

# Code of Ethics and Conduct



# MESSAGE

The Brazilian Constitution of 1988 established lawyers as indispensable to the administration of justice, ensuring them inviolability for their acts and manifestations in the exercise of their profession. The lawyer's mission is one of the most noble in any society, since his social function is to serve justice with loyalty and good faith. However, the exercise of this activity, although essential for the existence of a socially just Democratic State of Law, is subject to legal and ethical limits.

The practice of law, whether as a litigation or advisory practice, in light of all the guarantees guaranteed to lawyers to exercise their profession independently, carries in its essence a subjectivity that can facilitate the occurrence of misconduct. As a result, law firms are invariably considered by companies with effective integrity programs to be high integrity risk providers for acts of corruption, fraud and money laundering. Unfortunately, this perception of risk in relation to our activity is a reality highlighted daily by the news and by the dissemination of the jurisprudence of our legal system. Although we recognize the essentiality of all the rights and guarantees established by the Statute of the Brazilian Bar Association and its regulations for the exercise of our profession in an independent manner, we understand that it is necessary for us to make our formal manifestation on what are the principles and values that represent us and that should be followed by all the professionals of our firm and any third parties (suppliers, correspondents or business partners) that may come to represent us.

In the following pages, we present our Code of Ethics and Conduct, which introduces our Integrity Program and brings in a clear and detailed way how our relationships with clients, suppliers, correspondents, competitors, public agents, colleagues and business partners will be handled and what our expected conducts are.

Our commitment is to do the right thing, respecting the laws and acting with integrity, ethics and transparency in the exercise of our profession.

São Paulo, August 23, 2021

**Bruno Menezes Brazil**

Founding Partner of **BRUNO BRASIL ADVOGADOS**

# PURPOSE VISION VALUES

This Code of Ethics and Conduct applies to equity partners, service partners, associate lawyers and collaborators, as well as suppliers, correspondents and business partners.

## **PURPOSE**

To provide a service of excellence in the corporate and advisory legal area, with personalized service and strategic business vision, generating value for our clients and sharing results with our partners and society through affirmative social actions.

## **VISION**

To be a nationally active firm and a reference in the Bahia-São Paulo axis in corporate law and strategic consulting. To be an agent of social transformation.

## **VALUES**

- Ethics and integrity in conduct
- Customer focus and strategy
- Excellence in deliveries
- Respect in relationships
- Diversity and inclusion
- Simplicity and transparency
- Distribution of results
- Social Responsibility



# OUR RELATIONSHIPS

# SOCIETY, ENVIRONMENT AND GOVERNANCE

We are aware of our role in society as economic agents and of our social function as a company.

We comply with laws and contracts.

We respect the environment and are committed to reducing the environmental impact of our activities on nature.

We do not condone slave and child labor.

# PARTNERS AND COLLABORATORS

We are simple, transparent and respect diversity. We do not accept discrimination on the basis of race, color, sex, age, sexual orientation, religion, political beliefs, physical disability or any type of situation that could generate a differentiation in relation to the people with whom we relate.

We value quality of life and a healthy work environment. We are flexible in our working hours, but we are available and deliver results to our clients. We adopt clear rules for remuneration and distribution of fees and results.

# CUSTOMERS

We defend our clients' interests.

We do not share any customer information with third parties without your consent

We do not charge for unperformed or fictitious services.

We do not offer or pay commission or any kind of advantage to employees or directors of the client to obtain contracts or any other undue benefit.

We do not act in conflict of interest with other clients

We do not offer gifts or entertainment in disagreement with customer rules and regulations

# SUPPLIERS, CORRESPONDENTS AND BUSINESS PARTNERS

We are loyal and transparent with our suppliers, correspondents and business partners. We value their skills, pay them promptly and correctly, and do not tolerate unfulfilled or fictitious services. We prioritize the hiring of third parties that have Integrity Programs. We perform due diligence prior to the start of our relationships, classifying third parties into risk categories (high, medium or low). We monitor annually contracted third parties that have a high risk for corruption.

