LIMA e FALCÃO
ADVOGADOS

CODE OF CONDUCT

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HISTORY

Founded in 1995 and based in Recife, Lima e Falcão Advogados is one of the most highly regarded law firms in Northeast Brazil. The excellence of its work has been recognized by national and international organizations and it has, among other awards, been accorded the highest commendation given by the prestigious law journal Chambers and Partners to a firm in Northeast Brazil.

With a tradition of providing litigation services and legal advice for clients, the firm has been a pioneer in the provision of full service, operating in all branches of law, always with a focus on the client's range of business interests, giving priority to the particular needs and expectations of each. At present the firm has a multidisciplinary team of more than 104 professionals specializing in various fields. In addition to lawyers, the team includes professionals with a background in economics, business administration, accountancy, architecture, and engineering.

The firm is constantly investing in Information Technology, Human Resources and valuing people, with a particular emphasis on ethical and moral principles in all its work.

As a law firm, Lima e Falcão stands at the vanguard of supporting Social Responsibility projects and environmental protection, through continuous and significant contributions to the State of Pernambuco.

INTRODUCTION

The present Code of Conduct has as its objective to establish the ethical principles and rules of conduct that must guide the internal and external relations between all people, private individuals, or legal entities, that provide services to Lima e Falcão Advogados or hire its services and team, regardless of their responsibilities and duties.

This Code will name “employees” all the ones referred to as: partners, associates, staff members, suppliers, collaborators, and consultants with whom the firm maintains institutional relations, commercial relations, or other relations of any kind.

It is of great importance to express that the rules presented in this Code of Conduct are in concordance with the Code of Ethics of the Brazilian Bar Association (OAB), which mandates the relations between employees (lawyers or interns), as it is shown in Article 65 of the Code of Ethics.

Also, the rules set in this document reflect the provisions of the Anticorruption Law (Lei Anticorrupção - Brazilian Law 12.846/2013), which apply to all employees, regardless of their academic education or the kind of relationship that they maintain with Lima e Falcão Advogados.

Lima e Falcão Advogados is an honorable company, committed to the principles of ethical behavior in business and in the relationship with employees and partners.

We understand that the principles presented in this Code must be put into practice by all the staff at the firm. So, it is expected that all employees engage in the commitments established in this document and demand their compliance, seeking to ensure that the provisions and rules presented here are effectively practiced.

The respect for this Code of Conduct, which all the employees give, reaffirms one of our most important objectives: to maintain and consolidate the reputation of Lima e Falcão Advogados.

MISSION

We have, as our main objective, to provide services of legal consulting and advising, in many areas of the Law, with quality, quickness, and responsibility.

VISION

To be the greatest and best law firm in Brazil, expanding our network of clients and partners, improving the quality of our human capital, and adopting innovative technology and communication tools.

VALUES

The bases for a great company are established through its values and principles. Therefore, we define, as principles to be observed and respected by all employees, honesty, truthfulness, urbanity, dignity, responsibility, loyalty, valorization of the human capital, and the formation of successors.

Lima e Falcão Advogados require compliance with the dispositions in the Anticorruption Law by all its employees, in their institutional and private relations, public or private. The following principles must also be specially observed: the preservation of public property, national or foreign; the principles of the public administration; and the international commitments taken on by Brazil, in conformity with Article 5 of the Brazilian Law 12.846/2013.

In this regard, Lima e Falcão Advogados rejects any form of corruption, direct or indirect, and establishes as an obligation to all its employees the duty to act with transparency in questions that affect their businesses and to set mechanisms of corporate governance and management to avoid unnecessary risks to the firm.

Also, Lima e Falcão Advogados explicitly rejects any practices that favor people in malicious ways and characterize situations of corruption or bribing, in the way that all employees must guarantee that situations like the ones aforementioned are not practiced under any circumstance, directly or indirectly.

RESPECT FOR LAWS

Compliance with and respect for the laws are key principles at Lima e Falcão Advogados. Therefore, all employees must be attentive to their observance of the rules and laws that apply to all their professional activities and duties, thus making any claim of lack of knowledge automatically not plausible or reasonable.

If there are any doubts or questions regarding what is presented on this topic, all employees must seek the Leaders at Lima e Falcão Advogados and/or the Compliance Officer at the firm.

