

Code of Ethics and Conduct

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THE FIRM'S CULTURE

Committed to a **long-term vision and growth**, Mattos Filho aims to keep strengthening its culture moving forward. It seeks to maintain its high-quality services while fostering entrepreneurship and innovation without neglecting short-term strategic issues. The firm's professionals' engagement with both the present and the future of Mattos Filho is central to the firm's ability to offer increasingly better services and ensure continual growth.

Mattos Filho values their free-thinking, creativity, and new ideas, encouraging **entrepreneurship and innovation** and believing in the ability of every one of the firm's professionals to contribute to the firm's long-term strategy.

As a reference across many areas of law, Mattos Filho meets its clients' needs through the collaboration of its professionals, resulting in unique and integrated solutions. As its culture is underpinned by the idea that "**a unique firm is a united one,**" Mattos Filho continues to consolidate its multidisciplinary approach in order to offer clients complete and comprehensive legal advice.

With a **client-centered culture** and deep understanding of its business, opportunities, and challenges, the firm is able to anticipate trends and present flexible and customized legal solutions.

Mattos Filho has built a network of solid and long-lasting relationships, as it maintains its dedication and discipline to guarantee the highest degree of excellence in its work. This commitment is fundamental as Mattos Filho strives to be the **firm of choice** for both clients and professionals.

Mattos Filho invests in its people. The firm's entrepreneurial vision drives it to **create new opportunities** for its professionals, so that they may develop and reach their maximum potential. Thus, they are able to build long and successful careers while ensuring the continuity of the firm's business. At the same time, Mattos Filho promotes a **diverse and inclusive environment**, working to ensure that every professional has access to the same opportunities.

The corporate **governance** model adopted by the firm has enabled it to achieve its goals, all while undergoing continuous — yet sustainable — growth. The firm's collective and collaborative approach is one of its main strengths and has helped to make it into the robust institution it is today.

Mattos Filho also employs a professional management model with specialists across a range of areas of expertise in order to offer complete and comprehensive solutions for both clients and its professionals.

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The firm values its pioneering spirit and is **committed to placing social responsibility** at the heart of its DNA. Seeking to give back to society, the firm invests both financial and human resources in a variety of social projects intending to create a more just, equal, and democratic society. The pro bono practice area, together with diversity and inclusion initiatives are just two examples of how Mattos Filho carries out its role in building a more democratic and sustainable society for future generations.

Understanding the importance of these issues, we expect the firm's professionals to commit to acting with respect for the law, human rights, and the environment to ensure respect and honesty within the workplace. As such, the firm does not tolerate conduct that goes against its values.

Mattos Filho's Code of Ethics and Conduct reflects these commitments and standards of behavior for all of the firm's professionals.

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I. INTRODUCTION

The firm's Executive Committee approved the Code of Ethics and Conduct and it has been endorsed by the partners and management of Mattos Filho, Veiga Filho, Marrey Jr. e Quiroga Advogados.

It reflects the commitment of the firm and its leaders to conduct all activities in an ethical manner, with respect for applicable laws and regulations.

The code is intended to serve as a guide for all of the firm's professionals, emphasizing fundamental rules and principles that should guide conduct.

II. APPLICATION

The reference to "professionals" in the Code of Ethics and Conduct includes all partners and any persons contracted to Mattos Filho, including internships, trainee programs, or volunteering.

The firm's professionals must read and observe the provisions of the code and Mattos Filho's other policies and procedures, irrespective of their position at the company and where they work.

The Code of Ethics and Conduct is applied in conjunction with other Mattos Filho policies and procedures, which deal with similar themes and are complementary to this code.

III. MATTOS FILHO'S DNA

1. Institutional Values

- The firm aims to be the best at what it does;
- The firm is respectful and constructive in its relationships;
- The firm invests in a long-term vision and in the strength of the collective;
- The firm creates opportunities;
- The firm is entrepreneurial and innovative; and
- The firm acts ethically and with integrity.

