

CODE OF CONDUCT – LICEMPRES

Preamble

This Code of Conduct aims to establish the ethical principles and standards of conduct that should guide the internal and external relations of all LICEMPRES Members, regardless of their duties and responsibilities.

All LICEMPRES Clients, Suppliers and Members are expected to be aware of this Code of Conduct and to comply with its terms in all dealings and in all behavior with or on behalf of LICEMPRES.

Our reputation and credibility are the most important assets we have, and the ethical principles that guide our operations contribute to maintaining LICEMPRES's image as a solid and reliable entity to our Customers, Suppliers and Members in general.

We emphasize that our philosophy is based on integrity, independence and freedom of expression, precepts that will always be encouraged at LICEMPRES.

1. Relationship with Members

The criteria for admission and promotion will be meeting the basic requirements of each role, in accordance with predetermined criteria and objectives. There will be no discrimination by position held within LICEMPRES, religion, philosophical or political belief, nationality, origin, gender, age, color, sexual preference, marital status or physical or mental disability.

2. Conduct of Members

LICEMPRES expects from its Members, in the performance of their duties, the care and diligence that anyone usually employs in their personal affairs, that is, an honest and dignified conduct, in accordance with the laws and ethical standards of society.

LICEMPRES expects that all company matters, without exception, will be treated with confidentiality and confidentiality.

LICEPRE will promptly and rigorously investigate all facts involving suspected fraud, theft, theft, wrong accounting records, misappropriation or any other crime, misdemeanor or wrongful act, as well as acts that deviate from LICEPRE's corporate procedures and this Code.

3. Workplace

LICEPRE expects, in the relations between its Members, cordiality in dealing, trust, respect, dignified and honest conduct, regardless of any hierarchical position, position or function.

It is up to each LICEPRE Member to guarantee to others a work environment free of innuendo or restrictions of any nature, avoiding possible embarrassments, being forbidden the practice of harassment and sexual harassment.

Any conduct that may characterize hostility or sexual harassment should be reported to Management. If this is found the occurrence, appropriate disciplinary action will be taken against those responsible.

Aiming also at the well-being, safety and productivity of Members, the possession and/or consumption of illicit drugs and alcohol, as well as the possession of weapons, shall not be permitted in the workplace, except by persons expressly authorized, responsible for the safety of other Members and the company's assets.

LICEPRE does not allow intrusion into Members' private lives, inside or outside the workplace.

4. Child labor and others not permitted by law

LICEPRE will not resort to child labor or any labor or work prohibited by law.

5. Confidential Information and Property Rights

LICEPRE respects the privacy of data from Customers, Members, Suppliers and Partners.

Information is a precious asset of the company. LICEMPRES shall safeguard its own proprietary and confidential information, as well as information provided to it by Customers, Members, Suppliers and Partners. In general, proprietary and confidential information is information that has not been disclosed to the general public or that gives a company an advantage over its competitors or that could harm a company if it were disclosed prematurely or inappropriately. Common examples include inventions, creations, wisdom and trade secrets as well as financial information, company strategy, marketing programs, and information about relationships with Customers, Members, Suppliers and Partners. None of the members are allowed to disclose or distribute any confidential or proprietary information, except as authorized by LICEMPRES. The Member shall only use this information for the purposes permitted by LICEMPRES and in relation to its functions and responsibilities.

6. Responsibility of Members in Business

Members shall carry out their activities and conduct LICEMPRES's business with transparency and strict compliance with the law, principles and guidelines of the company.

LICEMPRES Members are responsible for taking appropriate action when they become aware of irregularities committed by third parties that may compromise LICEMPRES's name and interests.

Any operation involving LICEMPRES must be supported by the appropriate documents covered by all legal formalities.

Only the Board will sign all contracts, unless expressly provided otherwise. It is expressly forbidden to sign contracts, or any documents of any kind that compromise the company, without the respective assessment and rubric of the Legal Management.

6.1. Member Responsibility

It is the obligation of every Member to know and practice the provisions of this Code of Conduct. Members will also be responsible for preserving LICEMPRES's name and image.

6.2. Management Responsibility

Management, especially for the dedication of its time, its presence, its experience and, above all, by its example, have the obligation to contribute for its Members to comply with this Code of Conduct fully, and must:

- disclose the contents of this Code of Conduct and make them aware of their need and compliance, thus preventing any Member, Customer, Partner or Supplier from committing a violation for lack of information.
- Identify Members who have violated this Code of Conduct and discuss the matter with the LICEMPRES Board of Directors.
- Create a culture that manages compliance with this Code of Conduct and encourage Members to raise questions and concerns regarding its application.

