



CODE OF CONDUCT FOR BUSINESS PARTNERS

Bromelia Capital

1. PRESENTATION

By this Code of Conduct for Business Partners ("Code"), BROMELIA CAPITAL, as well as its Business Partners, being here included suppliers, distributors, representatives, resellers and others, are recognized as fundamental members of the team that contributes to the success of BROMELIA, and reaffirm their commitment to the goal of developing relationships that share the corporate values of trust, teamwork and, mainly, that act in an ethical manner with us.

2. OBJECTIVE AND SCOPE

The purpose of this document is to establish the guidelines to be followed by BROMELIA CAPITAL and its business partners, taking into account internationally recognized and approved standards in areas considered as essential, such as, but not limited to: human rights, professional ethics, working conditions and respect for environment.

Our business partners are expected to do exactly the same, i.o., to maintain relationships only with partners that meet these same standards.

This document is applicable to all partners, and the guidelines established herein shall be interpreted as integral to the agreements entered into by the company. Thus, non-compliance with this Code of Conduct may cause interruption of contractual relations, without prejudice to other applicable legal measures, if applicable.

3. GUIDELINES

3.1. RESPECT FOR PEOPLE, HUMAN RIGHTS, AND APPROPRIATE WORKING CONDITIONS

3.1.1. SAFE AND HEALTHY WORKING ENVIRONMENT

BROMELIA CAPITAL Business Partners must provide their employees, as well as require of their respective partners, a safe and healthy workplace in accordance with applicable international standards and national laws.

3.1.2. DISCRIMINATION

BROMELIA CAPITAL Business Partners must unfailingly treat all employees with dignity and respect, and ensure that equal opportunity is based solely on merit, regardless of color, race,

religion, sex, age, country of origin, sexual orientation, marital status or disability. Compliance with these conducts must be in accordance with all applicable laws regarding discrimination in its hiring and employment practices.

3.1.3. CHILD OR FORCED LABOR

BROMELIA CAPITAL Business Partners shall not use coercive, forced, slave or child labor, or authorize anyone to do so on their behalf. They must also comply with applicable law and the guidelines established by UNICEF (United Nations Children's Fund) and ILO (International Labor Organization).

3.1.4. FREEDOM OF ASSOCIATION

BROMELIA CAPITAL Business Partners shall respect and uphold their employees' freedom of association with respect to trade unions or similar external representative organizations. Their employees shall also have the right to collective bargaining under applicable laws and regulations, as well as the right to choose not to join a union or other body representing their occupational category.

3.2. ENVIRONMENTAL PROTECTION

3.2.1. REDUCTION OF ENVIRONMENTAL IMPACTS

BROMELIA CAPITAL Business Partners must always seek to reduce all environmental impacts resulting from their activities, which is why they are constantly encouraged to develop and implement an environmental policy, as well as to act in compliance with all applicable laws and regulations. BROMELIA encourages Business Partners to use and develop the most varied technologies, products and services that are eco-friendly.

3.3. ETHICS AND PROFESSIONAL INTEGRITY

3.3.1. GIFTS AND ENTERTAINMENT

The Business Partners of BROMELIA CAPITAL, as well as their employees and service providers, must not give or accept gifts from people or companies customers, or that may have some form of relationship with BROMELIA, above the value of \$ 200.00 (two hundred reais), without the express written authorization of BROMELIA, through the responsible for the area through justification also in writing to the direction of the company.

3.3.2. BRIBERY AND CORRUPTION

BROMELIA CAPITAL Business Partners must adhere to the highest standards of professional ethics, respect local laws and not engage in any form of extortion, corruption, bribery or fraud. BROMELIA defines facilitation payments as a form of corruption and is committed in every way to abolishing and exposing such practices.

3.3.3. MONEY LAUNDERING

BROMELIA CAPITAL Business Partners must not tolerate, ignore or support money laundering, in any form and anywhere, on behalf of BROMELIA. BROMELIA CAPITAL conducts its various businesses with high integrity and always within the boundaries of the law.

3.3.4. FAIR COMPETITION

BROMELIA CAPITAL Business Partners must commit to free and fair competition and comply with applicable laws and regulations. BROMELIA prevents anti-competitive agreements or conduct such as, but not limited to: price fixing, restricting the supply of products or services, bid rigging.

3.3.5. CONFIDENTIAL INFORMATION AND DATA PROTECTION

BROMELIA CAPITAL Business Partners must comply with all laws and regulations governing the protection, use, data processing and disclosure of BROMELIA proprietary, confidential and personal information. BROMELIA CAPITAL is committed to protecting all confidential and personal information that it may acquire through its activities and its Business Partners must do the same.

4. CONFLICTS OF INTEREST

BROMELIA CAPITAL expects its Business Partners and employees to identify and promptly seek resolution of situations where there is a conflict of interest.

TRANSPARENCY CHANNEL

Any and all breaches or issues related to the conduct of employees, consultants or service providers of BROMELIA CAPITAL and our Business Partners should be reported, immediately, to the Chief Compliance Officer of BROMELIA, by e-mail: compliance@bromeliacapital.com.