Besides the Anticorruption Law (Lei Anticorrupção - Brazilian Law 12.846/2013) and the Code of Ethics of the Brazilian Bar Association (OAB), both previously mentioned, some other regulations which are to be respected by employees at Lima e Falcão Advogados can be found below-mentioned:

- Decree 8.420, from March 18th, 2015 - This decree implements Law 12.846/2013;
- Decree 5.452, from May 1st, 1943 (Consolidated Labor Laws - CLT);
- Model Convention for the fight against corrupt practices by civil servants in international commercial transactions (OCDE Model Convention) - Brazil was one of the signing members on November 30th, 2000;
- Inter-American Convention against Corruption (OEA Model Convention) - Brazil was one of the signing members on October 10th, 2002;
- UN Model Convention against Corruption - Brazil was one of the signing members on January 31st, 2006.

RELATIONSHIP WITH EMPLOYEES

Our professionals reflect our values and our culture along with our clients, thus consolidating our success. We encourage our employees to always seek more and more education since our human capital is our reference. The selection criterion used for admissions and promotions will be the observance and fulfillment of the basic requirements of each function or position, in conformity with the predetermined objectives.

Lima e Falcão Advogados expects from its employees, in the performance of their duties, the adequacy and compliance with the corporate procedures that have been established, as well as the same care and diligence that each person usually applies to their matters. This is to say, the firm expects honest and dignified conduct by all its employees, in conformity with the laws and ethical standards of our society.

Therefore, all partners, associates, staff members, suppliers, collaborators, and consultants must treat our clients, public and private entities, coworkers, authorities, and civil servants with respect, discretion, and independence, as well as claim equal treatment for themselves and coworkers, in conformity with Article 44 of the Code of Ethics of the Brazilian Bar Association (OAB).

At **Lima e Falcão Advogados** no one must be referred to as “Doctor”, “Mister” or “Madam”. From our perspective, the respectful behavior inside the firm is shown by the courtesy and dignity with which we treat our coworkers, and not by formal vocatives.

RELATIONSHIP WITH CLIENTS

It is safe to say that the reason for our existence is the satisfaction of our clients, ensuring the defense of their rights.

Therefore, it is a core principle of the business operation at Lima e Falcão Advogados: to serve our clients with an emphasis on quality, productivity, and innovation.

It is forbidden for any employee to represent, in a court of law or out of it, clients with opposite interests or objectives. At the time of the first contact with any client, the employee must consult the legal processes management system used at the firm, searching and analyzing the name of the involved parties, to identify any potential conflict of interests.

In addition to the aforementioned, every employee must:

- Serve our clients with quality and efficiency;
- Be always available, kind, and friendly with our clients;
- Listen carefully to clients' concerns;
- Answer with professionalism to any eventual complaints from clients, proposing a solution to be applied as fast as possible;
- Constantly update the client, in writing, with news about the legal process using clear and technical language;
- Expose, in writing, all the risks related to the clients' wishes and expectations;
- Obtain written authorization from the clients in every step of the case's solution.

RELATIONS WITH PUBLIC ENTITIES

For this Code, the following examples shall be considered public entities: people in the exercise of a public position, mandate or term, chosen through an election process, designation, appointment or any other type of job linkage to a Public Administration entity or agency.

Our employees must treat all public entities with decency, courtesy, and dignity. However, it is expressly prohibited for all employees to offer an improper advantage to public entities or to answer private requests made by public officials that are not expressly envisaged in the legal procedure to which the public officials have been submitted.

GIFTS, MEALS, AND PROMOTIONAL SAMPLES THAT ARE OFFERED OR RECEIVED

Naturally, building relationships with clients sometimes involves offering gifts, promotional samples, dinners, and lunches. However, the aforementioned offers must be received by their beneficiaries strictly as a courtesy, not characterizing an obtention of improper advantage.

In the relationship between employees and the private sector, it is important that any courtesy to be offered, such as the aforementioned, has a modest cost and is related to special and commemorative dates, such as New Year, Christmas, Saint John Holiday, etc.

In the relationship between employees and the public sector, offering any type of gift, meal, or promotional sample, in any scenario, is strictly forbidden.

In terms of employees receiving courtesies, the same rule must be applied: no employee is allowed to accept gifts, promotional samples, or meals that do not have a modest cost or, even if they do, that are destined to be given in order to receive an improper advantage.