2. Legal services with a Social DNA

Mattos Filho strives to give all that it has achieved back to society. Social responsibility is part of the firm's DNA, with the investment of financial and human resources in projects that contribute to a more just, equal, and democratic society.

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Mattos Filho was one of the first Brazilian law firms to become a signatory member of the United Nations Global Compact in 2008. By signing the Compact, the firm has committed itself to ten principles regarding human rights, labor rights, environmental preservation, and the fighting of corruption.

The firm is increasingly incorporating social actions into its overall strategy, coordinated with a single social ecosystem in mind. Part of this is carried out through the firm's pro bono services — now ongoing for over twenty years — and its institutional investments in the area of corporate citizenship.

Mattos Filho's social DNA also drives it to promote more widespread and democratic access to justice, defense and respect for human rights, diversity, equality, and inclusion, as well as great dissemination and awareness of legal knowledge — whether at the firm or in society as a whole.

IV. PROFESSIONAL ETHICS

1. Ethics of Legal Practice

The Brazilian Bar Association (OAB) regulates the legal profession in Brazil, and the Statute of the Legal Profession, the General Regulation of the Statute of the Legal Profession, and the OAB's Code of Ethics and Discipline provide its central guidance.

All the firm's professionals must respect ethical and conduct standards applicable to members of a law firm.

Generally speaking, all the firm's professionals must:

- Work with honor, respect, and dignity, taking care of the essential and indispensable nature of the legal profession;
- Work with fearlessness, independence, honesty, decorum, truthfulness, loyalty, dignity, and good faith;
- Treat all colleagues, authorities, or public officers with respect and discretion; and
- Maintain professional secrecy and client loyalty.

The firm's lawyers must know the above standards and ensure that they comply with all the firm's activities, both for clients and for the firm itself.

If any professional has doubts about the legal profession's ethical issue, they should consult the partner in charge or Mattos Filho's Ethics and Conduct Committee.

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2. Confidentiality and Professional Secrecy

The firm's professionals must keep all the information they have access to in the law firm confidential and preserve professional secrecy under any circumstances, including if they leave Mattos Filho.

This obligation applies to client and case information and documents, as well as any Mattos Filho internal information or documents.

The information obtained in the law firm must be used only for work involving Mattos Filho. Its use is prohibited for any other purpose.

In addition to maintaining confidentiality concerning third parties, it is not allowed to send or keep copies of documents or information obtained as a result of your professional activity at Mattos Filho, whether confidential or not, to or in e-mails, applications or personal devices, nor to take photos, recordings or any other unauthorized record inside or outside the office.

Whenever, in the firm's normal activities, it is necessary to transmit information or deliver confidential documents to third parties, the professional must seek, as each situation requires, the guidance of the partner in charge of the case or the board of directors responsible for the administrative project in question.

All public information and documents prepared for disclosure or publication regarding the firm's performance must be clearly identified for this purpose and have the approval of the Communication and Marketing Department.

V. PROFESSIONAL CONDUCT

1. Client focus

Mattos Filho is committed to providing excellent services. In the relationships with its clients, the firm's professionals must:

- Act with respect and transparency;
- Work in an efficient, coordinated, and integrated way, allocating the best resources and designing highly qualified specific solutions to meet the clients' demands;
- Always seek to broaden the understanding of the clients' business; and
- Maintain the confidentiality of all information received, as required by the firm's professional ethics discussed above.

The firm's professionals cannot act as managers of companies at clients' request, nor accept the power of attorney or any kind for representation in acts of a partner

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or manager of a Brazilian company at clients' request. The firm's representation is limited to the provision of legal services.

Mattos Filho expects from the firm's clients the same commitment to ethics and respect for the law that the firm adopts in its practice. The firm's professionals must report internally any suspicion of irregularity in cases under its care by anyone.

