Code of Conduct

-SER-EXEMPLUM Program



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For all Exemplum employees and business associates:

We are a civil society with a regulated profession in accordance with Decree-Law No. 9,295/46 and we base our professional conduct on the on the Code of Professional Ethics for Accountants (CEPC, Código de Ética Professional do Contador), approved by Resolution CFC 803/1996, which expresses that we must take care of our profession in order to guarantee integrity, respect and morality.

To maintain the fruits of our labor, we encourage all employees and business partners to read the Exemplum Code of Conduct.

Remember that the Code defines the commitments to be assumed by all employees and business partners, but it does not cover all situations that you may encounter.

The Code serves to:

DEFINE THE CORE VALUES

that guide the organizational behavior

SET FORTH PRINCIPLES AND COMMITMENTS

cwith our stakeholders

ESTABLISH EXPECTATIONS

for employees in their day-to-day decision-making and their relationships with other stakeholders

PROVIDE GUIDANCE

in case of questions or concerns, and list additional resources on different topics.

When in doubt about potential ethical violations, direct your questions to your immediate superior, Legal Department, or Compliance Committee.

Thank you for your commitment to implementing the company's policy and, in doing so, for practicing and defending the principles of ethical conduct set out in our Code.

We count on you to provide an environment of encouragement and compliance with the rules and principles set out in the Exemplum Code of Conduct.



Our reputation and credibility are our most important goods.

Our reputation and credibility are the most essential assets, both as individuals and as a company, and the ethical principles that guide our actions contribute to maintaining Exemplum's image as a solid and trustworthy organization in the eyes of all audiences with which we interact.

This Code of Conduct sets out the ethical principles and standards of conduct that guide our internal and external relationships as Employees, Managers, Board, and Exemplum partners.

Our presence across the country and our participation in different geographic and cultural regions require transparent standards of action.

The guidelines established in this Code apply to all employees and partners, and all the members of Exemplum must be aware of them, regardless of the professional activity undertaken and your responsibilities.

It is expected that all employees, managers, partners, and the Board of Directors know, understand, and adhere to the provisions of this Code of Conduct and Exemplum's policies. By doing so, we collectively preserve the name and image of Exemplum.

All employees and partners are required to sign the Acknowledgment and Commitment Term, located at the end of this Code. This term serves as a formal declaration of commitment to the content herein. Please submit the term to the Human Resources department, where it will be securely filed.





MISSION, VISION AND CORE VALUES EXEMPLUM

At Exemplum, we provide strategic knowledge and accounting tools to enhance business management, consistently striving for optimal outcomes.

In all our endeavors, we are guided by a human-centered, strategic, and forward-thinking approach. Our goal is to guide our clients and partners towards sustainable prosperity, including financial, social, and business success.

We share with you our Mission, Vision and Core Values:

MISSION

We are dedicated to cultivating a relationship of trust and partnership with our clients, placing a strong emphasis on the quality of accounting information. Our commitment extends to addressing tax, corporate, or management challenges.

VISION

We aspire to be a lasting reference in our field, placing a high value on our dedicated team and clients.

CORE VALUES

Focus on the client, permanent search for knowledge, quality in service provision, ethics and truth, remuneration of capital, and respect and appreciation of human beings.





The purpose of this Code is to consolidate the primary rules, values, and principles governing Exemplum's activities. These guidelines are binding for all employees and partners, requiring strict adherence. The Code also serves as a reference for reporting doubts, suggestions or complaints through internal communication channels.

Applicable to all Exemplum employees and partners, irrespective of hierarchical level, this Code is an integral aspect of our daily responsibilities. It is important to note that the Code should not be construed as an employment contract.

Ethical conduct is not optional; it is an obligation expected from every Exemplum employee and partner. While this Code serves as a primary reference for ethical behavior, it may not cover every situation one might encounter.

Therefore, careful evaluation is crucial. When in doubt, consider the following questions:



Is my intended action in line with the Code of Conduct or other Exemplum policies?

Do I believe I'm doing the right thing?

Will my action harm Exemplum?