6.3. Customer Relations

Satisfied Customer is the foundation of LICEMPRES's existence. Therefore, it is the basic principle of corporate action to serve the Customer, with an emphasis on quality, productivity and innovation, with social, community and environmental responsibility, and with full respect for service laws and regulations and the region in which they operate.

Customers must be served courteously and efficiently and given clear, accurate and transparent information. The Customer must obtain, even if negative, responses to their requests, in an appropriate and timely manner.

LICEMPRES will continually develop and implement methods that meet or even exceed the legal requirements that contribute to ensuring the safety of its services. LICEMPRES is committed to providing customers with accurate and understandable information with due prominence and visibility.

6.4. Relations with Suppliers

The relationship with the Supplier must be lasting, without prejudice to the principles of free enterprise and fair competition.

The choice and hiring of suppliers must always be based on technical, professional and ethical criteria, in accordance with the needs of LICEMPRES. They must be conducted through a predetermined objective process, such as competition or price quotation, which ensures the best value for money.

6.5. Relations with Competitors

The competitiveness of services/products provided/ marketed by LICEMPRES must be exercised on the basis of free and fair competition.

No verbal or written statements should be made that could affect the image of competitors or contribute to the spread of rumors about them, and the competitor should be treated with the respect with which LICEMPRES expects to be treated.

It is expressly prohibited to provide strategic, confidential or otherwise harmful information to LICEMPRES's business to any third party, including, but not limited to, competitors.

It is forbidden for any Member to maintain understandings with LICEMPRES's competitor (s) aiming at setting prices and conditions of sale; adopt or influence the adoption of uniform or pre-agreed business conduct.

6.6. Relations with family

Family members are spouses, parents, siblings, children, uncles, nephews, and cousins up to and including 2nd degree, including those of the spouse.

If a Member wishes to conduct business on behalf of LICEMPRES with one of his family members or persons with whom his family members have close personal relationships, or even with companies in which such persons are partners, have a relevant interest in companies or hold a management position, This Member must obtain written permission from his/her management, who will discuss the matter with the LICEMPRES Board.

6.7. Relations with the Government

All LICEMPRES Members are expressly forbidden to offer gifts or benefits to civil servants, their families or similar, either directly or by third parties.

7. Liberalities

LICEMPRES Members and their families must not give or accept gifts or favors from Customers, Suppliers or Competitors.

Gifts or favors received through business relations should be communicated to the LICEMPRES Board of Directors and, if disapproved, returned to the offerer, accompanied by acknowledgments and style justifications prepared by the Board.

LICEMPRES may not give, offer, promise or authorize anything to be given to a Brazilian or foreign authority, directly or through an intermediary, such as an agent, attorney or lawyer, in order to influence the employee's action to obtain benefits. This prohibition, in practice, is intended to prevent not only money being given, but anything of value, such as gifts, travel, meals or entertainment, donations, sponsorships, job offers and other benefits that may benefit the government official or members of his/her family.

8. Conflict of interests

Conflict of interest occurs when a Member influences or may influence a LICEMPRES decision that results in or may result in some direct or indirect personal gain for himself, his/her family members or friends.

Members must ensure that their actions do not conflict with LICEMPRES's interests or damage their image and reputation.

For illustrative purposes only, some situations that characterize conflict of interest are listed below:

- having a personal interest that may affect the ability to value a business of interest to LICEMPRES.
- having confidential information that, if used, may have a personal advantage.

- accepting direct or indirect benefits that may be interpreted as consideration or to obtain LICEPRE's favorable position in business of interest to third parties;
- aceitar tarefa ou responsabilidade externa que afete o seu desempenho na LICEPRE.
- acquiring shares of companies with which LICEPRE relates, whether these are Customers, Suppliers, service providers or competitors, based on inside information, or even providing such information to third parties.
- maintaining private business relationships for which it will obtain privileges, by virtue of its attributions in LICEPRE, with Customers, Suppliers, service providers or competitors.

9. Activities outside LICEPRE

LICEPRE Members shall not engage in activities or engage in organizations that compromise their dedication to LICEPRE, nor engage in behavior that creates a conflict of interest with their responsibilities and duties, or to operate in any other segment whose duties may in any way compromise the integrity, confidentiality and security of LICEPRE.

10. Political activities

LICEPRE will not restrict the party-political activities of its Members. However, they must always act on a personal basis and in a manner that does not interfere with their professional responsibilities.

