

A stack of law books is positioned on the left side of the page. The top book has a dark blue cloth spine and a gold-colored band around the middle. A large, solid black arrow points from the left towards the right, passing behind the books. The background is a dark grey.

CODE OF CONDUCT

REGISTRATION UNDER THE BRAZILIAN BAR
ASSOCIATION, SÃO PAULO SECTION,
UNDER NO. 12765

INDEX

MESSAGE FROM THE COMPANY	4
SUMMARY	6
1. INTRODUCTION	7
Who does the Code apply to?	7
How is the Code enforced?	7
2. THE OFFICE AND THE RELATIONSHIP WITH SOCIETY AND THE ENVIRONMENT	9
2.1 DIVERSITY AND INCLUSION	9
2.2 DISCRIMINATION AND HARASSMENT	9
What do we practice?	10
HARASSMENT IS SERIOUS! DID YOU KNOW?	10
ALLOWED CONDUCT	10
FORBIDDEN CONDUCT	11
2.3 PRESERVATION OF OUR ASSETS AND RESOURCES	11
PERMITTED CONDUCT	11
PROHIBITED CONDUCT	11
2.4 FRAUD	12
PERMITTED CONDUCT	12
PROHIBITED CONDUCT	12
2.5 CIGARETTES, ALCOHOL, DRUGS AND WEAPONS	13
3. RELATIONSHIP WITH THIRD PARTIES	14
3.1 FRAUD AND CORRUPTION	14
PERMITTED CONDUCT	14
PROHIBITED CONDUCT	14
CORRUPTION IS SERIOUS! DID YOU KNOW?	15
3.2 DONATIONS AND SPONSORSHIPS	15
PERMITTED CONDUCT	15
PROHIBITED CONDUCT	16
4. CONFLICT OF INTEREST	17
A) PARALLEL ACTIVITY	17
PERMITTED CONDUCT	17
PROHIBITED CONDUCT	17

B) AFFECTIVE RELATIONSHIPS AND PARENTAL RELATIONS	18
PERMITTED CONDUCT	18
PROHIBITED CONDUCT.....	18
5. INFORMATION INTEGRITY	19
5.1 INFORMATION CONFIDENTIALITY	19
5.2 INFORMATION SECURITY.....	19
PERMITTED CONDUCT	20
PROHIBITED CONDUCT	20
6. WORK ENVIRONMENT	21
6.1 DISCRIMINATION AND PREJUDICE	21
6.2 HARASSMENT AND BULLYING	22
Did you know?	22
6.3 RELATIONSHIPS AND CONDUCT IN THE WORKPLACE	23
6.4 PRESERVATION OF ASSETS, RESOURCES AND INFORMATION OF THE COMPANY AND EMPLOYEES	23
6.5 PHYSICAL SAFETY OF PROFESSIONALS	23
6.6 OTHER CONDUCT	24
PERMITTED CONDUCT	24
PROHIBITED CONDUCT.....	24
ANNEX 1 - TERM OF RECEIPT AND ACKNOWLEDGMENT	25

MESSAGE FROM THE COMPANY

Dear professionals,

We want **Chohfi Sociedade de Advogados – OAB/SP 12765** to be known and respected for its transparency and ethics in conducting all its activities. This code of conduct is a result of all the work done to consolidate our Firm. It was designed and built based on the contribution of each of our practical experiences and that of our team, which made possible the idea of creating a practical manual for the daily life of a Human Institution.

Our code stands out for its clarity and simplicity in contemplating the rules and principles that must guide all our actions that are related to the activities that we develop within Chohfi Sociedade Advogados.

Our Institution believes that a rigorous commitment to ethical standards attracts the best professionals, efficient suppliers and honest clients. This manual presents several situations as a guide and aid to our internal team; however, it is not our objective to exhaust all the situations that may arise in each one's daily life.

We value good relationships and efficient communication. In this sense, we understand that it is essential to improve relationships, with a special focus on social, environmental and ethical responsibility.

This Code aims to bring clarity and security of compliance in advocacy, contacts, negotiations, actions and any other type of relationship between Chohfi Sociedade de Advogados and third parties, whether customers, suppliers, employees and law enforcers.

Ethical conduct is a non-negotiable rule and directs responsibility with the obligations assumed, avoids situations of negative institutional impact and improves the daily relationship between all those involved. The defense of the client is the main objective of Chohfi Sociedade de Advogados, which aims at profit as a natural consequence of the work performed.

In case of doubt, you can contact the Administrative Department or even the managing partner of the Area.

If you come across the conduct of another member of Chohfi Sociedade de Advogados or even if the Firm as a whole is not meeting the standard of conduct proposed in this code, we strongly request that you report the matter to the responsible bodies.

We count on everyone's participation in this project.

Our code reaffirms our commitment to the correct attitude in conducting activities and, above all, in relation to people.