Should I consult someone before acting?

How would my family react to my intended action?

Would there be any repercussions if my action was reported in the media?

What would I think of a competitor who acted similarly?

If uncertainties persist after answering these questions, refrain from the action and seek assistance. Lack of knowledge or uncertainty about the right course of action cannot justify a violation of this Code or Exemplum's policies. Similarly, orders from superiors do not excuse such violations.

4.1.RIGHTS AND DUTIES

No one, regardless of their hierarchical level, has the authority to compel you to act illegally or violate the provisions of this Code of Conduct.

If you have identified or witnessed any employee or partner, regardless of their hierarchical level, violating this Code and Anti-Corruption Law, you must report the incident to the Compliance Committee immediately. The Committee will investigate and determine the facts, evaluating the application of sanctions to be implemented in each case.

It is worth noting that any violation of this Code of Conduct will subject the offender to the sanctions provided in item "10. Sanctions" of this code.

Employees with management responsibilities must exemplify their commitment to complying with this Code of Conduct. They should foster an environment where subordinates feel comfortable expressing doubts and reporting violations.

Employees and partners are expected to perform their duties with an entrepreneurial and challenging spirit. They should be dedicated to actions that enhance internal communication, integration, and teamwork, eliminating situations that may result in errors or delays in service provision.

Employees and partners are responsible for upholding Exemplum's image in society. The performance of their duties should be guided in this regard.

Employees and partners must conduct themselves with honesty, loyalty, and integrity towards colleagues, Exemplum, and business partners, while respecting individual and functional differences.

Every employee or partner must ensure the proper allocation and efficient use of all facilities, assets, information technology infrastructure, telephony, and systems, among others. They should value the conservation, custody, and responsible use of these resources.

The merits of work should be recognized and praised as a means of valuing the performance of all employees. The expression of

innovative ideas should be actively encouraged among employees and partners.









Exemplum employees must treat everyone with respect and dignity. The work environment at Exemplum should be characterized by ethical, welcoming, and safe practices. All individuals, including co-workers, superiors, customers, public agents, third parties, or anyone interacting with Exemplum employees or partners due to their activities, must be treated equally.

We provide equal opportunities for all employees and job applicants, refraining from discrimination based on their race, religion, color, gender, physical disability, origin, marital status, age, sexual orientation, gender identity, or expression. This commitment includes providing access to training for professional development, promotion, salary adjustments, or other forms of compensation and recognition based on meritocracy.

We do not tolerate any form of prejudice, discrimination, or harassment. This includes situations constituting pressure, intimidation, hostility, embarrassment, or threats in relationships between employees, regardless of their hierarchical level. Individual assessments are based on common sense and balance, addressing concerns privately to avoid spreading opinions that could harm someone's image.

We respect the privacy of employees. Personal information is collected and processed in compliance with applicable legislation. Access to personal information is limited to individuals with a legal right to see it. Professionals handling personal information are regularly reminded of their responsibility to protect its confidentiality.

Exemplum prohibits any form of child labor, forced or compulsory labor, or labor under degrading conditions. This expectation extends to our partners and third parties engaged by us.

Employees have the freedom to associate with legitimately constituted class entities, and the effective right to collective labor negotiation is recognized.

Exemplum prohibits any contribution in value, goods, or services to campaigns or political causes on behalf of the company. While employees have the individual right to engage in civic matters and participate in political processes, such activities must occur outside working hours, and it should be clarified that political demonstrations are personal and not representative of Exemplum.

Employees are expected to work free from the influence of substances that may interfere with judgment or work safety.

- The use, possession, or sale of drugs or controlled substances is not permitted on Exemplum premises, transportation, or during business activities.
- The use or possession of alcohol on Exemplum's premises is prohibited, except for internal social events with prior authorization.

Exemplum will not tolerate any employees or partners' acts to obstruct possible assessments, investigations, or inquiries, or that induce individuals or public agents to have an incorrect or biased understanding of any information.

Employees, regardless of their hierarchical level, are prohibited from exceeding the limits of their authorization or competence in making decisions or signing documents on behalf of Exemplum.