We do not hire suppliers, correspondents or business partners who have politically exposed persons (PEPs) or public officials as partners or administrators.

We believe in partnership as a tool for attracting and expanding business, but we do not pay any kind of advantage or commission to third parties with the aim of obtaining benefit or contract in an improper manner or to the detriment of the client.

# PUBLIC OFFICIAL S

We relate to public officials within the limits of the law and in a clear and transparent manner.

Interactions with public agents should preferably take place during business hours and at the headquarters of the public authority linked to it.

Whenever there are interactions with public officials in situations where they have decision-making power or may influence our interests or those of our clients, partners, employees or third parties should preferably be accompanied by at least one other person.

The partner, employee or third party shall report to the Integrity Committee meetings or strategic interactions held with public officials, indicating the day, time, place, duration, participants and topics addressed

# PUBLIC OFFICIAL S

It is forbidden to offer giveaways, presents or other gratuities

entertainment for public officials

It is forbidden to offer, promise or pay any type of undue advantage, whether economic or otherwise, to Public Officials to do or not to do anything as a result of their position in benefit of **BRUNO BRASIL ADVOGADOS**, clients or third parties acting on our behalf.

It is forbidden to hire, directly or indirectly, relatives up to the 3rd degree of public agents who may influence or decide issues related to the business of **BRUNO BRASIL ADVOGADOS** or its clients.

# COMPETITORS

We are loyal to our competitors.

We do not tarnish the image of our competitors before third parties with the aim of obtaining any kind of business or advantage.

We do not use or seek to obtain confidential information from our competitors.

We do not make arrangements with competitors to obtain improper advantages to the detriment of clients or the public administration. We do not approach adverse parties with incorporated counsel to enter into agreements without their consent.

We do not pass on information to third parties of our competitors.



OUR EXPECTED  
BEHAVIORS

# RESPECT AND EQUALITY IN THE WORKPLACE

We value a healthy and respectful work environment.

We do not tolerate any kind of sexual or moral harassment.

We do not tolerate any kind of discrimination or prejudice of any kind.

Inappropriate behavior that causes discomfort or humiliation to our partners, employees or third parties is unacceptable and must be punished.

Conduct that characterizes situations of this nature must be reported to the Integrity Committee through the Ethics Channel.

# PROHIBITION OF CORRUPTION, FRAUD OR MONEY LAUNDERING

We do not condone acts of corruption, fraud or money laundering in the performance of our business.

We have not engaged in any acts that are harmful to the public administration as set forth in Law 12,846/2013.

We do not issue fee receipts or invoices for fictitious or unperformed services.

# BIDDINGS AND ADMINISTRATIVE CONTRACTS

We participate in public bids cleanly and enter into contracts with the public administration by waiver or unenforceability, provided that all legal formalities and requirements for this type of contracting are met.

We do not rig bids or direct their subject matter. We do not seek to obtain confidential or secret government information that could improperly favor us in obtaining a public contract.

We do not offer, promise or pay undue advantages to obtain contracts with public authorities

We do not make prior agreements or arrangements with competitors that could harm the competitive nature of the bidding process.

# DONATIONS AND SPONSORSHI P

The Integrity Committee shall be responsible for deciding on donations or sponsorships, which shall always

shall take place transparently, lawfully, in writing and by bank transfer.

Every donation and sponsorship must be based on the premise of fulfilling our social function as wealth generators, preferably serving projects that develop people in situations of social vulnerability.

We do not make donations or sponsorships to political parties or for-profit entities. We do not make donations or sponsorships in exchange for obtaining any type of economic advantage for the Company or its partners.

# CONFLICTS OF INTERESTS

We avoid situations of conflict of interest between private parties and with the public administration. We handle potential conflicts of interest with fairness and transparency. Where conflicts of interest cannot be avoided, we must take steps to mitigate them.

