

## **CODE OF ETHICS, INTEGRITY AND GOVERNANCE OF FERRAZ DE SAMPAIO SOCIEDADE DE ADVOGADOS**

### **PREAMBLE**

Ferraz de Sampaio Sociedade de Advogados, hereinafter referred to as FSSA or Firm, has acted with the aim of serving its clients with efficiency, providing personalized and innovative services in the various areas of law, always ethically and with integrity.

For this purpose and in compliance with the most current corporate governance practices, FSSA implemented this Code of Ethics, Integrity and Governance, establishing a structure with the best resources in each area, based on an efficient and ethical performance towards clients, employees, partners, suppliers and other interested parties.

In operation since 1958, the Firm is proud to contribute to the success of clients in various sectors of the economy, thus feeling an integral part of the projects developed.

Service dedicated also to Individuals who form the Firm's clientele, has always been a concern of professionals, who carry out the activity ensuring the search for the best result.

In this sense, ethics and respect for the precepts of the Attorney's Statute are inescapable principles in the work of Ferraz de Sampaio Sociedade de Advogados.

### **1. APPLICABILITY OF THE ATTORNEY'S STATUTE (LAW Nº 8.906 OF 1994) AND THE CODE OF ETHICS AND DISCIPLINE OF BRAZILIAN BAR ASSOCIATION**



Ferraz de Sampaio Sociedade de Advogados, regularly registered with the Brazilian Bar Association, recognizes and applies the Attorney's Statute (Law nº 8.960 of 1994) as well as the Code of Ethics and Discipline of Brazilian Bar Association, applying this Code in a subsidiary and complementary way.

## **2. PEOPLE SUBJECT TO THE CODE**

This Code of Ethics, Integrity and Governance is applicable to the activities of all members of the Firm, as well as its interns, employees, correspondents and other professionally connected people.

## **3. VALUES AND PRINCIPLES**

The Firm establishes the following values and principles:

- I. Ethics and integrity;
- II. Confidentiality and privacy;
- III. Cordiality, respect and solidarity;
- IV. Professional decorum;
- V. Dignity of the Human Person;
- VI. Right of Defense and Social Justice;
- VII. Democratic Rule of Law;
- VIII. Honesty;
- IX. Legality;
- X. Non-discrimination.

## **4. MISSION**

The mission of Ferraz de Sampaio Sociedade de Advogados is to efficiently provide legal services to its clients, accompanying the waves of innovation, without losing focus on the intended results of each engagement.

The Firm also has the mission of cordial and respectful treatment with other law firms, legal professionals, authorities, public officials and third parties with whom it relates.

## **5. PROFESSIONAL CONDUCT**

FSSA is committed to Environmental, Social and Corporate Governance, following the best governance practices adaptable to its structure and size, guided by its principles.

## **6. CONFLICT OF INTERESTS**

FSSA values the non-existence of conflicts of interest and, if applicable, complies with the norms that govern the practice of law.

Any member subject to this Code, before admitting the sponsorship of any matter, must verify, internally, whether there will be a conflict of interest with causes or services already in execution.

## **7. EXCLUSIVITY**

FSSA professionals maintain an exclusive bond in the provision of legal services, and cannot exercise it, autonomously or through another Law Firm, even in a State where Ferraz de Sampaio Sociedade de Advogados is not registered. Furthermore, they cannot earn the respective fees as personal income or carry out professional practice for the benefit of anyone other than FSSA.

## **8. CONFIDENTIALITY**

All professional information obtained in connection with the practice of law is treated by all people subject to this code with absolute secrecy.

#### **9. PRO BONO PERFORMANCE**

FSSA can practice pro bono services, within the precise limits established by the Brazilian Bar Association.

#### **10. PRIVACY AND DATA PROTECTION**

FSSA has an unwavering commitment to the protection of personal data, assuming the commitment to respect the fundamentals, principles and other devices that regulate data protection, ensuring the privacy of the data subjects with whom it relates.

#### **11. SOCIAL MEDIA**

The only social media account that the Firm maintains, on the date this code was issued, is on LinkedIn, which can be accessed through the following link: <https://www.linkedin.com/company/ferraz-de-sampaio-advogados/mycompany/>.

Any other account on a social media, even that of a partner of the Firm, does not necessarily represent the position of Ferraz de Sampaio Sociedade de Advogados.

FFSA also recommends that all people subject to this code act, on social networks, in accordance with the principles contained herein, including observing the duties of civility and ethical, austere and sober conduct, not propagating, under any circumstances, hate speech or any forms of discrimination.

#### **12. RELATIONSHIP WITH CLIENTS, PARTNERS, SERVICE PROVIDERS, SUPPLIERS AND THIRD PARTIES**

In all external relations, FSSA's actions must be guided by the values and principles established in this Code.

### **13. RELATIONSHIP BETWEEN PARTNERS, ATTORNEYS, INTERNS AND EMPLOYEES**

The Firm values cordial and solidary professional treatment, regardless of the level of hierarchy and seniority involved in the relationship.

### **14. RELATIONSHIP WITH SOCIETY AND PUBLIC AUTHORITIES**

The Firm, committed to the development of Society and respect for the Public interest, values Social Justice and the formulation of Public Policies that defend the Fundamental Rights necessary for the Welfare State.

Ferraz de Sampaio Sociedade de Advogados will also contribute to the improvement of legal order and democratic system, understanding that these are the tools for building a free and fair society, based on solidarity, aiming at the elimination of poverty and misery, and combating discrimination of all kinds.

### **15. CORRUPTION AND FRAUD COMBAT**

All people bound by this Code must respect the relevant legislation on anti-corruption and anti-fraud, having the obligation to report any activity, even if it does not materialize, that violates the ethical principles of law, this Code and other applicable legislation.

Acting in defense of the interests of foreign clients, FSSA is also committed to complying with the anti-corruption rules of the respective States.

### **16. HARASSMENT AND DISCRIMINATION COMBAT**

FSSA will not tolerate the practice of harassment and discriminatory treatment, regardless of its nature, committing itself to establishing a preventive policy and, if applicable, a remedial one, seeking to support the victim, if it occurs.

### **17. PARTY-POLITICAL ASPECTS**

FSSA does not get involved in party-political activities, being committed to the Democratic Rule of Law and Social Justice. Any statement made by individuals subject to this code, even if on an individual basis outside of work, must respect this premise and will not represent the opinion of FSSA.

## **18. TERM OF COMMITMENT**

All partners, lawyers, interns and employees of Ferraz de Sampaio Sociedade de Advogados, on the date of publication of this Code, became aware of its content and signed a term of commitment, declaring, for due legal purposes, that they had received a copy of this Code of Ethics, Integrity and Governance, having read and understood its entirety, and committing to act in the respective work activities in accordance with this act.

## **19. AMENDMENT AND PERIODIC REVISION**

The Firm is entitled to change the Code at any time, and must make updated copies available to the people subject to this act, and publish the updated version on the website [www.ferrazdesampaio.com.br](http://www.ferrazdesampaio.com.br) on the “ESG” tab, under Corporate Governance.

The Firm undertakes to periodically review this Code, and may or may not amend it.

Any omissions in this Code will be discussed internally and resolved following the principles established herein, in addition to other constitutional and legal provisions.

## **20. VALIDITY**

Ferraz de Sampaio Sociedade de Advogados’s Code of Ethics, Integrity and Governance comes into effect on the date of its publication.

SÃO PAULO – SP, 12/04/2023