Employees and partners must consistently address customers cordially and respectfully.

All customers must be treated fairly, with honesty and transparency. Contractual conditions must be strictly observed, and the offer of our services is based on technical criteria, emphasizing quality and safety. Exemplum employees and partners are prohibited from attempting to obtain undue advantages from contracts concluded with customers.

Employees and partners are committed to providing services to customers at a level of quality compatible with the standards established by Exemplum.

Any attitudes or actions that may impact customer satisfaction guarantees must be promptly reported to the immediate superior for appropriate resolution.

7-RELATIONSHIP with THIRD PARTIES



Exemplum employees and partners are required to adhere to ethical standards in all their interactions, including relationships with third parties. Third parties include suppliers, service providers, commercial partners, agents, dispatchers, and others who contribute to our activities.

Commercial relationships with third parties should be maintained only with those who adhere to values and rules outlined in this Code. Impartial and fair treatment must be extended to all third parties.

Exemplum must refrain from establishing commercial relationships with companies that do not share our ethical standards and demonstrably fail to comply with legislation.

Decisions regarding purchases or services contracts must be based on achieving the best cost/benefit ratio for Exemplum. The selection of third parties representing the company must adhere exclusively to objective criteria, whether technical, legal, or economic. Third parties engaged by Exemplum must be required to comply with the provisions outlined in this Code.

7.1 - RELATIONSHIPS with COMPETITORS

Exemplum employees and partners are required to adhere to the Accountant's Code of Professional Ethics (CEPC, Código de Ética Professional do Contador), as approved by Resolution CFC 803/1996. This code emphasizes the obligation to care for the accounting profession, ensuring integrity, respect, and morality.

Article 8 of the CEPC explicitly prohibits accounting professionals from offering or competing for professional services through the debasement of fees or engaging in unfair competition.

As an accounting company, Exemplum upholds the values of the profession and strives to foster harmony among professionals. The company is committed to valuing its class and strongly rejects any attempts to increase its client portfolio through the reduction of fees. Exemplum invests in technical capacity and its team, maintaining the quality and professionalism of the services it provides.

Exemplum strictly prohibits its employees and partners from acting as professional competitors, specifically serving as accountants both inside and outside Exemplum's premises with remuneration. Engagement in such competition will result in the termination of the relationship with Exemplum.

7.2 - RELATIONSHIP WITH PUBLIC POWER

Exemplum maintains a close relationship with Public Authorities to facilitate its activities. Due to this interaction, Exemplum employees and partners are obligated to adhere to rules prohibiting acts of corruption aimed at influencing procedures and decisions in favor of its customers.

It is crucial to note that not only the company but also employees and partners can face legal consequences for engaging in illegal acts. Brazil considers corruption, both by national and foreign public officials, a crime.

Exemplum adopts a zero-tolerance policy toward acts harmful to public administration, including corruption, as follows:

- Exemplum strictly prohibits contributions, donations, favors, gifts, travel payments, and other expenses to public agents that do not comply with the laws, rules set out in this Code, and other internal policies of Exemplum.
- Employees and partners, in their dealings with national or foreign public bodies, public companies, local authorities, and supervisory bodies, must act to uphold Exemplum's good name and reputation. This includes strict adherence to all legal norms

and rules outlined in this Code.

- Exemplum employees and partners involved in relationships with public bodies must be respectful and act with professionalism, especially in inspection or investigation procedures conducted by entities such as city halls, IBAMA, Federal Revenue, Ministry of Labor, among others. Their conduct should not interfere with the work of public agents, and they must ensure that such work is not hampered, impeded, or hindered.
- Exemplum will not make donations for political purposes.

7.3 - CONFLICT OF INTEREST

As Exemplum employees and partners, our primary obligation is to act in the best interests of the company and avoid situations that create a real or potential conflict of interest. A conflict arises when personal interests interfere with our ability to make correct and impartial decisions on behalf of Exemplum. Despite the best intentions, even the appearance of a conflict can be detrimental to the company.

