



# CODE OF ETICHS AND CONDUCT

## Bromelia Capital

## 1. INTRODUCTION

**1.1.** BROMELIA CAPITAL believes that the development of its activities in a competitive and dispute space requires that the employees, regardless of hierarchical level, perform their respective functions within an environment of respect, collaboration and reciprocity, taking care so that the internal and external relationships promote self-esteem and loyalty, once that, in the vision of the company, these are indispensable requirements for the increase of the confidence among all its members and between these and other publics with which BROMELIA in connected, mainly, the customers in general.

**1.2.** The admission of a set of pre-defined rules has the purpose of anticipating and avoiding possible problems that may eventually interfere in the good conduction of the work and in the interpersonal relationship, in order to facilitate the construction of an adequate environment for the personal and professional development of everyone involved in the process.

**1.3.** The guidelines and principles set forth in the Code of Ethics and Conduct aim to conduct the actions of all stakeholders for their individual growth and the collective development of BROMELIA CAPITAL .

## 2. PRESENTATION

**2.1.** The Code of Ethics and Conduct of BROMELIA CAPITAL (“Code”) highlights the fundamental principles and values that should always be present in the company’s relationships with its partners, customers, consortium members, employees, governments, suppliers, service providers, contractors, competitors, community, and society.

**2.2.** This Code is a set of guidelines that will serve as references for moral and ethical conduct, in order to guide the actions and decisions of all employees regardless of hierarchical level.

**2.3.** The adhesion to the Code of Ethics and Conduct of BROMELIA CAPITAL and the compliance with the principles and guidelines established therein are essential conditions for the work in the company by its employees and also for the preservation of the business environment with contractors, consortium members, suppliers, service providers and contracting parties.

**2.4.** According to the law of business probity (Law No. 12,846/2013) and the decree that regulated it (Decree No. 8,420/2015), BROMELIA CAPITAL also has the duty to extend the Code of Ethics and Conduct to its chain of relationships, in order to make public, in a very clear way, its commitment to business probity and thus assist in building business relationships based on integrity, trust and respect for the public sector, including.

**2.5.** BROMELIA CAPITAL is committed to submit the Code of Ethics and Conduct to periodic annual reviews, with the suggestions and participation of all employees involved in the company's activities, from a constant process of evolution and legitimization of the principles and guidelines provided in this document.

**2.6.** Failure to comply with BROMELIA CAPITAL Code of Ethics and Conduct will subject violators to the application of the penalties inserted in the company's internal rules and in the Brazilian legislation, in particular in Law No. 12,846/2013 and Decree No. 8,420/2015. It may even lead to the termination of the employment contract and/or the service contract, as well as other actions provided for.

**2.7.** All employees of BROMELIA CAPITAL, prior to starting their activities in the institution, must formally declare that they are aware of the Code of Ethics and Conduct of the company. If the employee does not have any formal contract, he/she will sign the "Term of Acceptance to the Code of Ethics and Conduct" confirming his/her knowledge and commitment to follow it.

**2.8.** The document "BROMELIA CAPITAL Code of Ethics and Conduct" is available at: [www.bromeliacapital.com.br/compliance/](http://www.bromeliacapital.com.br/compliance/).

## **3. DRIVERS OF BROMELIA CAPITAL BUSINESS INTEGRITY DEVELOPMENT AND MANAGEMENT SYSTEM**

### **3.1. PURPOSE**

**3.1.1.** To invest in companies and in the development of innovative healthcare solutions that are significant for improving people's lives and the efficiency of institutions.

### **3.2. MISSION**

**3.2.1.** To promote the synergy in the network for the creation, development, and support of the main solutions and innovative companies in the health business around the world, and to have a global vision of the most relevant innovation journeys, as well as to manage them for the continuous improvement of health and people's quality of life.

### **3.3. VALUES AND PRINCIPLES**

**3.3.1.** Committed to transparency and ethical conduct, we act as a reference in transforming conflict into synergy, based on the best governance in the health sector, in order to support the development of the production chain in a collaborative, sustainable and inclusive manner. Our employees work in the pursuit of continuous improvement.