Offering or receiving any courtesy must be a subject of previous discussion, and any situation must be previously informed to the Compliance Officer and the team leader

BRANDING

Lima e Falcão Advogados is a registered brand before the National Institute of Industrial Property. Therefore, its non-authorized use will constitute a violation of the firm's industrial property. That way, its use by employees must be strictly associated with institutional activities. Any different use must be previously authorized by the institutional communication department (limaefalcao@limaefalcao.com.br).

The brand **Lima e Falcão Advogados** is the visible face of the firm's reputation, built over its professional operation. That way, the brand communicates the following values: legality, promptness, quality, security, and transparency. The reproduction of the brand Lima e Falcão Advogados must be associated with the values aforementioned, in any use.

RESPONSIBILITIES

Lima e Falcão Advogados and all its employees exercise their activities with transparency, strictly complying with the laws and respecting human rights. In accordance with Article 3 of the Code of Ethics of the Brazilian Bar Association (OAB), the Law is a way to minimize the inequalities for finding fair solutions and provides instruments to ensure equality among all people.

Thus we exercise our activities by respecting the environment and developing social responsibility projects, providing support to the artistic and educational sectors in the State of Pernambuco.

1. OUR LEADERS' RESPONSIBILITIES

For this Code, the managers of each team or department shall be considered leaders. They, through dedicating time, presence, experience, and giving an example, have the obligation of contributing to the compliance of this Code of Conduct by all the employees.

The leaders must share this Code of Conduct with their employees, and raise awareness about the necessity of its compliance, thus avoiding any violation caused by lack of information.

The leaders play an essential role in the internal monitoring of this Code of Conduct and must be accessible to employees in order to settle doubts about any of the rules and provisions contained herein and keep themselves attentive to the firm's activity and its compliance with the guidelines.

2. SOCIAL RESPONSIBILITY

Lima e Falcão Advogados maintains social projects intending to reduce inequality and promote a more equal and fair society. The following items are some of the projects and actions supported by the firm:

- Happy Child Organisation, whose mission is to provide shelter and foster care to young mothers and their children, who frequently find themselves in situations of social vulnerability;
- Cultural projects that involve local groups, such as Criança Cidadã Orchestra, which welcomes young boys and girls from the neighborhood known as Coque; TXAIMUS Group; Contracantos Choir; Popular Orchestra of Bomba do Hemetério; Pernambuco Music Conservatory; among others;
- Donation of used computer equipment;
- Biannual campaigns for fundraising activities involving supplies and provisions, which are destined to be donated;
- Donation of law books to educational institutions;
- Support for the Academic Literary Magazine of the Recife Law School (FDR/UFPE);

The adoption of the piano area at the Music Creativity Center, a public entity that benefits 110 students and it's owned by the Education Secretariat of the State of Pernambuco. The project funds the purchase and

recovery of musical instruments, improvements of the facilities and furniture, expansion of the library's collection and electronic equipment, as well as the promotion of activities aimed at supporting the training and qualification of teachers and concerts that are held, also supporting the creation of an annual contest and an award ceremony.

3. ENVIRONMENTAL RESPONSIBILITY

Lima e Falcão Advogados stimulates conscious consumption by its employees, especially in situations involving professional activities that, generally, require the use of paper and, consequently, the production of discarded material. In that way, Lima e Falcão promotes:

- The implementation of a digitalizing procedure of physical documents, reducing the use of paper;
- Donation of paper to recycling;
- An internal policy of conscious use of electric power.

PERSONAL CONDUCT AND BEHAVIOR

Our human capital is our greatest resource. In this way, we invest in the personal and professional improvement of our partners and associates, sponsoring graduate programs, language courses, and extension courses. For that matter, it is fundamental that our employees:

- Have an inclusive and non-discriminatory attitude towards gender, sexual orientation, race, ethnicity, and people with special needs, who may be fellow employees, clients, or the public in general;
- Have an ethical attitude (practicing the principles of individual, social and professional ethics);
- Show professional commitment and wisdom;
- Are honest and reliable;
- Are responsible;
- Are cooperative;
- Show a good personal presentation;
- Respect professional confidentiality and discretion about any type of information, fact, or strategic operation that involves the firm, clients, or suppliers;
- Always find themselves interested in personal and professional improvement;
- Display technical knowledge: our professional must improve themself in the domaining of all functions and tasks, in order to become worthy of the client's trust and society's as a whole, through their intellectual attributes and personal integrity;
- Always work towards maintaining the firm's credibility and good image, avoiding any type of improper behavior when representing it.