Upon identifying any matter or situation with conflicting interests, the employee or partner must promptly disclose their potential conflict. Subsequently, he or she must recuse himself/herself from discussions and management related to the topic, and abstain from voting, if applicable. The conflicted employee or partner must not, under any circumstances, seek to exercise their influence concerning the matter in question, inside or outside the meeting, and may partially participate in the discussion to provide more information about the matter and the parties involved.

If the conflicted party fails to disclose their potential conflict, any person aware of the fact must report it. The conflicted individual is then obligated to follow the procedures mentioned above. Situations causing a conflict between personal interests and those of Exemplum, or raising doubts, must be brought to the

attention of Exemplum's Compliance Committee to be carefully evaluated.

While it is impossible to list all potential conflict situations, here are some examples:

- Exemplum employees and partners must not use the power of positions or privileged information to obtain facilities or favors for oneself or third parties.
- Exemplum employees and partners must use the company's equipment and materials only for Exemplum's interest and benefit, and not for personal or third parties' benefit.
- Employees and partners must take care that their personal investments or their interests, or those of their family members in companies do not negatively impact the hiring of Exemplum suppliers and service providers. Exemplum will hire the best supplier/service provider regardless of the interests of its employees, preventing personal interests from interfering in these contracts.

- Employees must avoid other jobs or parallel activities that harm performance or conflict with Exemplum's activities.
- Partners and collaborators must not use Exemplum's professional tools, such as WhatsApp, Skype, public agency websites, law update subscriptions, etc. for personal purposes.
- Exemplum strictly prohibits its employees and partners from acting as professional competitors, serving as accountants inside or outside Exemplum's premises with remuneration. Engaging in such competition will result in the termination of the relationship with Exemplum.
- Additionally, employees must not use their functions to seek professional placement with Exemplum clients, leveraging Exemplum's expertise for personal gain.



8.INFORMATION, DOCUMENTS and EQUIPMENT



8.1

EXEMPLUM INFORMATION AND DOCUMENTS

Preserving the confidentiality of all Exemplum information, including commercial, strategic, and financial information, is essential.

Employees and partners must refrain from disclosing Exemplum information to individuals outside the company, including family and friends.

Furthermore, this restriction extends even to other Exemplum employees or partners. Non-public information should not be shared outside the company.

Confidential and strategic information belonging to Exemplum must be kept confidential even after the termination of employment contracts.

Confidential information/documents include but are not limited to:

- Contracts entered into by Exemplum.
- Prices for services performed by Exemplum.
- Personal information of employees, including remuneration.
- Corporate operations involving Exemplum.

- New projects being prospected by Exemplum and any prepared proposals.
- Personal users and passwords.
- Exemplum costs and financial data.

8.2 USE OF EXEMPLUM COMPUTER EQUIPMENT

The use of electronic mail, internet and social media by Exemplum employees and partners must strictly adhere to company policy. All data stored on Exemplum computers, including emails sent or received through the internal network, is considered the property of the company.

The use of these systems must not compromise the performance of activities at Exemplum. This includes refraining from sending, receiving, or accessing explicit sexual content, information promoting hatred, violence, gambling, illegal drugs, the purchase and sale of weapons, or any illicit or inappropriate content.

The use of computers for playing electronic and entertainment games is strictly prohibited. Additionally, any practice of gambling, such as cards, snooker, lotteries, and bingo, with the intent of competition, financial gains, and/or betting is strictly prohibi-

ited. Discussions arising from disputes or competitions within the company will be considered serious misconduct.

Passwords for accessing systems and resources provided by the company are non-transferable and for personal use. Their disclosure is prohibited, as is the use of another employee's password, regardless of how it was obtained.

Exemplum employees and partners and their third parties must not use or install files or software not licensed by Exemplum or not approved by the responsible sector.

Computing equipment, programs, data, and information stored in computer systems must be adequately protected against damage, loss, theft, duplication, alteration or unauthorized access, in accordance with the Exemplum Information Security Policy.