2. Prevention of Conflicts of Interest

A conflict of interest exists whenever personal or third-party concerns or goals may influence the firm's professionals' ability to act impartially, either because the professional or someone close has something to gain or lose from the choices made in a given context. Close people include spouses or partners, parents, children, and other dependents of the professionals or their spouse or partner, friends, or other people in their relationship.

In addition, due to the rules applicable to the practice of law, the firm must identify and prevent the firm's involvement in representations that may cause conflicts between the interests of two or more of the firm's clients. To this end, Mattos Filho has an institutional and governance system applicable to checking clients' conflicts of interest, which is a mandatory step before accepting new clients and opening cases.

In addition to institutional controls, the firm's hiring of suppliers must be based on technical and professional criteria, free from actual or apparent conflict of interest.

The professionals must immediately communicate to the partner, associate, or executive officer in charge of any situation in which they identify a potential or actual personal conflict of interest with Mattos Filho or its clients.

These are examples of situations that the firm seeks to identify in order to adopt transparency measures and avoid situations that cause or may cause conflicts of interest:

- Ownership interests or relevant financial interests in companies doing business with the firm, including clients or suppliers, or in parties adverse to the firm's clients;
- Family relationship or friendship with public officers with decision-making power or influence in cases in which Mattos Filho acts;
- Family relationship with persons in key-client positions, especially if the person is responsible for hiring services or negotiating legal fees;

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- Previous work or involvement by the client's adverse party in the cause or legal acts in question (e.g., in another law firm or for another client); and
- Deals with Mattos Filho's competitors, agreements with third parties that work or operate for the firm, or that the firm presents to its clients.

The firm may hire companies in which a professional has an ownership interest, or individuals and companies of professionals' family members, as long as the business and relationships are transparent and approved internally, under commutative conditions, and with the decision making and operation by other exempt professionals.

3. Respect for Laws and Corporate Integrity

The firm's professionals must act with integrity and in accordance with all applicable laws and regulations.

Mattos Filho is committed to acting for its clients and conducting its activities respecting human and labor rights, the environment, preventing corruption or other irregularities, observing the free competition, protecting personal data, and other rules described in this code, which include the prohibition of payment of undue advantages and other violations of corporate integrity, including in the private sector.

Any violations or suspected violations of these laws and regulations, as well as of this code by any professional or third party within the scope of the firm's activities, must be immediately reported to Mattos Filho's Reporting Channel.

3.1. Respect and the Work Environment

Mattos Filho does not tolerate and prohibits any disrespectful, discriminatory conduct or that attacks human rights, whether in the form of violence, prejudice, harassment, or discrimination, both in the professionals' relationship and with third parties.

These are examples of conducts prohibited by Mattos Filho in all work environments and their extensions, including social and commemorative events related to the firm:

- Use of offensive or prejudiced words;
- Physical violence, yelling, intimidation, or threats of any kind;
- Discrimination based on race, color, ethnicity, sex, gender identity or sexuality, social origin or family status, age, physical condition or appearance, nationality, religion, political opinion or affiliation, personal

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conscience, ideological conviction, or any other characteristic or personal choice;

- Harassment, comments or actions capable of humiliating, coercing, embarrassing, despising, underestimating, isolating or encouraging isolation, disrespecting, suppressing, belittling or offending the personality of the other, repeatedly or not, in the work position or because of it, regardless of hierarchical or functional position, whether superior, equivalent or inferior, intentionally affecting the other's image, dignity or physical or psychological integrity;
- To promote, disclose, propagate, spread rumors or stories, or make malicious, ironic, jocular or defamatory comments; to disrespect individual limitation, resulting from physical or mental illness, attributing an incompatible activity with one's special needs;
- Harassment, unwanted sexual comments, actions, or suggestions, whether or not repelled by the recipient, regardless of the relationship of subordination;
- Disrespect, embarrass, or humiliate any person with pejorative nicknames or offensive conduct; and
- Inappropriate requests or offers of personal favors or benefits, internally or concerning third parties, incompatible with the firm's activities and values.

