



Code of Ethics

LIRA
ADVOGADOS



Message to Staff

LIRA Advogados law firm was established in 2005 and has always relied on ethics and integrity. Over the last 15 years, we have advised our Clients to comply with standards and properly deal with paperwork, honoring the competitiveness of their operations as well as their corporations' reputation and values.

We appreciate reflecting at all times on the values held by our partners and the big corporations we serve in our firm, always caring for our interpersonal relationships with customers, suppliers, business partners, and government agents. Therefore, we have formalized these considerations in this Code of Ethics.

These are instructions to guide the action of the members of our law firm, which everyone should know and act under, to continuously improve our work environment and our contribution to the stakeholders we are responsible for: our staff, our clients, and society.

Sincerely,

Alexandre Lira



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Our Values



Our Values

#1

Transparency

We are committed to transparency in all our actions and our relationships with staff, clients, partners, and society, which are based on the highest moral and ethical standards. In this way, we form partnerships that involve mutual trust and respect, responding quickly to changes.

#2

Excellence

We focus our efforts on the quality and excellence of the legal services provided, with a multi- and interdisciplinary environment, combining our extensive experience, diversity of skills, an agile mindset, and technology tools.

#3

Acknowledgment

We value our staff and respect the diversity in their way of thinking, behaving, believing, and being, and we promote a healthy, collaborative, and creative environment. The people are our most valuable asset, and by respecting them we create harmony and incredible results.

#4

Entrepreneurship

We encourage our staff to have an entrepreneurial spirit, inspiring them to act autonomously and creatively, thus assuming the main role of their professional paths and helping the constant growth of our firm, in an agile and constantly changing environment.

#5

Innovation

We base our actions on empathy to truly understand our clients' needs. Therefore, with our technical expertise and a contagious willingness, we have developed agile solutions in co-operation to achieve effective and surprising results.





Our Compliance Program

LIRA Advogados is built on a solid Compliance Culture, which guide all our services and actions.

Internally, we adopted policies and practices aimed at fighting illegal, criminal and/or immoral behaviors, such as corruption, fraud, bribery, influence peddling, improper trades, money laundering, and antitrust conspiracy. We have a work environment focused on valuing our people, always trying to foster a culture of integrity and respect.

The best practices are at the core of our work, serving as a guide for each professional to conduct their behavior. Thus, we have a commitment to society, our clients, partners, and team members, to keep and spread the Culture of Compliance, in order to build a society with more justice and greater development capacity.





Our Attitudes



Our Commitment to Society

#1

Everyone must be treated with fairness and equity. We disapprove of all discriminatory acts, abusive and offensive attitudes, against any person's moral and physical integrity, whether by race, color, nationality, religion, sex, age, marital status, sexual orientation, physical disability, social position, or any other conduct of a discriminatory nature.

We strive to make sure that we communicate to the public only true, clear, appropriate, and timely information.

We defend the precepts of freedom of competition. We condemn unfair competition, we do not form or participate in cartels, we do not enter into commercial agreements with competitors to match prices or share clients.

Since 2015 we are signatories of the Business Pact for Integrity and Against Corruption (Clean Company), based on the UN Convention against Corruption and the 10th principle of the Global Compact and the guidelines of the Organization for Economic Cooperation and Development (OECD), aiming to promote a more honest and ethical market.

In 2016, we registered in the Dun & Bradstreet, who is a world leader in commercial data, being in the market for more than 170 years with a presence in 220 countries and more than 240 million companies evaluated in the Global Database. Through the Duns Number, it links information about suppliers, customers, and commercial partners, thus providing us with a more complete view of the risks and opportunities in commercial relations.

We foster the culture of Compliance in our speeches, articles, reports, and other projects. We share our experience and the benefits of adopting good conduct practices.



Our Commitment to Our Clients

#2

Our basis for having a better relationship with clients is our values, as we wish to contribute to the development of their business. We care for integrity, while exposing views that may be contrary to the client's, and also for having and improving our knowledge, in order to better guide our clients in a precise and clear manner, thus gaining their loyalty and forming a relationship of trust.

Our primary commitment is towards companies, so we do not condone any unlawful behavior, despite it only being reprehensible, and always report to the instance immediately superior to the one having such behavior.

