



CODE OF ETHICAL CONDUCT

Version: 001.C-CED.ALF: EN/US

Date: October 10th, 2022





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DEAR EMPLOYEE/ COLLABORATOR, PARTNER, TRAINEE OR INTERN

Welcome to the ALF Code of Ethical Conduct!

This Code of Ethical Conduct is a natural evolution of all our management work, that comes gradually consolidating and improving more and more. It was built from the contribution of many groups from many areas of **ALF**. Our Code of Ethical Conduct searches to provide, in a clear and simple way, rules and principles that must guide all our actions. We believe that our commitment to the ethical standards is the better way of being an example for our employees, partners, and, above all, for our young people. Whenever in doubt about any point, you can contact the Ethics and Risks Committee, or the manager or director linked to you. In the same way, in case you believe that another person or even the **ALF** is not reaching the standard of this Code of Ethical Conduct, we strongly recommend that you report the issue to the responsible instances through the official channel:

Website: www.amorimlawfirm.com

We count on the participation of everyone!

We invite you to read and experience RENAPSI's Code of Ethical Conduct.

Kind regards, the Board.

I. INTRODUCTION



This **ALF** Code of Ethical Conduct establishes the basic precepts of professional conduct for all employees, partners, young people, interns involved in the activities of **ALF**, considered herein as **Recipients** of this code, which must be lived and disseminated by all during their professional activities. Our attitudes must be an example of ethics and conduct for everyone with whom we relate. The Code of Ethical Conduct of **ALF** has as basic purposes: establish principles, guidelines, and general norms that should guide behavior, as well as parameters that will help the search for an ethical and integrated performance. In addition to this, all other appointments expressed by **ALF** through rules, regulations, regiments, and policies, equally line up with the present set of values and are inspired by it. The last page of this Code of Ethical Conduct contains an acknowledgment statement that confirms that the recipient has received a copy of this document and is familiar with its content.

1.1 WHO MUST LIVE THE CODE OF ETHICAL CONDUCT OF ALF?

This Code of Ethical Conduct is intended to:

- A.** All the employees/collaborators, trainees, interns, apprentices, directors, associates, members of the board of directors and committees of **ALF**;
- B.** All the partners of **ALF** with whom the Institution maintains legal and institutional relations for the execution of its activities, which must commit to some basic conduct rules in what suits them;
- C.** All **ALF** suppliers, distributors, business partners, and service providers.

All these people are, together, here named Recipients.

1.2 HOW THE CODE OF ETHICAL CONDUCT MUST BE APPLIED?

The application depends on each one of us, both in relation to our own conduct and in relation to the attitude of everyone who we interact with. Therefore, whenever we become aware of a violation of this Code of Ethical Conduct, we will act to correct the problem and prevent new cases. Every report received will be investigated and, depending on the circumstances, will result in corrective, preventive, and/or disciplinary actions - such as training, counseling, and, if applicable, application of sanctions, which may result in termination of the employment contract or of the business relationship held with **ALF** by the person who violates this Code of Ethical Conduct. No



type of retaliation will be practiced against any person who reports a situation of non-compliance with this Code of Ethical Conduct, even because it can be done in an anonymous and confidential way.

1.3 ETHICAL CHANNEL

We have available communication channels with mechanisms of confidentiality guarantees to receive information or complaints, identified or anonymous, about possible non-compliance with the principles defended by the **ALF**. The reports received will be investigated and the result of this investigation will be discussed by the Ethics and Risks Committee.

II. WORK ENVIRONMENT

ALF is committed to conducting its activities in compliance with the laws and regulations of work safety, health, and the environment. Also hopes that the employees interact with each other and with any third parties with cordiality, trust, respect, and honesty, independently of the hierarchical, office or function. We encourage our employees to adopt the highest standards of coexistence, not only between themselves but also in the relationships with our Young Apprentices, partners, suppliers, and distributors.

2.1 RESPECT AND EFFICIENCY WITH THE YOUNG PERSON

Every **ALF** employee, independently of their hierarchical position, has respect and reverence for its targeted audience, no matter the age or descendance, in all their specific needs and demands to their age group and socioeconomic status. All the efforts of the Institution are aimed at the constant improvement of the operation of the program and the educational and psychosocial assistance provided. So, it's indispensable for all employees:

- A.** Perform the duties of your function with a high sense of commitment, responsibility, and proactivity.
- B.** Perform functions accurately and within the required deadlines.
- C.** Perform your activities, always seeking to overcome challenges.
- D.** Search for innovative proposals and continuous improvement of **ALF** processes.
- E.** Recognize the mistakes made, correct them, and identify ways to avoid them.

Good coexistence in the work environment is important for the quality of life

2.2 RESPECT FOR DIVERSITY



ALF believes in the potential of individuals and respects people from all backgrounds, abilities, orientations, and opinions. We value diversity and foster an inclusive environment that promotes expression, creativity, innovation, and individual achievements. We believe that diversity — of people and ideas — inspires innovation, provides crucial insights into our Young Apprentices, and enhances our competitive advantage in the market. Furthermore, we are committed to treating all internal and external stakeholders fairly and equitably. We aim to develop and retain a workforce with diverse backgrounds, experiences, approaches, and ideas, and we share this vision with the companies and individuals with whom we maintain institutional relationships.

Guided by this respect:

We hire, retain, and promote employees based on qualifications, skills, achievements, and merits;

We treat each other with dignity and respect, fostering an environment of open and honest communication;

We expect our partners to act consistently with our good conduct practices.

2.3 HARASSMENT AND DISCRIMINATION

ALF values the dignity of each of its employees and the right to a workplace free from discrimination and harassment. Decisions regarding hiring, salary, benefits, promotion, sanctions, termination, or retirement are solely based on the employee's ability to perform their job.