The firm assures professionals their constitutional rights to political freedom and freedom of thought. However, advertising, activities, or events affiliated with candidates or political parties are not allowed at the office premises or during office hours.

It is up to each of the firm's professionals to build a respectful, safe, and collaborative work environment. The firm counts on each professional so that manifestations incompatible with its standards of conduct are combated and discouraged, with respect and seriousness.

3.2. Commitment to Human Rights and Labor Law

Mattos Filho promotes the defense and respect for internationally proclaimed human rights, not only in its activities but also in its sphere of influence.

The firm's professionals should be vigilant in the work environment regarding its activities and relationships, defending human rights.

Mattos Filho guarantees freedom of association and recognizes the right to collective bargaining. Furthermore, the firm does not tolerate any form of forced or compulsory labor. It is committed to abolishing all forms of child labor in its activities and demanding vigilance from its suppliers.

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3.3. Commitment to the Environment

Mattos Filho is committed to protecting and preserving the environment and seeks to minimize any adverse impacts of its activities, aiming at sustainability.

The firm's professionals must remain attentive to the rational, responsible, and sustainable use of resources.

The firm does not tolerate waste of natural resources or office-provided goods (such as water, printing paper, food, and electricity).

3.4. Commitment to Fighting Corruption

The firm's professionals are expressly forbidden to practice any act of corruption, in any of its forms, whether in the public or private sector, for their own benefit, the firm's or its clients', directly or indirectly.

In the relationship with the public administration and its agents, national or foreign, this prohibition includes any act that may be understood as the corruption of public agents, bribery, extortion, kickbacks, misconduct in public office, fraud in public bidding, money laundering, or any crime or harmful act against the national or foreign public administration.

Among the various prohibited practices mentioned, we highlight the following harmful acts, provided by the Brazilian anti-corruption law, which apply to legal entities such as Mattos Filho:

- Promising, offering or giving, directly or indirectly, an undue advantage to a public agent or a third party related to the public agent;
- Fraud, manipulate, impede or frustrate bidding processes and administrative contracts;
- To hinder investigation or inspection activities or to intervene in the performance of public agencies, entities or agents, including regulatory agencies;
- Financing, funding, sponsoring, or in any way supporting the practice of the harmful acts described above; and
- Use third parties to hide or disguise real interests or the beneficiaries' identity of the harmful acts described above.

In relationships with the private sector, the firm's anti-corruption commitment and related prohibitions include any act that could be interpreted as private corruption.

Mattos Filho considers private corruption any situation involving the promise, offer, payment, or receipt of any undue advantage in exchange for the violation

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of a functional, fiduciary, contractual, or legal duty of a private agent, as well as a fraud practiced against persons or private companies to obtain, for oneself or a third party, undue advantages.

3.5. Commitment to Personal Data Protection

Any information relating to an identified or identifiable individual is personal data. Some personal data is more sensitive than others, but all personal data requires protection.

Specifically, every professional who handles personal data in the firm's activities must:

- Protect personal data by maintaining privacy and confidentiality as a standard (both in the design of systems and in their behavior) and transparent conduct;
- Limit the collection and storage of personal data to only data necessary for the activity and only for as long as required to fulfill a legal obligation or secure a right;
- Minimize the processing of personal data, only for the purpose established before its collection, and never for new and incompatible purposes;
- Periodically review the quality (relevance, clarity, and accuracy) of personal data undergoing processing and, if necessary, take steps to update or delete them, observing internal procedures; and
- Give access to personal data exclusively to professionals who really need it, observing the provisions on confidentiality and professional secrecy.

In general, all professionals must protect personal data under their responsibility and observe the firm's guidelines on information security.

3.6. Commitment to Free Competition

Any act that may result in an illicit restriction to free competition or free enterprise is not allowed in the firm's professionals' practice.