Thaís Barbosa de Almeida

Managing Partner

Thiago Chohfi

Founding partner

SUMMARY

In our relationships, we value the human being guided by the following principles:

- **Respect;**
- **Solidarity Spirit;**
- **Ethic;**
- **Union;**
- **Humanitarian vocation;**
- **Love of work;**
- **Affectivity;**
- **Spirituality.**

Nossa filosofia:

- We do not give up
Ethics, honesty and transparency;
- Our daily mission
Technical and social responsibility;
- In constant renovation
Modernity, agility and assertiveness.

1. INTRODUCTION

This Code of Conduct establishes the basic precepts of professional conduct for our team, which must be lived and disclosed by everyone during their professional activity. Our attitudes must be examples of ethics and conduct for everyone with whom we relate.

We expect and rely on our team to observe the provisions of this Code, in addition to current laws and the Code of Ethics of the Brazilian Bar Association, as well as your employment contract or service provision/association with the Firm.

Who does the Code apply to?

The provisions of this Code of Conduct are applicable to all those who exercise their professional activities related to Chohfi Sociedade de Advogados, such as partners, lawyers, interns, administrative staff, correspondents, suppliers and others related to the society.

We do not allow anyone to violate or ask anyone else to violate this Code.

How is the Code enforced?

Compliance with each one is fundamental in disclosing the Code and in complying with it.

We have a responsibility to incorporate the Code's principles into our work routines and relationships and to encourage others to do the same.

The consolidation of an environment of integrity depends on each one of us, both in relation to our own conduct and in relation to the attitude of everyone with whom we interact.

Therefore, if you have any questions or know of a situation contrary to the principles contained in this Code, the internal policies or regulations, or legislation, speak up.

We want – and need – to hear from you!

Whenever we become aware of a violation of the Chohfi Sociedade de Advogados Code of Conduct, we will act to correct the problem and prevent new cases. All reports received will be investigated and, depending on the circumstances, will result in corrective, preventive and/or disciplinary actions - such as training, counseling and, if applicable, application of sanctions that may result in the termination of the employment contract, association or the commercial relationship maintained by the offender with the Firm.

We do not tolerate retaliation of any kind against anyone who reports a breach of the Code or assists with an internal investigation.

If you believe you are the target of retaliation, report this fact to your manager.

We provide communication channels with confidential mechanisms to receive information or denunciations, identified or anonymous, about possible non-compliance with the principles and values defended by Chohfi Sociedade de Advogados. The reports received will be investigated and discussed by specific committees and may be submitted anonymously.

Official channel: compliance@chohfiadvogados.com.br

2. THE OFFICE AND THE RELATIONSHIP WITH SOCIETY AND THE ENVIRONMENT

As representatives of Chohfi Sociedade de Advogados, we respect the laws, regulations, rules and internal policies, guaranteeing the integrity and values practiced by the Firm.

We are proud to conduct our activities based on honesty and commitment to the defense of our values and our mission. The principles and ethical conduct must guide the work and relationships in the Institution, as well as our participation in the society in which we operate.

Encompassing the integrity of our actions, our honest relationship with employees, suppliers, the community and our human scope.

All employees and professionals must be treated with respect and dignity and have the opportunity for professional growth.

We do not tolerate any form of forced, child or compulsory labor, discrimination, threats, coercion, abuse or harassment in the workplace.

We are committed to sustainable development and adopt the following behaviors:

- act preventively in relation to potential risks to the environment and to the health and safety of people, avoiding waste and adverse events.
- preference for the use and consumption of socially responsible products.
- reduce consumption, reuse and recycle materials and products, with proper disposal of all waste.
- promote social inclusion, valuing and encouraging education for the development of society as a whole.

This positioning is based on the need to protect the reputation and image built over the last 20 years, which must always be recognized and also systematically reinforced by attentive management that knows how to respond to the ethical dilemmas that permeate the sector.

2.1 DIVERSITY AND INCLUSION

We are a Human Institution, we believe in the potential of people and we respect individuals of all backgrounds, abilities, orientations and opinions. We encourage an inclusive environment capable of promoting expression, creativity, innovation and individual achievement.

We value diversity – of people and ideas, which inspires innovation, provides important knowledge about our services, which makes us stand out in the market not only as a law firm, but also as a Human Institution. We strive to treat everyone fairly and equitably.

2.2 DISCRIMINATION AND HARASSMENT

We are a Human Institution, we believe in the potential of people and we respect individuals of all backgrounds, abilities, orientations and opinions.

Our Firm values the dignity of each of its professionals, clients and suppliers and the right to a work environment free of discrimination and harassment, sparing no efforts to achieve this.

It is a clear rule that we do not tolerate harassment within our organization of any kind that may interfere with a professional's personal work or that creates an intimidating, hostile or offensive work environment.

What do we practice?

We hire, retain and promote professionals based on qualifications, skills, achievements and merits.