A conflict of interest exists between private parties when the interest of a person who has the power to decide on any matter of interest to **BRUNO BRASIL ADVOGADOS** or its clients may not have the proper exemption to do so, generating a potential undue favoritism to **BRUNO BRASIL ADVOGADOS** or to third parties.

A conflict of interest with the public administration exists when a person who has the power to decide on any matter of interest to **BRUNO BRASIL ADVOGADOS** or its clients may not have the proper exemption to do so, generating a potential loss to the public power.

# CONFLICTS OF INTERESTS

Examples of **conflict of interest situations** are **interests** between private parties that should be avoided or mitigated, without prejudice to others:

- a) Disclosing or making use of privileged information, for one's own benefit or for the benefit of a third party, obtained as a result of the activities carried out in the Company;
- b) Performing an act in the interest of a legal entity in which he/she participates directly or indirectly through his/her spouse, partner or consanguineous or kin, in a direct or collateral line, up to the third degree;
- c) Receiving gifts, entertainment or presents in general in disagreement with the limits and conditions established in this Code of Ethics and Conduct;
- d) Rendering services, even if occasional or informal, to a Company that operates in the same segment as **BRUNO BRASIL ADVOGADOS;**

# CONFLICTS OF INTERESTS

e) Family relationships or romantic entanglements when there is direct subordination, i.e. immediate reporting line;

These are examples of **situations of conflicts of interest with the public administration** that should be avoided without prejudice to others:

a) Offering public or private agents any kind of gift, present, hospitality or entertainment (such as lunch, dinners and the like), in their own name or in the name of **BRUNO BRASIL ADVOGADOS**, to obtain an improper benefit or advantage.

b) Disclosure, use or exchange of confidential or privileged information with a public official;

c) Direct or indirect hiring of a former public officer who is still in a period of quarantine as a consultant, advisor or counselor;

# CONFLICTS OF INTERESTS

d) Hiring of relatives up to the 3rd degree or of companies whose managers are relatives up to the 3rd degree of public agents that may influence **BRUNO BRASIL ADVOGADOS'** business or your customers.

It is the obligation of everyone in a situation of conflict of interest to report this condition to the Integrity Committee.

# GIVEAWAYS AND GIFTS

We offer institutional gifts as a way to maintain a business relationship and promote our brand and our services.

We accept institutional gifts offered by third parties and customers as a way of maintaining a business relationship and institutional.

Institutional gifts, offered or accepted, are subject to the following limits:

- a) may not be for the purpose of obtaining any economic benefit or contract;
- b) must obey the rules of conduct of those who receive and offer;
- c) must bear the offerer's mark;
- d) may not exceed the limit of R\$ 300.00 (three hundred reais);

We do not offer or accept gifts from third parties, customers or anyone who may have influence over our business.

Under no circumstances may we offer gifts or presents to public officials.

Any failure to comply with these rules shall be disapproved in the Ethical Channel.

# MEALS AND ENTERTAINMENT

We can invite clients or partners for lunch or dinner to strengthen ties and discuss commercial matters, subject to the following limits:

- a) the value of the meal paid for the client or partner is reasonable, without exaggeration or extravagance;
- b) the standards of the customer or partner allow;
- c) does not aim to obtain from the client or partner any undue benefit for himself or for the Company;
- d) does not exceed the limit of R\$ 300.00 (three hundred reais) per person.

Under no circumstances may we provide entertainment for public officials.

Any violation of these rules must be disapproved in the Ethics Channel.

# ACCOUNTING BOOKS

We record our financial transactions and transparent and accurate manner, in accordance with the accounting standards in force.

We do not issue invoices without the respective service provision.

We do not receive payments in kind.

We do not charge for services not performed or in a different amount than the amount actually performed.

# PROFESSIONAL SECRECY AND CONFIDENTIALITY

Partners, employees and third parties have the duty to Keep secrecy and confidentiality of the data, documents and information that they come to know in the exercise of their professional activities.

Confidentiality and secrecy are presumed in relation to all communications and information exchanged with clients in the development of our legal activities, regardless of their nature.

Partners, employees and third parties have the duty to act in a careful and zealous manner, using all the measures necessary to maintain and observe secrecy and confidentiality. Situations in which information that should be kept confidential must be avoided.

# PROFESSIONAL SECRECY AND CONFIDENTIALITY

The duty to safeguard confidentiality and confidentiality will remain even after the partner, employee or third party has left the Company.

In the event of any breach or violation of the duty of confidentiality, the partner, employee or third party must inform immediately to the Integrity Committee for the necessary remedial measures to be adopted for risk mitigation.

Only in exceptional situations that constitute just cause, such as in cases of serious threat to the right to life and honor or that involve self-defense, may the partner, collaborator or third party break their duty of secrecy and confidentiality. It shall be incumbent upon the Integrity Committee to verify the occurrence of such situations that justify the breach of secrecy and confidentiality, always to the extent strictly necessary and sufficient for its exercise.

# USE OF COMPANY PROPERTY AND EQUIPMENT

It is the responsibility of the partner, employee or third party to properly use and maintain all property and equipment provided by the Company, using them exclusively for professional purposes, except if they do not hinder productivity and do not put at risk the security of the Company's information.

The assets and equipment of **BRUNO BRASIL ADVOGADOS** can be used by partners, collaborators to provide free legal services to people in social vulnerability.

We monitor the use of the Firm's property and equipment to ensure efficiency and safety in the work environment. We do not monitor the personal and intimate information of partners, employees or third parties who use the firm's property and equipment.

# USE OF COMPANY PROPERTY AND EQUIPMENT

It is forbidden to use any of the company's assets or equipment to access or disseminate offensive, pornographic, discriminatory content or that, in any other way, violates the morals, good customs or rules of this Code of Ethics and Conduct and other policies of the company.

In the event of termination of the contractual relationship of the partner, employee or third party with the Company, the goods and equipment under their responsibility that are not available in a shared cloud shall be returned to the Company.

# SECURITY AND DATA PROTECTION

We comply with all local and global laws regarding to personal data, notably the Brazilian General Data Protection Law - Federal Law No. 13,709/2018.

We do not process personal data unless there are legal grounds for doing so.

We take care that the use of personal data necessary for the exercise of our professional activity is always protected by the established standards.

We will only collect personal data for specified, explicit and legitimate purposes at the time of collection and will not process personal data that has subsequently become incompatible with those purposes.

# SECURITY AND DATA PROTECTION

We will not use personal data for the following purposes

other than those explained at the time of your request. Should the purpose of the use of the data change, the data subject shall be informed of the new purpose.

We will only keep personal data for as long as is necessary in accordance with the intended purpose.

We will appropriately dispose of personal data that is no longer required.

We will ensure that any personal data you provide is accurate, complete and, where possible, kept up to date.

# SECURITY AND DATA PROTECTION

We will ensure appropriate data security personal data, including protection against unauthorised or undue processing, and against accidental loss, destruction and damage, using appropriate technical and governance measures.

We will preserve the confidentiality of personal data, ensuring that they cannot be accessed by those who do not need to access them. We will not share personal data with third parties unless duly authorized, in accordance with the law or with the consent of the data subject.

If we find that any personal data to which we have access has been leaked, we will inform the data subject and take appropriate action.

# LEGAL ADVERTISING AND MARKETING

We use advertising strategies and legal marketing through communication tools (social networks, e-mail, participation in lives, events, publication of articles in books or journals or dissemination in specialized magazines, among others) in the dissemination of our services, within the limits established in the OAB's provisions on the matter.

We disclose our services, with discretion and sobriety, in order to avoid the commercialization of the profession.

We do not disclose information that could mislead or cause harm to clients, another lawyer or the firm

# LEGAL ADVERTISING AND MARKETING

We do not spread false information or promises of guarantees of results

We make no reference, direct or indirect, to fee amounts, form of payment, gratuity or discounts and price reductions as a means of attracting clients.

We do not advertise specialties for which we do not have a certified title or notorious expertise.

We do not use persuasive, self-aggrandizing or comparative phrases or expressions

We do not distribute gifts, business cards, printed or digital material, with presentations of our services indiscriminately in public places, in person or virtually, except in events of legal interest.



# OUR INTEGRITY PROGRAM

# INTEGRITY PROGRAM

The Integrity Program of BRUNO BRASIL ADVOGADOS is composed of a set of mechanisms that serve to prevent, detect and remedy ethical and conduct deviations eventually practiced by its internal or external public. Our Integrity Program is founded on the following pillars:

Top Management  
Commitment

Risk Analysis

Internal Controls

Policies and  
Procedures

Training and  
Communication

Guidance  
and  
Denouncem  
ent Channel

Internal  
Investigations and  
Remediation

Third Party *Due Diligence*

Monitoring

Transparency and Social  
Responsibility

Integrity Committee

# COMMITMENT FROM TOP MANAGEMENT



Equity and Service Partners commit, by example, to practice the conduct expected and disclosed in this Code of Ethics and Conduct.

No equity or service partners will be admitted to **BRUNO BRASIL ADVOGADOS** who have been convicted by final and unappealable judgment of crimes against the public administration, corruption, money laundering, criminal association or fraud.

# RISK ANALYSIS



The risks of the activities developed by the Company are mapped and classified as to impact and probability in high, medium or low, making up the map of risks of our business.

**BRUNO BRASIL ADVOGADOS'** risk matrix is updated annually and approved by the Integrity Committee.

# INTERNAL CONTROLS



We have developed and implemented internal controls for the Company's main process flows, particularly those related to risks that have been mapped with high impact and probability.

# POLICIES AND PROCEDURES

We establish our internal rules in writing and review them annually.

# TRAINING AND COMMUNICATION



We conduct annual training for internal and external audiences on this Code of Ethics and Conduct, as well as disseminate our Integrity Program through Communication actions.

# ADVICE AND REPORTING CHANNEL



We have an independent channel for guidance and denunciation that ensures confidentiality and anonymity to anyone who wishes to use it to seek guidance or denounce possible ethical deviations committed by the internal or external public of BRUNO BRASIL ADVOGADOS.

Bona fide whistleblowers are assured of non-retaliation.

Our ETHICAL CANAL can be accessed at the following link:

[www.contatoconfidencial.com.br/bbrasil](http://www.contatoconfidencial.com.br/bbrasil)

# INTERNAL INVESTIGATIONS AND REMEDIATION



We encourage and incentivize our partners, employees and third parties to cooperate with investigations and inspections carried out by public authorities.

Internally, we perform internal investigations to ascertain possible deviations of conduct and apply disciplinary measures to remedy them. If possible deviations of conduct related to corruption or fraud are identified, even before the conclusion of the investigation, the Integrity Committee will be triggered to adopt preventive measures, among them:

- a) the removal from activities of senior management members who may be involved.
- b) assess the need to communicate to the competent authorities the possible practice of misconduct, indicating the elements of investigation existing to date and the precautionary measures adopted for remediation.

# THIRD-PARTY DUE DILIGENCE



The Integrity Committee is responsible for conducting and supervising the prior analysis of the reputation of third parties (suppliers, correspondents or business partners) with whom we wish to engage, particularly with regard to mapping practices of harmful acts provided for in Law 12,846/2013 and other offenses related to corruption or fraud.

We do not have relationships with third parties that are involved in acts of corruption or fraud against the public administration, as well as those included in restrictive lists (CEIS (Registry of Disqualified and Suspended Companies), CEPIM (Registry of Impeded Private Non-Profit Entities), CNEP (Registry of Punished Companies) and CNCIA (Registry of those Convicted of Administrative Improbity and Ineligibility)).

# MONITORING



We monitor our Integrity Program periodically, based on metrics previously established by the Integrity Committee. The results are evaluated at the meetings of this Committee, which take place every six months.

# TRANSPARENCY AND SOCIAL RESPONSIBILITY

We are committed to our role in society as agents of social transformation. Accordingly, we publicly disclose: (i) our participation in public tenders and the contracts we enter into with the public administration; (ii) information on donations and sponsorships made.

We encourage the provision of legal services, free of charge (pro bono), to people in situation of social vulnerability.

# INTEGRITY COMMITTEE



The Integrity Committee is the Company's body responsible for managing, documenting and monitoring the Integrity Program of BRUNO BRASIL ADVOGADOS.

The Integrity Committee is composed of at least two equity or service partners.

The Integrity Committee is the body responsible for defining disciplinary measures due to non-compliance with this Code of Ethical Conduct, and the immediate manager of the offender is responsible for applying the penalty.

The Committee shall meet every six months or whenever necessary to deliberate on issues related to the Integrity Program.



ADDITIONAL  
INFORMATI

ON

# ETHICAL CHANNEL



Its purpose is to answer questions, clarify doubts and receive reports of possible misconduct related to our Code of Ethics and Conduct and other policies of the Integrity Program. Secrecy, confidentiality and anonymity are assured, if so desired, and it is possible to follow up on reports made without any identification. We guarantee non-retaliation to whistleblowers in good faith, even if the reported complaint has not been proven to be founded, after investigation.

Anyone can use the ETHICS CHANNEL to report a misconduct or make an inquiry.

Our ETHICAL CANAL can be accessed at the following link:

[www.contatoconfidencial.com.br/bbrasil](http://www.contatoconfidencial.com.br/bbrasil)

# DISCIPLINARY ACTION

Failure to comply with the provisions of this Code of Ethics and Conduct will result in disciplinary measures that will be applied according to the gravity of the conduct, the hierarchical level of the violator, the extent of the damage caused to the reputation and image of **BRUNO BRASIL ADVOGADOS** and the possible recurrence of the violation.

They may be:

- a) verbal warning;
- b) written warning;
- c) suspension;
- d) dismissal or termination of employment.

# DISCIPLINARY ACTION

Deviations of conduct related to corruption, fraud, money laundering or harmful acts related to Law 12.846/2013 are considered serious and must be punished with dismissal or contractual termination if confirmed.

Deviations related to sexual or moral harassment or other conduct related to inappropriate behavior may be considered serious or medium and may be punished with a written warning, suspension, dismissal or termination of employment.

In addition to the disciplinary measures defined above, the Integrity Committee may determine training and communication actions as a way to prevent new deviations from occurring.



# GLOSSARY

**Associated lawyers** - lawyers hired by **BRUNO BRASIL ADVOGADOS**

in an association regime, according to the regulations of the OAB.

**Public Agent** - Everyone who exercises, even if temporarily or without remuneration, by election, appointment, designation, contracting or any other form of binding investiture, mandate, office, job or function in the entities of the Direct, Indirect or Foundational Administration of any of the Powers of the Union, the States, the Federal District, the Municipalities, of a company incorporated to the public patrimony or of an entity for the creation or funding of which the Treasury has contributed or concurs with more than 50% of the assets or annual revenue.

**Moral harassment - Exposure of** a person to humiliating and embarrassing situations, in a repetitive and prolonged manner, in the performance of his/her duties, in the work environment.

**Sexual harassment** - occurs when a hierarchical superior embarrasses his/her subordinate by using his/her power due to the position held to obtain sexual advantage or favor. This embarrassment may occur through acts, insinuations, forced physical contact and impertinent invitations or by any means that implies the embarrassment of the victim.

**Company property and equipment** - All resources granted by the Company to its partners, employees or third parties for the performance of their duties, such as, but not limited to, a physical office, desk, meeting room, library, computers, electronic addresses (e-mail), mobile phones, physical file folders and/or digital folders stored in an electronic address (cloud) made available by the Company.

**Gifts** - Objects that aim to promote the institutional brand of **BRUNO BRASIL ADVOGADOS** and that do not have a value exceeding R\$ 300.00 (three hundred reais).

**Collaborators** - Employees of **BRUNO BRASIL ADVOGADOS** hired in a CLT regime and associated lawyers

**Integrity Committee** - Body composed of equity and service partners that is responsible for managing, documenting and monitoring the Integrity Program of **BRUNO BRASIL ADVOGADOS**

**Correspondents** - Law firms that report to **BRUNO BRASIL ADVOGADOS** when rendering services to **BRUNO BRASIL ADVOGADOS'** clients **Entertainment** - Meals, lunches or dinners

**Suppliers** - Individuals or legal entities that provide services or goods to Bruno Brasil Sociedade de Advogados.

**Privileged information** - Information with a confidential content or that relevant to the decision-making process within the public administration that has economic or financial repercussions and is not widely known to the public.

**Company information** - information considered proprietary due to its ownership as a legal entity of rights and interests, such as, for example, information of an accounting, financial, labor, commercial nature, etc., and all client information held by the Company, including information contained in physical files and/or stored in a cloud made available by the Company, whether or not shared with partners, employees or third parties.

**Members of senior management** - Equity or service members

**Business partners** - Individuals or legal entities doing business in association with Bruno Brasil Sociedade de Advogados

**Politically Exposed Persons (PEP)** - Politically exposed persons are considered to be public agents who perform or have performed, in the last five years, in Brazil or in foreign countries, territories and dependencies, relevant public positions, jobs or functions, as well as their representatives, family members and close associates.

**Gifts** - Any good that has a value over R\$ 300.00 (three hundred reais)

**External public** - Suppliers, correspondents or business partners **Internal public** - Equity partners, service partners, associate lawyers or collaborators

**Strategic meetings or interactions - Meetings** or gatherings held between partners, employees or third parties and public agents who have decision-making powers or may influence the interests of **BRUNO BRASIL ADVOGADOS** or its clients.

**Service partners** - Members of **BRUNO BRASIL ADVOGADOS** who hold service shares in the Company

**Equity partners** - Partners of **BRUNO BRASIL ADVOGADOS** who hold equity shares of the Company.

**Members** - Equity and service members

**Third parties** - Suppliers, correspondents or business partners **Social**

**vulnerability** -Socioeconomic situation of groups of people with few financial resources, housing, education and access to opportunities for their development as citizens.



ANNEX

**TERM OF COMMITMENT FOR ADHERENCE TO THE CODE OF ETHICS AND CONDUCT  
OF BRUNO BRASIL SOCIEDADE DE ADVOGADOS  
DEED OF UNDERTAKING**

I..... (full qualification),  
in the capacity of \_\_\_\_\_(partner, collaborator or third party) of  
**BRUNO BRASIL ADVOGADOS**, legal entity registered with the CNPJ No. 30.079.170/0001-74  
with address at Av. Brigadeiro Faria Lima, 4509, 8º andar, Itaim Bibi, São Paulo - SP, CEP 04538-  
133, I hereby **DECLARE** that I have read and understood the provisions contained in the **CODE  
OF ETHICS AND CONDUCT OF BRUNO BRASIL ADVOGADOS**, a copy of which was provided  
to me digitally, committing myself to fully comply with such provisions in the performance of my  
activities.

I also **DECLARE** that in case of doubt or knowledge of any violation of the provisions of the  
said **CODE OF ETHICS AND CONDUCT**, I will immediately inform the Integrity Committee of  
**BRUNO BRASIL ADVOGADOS** directly or through the available channels.

Place \_\_\_\_\_ Date: \_\_\_/\_\_\_/\_\_\_\_\_.

\_\_\_\_\_  
Signature of the declarant

# STRATEGIC VISION, CREATIVITY AND ETHICAL CONDUCT TO CREATE CUSTOMIZED SOLUTIONS FOR THE CLIENT

<b>Category</b>		<b>Document Code</b>	<b>Version</b>
Policies and Procedures		CEC	20210823
<b>Title</b>	<b>Disclosure</b>	<b>Expiry date</b>	<b>Next review</b>
Code of Ethics and Conduct	Internal and external public	23/08/2021	23/08/2022