### **3.4. STRATEGY**

**3.4.1.** Our role is to add and generate value by bringing innovative products and services from startups and healthcare companies to hospitals and other institutions interested in innovation, offering these organizations the opportunity to mitigate risks, save resources, and improve their capital performance by deploying these solutions.

### **3.5. BROMELIA CAPITAL INSTITUTIONAL COMMITMENTS**

#### **ETHICAL COMMITMENT**

**3.5.1.** Ensure that the business activities and professional performances reflect, with total fidelity and transparency, the search for compliance with the ethical principles and conduct guidelines of BROMELIA CAPITAL, whether in contracts, obligations or pacts assumed with its contractors, contractors and consortium members.

### **COMMITMENT TO SAFETY, QUALITY OF LIFE AND EXCELLENCE**

**3.5.2.** To act constantly to monitor and reduce the risks related to work processes, ensuring the physical and mental well-being of employees in environments that encourage cooperation, cohesion, knowledge dissemination, and professional and human development.

### **COMMITMENT TO AUSTERITY**

**3.5.3.** BROMELIA CAPITAL considers austerity as an administrative north of high ethical value, which should guide all the actions of the company, and allocates with caution its material or financial resources, without exaggeration or undue expenditure, that is, in a rational and sustainable way, in the correct measure of needs to achieve the business goals.

### **COMMITMENT TO SUSTAINABILITY**

**3.5.4.** To assess the future consequences of its actions and decisions, always aiming to control and avoid risks that can bring threats to the continuity of the company, the business, and our customers, as well as undesirable effects to the environment.

**3.5.4.1.** BROMELIA CAPITAL will always promote, in its activities, the environmental preservation and the use of energy in a rational way.

### **COMMITMENT TO CREDIBILITY, TRUST AND RESPECT**

**3.5.5.** To establish and maintain relationships of trust, based on good reputation, loyalty, respect, and balance between its own interests and those of the contracting parties, contractors, and consortium members.

### **COMMITMENT TO ENTHUSIASM, OVERCOMING AND INNOVATION**

**3.5.6.** To believe that everything can be improved and made effective in an innovative way, in order to surpass all market references and exceed the expectations of its public, always seeking to solve bigger challenges more efficiently.

### **COMMITMENT TO ENTREPRENEURSHIP**

**3.5.7.** To make each employee of BROMELIA CAPITAL an agent of business entrepreneurship, who permanently seeks to establish, in his/her field of activity, competitive advantages, being attentive to retain future trends, appropriating new knowledge, technologies and processes, and seeking improvement through a strong feeling of responsibility regarding his/her attributions and participation in the company.

## **4. BROMELIA CAPITAL ETHICAL PRINCIPLES**

**4.1.** BROMELIA CAPITAL connection with its contractors and consortium members is based on honesty and integrity. This means that all decisions in the company must permanently include evaluation of an ethical nature. The daily activities practiced must be compatible with the ethical values of the company.

**4.2.** In BROMELIA CAPITAL all the business means are guided by transparency and by the permanent search for the truthfulness of the information provided to the business partners and to the Government.

**4.3.** In BROMELIA CAPITAL it is imposed that everyone must be treated with dignity and respect in their personal relationships (internal and external). The company must be seen as an institution where all people feel respected.

**4.4.** In BROMELIA CAPITAL it is constant the concern with the impacts of all its activities and decisions to the longevity of the company, its enterprises and our customers; as well as with the preservation of the environment of the best business practices and business probity. To this end, there is a permanent management of the risks involved in the business with contractors, contracting parties, and consortium members, always taking into account that the future of the company depends on the decisions that are being made in its day-to-day operations.

**4.5.** At BROMELIA CAPITAL we are concerned with the environment and with the exploitation of its known scarce and finite resources. BROMELIA has commitment with the accomplishment of constant and rigid measurement of the consequences of all its programs and enterprises in the quality of life of the people who inhabit the planet.