We treat each other with dignity and respect, promoting an environment of frank and open communication.

Moral harassment consists of repeatedly and constantly exposing someone to a situation of discriminatory humiliation. The person who suffers moral harassment is usually exposed to situations that are not part of their duties or is led to tolerate words and attitudes that undermine their dignity.

Sexual harassment, in turn, is defined as the embarrassment of someone with the intention of obtaining sexual advantage or favor, taking advantage of a condition of hierarchical superiority or influence over the victim, inherent to the exercise of a job, position or function. Sexual harassment is a crime provided for in the Brazilian Penal Code and will be treated as such by us.

Any situations involving humiliation, intimidation, exposure to ridicule, hostility or embarrassment are considered harassment, whether related to color, gender, sexual orientation, age, competence, medical condition, religion, political ideology, nationality or social status.

In the event of any irregularity, attempt, real or suspected harassment and/or discrimination, we recommend an open and immediate complaint to the manager, which must be reported through any of the available Communication Channels. We will investigate and, as appropriate, report any unlawful practices to the appropriate authorities.

Decisions on hiring, salary, benefits, promotion, sanctions, termination, among others, are based exclusively on the professional's ability to perform his job.

HARASSMENT IS SERIOUS! DID YOU KNOW?

The demand for sexual favors as a prerogative to obtain a promotion or even as a threat to prevent the victim from being fired is a common example of sexual harassment. Sexual harassment is a crime provided for in the Brazilian Penal Code, with a penalty of up to 2 years in prison.

ALLOWED CONDUCT

We do not expect it, but if you believe you have been discriminated against or harassed, or become aware of a situation of discrimination or harassment involving one or more professionals of Chohfi Sociedade de Advogados, whether managers, partners, suppliers or clients, you must report the situation immediately to the manager, through the Communication Channels.

Don't worry, all reports will be investigated and the identity of the whistleblower will be kept confidential.

FORBIDDEN CONDUCT

We do not accept an offensive posture, whether verbal, physical or virtual, that embarrasses other professionals, collaborators, whether managers, employees, customers, suppliers, distributors or visitors during the exercise of their professional activity, inside or outside the Firm.

We do not admit the practice of acts that constitute discrimination or moral or sexual harassment during their professional activity, inside or outside Chohfi Sociedade de Advogados, under penalty of the harasser suffering sanctions provided for in this Code, as well as being civilly and criminally responsible for their actions.

2.3 PRESERVATION OF OUR ASSETS AND RESOURCES

Chohfi Sociedade de Advogados' assets and resources constitute the company's assets and can be described by facilities, infrastructure (physical and virtual), equipment, vehicles, furniture and financial resources.

Assets are entrusted to professionals, who are responsible for their protection, safeguarding and proper use in the performance of their tasks. We protect our assets against waste, loss, damage, misuse, theft or abuse.

The assigned assets must be used exclusively for activities related to the office, and it is expressly forbidden to lend, rent, trade, exchange or donate them without proper authorization.

The internet and e-mail are provided by Chohfi Sociedade de Advogados to the Protagonists for professional use. These resources are expected to be used consistently with the professional activity carried out.

PERMITTED CONDUCT

The use of assets made available by Chohfi Sociedade de Advogados is allowed to carry out its work in an adequate and efficient manner, always respecting the rules for conservation and use of the assigned asset.

The use of assets and resources provided by Chohfi Sociedade de Advogados to employees may be monitored, including the use of emails and programs installed on the computer.

PROHIBITED CONDUCT

We do not admit the request for equipment or resources for exclusively personal use or for activities that may conflict with the interests, principles, values, mission and vision of Chohfi Sociedade de Advogados.

If you need to acquire some special resource for the development of your activity, the request can be made to the Administrative sector of Chohfi Sociedade de Advogados, for analysis of the pertinence. If you have any doubt whether you can or should request a certain resource or asset, ask your area manager. The resources and assets belong to Chohfi Sociedade de Advogados and, therefore, any form of appropriation of the assets is prohibited.

We consider cases of theft or misappropriation to be a serious infraction, conduct that will be reported to the competent authorities, with the possibility of civil and criminal consequences.

The electronic resources and goods provided may not be used for gaming, exchange or storage of inappropriate, violent, discriminatory, obscene, racist or defamatory content.

If you come across misuse of resources and goods provided, please report it immediately. Aiming to guide the use of the internet, e-mail and social media in a responsible and ethical manner, all employees and professionals who have a relationship with Chohfi Sociedade de Advogados must follow the guidelines:

- Do not express opinions that may imply or imply that they are an official position of Chohfi Sociedade de Advogados.
- Do not disclose or share images, videos or internal information about Chohfi Sociedade de Advogados that have not been disclosed on official channels.
- Do not expose information about Chohfi Sociedade de Advogados, partners, co-workers, suppliers.
- Not share, enjoy, publish information, photos, videos and any other materials on social networks, emails, WhatsApp group, which present content contrary to the interests of Chohfi Sociedade de Advogados.