INTERNAL COMMUNICATION

Environments with sound pollution, in addition to being unpleasant spaces, disturb the quality performance of all activities, reducing productivity levels.

We must avoid excessive noise by reducing the volume of telephone ringtones, trying to answer calls with gentle talk and a soft tone, using extension lines to speak with people on the same floor, and wearing headphones.

CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

All employees must protect confidential information obtained, accessed, or produced by Lima e Falcão Advogados and its clients, restricting the disclosure of such information to people authorized by team leaders.

All documents produced by employees at Lima e Falcão Advogados, in the development of their professional activities, constitute the intellectual property of the firm, and must not be reproduced, altered, transmitted, or distributed without previous authorization from the communication department (limaefalcao@limaefalcao.com.br).

PROTECTION OF PERSONAL DATA

The treatment given to private data belonging to employees and clients, by Lima e Falcão Advogados, follows the General Law of Data Protection (Lei Geral de Proteção de Dados - Brazilian Law 13.709/2018). Therefore, all private data is treated with compliance and monitoring of good faith and the principles established in Article 6 of the aforementioned law, which can be described as purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, accountability, and legal reporting.

USE AND CONSERVATION OF THE STRUCTURE OF LIMA E FALCÃO ADVOGADOS

Each and every employee is required to look after the conservation of the firm's assets, which include: facilities, equipment, furniture, values, and others.

Web browsing and telephone calls, as well as the use of emails, software, hardware, equipment, and other properties, must be restricted to the professional activities of our employees, in compliance with

the rules established in policies, regulations, and guidelines.

PROFESSIONAL IMAGE

A strong corporate image is the reflection of our services and performance, and also the reflection of our employees.

We value the image as a tool of communication, and each employee is a part of our corporate image. In that way, it is important that all employees are conscious of the impact that dressing appropriately and behaving correctly has on their professional image. Therefore, the choice of clothing must be directed toward valuing behavior and professional qualities. As we work in a formal environment, adopting a formal clothing style is essential.

FINANCIAL INTEGRITY

The integrity of financial records reflects our commitment to the government, employees, and partners. We ensure that our financial and accounting practices are always in compliance with the law, as well as transparent and ethical. These principles regulate our records and internal monitoring.

REPORTING CHANNEL

If any employee suspects or identifies that any rule in this Code of Conduct is being violated, it is their duty to inform such violation through our reporting channel. It is optional, however, for the employee, the act of identifying themself, which opens the possibility for anonymous reports.

Any potential report must be informed via email (ouvidoria.rh@limaefalcao.com.br), in person, or by telephone to the Compliance Officer.

GENERAL RULES

This Code of Conduct must be implemented for an indefinite period, and it is up to the Compliance Officer (Othon Bastos) to promote its dissemination, supervise its implementation, and look after its execution.

Specific areas of the firm may establish their own conduct policies and rules, which must be, necessarily, in accordance with the ones in this Code of Conduct, and must also be known by the employees of such areas.

No employee may claim unawareness or lack of knowledge of the rules and guidelines in this Code.

The non-compliance with the rules set in this Code of Conduct represents serious misconduct, which is susceptible to the application of penalties. Such penalties may vary from verbal orientation to the termination of internship contracts with interns and students, termination of service provision contracts with associate lawyers, exclusion of partners from the social contract, and termination of working contracts with employees hired under the CLT regulations.

APPENDIX

CONTRACT OF ADHESION TO THE CODE OF CONDUCT OF LIMA E FALCÃO ADVOGADOS

By this instrument, I declare that I have read the Code of Conduct of Lima e Falcão Advogados and that I find myself in accordance with all its rules, committing to looking after its execution in the performance of all my professional activities.

In that way, I sign this Contract of Adhesion to manifest, explicitly, my agreement to the content of this Code of Conduct, committing as of now to inform the Compliance Officer of any doubts, suspicions, or violations of the rules in this Code of Conduct.

Recife, _____ _____, 202____.

NAME:	
CPF:	
E-MAIL	
PHONE NUMBER:	
TYPE OF EMPLOYEE:	
DEPARTMENT OR AREA:	
SIGNATURE:	