**4.6.** By acting in a strategic sector for the development of technology, BROMELIA CAPITAL aligns its business strategy with the global development agenda, in order to help the country's growth, aiming at the economic and social development of all communities scattered in our territory.

## **5. BROMELIA CAPITAL BUSINESS CONDUCT GUIDELINE**

### **5.1. BROMELIA CAPITAL GOALS WITH THE CODE OF ETHICS AND CONDUCT**

**5.1.1.** The business conduct guidelines have the goal of guiding the decision making processes at BROMELIA CAPITAL. They also direct the attitudes and behaviors of the

company's directors, managers and employees in their relations with their contractors, consortium members and contracted parties.

## **5.2. RESPONSIBILITY OF OFFICERS FOR COMPLIANCE WITH THE PRINCIPLES AND GUIDELINES OF BROMELIA CAPITAL CODE OF ETHICS AND CONDUCT**

**5.2.1.** At BROMELIA CAPITAL it is essential that all professionals respect and ensure compliance with the principles and guidelines explained in this Code of Ethics and Conduct. The professionals who act in leadership positions are responsible for ensuring that the principles and guidelines defined in this document are followed, mainly because they are the ones who permanently guide the decisions made in their respective sectors. They must also demonstrate, in their attitudes and behavior, that they are engaged with the company's values, creating an environment that encourages compliance with the principles set out here.

## **5.3. ENNOBLEMENT OF RESPONSIBILITY**

**5.3.1.** At BROMELIA CAPITAL there is a requirement to comply with the current regulations, both the company's internal policies and procedures, and the Brazilian legislation, especially Law No. 12,846/2013 and Decree No. 8,420/2015.

**5.3.2.** Adding to such impositions, there is still on the part of the company a stimulus to the responsibility of its employees, who have the free will not to perform any act that puts at risk the good image of the company, the environment, the best business practices and the business probity that BROMELIA CAPITAL values.

**5.3.3.** No one has the prerogative to demand from a BROMELIA CAPITAL professional, or any professional who performs any type of activity for him/her, to practice illegal acts or infractions to the values, ethical principles and conduct guidelines established herein.

**5.3.4.** All professionals who work at BROMELIA CAPITAL or participate in any activity related to it have the right to obtain clarification and express their concern about improper conduct in the workplace, when considered contrary to the guidelines contained in this document.

## **5.4. CORPORATE GOVERNANCE**

**5.4.1.** Considering the extreme value of transparency and integrity for the company, as well as the importance of building and maintaining relationships of trust with its business partners and the Public Power, BROMELIA CAPITAL always reports accurate data about its operations, regularly accounts for its actions and thus maintains the balance and fairness in its decisions, with the goal of always respecting the contracts, obligations and covenants with contractors, contractors and consortium members.

**5.4.2.** All BROMELIA CAPITAL professionals, when issuing documents on behalf of the company or to represent it, whether by physical or electronic means, must obtain prior final authorization from the supervisor of the respective area whenever such documents may generate any consequence to the fulfillment of contracts and obligations, as well as negatively influence the transparency and integrity of the company's operations, actions and behavior.

## **5.5. COMMITMENT TO VALUE GENERATION**

**5.5.1.** At BROMELIA CAPITAL we are constantly seeking the expansion of our efficiency, performance and competitiveness, carrying out a frequent management of the risks associated with the business, with the objective of assuring the increase of profitability and the incorporation of value to the services.

## **5.6. COMMITMENT TO EXCELLENCE**

**5.6.1.** BROMELIA CAPITAL believes that all processes can always be improved and it wants its processes, actions and services to be recognized as a reference in the national and international scenario.

## **5.7. COMMITMENT TO THE ACCURATE PROVISION OF DATA**

**5.7.1.** BROMELIA CAPITAL is committed to providing correct, consistent, accurate, truthful and complete information, as well as communicating its systematic positions of control, transparency and integrity of its operations, reporting regularly to customers and competent control bodies.