2.4 FRAUD

Fraud occurs when the professional misleads Chohfi Sociedade de Advogados or a third party in order to gain some advantage for himself or for a third party. Examples of fraud include falsifying documents (receipts, for example), improperly altering accounting data and deliberately allocating expenses to inappropriate cost centers.

Any behavior or transaction that seeks to divert or acquire financial or other benefits for you or third parties, including misappropriation of assets of Chohfi Sociedade de Advogados or clients, not only are a violation of this Code and the terms of its contract, but it also constitutes a crime!

We encourage the open and immediate denunciation of any real or suspected attempt at fraud involving Chohfi Sociedade de Advogados and/or its professionals, which must be done through any of the available Communication Channels. Chohfi Sociedade de Advogados will investigate and, as the case may be, will report any fraudulent or illegal practices to the competent authorities, in addition to exercising all applicable rights in the civil and criminal spheres.

PERMITTED CONDUCT

Employees responsible for accounts at Chohfi Sociedade de Advogados must keep such information duly and clearly recorded in the relevant books, always in compliance with the applicable legislation and best market practices.

The analysis of our partners and suppliers must be carried out cautiously and, once the contracting phase is over, it is up to Chohfi Sociedade de Advogados, through its responsible collaborators, to demand and value the maintenance of the required quality standard.

PROHIBITED CONDUCT

Accountability using forged receipts or receipts that do not correspond to the expenditure incurred will not be accepted under any circumstances, as well as the approval of expenses that those who do not have the prerogative to do so will not be allowed.

No professional at Chohfi Sociedade de Advogados is authorized to conceal, alter, falsify, manipulate or intentionally omit any type of information or document, such as balance sheets, reports, tax documents, money, evidence and notes.

2.5 CIGARETTES, ALCOHOL, DRUGS AND WEAPONS

We value a healthy and respectful work environment for all those who visit our space and, therefore, some rules regarding the consumption of alcohol and drugs and the carrying of weapons must be observed. See below:

You may not perform your duties, join or remain in our facilities or in external activities related to Chohfi Sociedade de Advogados under the influence of alcoholic beverages, illicit drugs or narcotics.

No professional or visitor is allowed to keep or carry any type of weapon (knives, pocket knives, air guns, pellets, fire, etc.) on our premises or in external activities related to Chohfi Sociedade de Advogados. Service providers who use weapons as a work tool must be properly identified, trained and authorized.

In order to protect the health of all our professionals, smoking cigarettes is also not allowed on the physical premises of Chohfi Sociedade de Advogados.

3. RELATIONSHIP WITH THIRD PARTIES

3.1 FRAUD AND CORRUPTION

All those who work on behalf of Chohfi Sociedade de Advogados, without exception, including third parties, have the responsibility to ensure that they are not involved in corrupt activities. Harmful acts against public administration, national or foreign, or any other entity or individual with which Chohfi Sociedade de Advogados maintains ties will not be tolerated.

Corruption is understood to be any act involving the promise, offer or delivery, directly or indirectly, of money or any other benefits, regardless of their economic value, with the aim of obtaining any illicit advantage for oneself, third parties or even same for the Company.

For internal investigation purposes, acts of this nature involving any third parties, whether public or private agents, will be considered corruption.

Examples of illicit advantages obtained through acts of corruption are: directing bids, obtaining licenses and permits, speeding up processes, favoring the acquisition of goods or services, among countless other ways.

Specifically, it is prohibited to make or grant offers, promises, gifts, discounts, payment authorizations or other benefits, favors or hospitality:

- either directly or indirectly
- for any public agent who influences or intends to influence any action, omission or decision to obtain or retain business or any type of advantage for Chohfi Sociedade de Advogados; or, then, to any person who induces or intends to induce the public official to perform or reward the person for performing his/her job improperly. We encourage open and immediate reporting to the manager or specific channel of any real or suspected attempt at corruption involving Chohfi Sociedade de Advogados and/or professionals.

Chohfi Sociedade de Advogados will investigate and, as the case may be, report any illegal practices to the competent authorities, in addition to exercising all applicable rights in the civil and criminal spheres.

PERMITTED CONDUCT

If you come across, are aware of or suspect any act of corruption perpetrated by any professional at Chohfi Sociedade de Advogados, including by any supplier, distributor or client, you must immediately report the situation to your manager or report it through the specific channel. All reports will be investigated and the identity of the whistleblower will be kept confidential.

PROHIBITED CONDUCT

Our policy is zero tolerance for acts of corruption. You are not authorized to offer or receive any payment or undue advantage from any commercial partners or any public agents, directly or indirectly, with the aim of obtaining any illicit or immoral advantage for yourself, third parties or for Chohfi Sociedade de Advogados.