Voicemail, electronic mail (email), and telephone systems are company-owned and are expected to be used primarily for work-related communications.

In addition to this Code of Conduct, Exemplum provides all its employees with specific internal procedures that regulate expectations in each process, based on the location in which the employee is providing services.





Exemplum recognizes its role in society and embraces economic and social responsibility. As a partner with the environment, the company's management is founded on transparency and ethics, with a strong commitment to environmental issues and the sustainability of the planet.

Concern for environmental sustainability is ingrained at all stages of the production process. It is the responsibility of every individual at Exemplum to comply with environmental legislation and actively contribute to preserving the environment through the rational and conscious use of natural resources.

The health and physical integrity of employees are paramount concerns at Exemplum. No emergency, work, or economic situation can justify exposing our employees and/or the environment to risks. Each employee is committed to contributing to the conservation and improvement of the environment, hygiene, safety, health, and well-being of people. Immediate reporting of situations arising from activities that may pose risks to employees or harm the environment is mandatory.

Exemplum considers ensuring the occupational health and safety of its employees an integral part of its business.



Failure to comply with any provision in this Code will result in internal sanctions for those responsible, determined by the nature and severity of the committed infraction.

All Exemplum employees and partners, without exception, involved in any violation of this Code, may face the following sanctions, applied based on the severity of the infraction:

Verbal or written warning;

- Suspension without pay;
- Termination of the employment relationship or contract with or without just cause;
- •Liability for material and moral damages.

Partners found in violation may face fines, contractual termination, and legal action, with the severity of the sanctions depending on the nature of the infraction.

For violations of any of the provisions stipulated in this Code related to the fight against corruption, individuals involved in corrupt acts may be held civilly liable, and sanctions applied in court can include:

- Loss of unlawfully acquired assets or values;
- Full compensation for damages;

Payment of civil fines;

Imprisonment ranging from 2 to 12 years.

11. COMPLIANCE COMMITTEE COMMUNICATION **REPORTING CHANNELS**

It is of utmost importance that all employees and partners are familiar with, disclose, and adhere to this Code for the effective performance of their activities.

Exemplum is keen on being informed about challenges and potential violations related to this Code within the work environment. Only through such information can Exemplum take necessary measures to address unwanted situations and prevent future violations.

To address this, Exemplum has instituted a Compliance Committee, composed of individuals appointed by Senior Management, with the following responsibilities:

- Promote, enforce, and apply ethical precepts in the activities of all employees.
- Treat all matters brought to their attention with the utmost confidentiality, safeguarding the interests and image of both Exemplum and the involved employees, except when judicial testimony is required.
- Evaluate and investigate the veracity of complaints, making timely decisions on all cases related to non-compliance with ethical precepts outlined in this Code of Conduct.

- Evaluate situations of non-compliance with the Code, as well as unforeseen situations, to determine appropriate sanctions in accordance with the provisions in item "10. Sanctions" of this Code.
- Recommend, in writing, measures to be taken in cases indicating conflicts of interest.
- Periodically review this Code, monitoring its effective application and compliance.
- Committee participants are also bound by the provisions of this Code of Conduct.

The operational procedures, responsibilities, and composition of the Compliance Committee are outlined in its Internal Regulations.

11.1 - REPORTING CHANNELS

In the pursuit of enhancing processes and proactively addressing risk events, Exemplum inaugurated its Reporting Channel in March 2023, operated by an external and independent professional.

The primary goal of engaging an external channel is to ensure absolute confidentiality, protect the whistleblower's anonymity, and preserve information for a fair investigation. Complaints are treated with complete confidentiality and impartiality.

The Reporting Channel operates 24 hours a day, seven days a week, in compliance with the General Data Protection Law (LGPD, Lei Geral de Proteção de Dados). It serves as the conduit through which employees, partners, and all those associated with Exemplum can communicate—either identified or anonymously—about practices deemed illegal, such as embezzlement of funds or moral harassment. This underscores Exemplum's strategic commitment to combating irregularities.