Specifically, the firm's professionals must not discuss or in any way transmit Mattos Filho's commercially sensitive confidential information or receive it from competitors.

In the relationship with competitors, it is not allowed:

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- To make an agreement or exchange commercially sensitive information that may harm free competition, either to harm any competitor or to favor Mattos Filho and/or any competitor;
- To agree expressly or tacitly to fix prices, price limits, discounts, or ways of calculating fees or other similar topics that divide customers, suppliers, or territories; and
- Agreeing not to provide some service to a client or to stop hiring a certain type of supplier.

If the professional is in any association, workgroup, or other organization meetings where someone starts a conversation about the above topics, they should stop the conversation or withdraw immediately from the meeting, having their withdrawal entered upon the minutes, if any, and report it internally.

In the case of joint work with other law firms or consultancies that might be considered Mattos Filho's competitors, professionals should restrict communications to only the subject matter of this work.

4. Relations with Suppliers and other Third Parties

Professionals must demand from the firm's suppliers of goods or services and third parties with whom it works in partnership the same degree of commitment to ethics and laws that it practices.

Professionals involved in hiring suppliers should ensure that the following steps are taken:

- Before hiring new suppliers, professionals must conduct a compliance due diligence, with the support of the compliance analysts from the firm's administrative area, who will adopt a procedure based on the contracting risks;
- Formalize a contract with clauses respecting the law and corporate integrity, except in the case of an express waiver in the firm policy; and
- Request a reasonable breakdown of the compatible and proportionate invoices to the services or goods and archive proof of actual delivery.

The same guidelines apply to any company, firm, or person with whom Mattos Filho agrees to work together to benefit its clients, such as other law firms, correspondents, experts, consultants, and others.

In joint work with third parties selected by a client, contracts with such third parties must be executed directly by the client. The firm's professionals are prohibited from making advance payments or paying third parties in substitution

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for its clients when the third parties are hired by them, except in extraordinary cases that receive internal approval.

In the temporary impossibility of completing the prior due diligence or entering into a contract given the need to meet an emergency demand from a client (for example, when only one supplier is meeting the requirements or the hiring is necessary outside business hours), the requesting professional must promptly inform the Financial Management for registration and control measures.

5. Donations and Sponsorships

The firm's professionals must not link any personal donations or sponsorships to Mattos Filho. This rule is significant regarding donations to election campaigns and political parties, which are prohibited for legal entities.

Professionals must follow the same guidelines applicable to hiring suppliers — mentioned above — when selecting and carrying out donations and institutional sponsorships. In addition, for these specific acts, professionals must ensure that donations or sponsorships are granted:

- For civil society organizations or duly constituted, registered and reputable companies;
- Accompanied by documentation containing clear information about donations and sponsorships; and
- Through the receipt of periodic rendering of accounts by the beneficiary institutions, in order to prove that the donated resources or sponsorships were destined to the purpose to which they were subject.

Any donations or institutional sponsorships must be made following the applicable legislation, with no purpose of influencing the action of a body, entity, company, or employee, public or private, to obtain an illegal or undue advantage.

Sponsorships are understood as monetary contributions or services rendered by Mattos Filho for an action organized by a third party with the objective of advertising or promoting Mattos Filho's brand or the firm's professionals.

6. Business Amenities

Business amenities are meals and hospitality related to firm activities, expenses related to invitations to speak or attend corporate events, invitations to entertainment events, and gifts related to commemorative dates or special occasions.

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6.1. Offer of Business Amenities

The offering of business amenities by professionals to clients or third parties is allowed as long as the professional observes the approval, accountability, and transparency procedures instituted by the firm, along with the following requirements:

- The offer must not be linked to any exchange, favor, reward, influence, or undue advantage for the professional, the firm, or any person;
- There is a clear and lawful professional purpose, which can be a work meeting, the beginning or the narrowing of the relationship;
- The amenity does not violate any law or regulation, nor codes of ethics and conduct, and is preceded by the formalities prescribed by law or regulation if any; and
- Amenities must not be lavish, excessive, or frequent, seeming to be improper.