We are committed to constantly developing and improving our technical knowledge, always aiming at providing the best guidance and support to the demands of our clients. Our professionals have a duty of care with clients, by having an attentive, helpful, and cordial attitude. The information and inquiries requested must be answered in an agile, complete, and accurate manner, keeping our clients informed and making sure to give them explanations about any doubts regarding our activities, business, and results.

Assertiveness is the hallmark of our technical opinions. All are thoroughly reviewed, internally discussed, and double-checked, in an exercise of continuous improvement.

We work under the commitment of confidentiality. In this manner, any kind of information relating to our clients that is not known to the public, obtained as a result of our activity, remains confidential. Failure to observe confidentiality will be subject to the attribution of liability in the civil and criminal spheres.

We seek to identify the needs, expectations and opinions of our clients, in order to improve our services.

We are receptive to complaints from our clients, made through any communication channel. We are always at the disposal of our clients to resolve any kind of conflict or dissatisfaction, aiming at keeping a lasting relationship with them.



Our Commitment to Government Agents

#3

We do not offer and actually condemn offers or requests of any kind for the purpose of obtaining a benefit or incentive, whether monetary or not, as well as getting any undue advantage or privileged relationship.

We do not offer or accept requests or suggestions for the provision of courtesies, such as gifts, presents, trips, dinners, etc., in exchange for favors or requests for facilitating relationships with the government.

We do not hire employees who are relatives of government agents, because of their kinship, but neither do we avoid hiring people for the same reason. The recruiting processes are guided by objective criteria.

We run our business without the influence of ideology or partisanship.

Our staff members are allowed to engage in political activities, as long as these do not interfere with their responsibilities, and provided that they are carried out outside the working hours, acting in their name and without involving the name of our firm. Besides, personal political contributions should not be made for the purpose and/or expectation of a return of any favor and/or favoritism.

Whenever it is in accordance with the principles and guidelines of our policy, we will also follow the code of conduct of the organizations that hire our services.

The hiring of services, such as lectures, courses, and events from a public official must always follow technical and objective criteria, which will not consider the position held by such official as any differential feature taken into account for hiring the services, but only the service itself.

We seek the continuous improvement of our policies, through internal training, information feedback, and the evolution of our qualities.



Our Members

#4

We aim to promote human and professional development, by adopting policies and practices to ensure dignified, healthy, and motivating working conditions. We do not tolerate any kind of disrespect or form of unworthy work.

Our professionals must not violate any rules, be vigilant, and avoid any conflict of interest, real or potential, reporting to their superior if it occurs.

Our professionals must not ask for or accept, for themselves or third parties, payments or benefits of any kind to carry out their activities at the firm.

Our staff members must not use their position, access to information or the name of the firm, inside or outside the work environment, to obtain personal benefits or advantages of any nature for themselves or for third parties.

They must not receive or pay commissions, of any kind, or payments in general to or from customers and partners.

We do not encourage the receipt or offering of gifts or presents.

All professionals must commit the code of ethics and conduct and must report cases of violation if they become aware of it.

Any professional who violates the principles set out in this document will be subject to disciplinary sanctions/measures.

Criticism, notes, and complaints regarding the conduct of our professionals that violate our Compliance Policy are encouraged so that we carry out our continuous improvement.



Our Commitment to Human Rights

#5

We respect the human rights and minimum labor standards of the International Labor Organization (ILO), with special emphasis on the protection of fundamental labor rights. We pay special attention so that human rights are also respected by our business partners.

We reject any kind of discrimination in hiring and employment, refusing slavery, child labor, and the threatening of people who defend human rights, and we try to ensure that our suppliers and business partners also follow these principles.





Culture & People

Our Principles of Collaboration in the Work Environment

#1

Decisions on hiring, promotion, dismissal, transfer, compensation, and training must be made based on criteria related to work, such as education, experience, skills and performance. All staff members will have access to opportunities for professional advancement, following the terms of the Internal Recruitment Policy of LIRA Advogados. We do not tolerate any type of discrimination, especially with regard to:

- _Gender, ethnicity, origin, and nationality;
- _Religion and worldview;
- _Political, social or union engagement;
- _Sexual orientation, physical or mental limitations;
- _Age.