The Reporting Channel operates without interruption, and the identification of any conduct contrary to the provisions of this Code of Conduct may be reported via email:

canaldeetica@exemplum.com.br

Exemplum places high value on fostering an environment of open and transparent communication. Retaliation or reprimands for making good-faith reports of potential violations of this Code of Conduct or any internal policies will not be tolerated. Conversely, presenting false accusations or providing untrue information with the intent to harm others is considered a violation of this Code.

In cases where an Exemplum employee or partner feels that their query/complaint has not received due attention or follow-up, the Exemplum Compliance Committee is always available to provide necessary clarifications.

Complaints may be made anonymously at the discretion of the complainant and will be investigated by a professional external to Exemplum.





This Code aims not to encompass every conceivable situation that may arise in daily professional life but rather to serve as a foundation for ethical and conscientious decision-making by employees and partners, as applicable.

In the context, terms used in this Code in the singular will also include the plural, and vice versa. Similarly, each masculine, feminine, or neuter pronoun will also encompass the other genders. The titles of items in this Code are for reference only.

For contextualization, the term "Employee" in this code includes all Directors, managers, advisors, employees, attorneys, representatives, and interns of Exemplum, irrespective of their position or function. Likewise, the term "Partners" encompasses all service providers, partners, suppliers, distributors, and their subcontractors, etc.

Exemplum compensates its employees according to the sector they work in. Salary and benefit breakdowns are clearly detailed for employees and are paid in accordance with all applicable laws.

All Employees and Partners will be subject to the terms of this Code and must sign the Acknowledgment and Commitment Term, a standard draft of which is included in this document as Annex I, obliging themselves to fully comply with all obligations contained herein.

This Code of Conduct and the Exemplum Internal Policies mentioned herein are available to all interested parties.

Exemplum reserves the right to review this Code of Conduct and its Internal Policies at any time. In such instances, employees and partners will be notified by the Compliance Committee through any available communication channel.

This Code of Conduct will come into force from the date of its approval by Exemplum's Senior Management and must be communicated to all employees and partners.



Attachment I

TERMO DE CIÊNCIA E COMPROMISSO

Modelo Colaborador

Por este instrumento particular, (nome do colaborador),			
CPF/MF Nº: (nr do CPF do colaborador), lotado na			
Unidade(descrever			
nome da empresa do Grupo e cidade), COMPROMETO-ME a cumprir integralmente as			
disposições das Políticas Internas e do Código de Conduta da Exemplum , do qua			
tomei conhecimento neste ato por meio da leitura da cópia que me fo			
disponibilizada (e que está disponível para consulta também na rede da			
Exemplum), DECLARANDO, ainda, estar ciente de que a fiel observância deste			
instrumentoé fundamental para a condução das atividades inerentes ao meu cargo			
de maneira ética e responsável constituindo falta grave, passível de imposição de			
penalidade, qualquer infração, nodisposto deste instrumento.			
(cidade), (dia)de (mês)de (ano)			
(nome docolaborador)			
CPF/MF №: (nº do CPF do colaborador):			

Attachment II

TERMO DE CIÊNCIA E COMPROMISSO

Modelo Parceiro

Por este instrumento particular, (nomedore presentante do Parceiro)
,CPF/MF Nº: (nr do CPF do
representante do Parceiro), lotado na Unidade
representante da (nome da empresa,
Parceiro contratada), CNPJ/MF Nº: (CNP.
daempresa contratada), COMPROMETO-ME
cumprir integralmente as disposições das Políticas Internas e do Código de Conduta da
Exemplum, do qual tomei conhecimento neste ato por meio da leitura da cópia que
me foi disponibilizada(e que está disponível para consulta também na rede da
Exemplum), DECLARANDO, ainda, estar ciente de que a fiel observância deste
instrumento é fundamental para a condução das atividades inerentes ao meu
cargo de maneira ética e responsável constituindo falta grave, passível de
imposição de penalidade, qualquer infração, no disposto deste instrumento.
(cidade), (dia) de (mês)de (ano)
(nome do representante)
CPF/MF Nº: (nr do CPF do representante)





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