It is forbidden the exercise of political activities in the workplace and involving in any form, LICEPRE resources. Members may not use company assets when engaging in political activities.

It is strictly forbidden to display any form of political propaganda on LICEPRE's premises, vehicles, publications, any other property, or the use of T-shirts, caps, pins and any other object referring to political activity on LICEPRE.

Members who participate in political activities do so as citizens, not as representatives of LICEPRE.

11. Use and preservation of LICEPRE assets

Members are responsible for preserving LICEPRE's assets, which include facilities, machines, equipment, furniture, vehicles, valuables and others.

It is not allowed to use LICEPRE equipment and other assets for private use.

Internet and telephone access, as well as the use of e-mails, software and hardware must be restricted to the member's professional activity, observing the other provisions that may be established in LICEPRE policies, regulations or guidelines.

Members are not authorized to use LICEPRE's address to receive private correspondence, except in authorized cases.

LICEPRE does not authorize the use of software or any other property in its facilities other than those previously authorized.

LICEPRE does not authorize the installation of software on equipment owned by it without prior authorization.

12. LICEPRE Spokespersons

Only certain Members are allowed to speak on behalf of LICEPRE and make comments about it to the press or outside groups. Such authorization will always be expressed in writing.

13. Accounting and financial records

LICEPRE's accounting standards and practices must be strictly adhered to, generating consistent records and reports, and allowing a uniform basis for the assessment and disclosure of operations. Thus, it is necessary to ensure the accounting of any good or right that LICEPRE is required to do.

LICEMPRES will perform periodic audits for the conference of accounting and financial data.

14. Environment

The balance of the environment and the preservation of nature are of fundamental importance for LICEMPRES, whether by helping to preserve forest reserves, preventing the waste of natural resources, promoting preservation campaigns to raise awareness among regional communities, as well as supporting various public and private projects related to environmental preservation.

Therefore, it is the responsibility of each Member:

- contributing to the conservation and improvement of the environment and its ecosystems.
- becoming familiar with all policies and procedures that may be adopted by LICEMPRES regarding the environment.
- identifying hazards, assess risks and, where possible, initiating corrective and preventive actions, and bringing the matter to the attention of management.
- immediately reporting any environmental accidents and/or incidents to the local administration to enable investigation of causes and the initiation of corrective and preventive measures.
- where applicable by local law, reporting accidents and / or incidents immediately to the competent authorities.

15. Questions

The guidelines of this Code allow us to evaluate most situations and minimize the subjectivity of personal interpretations of moral and ethical principles, but do not necessarily detail all situations that may arise in the daily life of each Member. Therefore, in case of questions regarding the application of the guidelines of this Code, the Board, or one of its members, should be consulted.

16. Infraction

All Members are expected to comply with these guidelines under all circumstances.

A Member who violates a LICEMPRES conduct, practice or policy, or who allows another Member to do so, will be subject to disciplinary action, including dismissal. A Member who becomes aware of a violation of any aspect of this Code by anyone should report it to his or her Management or one of the Board Members.

If the Member wishes to remain anonymous in reporting the infraction of the Code of Conduct, he or she may use correspondence, in a sealed envelope, addressed to the Board, without the need for identification of the sender.

It is up to the Board to assess whether or not further investigation of the infraction is necessary.

17. Ethics Committee

LICEMPRES will have a non-permanent Ethics Committee, which will be responsible for judging the most serious violations of this Code and for imposing the appropriate disciplinary sanctions, as well as deciding on the clarification of doubts regarding its text.

The Ethics Committee will be composed of 2 (two) members: the General and Financial Board.

The Ethics Committee will be convened at the request of any interested party, if it is addressed to one of these four members and its meetings will take the minutes.

18. General Provisions

This Code of Conduct will remain in force indefinitely and the Ethics Committee shall promote its disclosure and update, never exceeding two years.

All LICEMPRES Members, Suppliers and consultants will be made aware of the conduct guidelines contained in this Code.

Specific areas of LICEMPRES may establish their own policies and rules of conduct that must necessarily be in harmony with this Code of Conduct and which should be known to Members of such areas.

No Member may claim to be unaware of the guidelines in this Code under any circumstances or under any argument. The financier shall notify the Board of Directors monthly of Members who have not yet received training on this Code of Conduct and shall provide each new Member, along with a copy of the employment contract, a copy of this Code of Conduct by signing the Term of Adhesion.

Preparation - Board of Executive Officers on 01.07.2019.