

CODE OF CONDUCT

1. Purpose and principles

The practice of the law firm Henrique Mourão Advocacia ("HMA") is governed by strict rules of conduct and compliance with this Code by all of its members, including partners, associates, employees and trainees is essential to ensure the excellence and the high level of legal services provided to its domestic and foreign clients.

This Code of Conduct is also available upon request to partner and correspondent firms, suppliers and service providers hired and contracted by HMA.

These rules of conduct do not alter, replace or conflict with the provisions of the Code of Ethics and Discipline of the Brazilian Bar Association (OAB), the Statute of the Practice of Law, the General Law for the Protection of Personal Data - LGPD and other applicable legal standards.

The types of conduct set out in this code are based on the principles of professional confidentiality, transparency and legal security for the appropriate practice of professionals and are employed in order to prevent financial losses and damages to the image of its clients and its members.

2. Relationship

2.1. Relationships between members of the Firm

The members of the Firm shall treat everyone with respect and dignity, and any type of conduct that may characterize sexual, moral or psychological harassment, or any type of discrimination or abuse shall not be admitted.



Any conduct that disrespects freedom of expression and religious beliefs, political party convictions, the right to intimacy, privacy, honor and image is prohibited.

2.2. Client relationships

The members of the Firm shall observe articles 8 to 24 of the Code of Ethics and Discipline of the Brazilian Bar Association (OAB), which govern the relationship between attorneys and clients.

2.3. Relationships with governmental agents

The members of the Firm must comply with the regulations that govern and limit the actions of governmental agents, primarily the Codes of Ethics and the Organic Laws of the Courts, the Public Prosecutor's Office and the Public Defender's Office, at the state and federal levels; Law No. 8429 of June 2, 1992, which "*provides for the sanctions applicable to governmental agents in cases of unlawful enrichment in the exercise of a mandate, office, job or function in the direct, indirect or foundational public administration*"; Law No. 12.816 of May 16, 2013, which "*provides for the conflict of interests in the exercise of office or employment in the federal Executive branch and subsequent impediments to the exercise of the office or employment*"; Law No. 12.846 of August 1, 2013, which "*provides for the administrative and civil liability of legal entities for the practice of acts against the public administration, domestic or foreign,*" as well as other legal rules applicable to the case at hand.



3. Conflict of interest

Members of the Firm may not act in any judicial or administrative proceedings in which they have worked for the opposing party, in the public or private sector, prior to joining the Firm.

In addition, they are obligated to respect the rules of "quarantine" stipulated by legal rules or other instruments that apply to lawyers coming from the public or private sector.

4. Use of social media and means of communication

The use of social media and means of communication shall comply with articles 25 to 34 of the Code of Ethics of the Bar, the Law on Personal Data Protection - LGPD and the internal rules that are issued by the Firm.

5. Non-disclosure

HMA members are required to keep strictly confidential all information about and regarding the Firm and its partners, clients and projects to which they have access and to remain in compliance with the LGPD.

All information that is not public knowledge is considered confidential, and the duty of non-disclosure remains even after the employee leaves HMA.

HMA will process the personal data of clients, employees, collaborators and partners, in accordance with item X of Article 5 of the LGPD.



The processing of personal data may be carried out by HMA in relation to its clients, without the need for prior and express formal consent, provided that such data is necessary for the proper performance of the service provision contract, previously formalized with the holder of personal data (item V, article 7, of LGPD).

Personal data of employees and other collaborators and partners may also, as a rule, be processed by HMA, provided the purpose of such practice is observed in compliance with the rules previously established by the parties.

If a need arises for HMA to process personal data that exceeds the limits established for the performance of the contractual object, the data holder must be requested, upon justification, to comply with the principles of adequacy, purpose, and specific prior consent (items I and II, of article 6; clauses I and V, of article 7; of the LGPD).

6. Ethics Committee

6.1. Institution and Composition

The Ethics Committee of HMA is hereby instituted, which shall be composed of at least three (3) partners, and its members shall perform their functions, without remuneration, for a period of two (2) years, with the possibility of reappointment.

Exceptionally, by majority decision of the members of the Ethics Committee, in view of a specific case, an external and independent member who has an unblemished reputation and renowned knowledge of the rules of conduct and ethics may be invited.



6.2. Responsibilities

The responsibilities of the Ethics Committee entail:

- receiving reports, including anonymous ones, which may be forwarded to the e-mail address: comitedeetica@hmourao.com.br;
- initiating and carrying out internal procedures to investigate the complaints received, ensuring that the accused has the right to adversary proceedings, full defense, and the due process of law;
- suggesting to the partners the application of penalties of warning, suspension of activities for 30 (thirty) days and termination, when the practice of the acts reported in the complaint is proven, taking into consideration the principles of proportionality and reasonableness;
- taking the appropriate preventive measures to cease the practice of irregularities and infractions, such as audits, assessment of procedural background checks (judicial and administrative) related to the exercise of the profession of candidates who intend to join the Firm's team;
- organizing and promoting continuous training to disseminate the content of this Code;
- reporting acts of corruption and administrative misconduct to the appropriate authorities.

6.3. Meetings of the Ethics Committee

One (1) ordinary meeting shall be held per semester, and extraordinary meetings may be held whenever necessary and convened by any member



of the Ethics Committee.

7. Donations and sponsorship

Sponsorships and donations to bodies or institutions that promote legal enhancement and education will only be allowed upon prior approval by the Ethics Committee, provided there is no conflict of public and private interests.

8. Final provisions

If any questions regarding the interpretation and adequate application of the provisions of this Code of Conduct arise, the members of the Ethics Committee should be consulted.

This Code of Conduct will be continuously improved in accordance with the most modern standards of governance.

Members of the Firm will receive a copy of this Code of Conduct by signing the attached statement.

The most recently updated version of this Code of Conduct will be available, both in Portuguese and English, on the Firm's institutional website (www.hmourao.com.br).

All copyrights of this Code of Conduct belong to HMA, and its total or partial reproduction is forbidden without the express consent of its holder.



STATEMENT

I declare that I have received a copy of the Code of Conduct of Henrique Mourão Advocacia and am aware of its contents in their entirety. I undertake to comply with it and to ensure that the other members of the Firm equally comply with it.

Full name:

OAB registration number:

Identity Card (employees, collaborators and trainees who do not yet have a registration number with OAB):

Signature:

