



synergia
SOCIOAMBIENTAL

MEMBER OF
EPF

Synergia Consultoria
**Code
of Conduct**

Table of Contents

Message from Synergia and its shareholders 1

Synergia, its Purpose and Values 2

1. Respect to people 4

1.1 Supporting diversity and rejecting discrimination 5

1.2 Work relationship and Human Rights defense 6

1.3 Fighting against moral and sexual harassment 8

1.4 Use of common spaces and practice of coexistence 9

2. Preservation of health, safety and environment 10

2.1 Sustainability and environment 11

2.2 Health and occupational safety 12

2.3 Use of alcohol, drugs and gun license 13

3. Acting with integrity 14

3.1 Relationship with clients and third parties 15

3.2 Conflict of interests 16

3.3 Anticorruption policies 18

3.4 Relationship with public authorities 19

3.5 Accounting records and fight against money laundry 20

3.6 Gifts, presents and hospitality 21

3.7 Donations, social and environmental actuation and sponsorships 22

4. Protecting our assets and information 23

4.1 Data and information secrecy 24

4.2 Information security 25

4.3 Personal data protection 26

4.4 Productivity, use of social media and external communication 27

4.5 Use of the company assets and information 28

Reporting channel 29

Penalties 30

Synergia Consultoria Socioambiental Code of Conduct

Version 01 – October 2021

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Message from Synergia and its shareholders


This Code of Conduct is the consolidation of the principles, values and behaviors expected in our work routine. It is also the outcome of Synergia culture, starting from the conception of a fairer, more balanced and more inclusive world. We prepared it to have support and guidance regarding the relationship with all interested parties, including employees, suppliers, clients, addressed communities, government, shareholders, competitors, and the society in general.

In light of this, Synergia Consultoria Code of Conduct is integral part of our Compliance Program gathering, in a unique document the ethical, moral and integrity principles which guide the performance of our activities in order to strengthen and reinforce them. This document shall serve as guidance regarding the conduct to be adopted when doubts or occasional conflicts come up.

We ask everyone's cooperation to carefully read this Code because we believe in the commitment of both our employees and business partners and outsourced companies so we can continue promoting ethical behavior in the corporate environment, always according to the best practices of corporate governance.

Good Reading!





Synergia, its Purpose and Values

At Synergia , we have as purpose to support people, community and organizations growth which, in the face of social and environmental challenges, create unprecedented solutions contributing to the emergency of a fair, solidary, inclusive and prosperous society. In this regard, Synergia and its shareholders are committed to formally take decisions which take into consideration, at the short and long terms, in addition to their interests, the interests of the public it relates to, such as employees, communities, suppliers, clients, creditors and local and global environment, among others.

We have, as major values, courage to work internal and external changes, commitment to do everything the right way, respect to diversity, and ethics as guiding to our practices.

1.1 Supporting diversity and rejecting discrimination

We stand for the idea that a work environment composed of interaction between people of several origins, ages, races, looks, nationalities, religion convictions, sexual orientation, genders and philosophical or political thoughts may lead to better outcomes, making problems resolution presented to our clients even richer and more innovative. That is why our multidisciplinary team of employees is composed of different people with unique experiences. Everyone is going to have the same opportunity in our recruiting, admission, development, promotion, transference, and compensation processes.

We must adopt a conduct pattern based on the respect to diversity and individualities. We do not tolerate the use of discriminatory words and practices related to race, social class, regionality, nationality, culture, religion, gender, age, physical or mental impairment, sexual orientation, looks, diseases, political ideology, language prejudice, and any other form of discrimination, as well as any other expression which shall be used with humiliating purposes. We are committed to mitigate inequalities, adopting pro diversity policies which ensure the inclusion in all its ways.



1 General Principles of Conduct

Respect to people

1.2 Work relationships and Human Rights defense

We stand for the balance between work and personal life so our employees can have a better quality of life.

To all the people who work for Synergia, respectful, non-discriminatory, friendly, and fair treatment should be provided, regardless the position or duty they have. We strongly reject assault to Human Rights, and, because of that, we shall not accept, under no circumstance, the use of child labor, featured by activities performed by children and teenagers out of the criteria allowed by the legislation.

We support freedom of association and effective recognition of the right to collective bargaining.

It is absolutely forbidden to use forced, compulsory, degrading, or slavery-like work. Regarding working hours, we should commit ourselves to comply with and control it respecting the labor rules, duly recording employees' arriving and exiting hours, as well as break and meals. No extra time shall be done without the



immediate supervisor express authorization who shall only allow it in justified situations, without exceeding the working hours legal limit.

Synergia values should reflect the conduct of our employees in situations which enable the employer's identification, both in the internal and external environments (such as, during their participation on trainings or events, when using their uniform or car provided by the company), thus contributing to the recognition of our good corporate image.

Synergia respects the exercise of its employees' individual rights, but the company resources, spaces, and images cannot be used for political, religious, or commercial propaganda.

1.3 Fighting against moral and sexual harassment

People's well-being and satisfaction is a fundamental value to Synergia. More than a safe and free of risks physical environment, we should ensure psychological health of the people who work for the company. That is why we are responsible for the maintenance of a safe, free of intimidation atmosphere, adopting the highest ethical standards of behavior. We highlight that both moral and sexual harassment are inadmissible conducts to Synergia and should be reported through our Reporting Channel.

Moral harassment happens through hostile acts within the work environment, usually motivated by some type of discrimination, continually and repeatedly exposure of workers to humiliation, insults, screams, arbitrary treatment, excessive rigor on the compliance with duties stipulating unachievable goals, and other types of moral pressure and violence which may hit the self-esteem or human dignity, made by one person in any type of hierarchical position.

Sexual harassment may be identified when one person uses his/her position, duty, proximity in work relations, or hierarchical position to impose or embarrass someone else to carry out advantages or favors of sexual nature. It can also occur with undesirable sexual advance, particularly in a persistent or repetitive way.

It is not necessary that such behaviors occur explicitly, by means of blackmail or threats, as well as it is irrelevant that it occurs physical contact to be characterized. It is also included slight demonstration or insinuation made with the same purpose. Furthermore, sexual harassment is typified in the Criminal Code and even if the attitudes occur out of the work environment, they will not be tolerated.

When we are aware of incidents of such nature, we should immediately communicate them through the Reporting Channel of the company, so they are appropriately investigated and censored with the application of pertinent sanctions.

1.4 Use of common spaces and practice of coexistence

We expect the continuous adoption of an approach consistent with Synergia principles and the commitment with the maintenance of a cooperative, friendly, free of hostility work-place, so we can perform our work with excellence.

In work-places and spaces aimed to collective housing, we should cooperate by keeping the care, cleaning, and organization of the rooms, cafeterias, bathrooms, furniture, and facilities. It is also fundamental that we put ourselves in other people's shoes, respecting their privacy and their personal objects before we behave in a way that may affect coexistence.





2.1 Sustainability and environment

We continuously seek to provide the best services and technological innovations to supply social and environmental demands.

Our efforts should be used to avoid wastes and use of renewable materials, aiming the preservation of resources and power. Furthermore, we work according to the environmental standards and legislation, reducing our own impact, while we help our clients to achieve such purposes.

Our commitment with the social and environmental development is reflected by our respect to communities affected by our projects. We seek to strengthen our relationship with local citizens, in addition to commit ourselves to implement projects which aim the improvement of their well-being. We also encourage the continuous improvement of our business partners on their social and environmental performance.



Reduce



Reuse



Recycle



Refuse



Rethink

2

General Principles of Conduct

Preservation of health, safety, and environment

2.2 Health and occupational safety

Synergia devotes special attention to the care with its employees' health and safety. Thus, we must follow applicable legislation regarding health and labor safety, in addition to correctly using PPEs (Personal Protection Equipment) made available by the company.

We seek continuous improvement in our work conditions, thinking on solutions regarding factors which may affect our safety, physical integrity, and health. That is why it is important that we are committed to contribute to the effective implementation of environmental risks prevention, occupational health programs and to the legislation on safety.



2.3 Use of alcohol, drugs and gun license

It is strictly forbidden to use drug and alcohol during the performance of our professional activities both in internal and external environments, as well as to work under the effect of such substances. This impairs not only the health, but also the performance of duties, our image, and puts at risk other employees.

It is also forbidden to use or carry guns of any type inside our premises, except regarding professionals who have express authorization for that due to their duty.



3.1 Relationship with clients and third parties

It is fundamental to keep a healthy relationship between Synergia, clients and business partners. For that reason, every contract held on behalf of the company shall occur respecting objective and technical criteria, in a transparent and ethical way, moving away any type of advantage and unfair competition.

We encourage the recruitment of people and services from local communities contributing to their social and economic development and encourage our suppliers to adopt the same posture.

We should not do business with third parties who are not aligned with Synergia essential values.

In this way, contracts with companies which are linked to unethical, corrupt practices or which have been convicted of discrimination, use of forced work, involvement in acts of harassment, racism or other environmental or human rights assault shall be put away.

Synergia is committed to follow legal practices of free competition. Every information regarding the market and competitors, legitimate and necessary to the business, should be obtained through transparent and convenient practices, and their obtainment through illegal methods shall not be accepted.

3 General Principles of Conduct

Acting with integrity

3.2 Conflict of Interests

Conflict of interests occurs when our activities, interests, and private relationships may interfere in a negative way with our commitments before Synergia, causing damages or losses.

For that reason, relationships which generate conflict of interests –whether real or apparent–should be avoided because they may interfere with the exempt performance of activities. Synergia treats everyone with respect and impartiality, so that decisions occur exclusively through analysis of technical and transparent criteria, and any type of advantage or discrimination is forbidden.

Consequently, we should keep ourselves away from decisions taking which may have been influenced by personal interests which are conflicting with our duties.

On the same way, we should communicate occasional power of influence or kinship up to 3rd grade¹ of our employees with our business partners or public agents.



1. (*) father, mother, siblings, grandparents, grandchildren, uncles/aunts, nephews/nieces, cousins, son/daughter in law, godchildren, stepfather/stepmother, stepchildren, brother/sister in law.

Former public agents who are in quarantine established by law 12.813/2013 (also known as Conflict of Interest Act for Public Agents) shall not be contracted, and, after such quarantine, in order to hire them, the Human Management Department should be duly communicated so they can analyze potential risks.

Synergia Shareholders, Directors and Managers, for having powers of decision inside the company, should safeguard themselves in a reinforced way to avoid conflicting situations. It shall never be accepted that they use their hierarchical position to obtain personal benefits. In addition to that, they should periodically fill a questionnaire for verification of potential risks and conflicts in their relationships.

The employee who identifies any real, potential or apparent conflict of interest which may directly or indirectly involve him/her, should openly and transparently inform their leaders or the People Management department, so the issue is duly analyzed by the Compliance department and occasional alternatives are thought to minimize or eliminate the risk.

The same procedure should happen in the event it is established affective relationship between employees in any level of hierarchical subordination.

3.3 Anticorruption policies

We constantly seek the improvement of ethical standards and strong rejection of any corruption practice or sign, both public and private. Corruption may be characterized by attitudes such as promises, offers, deliveries, requests, obtainment of illegal advantages or pocketing up values with the purpose of gaining or granting undue advantages.

Synergia is aligned with the Anticorruption Law (Law 12.846/2013). We shall never incur bribery with public agents, political agents, or any member of bodies or companies which compose direct or indirect public administration framework, as well as private sector agents, with the purpose of compensation through undue benefits, promptness or greater flexibility.

On the same way, we shall never grant any type of special treatment with the scope of favoring analyses, obtainment of licenses, authorizations, or permissions from public agents.

It is important to highlight that every person who, even not being public agent, competes for the practice of an act of administrative improbity or benefits from it, shall be punished according to provisions of Law 8.429/92 (Administrative Impropriety Act) as far as it fits. Therefore, we are also responsible for not making public entities, which we relate with, to incur in such acts.

Similarly, we should apply the dispositions mentioned above – wherever it fits – on relationships with foreign entities and public agents in other countries where we operate.

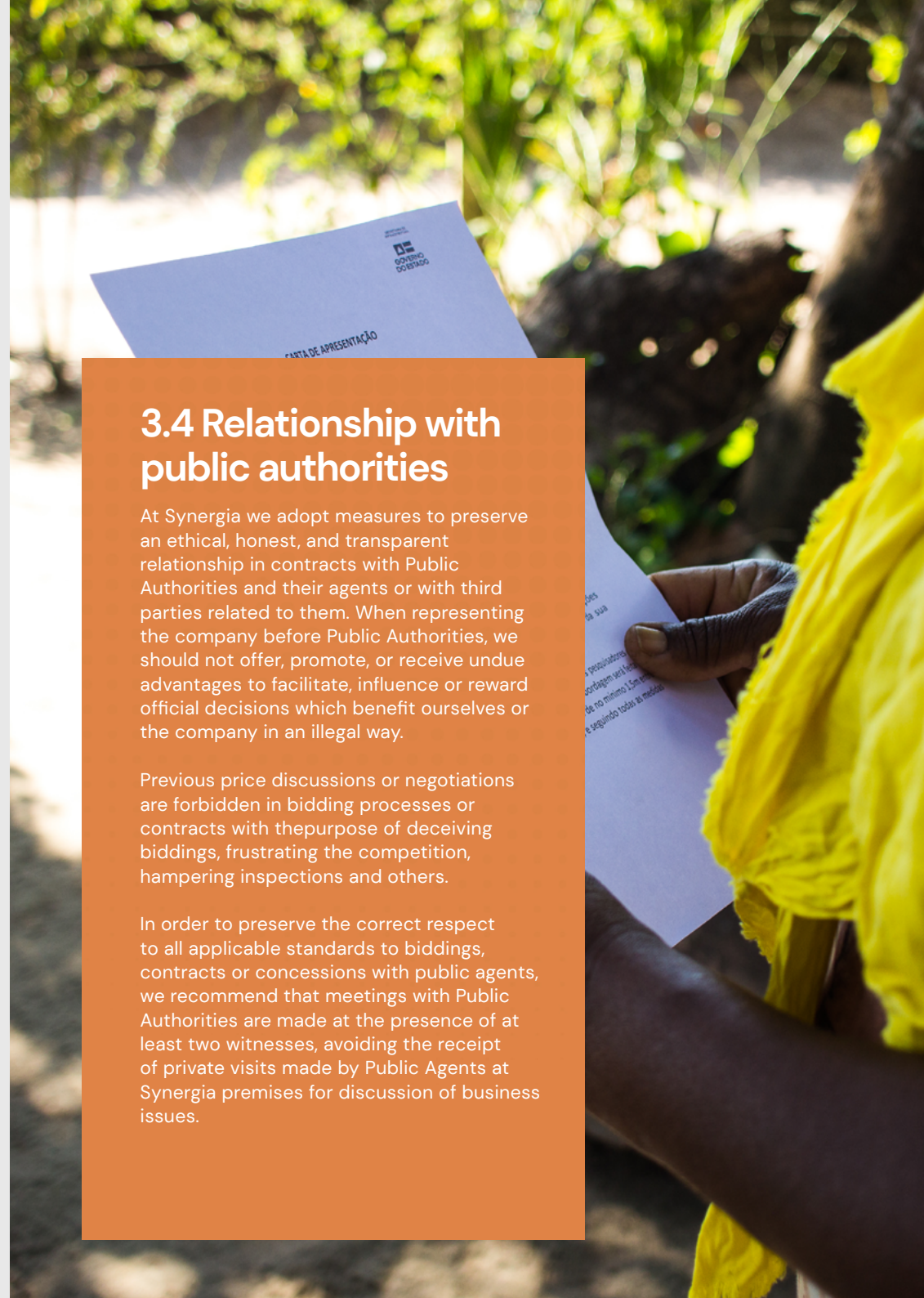
All such conducts shall suffer due penalties, including applicable lawsuits.

3.4 Relationship with public authorities

At Synergia we adopt measures to preserve an ethical, honest, and transparent relationship in contracts with Public Authorities and their agents or with third parties related to them. When representing the company before Public Authorities, we should not offer, promote, or receive undue advantages to facilitate, influence or reward official decisions which benefit ourselves or the company in an illegal way.

Previous price discussions or negotiations are forbidden in bidding processes or contracts with the purpose of deceiving bidders, frustrating the competition, hampering inspections and others.

In order to preserve the correct respect to all applicable standards to biddings, contracts or concessions with public agents, we recommend that meetings with Public Authorities are made at the presence of at least two witnesses, avoiding the receipt of private visits made by Public Agents at Synergia premises for discussion of business issues.



3.5 Accounting records and fight against money laundry

The maintenance of the organization, transparency and accuracy of accounting records help the preservation of the financial health of our company. For that reason, it is fundamental that all payments naturally arising from negotiations, such as acquisitions or services rates, are mandatorily recorded in a clear way and in compliance with the standards and regulations in force.

Omissions or camouflage of profits obtained from illegal activities which appear to have legal origin are characterized as money laundry and not only are unauthorized, but we should also be committed to monitor them in an effective way and suppress their possible occurrence.

Synergia tax obligations should be always updated, strictly following the national tax legislation. No illegal simulation aiming the reduction of tax burden shall be made and all taxes shall be correctly collected, with due records in the company books—so our financial statements are accurate and easily investigated.

False data or data in disagreement with the reality may never be inserted at Synergia books and records, regardless any motive. Internal control audits shall also be executed ensuring the authenticity of financial statements.

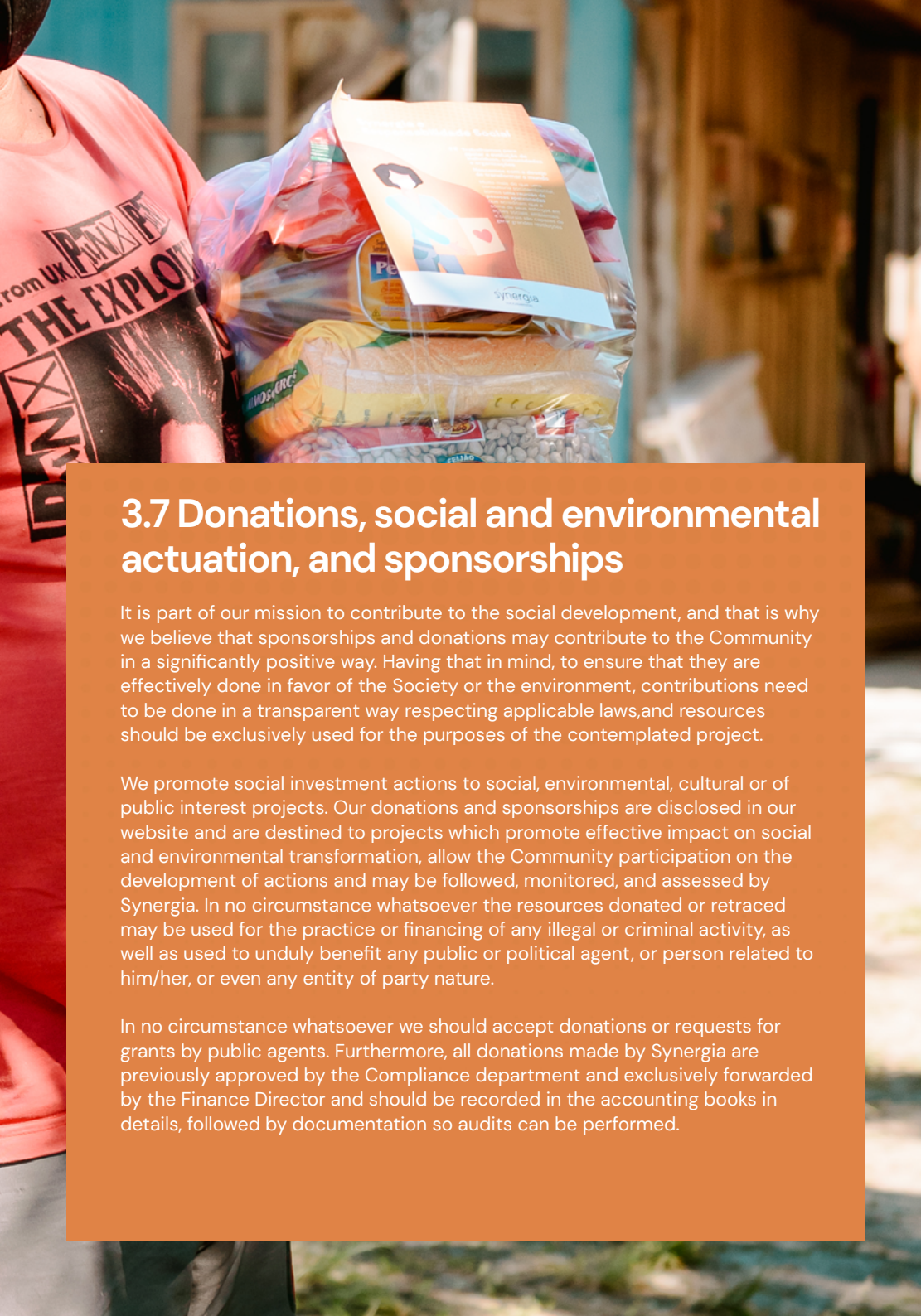
Not only our financial records, but also operational, projects, health and safety, resources and time records should always be faithful, accurate, complete, consistent and intelligible.

3.6 Gifts, presents, and hospitality

So we can perform our functional attributions at the best way possible and based on technical criteria, we should not employ our positions or duties in order to obtain personal advantages in the detriment of the company. For that reason, the receipt of gifts, hospitality, entertainment, courtesy or any present which have the purpose to influence business decision taking in exchange of such advantages is forbidden.

It shall only be allowed to accept or grant to third parties institutional presents, in other words, those made with the purpose of expanding brand disclosure.

In the events of receipting gifts not required and which are not in compliance with this Code of Conduct or in situations which may generate doubts, we should inform the leadership or the People Management department, so the issue is duly analyzed by the Compliance department, and the best treatment of the event is driven.



3.7 Donations, social and environmental actuation, and sponsorships

It is part of our mission to contribute to the social development, and that is why we believe that sponsorships and donations may contribute to the Community in a significantly positive way. Having that in mind, to ensure that they are effectively done in favor of the Society or the environment, contributions need to be done in a transparent way respecting applicable laws, and resources should be exclusively used for the purposes of the contemplated project.

We promote social investment actions to social, environmental, cultural or of public interest projects. Our donations and sponsorships are disclosed in our website and are destined to projects which promote effective impact on social and environmental transformation, allow the Community participation on the development of actions and may be followed, monitored, and assessed by Synergia. In no circumstance whatsoever the resources donated or retraced may be used for the practice or financing of any illegal or criminal activity, as well as used to unduly benefit any public or political agent, or person related to him/her, or even any entity of party nature.

In no circumstance whatsoever we should accept donations or requests for grants by public agents. Furthermore, all donations made by Synergia are previously approved by the Compliance department and exclusively forwarded by the Finance Director and should be recorded in the accounting books in details, followed by documentation so audits can be performed.



4 General Principles of Conduct Protecting our assets and information

4.1 Data and information secrecy

Every confidential information to which we have access due to Synergia operation is protected according to the legislation in force.

It may be understood as confidential any information which is not public, such as employees or third parties' personal or sensitive data, technical, administrative, operational, legal information, or information regarding business models, projects and their scopes, documents and negotiations made by Synergia clients, partners and suppliers, even if it is not classified as secret.

The referred information should be kept in absolute secrecy, and used only in compliance with the purposes to which it was obtained. In the event there is any doubt regarding the nature of the data to which we had access, we should

always act with full discretion, avoiding the disclosure and assuming secrecy –even if we had not obtained access to a given information by direct exercise of functional attributions.

We also have the duty to ensure the confidentiality when addressing restrict information to given employees. To ensure such protection, it is of our responsibility to take care of our access data, and it is forbidden to share passwords, tokens, or other methods of electronic keys.

4.2 Information security

Information stored in our equipment and systems may be monitored regardless prior notice to the employee responsible for it. In order to protect Synergia intellectual collection, we should pay attention to practices such as:

- Caution when clicking incorporated links, always preferring to directly access special websites in order to avoid phishing attacks².
- Not downloading copies of media, software, plugins, or extension not authorized, preserving data security.
- Not using internet to visit websites not related to the activities performed and in no circumstance access or transmit content of vulgar or pornographic nature through the resources provided by the company.
- Backup data, projects, and intellectual information according to security standards required.
- Not sharing passwords and always operating a connection protected against risks.



2. Fraudulent actions characterized by attempts of illegally acquiring other people's passwords, financial data, bank information, credit card number or personal data.

4.3 Personal data protection

When addressing personal data and sensitive personal data, Synergia complies with the General Data Protection Law (LGPD) regarding collection, storage, use, retention, transference, and exclusion of such data. In addition to that, we adopt technical measures to protect data against violations.

If personal data are shared between Synergia and our business partners, we also formalize with them our commitment to comply with the legislation requirements regarding privacy and data protection.

Therefore, we can respect the rights of those people who share their personal data with us, whether they are employees, served communities, relationship public, or people who are related to our business partners.



4.4 Productivity, use of social media, and external communication

We need to respect Synergia ethical precepts when we access social medias, virtual communities, or other digital medias, responsibly using such means at our disposal, with full priority to the performance of functional attributions. When expressing themselves in social medias, our employees may only speak in their own behalf, never on behalf of the company.

We cannot disclose images or videos of our internal or external facilities, nor information on our clients or other employees in any social media or communication

channel, except when previously authorized by our company for the achievement of its specific purposes.

Only spokespeople formally authorized may speak on behalf of Synergia to press bodies such as journals, magazines, websites, blogs, and other communication vehicles requiring an official positioning of the company.

4.5 Use of the company assets and information

(tangible and intangible assets)

For the performance of Synergia activities, we have daily contact with assets and information which belong to the company and should be used only for the purposes to which they are made available.

We are responsible for the protection against inappropriate use, wear, damages, theft, undue appropriation, or other ways of violation of resources granted. Our physical assets may only be occasionally disposed of, sold, borrowed, or donated by the responsible area (Procurement) which, in this regard, shall strictly act in accordance with respective procedure.

It is part of Synergia operations and shall not be used in personal benefit, both its tangible and intangible assets:

- Tangible assets: facilities, vehicles, equipment, furniture, printed and digital technical collection, financial resources.
- Intangible assets: documents, data, methodologies, know-how, projects, business strategies and other type of intellectual collection.



Reporting Channel

or the development of an ethical environment, the commitment of everyone who relates to Synergia is fundamental. Therefore, it is important that we are strongly committed with the Compliance Program, contributing to the realization of the guidelines presented in this Code of Conduct.

We made available to everyone an external and independent Reporting Channel open to receive accusations on violations, non-compliance with the legislation in force, precepts contained on Synergia Code of Conduct or its policies. Furthermore, the Channel may be used for clarification of doubts in the event an ethical dilemma occurs.

Accusations may be reported 24 hours per day, 7 days a week, as follows:



Call answer by analysts, through phone number 0800 746 46 49 (call free of charges), from 9am to 5pm –Monday to Friday (Brasilia time zone), except holidays.



Through message recording made by free of charges call to phone number 0800746 4649, on other periods of time.



Through the website www.contatoconfidencial.com.br/synergia

The Reporting Channel may also be accessed by Synergia website (www.synergiaconsultoria.com.br) and through the company intranet.

The use of the Reporting Channel may also be made anonymously, ensuring the safety, confidentiality and preservations of all information recorded. Though, false notification of violations may also generate disciplinary or legal consequences to complainants who act in bad faith.

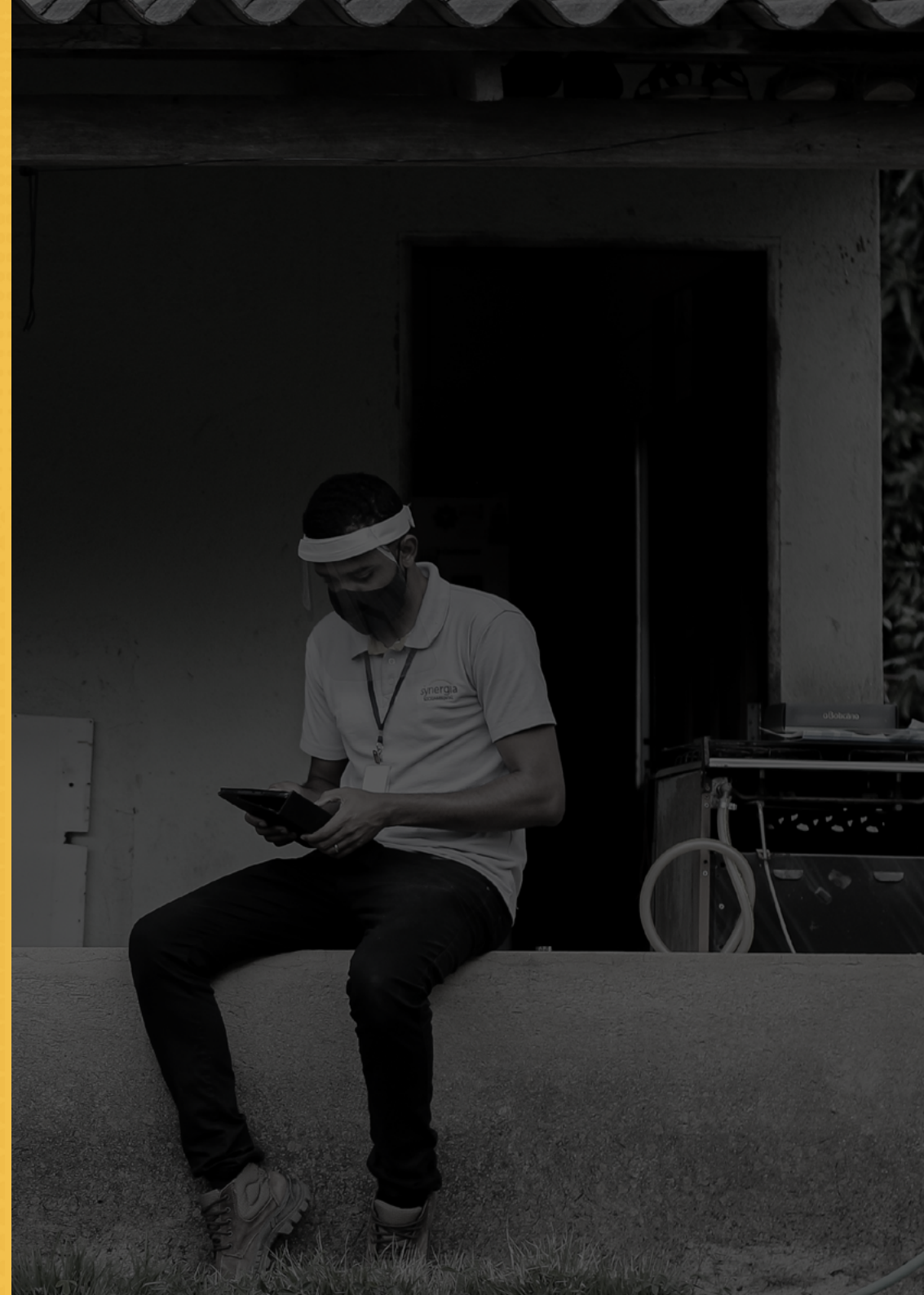
We highlight that **retaliations or reprisals against any employee who communicate any possible violation shall not be accepted.**

Penalties

Behaviors which violate the regulations expressed in this Code may lead to disciplinary measures, such as notices—both oral and in writing—suspension or even fair dismissal, depending on factors such as infringement seriousness and damage magnitude, and shall be applied after deliberation of Synergia Ethics Committee. Depending on the violation, such acts shall also be communicated to competent legal authorities.

In events of call by the Ethics Committee for presentation of information in diligences and investigations on violations of the precepts of this Code of Conduct, every effort is necessary to cooperate in the widest way possible—particularly in events which involve occasional investigations and inspections by public bodies, entities and agents—so the irregularities are resolved, and penalties are duly applied.

In order to prove that our guidelines are being respected, Synergia may convene internal audits at any time.



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Code of Conduct developed by PROETHIC