In addition to complying with all the requirements above, any offer of corporate amenity directed to public agents must be previously submitted to the Managing Partner's approval after hearing the Ethics and Conduct Committee. The submission for approval of any invitations to firm events that do not involve payment of expenses is unnecessary.

6.2. Receiving Business Amenities

The professional may accept gifts, presents, and meals offered by clients or partners, as long as the following requirements are met:

- The amenity must not be bound to any consideration or be received within the context of any decision by the professional, especially during the negotiation of contracts or fees;
- There is a clear and lawful professional purpose, which can be a business meeting or thanking for services already rendered; and
- Amenities must not be lavish, excessive, or frequent, seeming to be improper.

The professional who receives any business amenity or gift that they consider inappropriate or that causes discomfort should seek guidance from their manager or the Ethics and Conduct Committee.

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7. Accounting and Financial Records

Mattos Filho is committed to keeping complete, valid, and correct accounting books and records, reflecting timely and accurately, in reasonable detail, its transactions, assets, and liabilities.

All information entered into the firm's systems must be complete, timely, and truthful, including supporting records and documentation such as expense claims, receipts, invoices, and entries of hours worked by the professional.

Each professional is responsible for reporting correctly and timely whenever incurring expenses or assuming obligations or contracts on behalf of Mattos Filho or in connection with work for clients.

We consider fraud, misrepresentation, mishandling, or circumvention of any of these or other systems, records, or internal firm controls to be serious and unacceptable offenses, whether for personal benefit or not, regardless of value.

8. Use of Mattos Filho's Assets and Resources

All professionals have an obligation to protect and preserve Mattos Filho's assets and resources and use them exclusively for their work.

Mattos Filho assets and resources include everything that the firm owns or hires and that it uses in its activities, be it materials such as our financial resources and physical facilities, computers, mobile phones, furniture and machinery, technology systems, or immaterial, such as concepts, methodology, know-how, minutes and models, information, strategies, plans, research, systems, inventions and all our technical and intellectual collection.

Professionals must not use Mattos Filho's assets and resources to handle personal matters or store documents and information. All our electronic equipment and means of communication, including corporate e-mail and messaging applications, as well as the information created or stored in them, can be accessed at any time by Mattos Filho, which is why the professional should have no expectation of privacy in relation to the firm when making use of our systems and resources.

9. Intellectual Property

Mattos Filho respects third parties' intellectual property. The firm does not condone plagiarism, unauthorized use of software, and other intellectual property violations. All intellectual property created by our professionals in the course of their professional activities is Mattos Filho's property and cannot be shared with third parties without proper authorization.

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10. Press, Internet, and Social Networks

No professional can speak publicly on behalf of the firm without proper authorization, except by authorized official spokespersons. The firm's professionals must follow this code's provisions in their relations and interactions with the press and when using social networks and other websites.

Our professionals should not make comments on the internet, on social networks, or to the press about cases in which the firm is involved, even if the case in question is public.

When the client authorizes contact with the press, only responsible partners may speak on behalf of the firm. Any exception must be aligned with the firm's Communication and Marketing area.

11. Participation in Training

All professionals must participate in mandatory institutional training at the time of admission and whenever requested by the firm. Training includes topics related to culture, positioning of the firm, and its commitment to compliance with the laws and regulations of their activities, such as this code and other internal and external rules of labor, integrity, data protection, among others.

12. Obligation to Report Violations

If an employee identifies a violation or has reasonable suspicion that a violation of this code has occurred, the firm's employees must report it internally without delay.

VI. GUIDELINES, COMPLAINTS, AND ACCUSATIONS

The firm offers different communication channels that can be used by our professionals, which are listed below:

1. Managers and Partners

Regardless of their position or function in the firm, all professionals may approach their manager or partner to seek guidance related to compliance with this code.