You must not authorize the hiring of intermediaries whom you suspect may commit an act of corruption for their own benefit or that of Chohfi Sociedade de Advogados.

In this case, you must call your manager or the specific whistleblowing channel and inform them in advance about your suspicion and the hiring process, so that the facts can be ascertained.

CORRUPTION IS SERIOUS! DID YOU KNOW?

In Brazil, corruption (active and passive) is a crime provided for by the Penal Code, with a penalty of up to 12 years in prison.

- In 2013, Law No. 12,846/2013 ("Anti-Corruption Law") was published, which provides for the liability of companies for acts of corruption committed by their professionals in the administrative and judicial spheres. In addition to the expressive fines to which the company would be exposed, there is even the possibility of dissolution of the offending legal entity.
- According to the Anti-Corruption Law, companies are responsible for any act of corruption from which they benefit, even if none of their professionals or top management knows that such act was committed. As such, we need to be extra careful when hiring intermediaries, granting sponsorships or making donations to our partners.

3.2 DONATIONS AND SPONSORSHIPS

Donations are contributions made exclusively on a voluntary basis and without the expectation of obtaining any return. Receipt of any consideration deprives the donation of its character, which may have serious tax and administrative consequences for the Institution. Donations must always be received and managed by Chohfi Sociedade de Advogados, which will keep records of amounts in an appropriate manner and with all necessary information for accountability purposes.

Sponsorship is characterized by the dissemination of the name and image of the law firm, its products or services through its association with events, activities, sporting or cultural entities.

With the exception of advertising and marketing actions, sponsorship activities must be aimed at non-profit institutions that carry out activities related to research, education, culture, sports or social programs.

Sponsorships, likewise, must always be received or paid according to documented guidelines and the counterparts must be detailed and explicit in a contract formally signed between the parties.

Any benefit to the sponsor that is not duly expressed in the sponsorship contract is prohibited. Also, the offering of gifts and entertainment, including payment of travel expenses, granting of scholarships, donations, sponsorships and other commercial incentives must be in accordance with the policies of Chohfi Sociedade de Advogados, applicable to each case.

PERMITTED CONDUCT

You must forward requests for sponsorships and donations to the areas responsible for their approval, provided that such requests are made in writing and contain a precise description of their purpose.

PROHIBITED CONDUCT

We do not accept that our employees offer, promote, deliver a donation or sponsorship on behalf of Chohfi Sociedade de Advogados to any entity, public or private, without first obtaining the due internal authorizations.

The process for granting donations and sponsorships must be transparent and duly documented.

Payment or delivery of goods related to donations and sponsorships must always be made directly to the beneficiary institution or person. You may not negotiate or authorize the payment of any amounts relating to third parties other than the final beneficiaries of the sponsorship or donation.

4. CONFLICT OF INTEREST

We value acting in the best interest of Chohfi Sociedade de Advogados, our professionals and clients. Conflict of interests is any situation that may lead the professional to make decisions motivated by interests other than those of Chohfi Sociedade de Advogados and its clients.

We do not admit any situation that makes it difficult for the professional to comply impartially with his obligations to Chohfi Sociedade de Advogados, even if no unethical or improper act results from it. Communication and vigilance are paramount to ensure that no professional is placed in a situation in which their interests or personal relationships could generate a conflict with the interests of Chohfi Sociedade de Advogados.

The decisions you make must not be influenced by any actual or potential opportunities, financial gains or other benefits to you or third parties, including friends, relatives or business partners.

Everyone should avoid situations involving a conflict of interest, even if it is only apparent.

CASE STUDY: if you receive a contact for a certain partnership with Chohfi Sociedade de Advogados, which has the payment of a certain amount in the form of sponsorship, learn how to act!

Sponsorships are a way of publicizing our brand or our services, and should never be used as a counterpart to obtain any other personal benefit or for Chohfi Sociedade de Advogados. If you receive such a request, inform that all sponsorship requests must be formalized and analyzed by internal sectors of Chohfi Sociedade de Advogados.

Do not make promises, look for your direct manager or the Administrative Department, so that together they can assess the specific situation.

Below, we list some situations in which there is a potential conflict of interest, for which you must necessarily consult your direct manager and/or the Administrative Department before starting such activities, which may authorize the potentially conflicting activity, provided that it understands that there is no damage to the interests of Chohfi Sociedade de Advogados:

A) PARALLEL ACTIVITY

We consider parallel activity the performance, by the professional, of another professional activity, remunerated or not, in addition to that developed at Chohfi Sociedade de Advogados.

PERMITTED CONDUCT

You may perform parallel activities whenever such activities do not impair the performance and execution of your contract and/or do not conflict with the interests of Chohfi Sociedade de Advogados or with the activities carried out by it. We warn of possible ethical conflicts that may also arise from parallel activities, including and especially sponsoring third-party actions against our customers.