At LIRA Advogados, we have a career plan based on performance evaluations carried out periodically from measurable factors. Employees know beforehand how they will be evaluated and that their behavior and ethical decisions, both inside and outside the firm, will also be taken into consideration.

We create conditions that support the balance between professional and personal life. The firm's culture is based on trust and respect. We create basic conditions for staff members to remain efficient, trying to take the best from each for the company's success.



Our Responsibilities Towards the Use of the Firm's Resources

#2

All members of staff must ensure prudent and sustainable resource management, using the firm's resources for professional purposes only. All business information are precious assets, especially secrets involving the provision of services.

All external or public presentations must be previously aligned with members of the Board. In the case of public statements, we must make it clear when it comes to personal opinions.

Conflict of Interest

#3

We carefully weigh personal and company interests. If conflicts of interest exist, they must be stated. The financial or personal interests of each member of staff must not influence business decisions. Conflicts of interest can happen when: they accept or offer or grant gifts and invitations; be members of other companies or bodies; perform similar or related activities; hold shares in competing companies.

LIRA Advogados will carry out its activities always according to the current provisions of the Code of Ethics and Discipline of the Brazilian Bar Association and will only accept cases related to each other when there is no conflict of interest, especially regarding the practice of law for parties with conflicting or opposing interests. The acceptance of holding offices in other companies is subject to the approval of the firm's Board of Directors. Holding shares in business partner companies or competitors should not give rise to a conflict of interest, and it is mandatory to communicate the interest or shareholding in these companies in advance.





Relationship With Business Partners



Selecting Our Business Partners

#1

Integrity is expected from our business partners. The firm submits all business partners to a risk-based integrity check and everyone is informed about our code of ethics. All business partners of LIRA Advogados are encouraged to respect our code of integrity and foster such practices with their respective partners.

Relationship With Shareholders #2

We care for the image and equity of shareholders, maintaining confidentiality about sensitive information to which we have access, in order to preserve, within legality, the interests of the company and proprietary partners. Respect for minority shareholders is vital for us when considering votes on strategic issues and investments in shareholders' meetings, as we deem it ethical to discuss it openly. We believe that minority shareholders' arguments may add to important contributions.

We will use corporate governance to balance the relationship between majority and minority shareholders, the Board of Directors (elected by shareholders), and the executives (appointed by the Board).

Relationship With Competitors #3

The offer of services provided by LIRA Advogados must be made based on fair competition. Acts that may constitute slander or defamation of competitors are not allowed. It is forbidden to provide third parties with strategic, confidential information or information that, in any other way, are harmful to the business of LIRA Advogados, as well as internal matters that may reflect or anticipate a market action.



Strategic and confidential information is considered the information related to business management policies and practices, business results, prices, list of clients and suppliers, among others. The commercial strategy of LIRA Advogados must always be defined regardless of its competitors. Tax and Customs Provisions: We comply with all applicable legal, tax and customs provisions. The firm rejects aggressive tax planning models, by making accurate and timely declaration of taxes and fees due.

Tax and Customs Provisions **#4**

We comply with all applicable legal, tax and customs provisions. The company rejects aggressive tax planning models, making the correct and timely declaration of taxes and fees due.

Antitrust Legislation **#5**

We value healthy competition and we are committed to fair competition. All staff members are aware of the regulations relevant to their business, such as exchange of information and benchmarking with competitors; the scope of shareholdings and cooperation; in the context of customer service and sales; the lawfulness of sales incentives; within the framework of international trade class associations and economic sanctions. We comply with all the rules of international trade law, strictly the rules of international trade law, when advising our clients on the export and import of goods or services. Our law firm also respects and takes great care in relation to embargoes and restrictions imposed by international or national bodies, such as weapons or luxury goods. All staff members respect the rules related to their responsibilities. We respect sanctions and support the fight against money laundering and the financing of terrorism. We tailor all our advisory services according to the business processes involved in order to prevent financial crimes.



Protection of Intellectual Property Rights

#6

Our patents are one of the most important assets and therefore must be protected. Every staff member must ensure that they are not misused by third parties.

Preventing Corruption

#7

We do not bribe or let ourselves be bribed. At LIRA Advogados, business is not done at any price and we convince our business partners and clients with products and services that suit their needs. We do not tolerate any kind of corrupt behavior by our staff, partners or clients. We strive to avoid any possible damage to the firm's image and reputation, even in the face of an improper influence. In our relationship with public entities and companies, government agents, and politicians, we act in accordance with our corporate principles and current laws, avoiding improper influence such as payments, gratuities or other advantages.

Staff members are prohibited from promising, offering or giving an undue advantage to any government agent; financing the practice of illegal acts; using an intermediary to hide interests or conceal the identity of beneficiaries; defrauding, frustrating, disturbing public events at all stages; impeding or intervening in investigative or inspection activities by public bodies and agents. Offering presents, gifts, or other kinds of hospitality to government agents must not constitute a means of obtaining improper or questionable advantages.

Presentes e Convites

#8

In general, gifts and presents can be offered, once a year, as a courtesy, for advertisement or usual dissemination. The invitation of government officials at artistic



or sports events must have a proven institutional reason and not include government officials' relatives. Expenses of government agents who need to perform due diligence on the premises of LIRA Advogados must be paid directly by the Government. Paying such expenses is prohibited, in particular, to obtain improper advantages. All of our staff receive regular training to ensure that corrupt behaviors are discovered, avoided and punished.

We refuse inappropriate gratuities from business partners and do not suggest, request or demand them for us or third parties. Invitations must have a commercial motive, be offered voluntarily, not happen frequently, and be appropriate to the occasion. In the case of gratuities from third parties, we guide ourselves by established amounts. We document and maintain transparency regarding gratuities received above reference amounts and make sure that all gratuities offered to partners are adequate.

Parallel Activities, Offices in Other Companies, and Shareholding

#9

We will only accept cases related to each other when there is no conflict of interest. The acceptance of holding offices in other companies is subject to the approval of the firm's Board of Directors. Holding shares in business partner companies or competitors should not give rise to a conflict of interest, and it is mandatory to communicate the interest or shareholding in these companies in advance.

Representation of Political Interests

#10

The law firm dialogs with governments and organizations in a trusting environment and engages as a reliable and trustworthy business partner in the processes of forming public and political opinion.



Donations and Sponsorship

#11

To us, business success is inseparable from social responsibility, to reinforce social development and promote equal opportunities. We do not request any consideration for our donations and care for so that all donations and sponsorship to political organizations happen by express authorization.

Volunteer Work

#12

Volunteer work helps maintain society and we encourage and support the voluntary involvement of our staff in volunteering activities dedicated to political, democratic, social, and charitable causes.





Digitalization

Processing of Data

#1

At LIRA Advogados, we use personal data only to the extent permitted by the current provisions of the General Law on Protection of Personal Data (13,709/2018), and as allowed by the individual, thus respecting the personal rights of our business partners, clients, and staff. We keep adequate controls for accessing this data so that our staff and business partners can be sure that the information they share with us is safe and will not be accessed by third parties.

Social Media

#2

Social media like LinkedIn, Facebook, Instagram and Twitter influence more and more public speeches, so we do not tolerate speeches on social media that incite violence, hatred, insults or discrimination. At LIRA Advogados we value tolerance and respect. Among other aspects, we consider unacceptable posts that:

- # Contain subversive content;
- # Violate the dignity of others;
- # Are harmful to the firm's work environment;
- # Damage the image of the firm or our staff;
- # Harm the relationship with relevant groups of interest.





Compliance with the Code of Ethics

All members of staff must know and align their behavior with the content of this code of ethics and use it as a guide. If the firm has other specific procedures or guidelines, these must be followed. Each staff member is responsible not only for their own behavior, but must also report any violation of the Code, in an honest, fair and respectful manner, to their superior and the Human Resources and Legal Department, or through the reporting channel.

We expect our executives and partners, at all levels, to behave with integrity and to live up to their role, promoting a culture of respectful cooperation and being an inspiring example to the whole team.

We want to learn from mistakes as individuals and as an organization, to create a culture of transparency, justice and trust. Therefore, it is necessary to form a business culture that recognizes, analyzes and corrects wrong decisions. Each staff member is responsible for creating an environment that makes it possible to approach any mistakes without fear.

You can accept these terms in digital form, to avoid paper.



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