As for complaints, it is recommended that they be made through the channels described below.

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2. Internal Reporting Channel

Mattos Filho has a confidential and internal Reporting Channel, open to all professionals, which can be used to obtain guidance or report potential violations of this Code, Mattos Filho's other policies and procedures, or any applicable law or regulation.

A link to the Reporting Channel is featured on the home page of Mattos Filho's intranet.

3. E-mail for Orientation, Complaints, and Accusations

The e-mail integridade@mattosfilho.com.br has a direct connection with the Reporting Channel and can be used for the same purposes.

4. Direct Contact with the Ethics and Conduct Committee

The Ethics and Conduct Committee's current composition and its members' respective contact information are available on the firm's intranet.

The Ethics and Conduct Committee is a permanent body whose purpose is to advise the Executive Committee concerning the operation, supervision, and guidance of the firm's integrity program and may issue opinions and recommendations on the adequate application of this code and other related internal rules.

The Ethics and Conduct Committee's responsibility is to receive timely information from the Human Development area about all reports submitted via the Reporting Channel or in any other way and take note of the respective measures and decisions to forward them.

The Ethics and Conduct Committee may evoke and investigate any reports submitted through the Reporting Channel, at its sole discretion, which must be analyzed independently and in a confidential, impartial, and impersonal manner.

If violations of laws, regulations, or Mattos Filho's internal rules are identified, the Ethics and Conduct Committee is responsible for recommending the appropriate measures to the Executive Committee, partner, or executive officer in charge.

VII. PROTECTION AGAINST RETALIATION

Mattos Filho assures protection to all its professionals against retaliation related to any request for guidance, complaint or accusation in good faith related to compliance with this code and other Mattos Filho policies and procedures. In

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particular, Mattos Filho ensures the following mechanisms and protection measures:

1. Identity Confidentiality

If the professional chooses to identify themselves when asking a question, making a complaint or accusation, Mattos Filho ensures that their identity will be, to the extent permitted by law, kept confidential and of restricted knowledge only to those responsible for the measures directly related to the issue.

2. Anonymous Reporting

The professional can also choose to make a complaint anonymously. Even if, given the case's specific circumstances, the firm eventually identifies the reporting professional during an investigation procedure, Mattos Filho is committed to preserving their identity to the extent permitted by law.

The firm does not guarantee the internal investigation of anonymous complaints that do not present a report of the irregularities allegedly committed or do not minimally individualize the parties involved. In this case, making anonymous complaints may prevent the firm from seeking additional clarifications that could assist in opening or continuing the investigation.

3. Presumption of Good Faith

The firm will adopt a presumption of good faith concerning all complaints, even if it is ultimately determined to be inconclusive or unfounded. Only complaints proven to be made in bad faith can generate sanctions due to non-compliance with this code.

4. Support from the Human Development Area

The reporting professional may request support from the Human Development Area, which can monitor the professional's activities and evaluations focusing on protection against retaliation and take the measures it deems appropriate.

VIII. DISCIPLINARY SANCTIONS AND MEASURES

Violations of this Code, other Mattos Filho policies and procedures or any applicable law or regulation will subject the professional to the following sanctions, to be applied by the Executive Committee in its sole discretion, without duplication:

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- Oral or written warning;
- Disciplinary suspension for up to 30 days; and
- Termination of the employment contract or exclusion from the partnership.

The consequences described above must be applied according to the criteria of proportionality, graduality and immediacy.

The application or non-application of any of the above sanctions does not prevent the firm from taking any applicable legal measures, including those related to repairing damages and/or reporting to the competent authorities.

IX. FINAL PROVISIONS

The risks professionals are exposed to as a result of the firm's activity and the provisions of this code must be periodically reviewed and monitored, with the Ethics and Conduct Committee's supervision.

This code was approved by the Executive Committee on February 18, 2021.