PROHIBITED CONDUCT

Parallel activities developed with direct competitors of Chohfi Sociedade de Advogados are prohibited, since they are characterized as a clear case of conflict of interests.

Professionals from Chohfi Sociedade de Advogados are not authorized to provide services on behalf of clients that already belong to Chohfi Sociedade de Advogados or against such clients, under

penalty of characterization of unfair competition, irregular clientele acquisition and violation of the Order's Code of Ethics of Lawyers in Brazil.

B) AFFECTIVE RELATIONSHIPS AND PARENTAL RELATIONS

We understand that there may be situations in which our professionals are related to each other or become emotionally involved with a co-worker. In order to prevent a conflict of interest from being verified in these situations, we have established certain rules that must be observed when there is a family relationship or an affective relationship.

PERMITTED CONDUCT

You may have a family relationship or an affective relationship with another Chohfi Sociedade de Advogados employee, as long as there is no level of hierarchical subordination or influence in management decisions between you.

Whenever there is a kinship relationship or emotional relationship between you and another professional in your same hierarchical chain, the situation must be reported to your immediate manager and the Administrative Department so that the case is evaluated and, as the case may be, the professionals are reassigned from the area.

PROHIBITED CONDUCT

You may not, under any circumstances, intervene in the hiring or evaluation process of a person who is your relative. You cannot hide the existence of an affective bond or family relationship between you and another professional or third party in the same hierarchical chain, such omission being considered a serious misconduct.

5. INFORMATION INTEGRITY

Our intellectual property, our data, documents, know-how and information in general are extremely valuable and irreplaceable assets. Chohfi Sociedade de Advogados' position in the legal services sector attracts the attention of our competitors, which increases the risk of leakage of our confidential information.

5.1 INFORMATION CONFIDENTIALITY

The data and information produced or stored internally are part of our competitive strategy and our intangible assets. Such data and information must be stored securely and never shared with anyone outside Chohfi Sociedade de Advogados, mainly business partners or competitors.

Internal information of Chohfi Sociedade de Advogados must be presumed to be confidential whenever there is no clear indication that Chohfi Sociedade de Advogados disclosed it publicly or that it authorized its disclosure.

Our professionals must always maintain confidentiality in relation to documents, manifestations, reports, spreadsheets, data, surveys, financial information, especially in relation to clients to whom they have had access during the exercise of their activities at Chohfi Sociedade de Advogados or who are product of your work or that of other professionals.

All professionals have a legal and moral duty of confidentiality towards Chohfi Sociedade de Advogados, the commitment to confidentiality remaining valid even after the termination of the employment contract/association/provision of services or their commercial relationship with Chohfi Sociedade de Advogados, until that information becomes public by means other than the disclosure of the professional.

Confidential is that information that only a specific group of people can have access to, due to the need to maintain secrecy to protect strategic information of Chohfi Sociedade de Advogados and whose disclosure may frustrate its objectives or jeopardize the security and/or image of Chohfi Sociedade de Advogados.

Breach of confidentiality or improper use of confidential information is unacceptable. It is prohibited to use information about activities, matters of Chohfi Sociedade de Advogados or of clients to favor oneself or third parties.

5.2 INFORMATION SECURITY

Our employees rely on electronic assets from Chohfi Sociedade de Advogados for the development of their routine professional activities. All information and documents must be stored in appropriate virtual environments and previously approved by Chohfi Sociedade de Advogados.

Files created, received or stored in electronic equipment and communication systems provided by Chohfi Sociedade de Advogados are considered the property of Chohfi Sociedade de Advogados.

In times of systematization and advanced information technology, it is imperative that deadlines, measures and other notes relevant to the work carried out by partners, associates or other collaborators are registered in the relevant system, avoiding omissions, communication problems or even non-execution of activities. The registration and security of information and internal communications is one of the pillars of our code of conduct.

PERMITTED CONDUCT

You can install software and programs that are necessary to carry out your work in the most efficient way, provided that they are previously authorized by the information technology sector that provides services to Chohfi Sociedade de Advogados and by your manager.

PROHIBITED CONDUCT

You are not authorized to save documents and information on personal internet or cloud services, or even on external devices (such as pen-drive and external HD). You cannot share your credentials, be they passwords, badges or login.

Such credentials generate information that needs to be faithful to the accesses of each professional. You cannot hide or destroy documents produced during your professional activity, even in a situation of dismissal, nor keep such documents in your possession, whether in physical or virtual form.

All the intellectual production of professionals, during their activities, are the property of Chohfi Sociedade de Advogados, unless otherwise agreed in writing. You are not authorized to install pirated or free software on the computer provided by Chohfi Sociedade de Advogados.

If you have any doubts about the program you intend to install on your computer, consult the Administrative Department, Manager and Information Technology before taking any action.

Chohfi Sociedade de Advogados monitors and can access, at any time, all records of access to the internet, e-mails and corporate cell phones, as well as information and files received or stored in the electronic equipment and communication systems of Chohfi Sociedade de Advogados.

