interests to interfere in your professional relationships;
- 2.2.6. Keep under their immediate leadership, in a position or position of trust, spouse, partner or relative, up to the second civil degree;
- 2.2.7. Deliberately damage the reputation of the Company's employee or any other professional with whom the FVCM maintains a business relationship;
- 2.2.8. Deliberately damage the reputation of customers, government agencies, suppliers, entities and other companies with which FVCM maintains a business relationship;
- 2.2.9. Pleading, requesting or receiving gifts, or advantages of any kind, for themselves or for third parties, beyond mere insinuation or provocation for the benefit given, in exchange for concessions or privileges of any nature with FVCM;

## 2- CODE OF BUSINESS CONDUCT

- 2.2.9. Pleading, requesting or receiving gifts, or advantages of any kind, for themselves or for third parties, beyond the mere insinuation or provocation for the benefit given, in exchange for concessions or privileges of any nature with FVCM;
- 2.2.10. Prioritize and preserve personal interests, customers, government agencies, financial institutions, suppliers, entities and other companies, to the detriment of FVCM's interests;
- 2.2.11. Obtaining advantages, for oneself or for third parties, arising from privileged access to FVCM information, even if they do not cause harm to the Company;
- 2.2.12. Use for their own benefit or pass on to third parties, documents, works, methodologies, products, tools, services and information owned by FVCM or its customers and suppliers, except by legal or judicial determination;
- 2.2.13. Manifest on behalf of the Company, by any means of public disclosure, when not authorized or authorized to do so;
- 2.2.14. Make inappropriate and uneconomical use of the Company's material, technical and financial resources;
- 2.2.15. Prevent or hinder the investigation of irregularities committed in the Company;
- 2.2.16. Change or misrepresent the content of any document, information or data under the responsibility of the Company or third parties;
- 2.2.17. Facilitating third party actions that result in loss or damage to the Company;
- 2.2.18. Generate any type of patrimonial confusion between the Company's assets and its own assets, regardless of the pecuniary advantages arising from this confusion;
- 2.2.19. Remain in the exercise of the function of trust for which it has been assigned, when there is disagreement with the corporate strategic guidelines and guidelines.