## **5.8. DATA SECURITY**

**5.8.1.** Internal information is considered as assets of BROMELIA CAPITAL. Therefore, the company has a strict information security policy and classifies them into public, internal use and confidential, in order to ensure the correct use and adequate protection of its database.

**5.8.2.** The use, sharing and disclosure of company proprietary information about the market, processes, programs, technologies, business trends, customer data and the institution's results must comply with the respective appropriate levels of each information. The unauthorized use of any information generated by BROMELIA CAPITAL is a serious offense.

## **5.9. CONFLICTS OF INTEREST**

**5.9.1.** It is the duty of all professionals who work and provide services to BROMELIA CAPITAL to act with total integrity, avoiding, in the exercise of their duties, conflicts of interest, whether real or apparent, in their personal and professional relationships. In this particular, the definition of relations and the performance of business are based on transparency,



respect for ethical principles and guidelines of business conduct, as well as the observance of the best market practices.

## **5.10. COMMERCIAL RELATIONS**

**5.10.1.** BROMELIA CAPITAL preserves rules that determine its procedures on commercial relations, which must at all times be based on the impartial choice of customers and suppliers, and on the use of strictly technical and commercial decision criteria in contracting processes.

**5.10.2.** The ties of BROMELIA CAPITAL with its suppliers of inputs, materials or service providers, must cover the legitimate interests and work of those involved, not being admitted undue benefits, achieved through constraint, coercion, manipulation of information, intimidation or the artificial creation of situations of dependence on the other party involved, unfair competition practices or situations characterized as conflict of interest with the company's business.

**5.10.3.** With the purpose of guaranteeing the smoothness, the exemption and the transparency in its activities, as a general rule, BROMELIA CAPITAL forbids the participation of its professionals in decision processes with companies that have, as partners or directors, people with whom they have natural or civil kinship, in any line or degree.

**5.10.4.** The professionals who work in and for BROMELIA CAPITAL have the obligation to act with care and diligence, when conducting business of a particular nature with suppliers or other parties with whom the company has a relationship. At BROMELIA CAPITAL, it is prohibited to contract with suppliers who do not comply with current labor laws or who supply products or services without adequate safety, as well as with those who do not offer training and safety equipment to their employees or who exploit child labor.

## **5.11. PROFESSIONAL WORK OUTSIDE BROMELIA CAPITAL**

**5.11.1.** In BROMELIA CAPITAL, the exercise of other activities as consultancy for third parties outside the company, by its professionals, will only be accepted if it does not generate incompatibility of schedule and damage to the professional performance of the employee, nor conflict with the business and interests of the company.

## **5.12. FAMILY RELATIONSHIPS AMONG THE COMPANY'S PROFESSIONALS**

**5.12.1.** At BROMELIA CAPITAL, it is authorized to work with professionals who are related to each other, and the hiring will always be preceded by a rigorous selection process and specialized evaluation, in order to ensure fairness, impartiality and transparency. People from



the same family or with a direct social relationship will not be allowed to work together in positions of direct subordination.

### **5.13. USE OF COMPANY-OWNED RESOURCES**

**5.13.1.** BROMELIA CAPITAL owns assets of all kinds, such as: patents, facilities, vehicles, real estate, equipment, brands and a wide range of knowledge, information, systems, processes, technologies and innovations that were perfected in the company. All the professionals who work there have the duty and obligation to protect and preserve the company's assets from improper or improper use.

### **5.14. USE OF ELECTRONIC MEDIA**

**5.14.1.** BROMELIA CAPITAL maintains detailed rules on the use of social networks, corporate email, internet, intranet and other electronic sources of information for working hours and / or in situations of conflict with the positions and activities performed by professionals of the company, regardless of the time they occur. It is forbidden to divulge, internally or externally, messages with contents alien to the company's activities, mainly those related to racism, rumors, propagation of pranks, pornography, trafficking of illicit substances, as well as weapons, pedophilia, illegal commerce (smuggling or propaganda) and activities of a political party nature.