The professional should not expect privacy in relation to any activities carried out on equipment belonging to Chohfi Sociedade de Advogados, even if of a personal nature.

6. WORK ENVIRONMENT

Our Office is committed to ensuring a quality environment for the practice of tasks:

- Promoting the rights and security of the entire community;
- Valuing the diverse identities and competences of professionals, recognizing the value of cooperation;
- Ensuring accountability for the attitudes and behaviors of each member of the community;
- Prohibiting all forms of discrimination, prejudice, bigotry, harassment and other potentially offensive conduct;
- Ensuring an environment that promotes inclusion in all dimensions;
- Ensuring a work environment that offers the best conditions for our professionals to be intellectually free, autonomous and aware of themselves and the world around them.

Chohfi Sociedade de Advogados prioritizes the safety and well-being of its professionals, both physically and psycho-emotional. We believe that a professional will only be able to fully develop his skills and competencies in an environment where he feels welcomed and safe. All members of Chohfi Sociedade de Advogados are subject to these terms. They are applicable within the spaces of Chohfi Sociedade de Advogados, in the surroundings or in any activity related to the Firm, regardless of where it takes place.

It is important to remember that with the wide access to technology, many of the dangers and risks also occur through the virtual environment. Therefore, all rules of conduct applicable to the work environment must also apply to manifestations carried out via the internet, social networks and other forms of virtual communication, such as instant messaging applications.

Complying with this Code, other applicable internal policies, the legislation in force in the country and the set of rules of conduct of the Brazilian Bar Association, allows for the balance between individual and collective rights and duties that permeate social life from early childhood.

Therefore, it is essential that all professionals know these terms and sign the Term of Commitment and Receipt of the Chohfi Sociedade de Advogados Code of Conduct, declaring their knowledge and agreement.

Ensuring the application of this Code is a commitment of all members of the community and, above all, the responsibility of the Management of Chohfi Sociedade de Advogados.

This chapter does not intend to exhaust the issues that involve the day-to-day activities of Chohfi Sociedade de Advogados, so that specific rules may be contained in the respective internal regulations and other internal policies of Chohfi Sociedade de Advogados. If you have any doubts or comments about the application of these rules, do not hesitate to contact Management and/or the Administrative Department.

6.1 DISCRIMINATION AND PREJUDICE

The work environment is home to professionals of different ages, levels of psychomotor development, gender, sexuality, race, social conditions and those with special needs. Differences

are part of human nature, but the way we deal with them is socially constructed. Therefore, it is the duty of Chohfi Sociedade de Advogados to provide spaces that broaden the discussion on the subject, its different types, origins and consequences.

In addition to expanding the discussion, professionals have an obligation to conduct their activities at Chohfi Sociedade de Advogados in a way that respects differences and includes all members of the community, without exception. In the workplace, prejudice and discrimination can manifest themselves in different ways:

- Jokes, whether intentional or not, that convey a negative message or offend a group or individual;
- Verbal and physical aggression;
- Failure by the Board of Directors and managers to choose instruments, graphic materials for communication and decoration consistent with valuing diversity (racial, gender and cultures);
- Aggressive or prejudiced manifestations in the press, social networks or any other media;
- Political-partisan, religious, ethnocentric manifestations or manifestations that somehow exclude any type of individual identity and have any partisan or discriminatory nature on the part of our professionals, in any environment at Chohfi Sociedade de Advogados, whether inside or in its physical surroundings or at events promoted by them.

Prejudice and discrimination, in addition to hurting the principles of Human Rights, are attacks on the Right to Equality, a fundamental right of the individual. We do not tolerate any kind of prejudice and discrimination.

6.2 HARASSMENT AND BULLYING

Bullying is an English term (bully = "bully") that refers to all forms of violence, physical or psychological, intentional and repetitive, exercised by one or more individuals, with the aim of intimidating or assaulting the victim, without that it has the capacity to defend itself, within an unequal relationship of strength or power.

Bullying can also be practiced through the internet and social media, when it is known as cyberbullying. Common cyberbullying actions are sending intrusive messages of intimacy or tampering with photos and personal data, with the aim of creating psychological and social embarrassment.

Did you know?

- The Statute for People with Disabilities (Law No. 13,146/2015) is designed to ensure and promote, under equal conditions, the exercise of fundamental rights and freedoms by people with disabilities. To this end, it considers a person with a disability to be someone who has some kind of long-term physical, mental, intellectual or sensory impairment that may hinder their full and effective participation in society, on an equal basis with other people.
- If you have any reason to believe that one of our community members (professionals, providers, customers) is suffering or being the protagonist of a situation of harassment, abuse or bullying, you should immediately contact your manager or the appropriate reporting channel, so that all measures within the reach of Chohfi Sociedade de Advogados can be taken.