### **5.15. INTELLECTUAL PROPERTY AND COPYRIGHT**

**5.15.1.** BROMELIA CAPITAL observes the copyrights and intellectual property rights of third parties in similarity to the various materials used by the company, and does not authorize their use, nor the dissemination of unauthorized copies (obtained illegally) of any materials, systems and software made available by third parties.

**5.15.2.** The technical documents, materials, methodologies, proposals and processes elaborated by BROMELIA CAPITAL and its professionals are the exclusive property of the company, and BROMELIA partners, its consortium members and contractors are not allowed to use them without previous and express authorization from the institution's board of directors.

### **5.16. RELATIONSHIPS WITH POLITICAL ACTIVITIES AND THE PUBLIC SECTOR**

**5.16.1.** The relations of BROMELIA CAPITAL with public authorities are based on transparency, aiming to implement the construction of relationships of integrity, sustainability and contribution with the Executive, Legislative and Judiciary powers. The company, within the limits of its essential activities, may eventually participate in debates on public policies and other matters of relevant interest to society.

**5.16.2.** BROMELIA CAPITAL maintains impartiality and exemption in relation to candidates, political parties or currents. The employees who work in the company, when participating in

political party activities, do it by strictly personal choice, out of their working hours and places.

**5.16.3.** BROMELIA CAPITAL does not authorize the use of its resources, programs and services to be associated with political activities, being prohibited any form of donation, financing or contribution to political campaigns or electoral candidacies.

### **5.17. CORRUPTION AND FAVORITISM**

**5.17.1.** BROMELIA CAPITAL repudiates and exposes all and any form of favoritism, corruption, extortion and bribery, at all levels. The company is committed to always perform the best market practices, fully observing its ethical and conduct guidelines.

### **5.18. ADVERTISING, PUBLICITY AND GRANTING OF SPONSORSHIPS**

**5.18.1.** BROMELIA CAPITAL commits to respect the best practices regarding sponsorships and donations, not allowing them, in any way, when they: encourage the use of alcoholic beverages, tobacco and illicit drugs; generate prejudiced presentation; cause embarrassment, exclusion, humiliation; stimulate or induce environmental damage; expose the vulnerability of individuals and groups; cause animal abuse.

### **5.19. PREJUDICE, DISCRIMINATION AND HARASSMENT**

**5.19.1.** BROMELIA CAPITAL does not tolerate and must reject from its activities any and all forms of prejudice, discrimination and harassment.

**5.19.2.** The company's commitment is to investigate and confront situations of injustice, humiliation, exposure to ridicule, intimidation, hostility and embarrassment, due to color, sexual orientation, place of birth, race, sex, ethnic origin, language, age, union ideology, economic condition, nationality, religion, physical, mental or psychological condition, kinship or political position.

**5.19.3.** The company is committed to preventing specific functional categories from receiving privileges, due to their differences.

### **5.20. HEALTH, SAFETY AND QUALITY OF LIFE**

**5.20.1.** In BROMELIA CAPITAL, there is the understanding that the good performance of the company is directly associated with the safety, health and quality of life of its professionals. In this way, it always seeks to provide work safety to the employees, besides stimulating educational initiatives that increase the perception and knowledge of all its professionals in relation to this matter. Thus, the employees who work in the company have the duty to know all the internal safety norms, in addition to properly using the protection equipment and always acting to prevent accidents.

**5.20.2.** In BROMELIA CAPITAL, no activity will be executed without safety conditions, constituting duty and obligation of its collaborators the immediate communication of unsafe conditions that can put in risk the life of any person.

### **5.21. PROFESSIONAL DEVELOPMENT AND ENHANCEMENT**

**5.21.1.** The professional growth of each employee in BROMELIA CAPITAL is based exclusively on individual merit. The company rejects any criterion of favoritism or discrimination of people.

**5.21.2.** The company values the potential of its service providers, by means of permanent professional development programs and the use of various remuneration systems, in accordance with market practices.

### **5.22. VALUING DIVERSITY AND SOCIAL INCLUSION**

**5.22.1.** BROMELIA CAPITAL stimulates and values diversity, as well as social inclusion, respecting differences and adapting its work processes, environments and equipment, with the goal of ensuring good conditions in the workplace. The company is committed to implement and maintain a personnel management system that incorporates this position in the policies of compensation, termination of persons, selection, hiring, development and promotion.

### **5.23. RIGHT TO FREE ASSOCIATION AND COLLECTIVE BARGAINING**

**5.23.1.** BROMELIA CAPITAL knows the value of the constant search for harmonization of the interests of the company and its employees. The company defends the right to free association and collective bargaining, as well as recognizes the legitimacy of all professional unions.

### **5.24. GIVEAWAYS AND GIFTS**

**5.24.1.** BROMELIA CAPITAL professionals must promptly refuse gifts or favors of any nature that are not in line with the company's values and principles, as well as good business relationship practices. Only promotional gifts and presents that do not have commercial value or that can be publicly revealed without causing any embarrassment to the company and the professional may be accepted.

### **5.25. ALCOHOL AND DRUG USE**

**5.25.1.** BROMELIA CAPITAL knows that the use of alcohol or any kind of narcotic substance that alters the individual's behavior, be it by its employees or professionals from consortium and contracted companies, constitutes serious misconduct, since it compromises the health and professional performance, damaging the work environment and generating damages to the company and its image.

**5.25.2.** At BROMELIA CAPITAL, the use, possession or commercialization of illegal drugs, subject its practitioner to the penalties of the legislation in force, and may even cause the termination of the employment contract and/or the service contract, if applicable.

#### **5.26. RESPECT FOR PRIVACY AND CONFIDENTIALITY**

**5.26.1.** BROMELIA CAPITAL fully respects the private life and privacy of its professionals, as well as the confidentiality of their personal information.

**5.26.2.** The authority exercised by BROMELIA CAPITAL to its employees may not restrict the right to freedom of expression and privacy. Nor may they be used arbitrarily to obtain privileged information.

#### **5.27. COMMUNITY PARTICIPATION AND SUPPORT FOR VOLUNTARY ACTIONS**

**5.27.1.** BROMELIA CAPITAL will participate in social and cultural projects and/or in activities that stimulate the practice of citizenship, the elimination of poverty, and the reduction of social inequalities.

#### **5.28. DISSEMINATION OF THE CODE'S PRINCIPLES AND GUIDELINES**

**5.28.1.** BROMELIA CAPITAL has the commitment of disseminating its ethical principles and the guidelines of business conduct contained in this Code. Therefore, it will promote the regular disclosure of the same and will carry out actions with the objective of training its professionals to apply these measures in the company in all situations that may be necessary.

**5.28.2.** The company will also maintain access channels for the presentation of complaints, suggestions, criticisms, and denunciations of an ethical nature and regarding the conduct of its professionals or representatives, regardless of their hierarchical level.

#### **5.29. INSPECTION AND CONTROL ACTIONS OF THE ACCOUNTING BOOKS AND RECORDS**

**5.29.1.** BROMELIA CAPITAL is committed to writing down all its reports and balance sheets to ensure their transparency.

**5.29.2.** The company assumes the commitment of making its accounting books available to the audits of the inspection and control bodies, as well as to the competent public authorities, maintaining the constitutional guarantees of due legal process, ample defense, and adversary proceedings.

### **5.30. VESTIMENTA**

**5.30.1.** The personal presentation of each employee helps the image of BROMELIA CAPITAL, whose objective is to be seen as a serious, ethical and responsible company.

**5.30.2.** Each employee must remember that his or her appearance conveys a non-verbal message, and dress should mirror the seriousness that BROMELIA CAPITAL activity requires. In any case, the employees' common sense prevails.

### **5.31. RECORDING AND ACCESS OF CALL, MESSAGES, E-MAILS AND MONITORING**

**5.31.1.** BROMELIA CAPITAL reserves the right to monitor calls, messages and e-mails made by its employees when originating from strictly professional devices and activities.

### **5.32. PUNISHMENTS**

**5.32.1.** The non-compliance by agents and employees with any of the rules established in this Code, whether isolated or cumulative, will be capable of producing, according to the violation committed, the following punishments:

**5.32.2.** Communication of non-compliances;

**5.32.2.1.** A communication will be sent to the infractor, by e-mail, with a copy to the superior, informing of the possible non-compliance with the rule, with a precise indication of the violation committed.

**5.32.2.2.** A copy of this communication will be sent to the company's representatives and this act will be analyzed in a meeting specifically scheduled for this purpose.

**5.32.2.3.** The eventual punishment will be communicated to the offender, who will have a period of 5 (five) days to produce his defense, which will be analyzed by those who issued the punishment, so that they can change it, if they so wish.

**5.32.3.** Notice

**5.32.3.1.** The warning penalty will be applied, in writing, only in cases of a serious nature, as defined by the company's representatives, or in the case of repeated practice of two infractions of lesser gravity.

**5.32.3.2.** In the case of a warning, the offender will also have a period of 5 (five) days to defend himself, and such arguments will be sent to the body that issued the decision, which may or may not change it.

**5.32.4.** Suspension

**5.32.4.1.** In the case of a warning, the offender will also have a period of 5 (five) days to defend himself, and such arguments will be sent to the body that issued the decision, which may or may not change it.

**5.32.4.2.** If it is the company's understanding that this is a very serious violation, the user may be terminated for cause, even if he has not been previously warned.

## **6. CHANNEL FOR COMPLAINTS**

**6.1.** The Channel for Denunciations has the objective of obtaining internal and external demands related to the ethical issues and business probity dealt with in this Code of Ethics and Conduct of BROMELIA CAPITAL.

**6.2.** The employee or whistleblower is assured total secrecy and confidentiality. The demands will be forwarded and analyzed by the BROMELIA CAPITAL Compliance Officer, who will be responsible for preparing a detailed opinion regarding the legal and economic effects that the violations, in theory, may generate for the company or its employees.

**6.3.** BROMELIA CAPITAL makes available for the communication of possible transgressions to the Code of Ethics and Conduct the following channels:

- Electronic access by e-mail;
- Electronic access through the company's website;
- Direct access to the Compliance Officer to report irregularities.

**6.4.** The Compliance Officer will be in charge of submitting the demands to the Board of Directors of BROMELIA CAPITAL, with the elaboration of the opinion mentioned above, giving its opinion on the eventual instauration of the due process of internal investigation, according to the internal norm of processing of investigation processes.

**6.5.** BROMELIA CAPITAL does not tolerate revenge or punishment to the company's professionals or to any persons who present critics, suggestions, complaints or claims.

**6.6.** Any and all breaches or issues related to the conduct of employees, consultants or service providers of BROMELIA CAPITAL, or any of our business partners, should be reported, immediately, to the Chief Compliance Officer of BROMELIA CAPITAL, via e-mail: **[compliance@bromeliacapital.com](mailto:compliance@bromeliacapital.com)**.

## **7. GENERAL DATA PROTECTION LAW (LGPD)**

**7.1.** The company takes measures in order to safeguard all information received by it and ensure the activities related to Information Security, as well as the protection of fundamental rights of freedom and privacy of each user, in line with the Law No. 13,709/18 - General Law of Data Protection (LGPD).

**7.2.** Employees and service providers who access and manage the company's data must take all reasonable precautions to ensure that the data is accessed, handled and/or processed only by persons who need the information exclusively to perform their professional activities. They must also acquire data only for the performance of their activities, especially those considered sensitive.

**7.3.** If third-party data is to be disclosed by the company, the responsible service provider must have the consent of the data subject to its collection and processing, by means of a Term of Consent, with due care and preservation of confidentiality.

**7.4.** The disclosure of personal data acquired and maintained in the company, as well as its collection, especially in relation to data classified as sensitive by LGPD, is strictly prohibited.

## **8. DURATION**

**8.1.** BROMELIA CAPITAL Code of Ethics and Conduct was approved by the company's principal shareholders and signatories by unanimous decision, effective as of the date of its approval.