6.3 RELATIONSHIPS AND CONDUCT IN THE WORKPLACE

We believe that all of our professionals, regardless of their position, have a significant influence on the other professionals in our firm. By taking on professional commitments and signing work/association contracts, professionals at Chohfi Sociedade de Advogados, regardless of the team in which they work, are committed to fostering human relationships in which solidarity, ethics, tolerance, respect and honesty.

When managers interact with other members of their team, they must know that they are in a position of trust and authority. This position must always be exercised with the aim of guiding the professional in their work and social life, and never for activities that go against the principles and rules of this Code, the rules of conduct of Chohfi Sociedade de Advogados, Brazilian legislation and the Code of Ethics of the Brazilian Bar Association.

It is the fundamental duty of every professional at Chohfi Sociedade de Advogados to respect the social codes and moral expectations of the community in which he is inserted.

Efforts or attempts by either party to initiate sexual relationships, inside or outside the premises of Chohfi Sociedade de Advogados, are also prohibited. Jokes, comments or suggestive phrases of a sexual nature that may, in any way, embarrass or create an uncomfortable situation for any professional at Chohfi Sociedade de Advogados are also prohibited.

The professional must always carry out his work in accordance with the rules of this Code, known and accepted at the time of formalizing his contract. Remember: violations of the rules of this Code by a professional are strong grounds for terminating your contractual relationship with Chohfi Sociedade de Advogados.

6.4 PRESERVATION OF ASSETS, RESOURCES AND INFORMATION OF THE COMPANY AND EMPLOYEES

The facilities of Chohfi Sociedade de Advogados must be maintained by all those who visit them. It is extremely important that all professionals develop a sense of citizenship, respecting and conserving the corporate heritage.

Just like physical assets, Chohfi Sociedade de Advogados' documents and information must be preserved with care and disclosed only to the extent authorized by Management.

Likewise, all our professionals, regardless of the position held, must maintain the confidentiality of our clients' information, including procedural documents, judicial or administrative proceedings, surveys, projects, data, reports, financial information and other elements to which they have access, during the exercise of their activities at Chohfi Sociedade de Advogados.

Data and information relating to our employees, whether personal or professional, must be kept confidential and their disclosure must occur in strict compliance with Brazilian legislation regarding the protection of personal data and privacy – Law n. 13,709/2018.

6.5 PHYSICAL SAFETY OF PROFESSIONALS

Chohfi Sociedade de Advogados has a strong role in ensuring the physical safety of our professionals.

It is the responsibility of all community members to identify and report to Management any facility or building condition that may pose a potential risk to professionals.

6.6 OTHER CONDUCT

Chohfi Sociedade de Advogados is concerned with the health and well-being of its professionals and adopts a position in relation to tobacco, alcoholic beverages, drugs and all types of narcotics in the work environment that is in full compliance with the legislation applicable.

The possession, use and/or distribution of alcohol and drugs within Chohfi Sociedade de Advogados' premises, its surroundings and in any other environment that may be considered an extension of the work environment, such as sponsored or developed external activities, is prohibited. by Chohfi Sociedade de Advogados.

This way:

PERMITTED CONDUCT

It is the responsibility of community members, when witnessing the use/consumption of alcohol, tobacco or illicit drugs by any professional within the premises of Chohfi Sociedade de Advogados, in the surroundings, or in external activities sponsored or developed by the office, to report immediately to the Management.

PROHIBITED CONDUCT

The use of cigarettes, drinks and other legal substances by professionals is prohibited, inside or around the premises of Chohfi Sociedade de Advogados or in external activities sponsored or developed by the firm.

The carrying, consumption, sale and apology of tobacco, alcoholic beverages and toxic substances on the premises of Chohfi Sociedade de Advogados and its surroundings, as provided for by law, is prohibited. It is not allowed to enter or remain on the premises of Chohfi Sociedade de Advogados or in related external activities after having ingested alcoholic beverages, drugs or other narcotics.

If necessary, the Management and the entire team of professionals are open and prepared to discuss, assist and advise on issues related to alcohol and drug addiction.

No member of the community is allowed to keep or carry any type of weapon on the premises of Chohfi Sociedade de Advogados or in external activities related to the office. Service providers who use weapons as a work tool must be properly identified, trained and authorized.

If you become aware of the size or witness any person with a weapon inside the office or its surroundings, immediately report it to the Management and/or the Administrative Department, so that the necessary measures can be adopted.

ANNEX 1 - TERM OF RECEIPT AND ACKNOWLEDGMENT

TERM OF RECEIPT AND AWARENESS

I, _____, bearer of identity card RG nº _____, enrolled in the CPF under nº _____, enrolled in the OAB/____ under nº _____, I DECLARE that I have received and become aware of the Code of Conduct of Chohfi Sociedade de Advogados – OAB/SP 12765, committing myself to observe all the rules contained therein.

Campinas/SP, _____ of _____ of 20____.

(professional signature)