Psychological harassment involves subjecting someone to a situation of discriminatory humiliation repetitively and constantly.

The person who experiences psychological harassment is often exposed to situations that are not part of their responsibilities or is forced to tolerate words and actions that undermine their dignity.

In the Penal Code, sexual harassment is defined as the coercion of someone to obtain sexual advantage or favor, taking advantage of hierarchical superiority or influence over the victim, inherent to the exercise of employment, position, or function.



In Labor Law and Civil Law, harassment is established even in relationships where there is no hierarchy between the parties. Thus, the harasser may be terminated for just cause and may also have to pay compensation if claimed by the victim, even when there is no hierarchical relationship between the parties.

Sexual harassment is a crime under the Brazilian Penal Code and will be treated as such by **ALF**. Any situations involving humiliation, intimidation, exposure to ridicule, hostility, or embarrassment are considered harassment, whether related to race, gender, sexual orientation, age, competence, medical condition, religion, political ideology, nationality, or social status.

ALF encourages open and immediate reporting to the Compliance and Control Department of any attempted, actual, or suspected harassment or discrimination involving any of its Recipients. This report can be submitted through the following communication channel:

Website: www.amorimlawfirm.com

Did you know...

- **That the demand for sexual favors as a prerogative for obtaining a promotion or even as a threat to prevent the victim from being fired is a common example of sexual harassment?**
- **That sexual harassment is a crime provided for in the Brazilian Penal Code, with a penalty of up to 2 years in prison?**

ALF will investigate all complaints and, as appropriate, will report any unlawful practices to the relevant authorities.

Expected and Encouraged Conduct

A. If you believe you have been discriminated against or harassed, or if you become aware of a situation of discrimination or harassment involving one or more Recipients, whether they are instructors, Young Apprentices, partners, or suppliers, you must immediately report the situation to **ALF's** Department of Control and Compliance through the communication channels mentioned above. All reports will be investigated, and the identity of the reporter will be kept confidential.

Unacceptable Conduct



A. You must not have an offensive behavior, whether verbal, physical, or virtual, that harasses other Recipients, whether they are employees, instructors, Young Apprentices, clients, suppliers, distributors, or visitors during the course of your professional activities, both within and outside of **ALF**;

B. You may not engage in acts that constitute discrimination or psychological or sexual harassment during your professional activities, whether within or outside of **ALF**, under the risk of facing the sanctions stipulated in this Code of Ethical Conduct, as well as civil and criminal liability for your actions.

2.4 PRESERVATION OF ALF'S ASSETS AND RESOURCES

ALF's assets and resources include facilities, infrastructure (physical and virtual), equipment, vehicles, furniture, and financial resources and investments.

According to the role performed by our Recipients, **ALF** will provide the necessary resources for the optimal performance of their professional activities, such as computers, internet access, email, telephone, vehicles, machinery, and furniture, among others.

Recipients must use them prudently, respecting occupational safety and health regulations, as well as preserving their integrity;

The assets provided by **ALF** must be used exclusively for activities related to the Institution, subject to other provisions established in specific policies. It is expressly prohibited to lend, rent, trade, exchange, or donate them without proper authorization;

Recipients must ensure the conservation of **ALF's** assets and resources, avoiding waste and unnecessary expenses;

The internet and email are provided by **ALF** to Recipients for professional use. It is expected that these resources are used in a manner consistent with **ALF's** Information Technology policies and procedures, including the adoption of Information Security Policy."

Expected and Encouraged Conducts

A. You may use the assets provided by **ALF** to carry out your work properly and efficiently while respecting the conservation and usage guidelines for the provided asset;



B. You may use **ALF's** internet moderately for personal purposes, as long as it does not hinder the progress of your work and does not violate the Information Security Policy, this Code of Ethical Conduct, or any relevant laws in the country;

C. You must use the resources provided by **ALF** correctly and moderately, being mindful of potential wastage due to misuse. **ALF** will monitor the usage of all resources provided to Recipients, including email and computer programs.

Unacceptable Conducts

A. You must not request **ALF's** equipment for exclusively personal use or for activities that represent a conflict of interest. All requests for the acquisition of goods or use of **ALF** resources must be made strictly for professional purposes. If you have any doubts about whether you can or should request a specific asset or resource, ask the Compliance and Control Department;

B. You must not unlawfully appropriate assets or property belonging to **ALF** or other Recipients;

C. Cases of theft or misappropriation will be treated as serious violations of this Code of Ethical Conduct and, whenever applicable, reported to the relevant authorities, with potential civil and criminal consequences;

D. You must not use the electronic means provided by **ALF** for playing games, exchanging, or storing obscene, pornographic, violent, discriminatory, racist, or defamatory content. If you identify the misuse of resources provided by **ALF**, report the practice to the Ethics Channel!

2.5 FRAUD

Fraud occurs when the Recipient misleads **ALF** or any third party in order to gain an advantage for themselves or others. Examples of fraud include the forgery of documents (such as receipts), improper alteration of accounting data, and the intentional allocation of expenses to inappropriate cost centers. Any behavior or transaction aimed at diverting or deriving financial or other benefits for you or others, including misappropriation of **ALF's** or partners' assets, not only constitutes a violation of this Code of Ethical Conduct and the terms of your contract but also constitutes a crime!

ALF encourages open and immediate reporting to the Department of Controller and Compliance of any attempted, actual, or suspected fraud involving **ALF** and/or its Recipients. This report can be submitted through the following communication channel:



Website: www.amorimlawfirm.com

ALF will investigate all complaints and, as appropriate, will report any fraudulent or illegal practices to the relevant authorities, in addition to practicing all rights maintained in the civil and criminal spheres.

Expected and Encouraged Conducts

If it is your responsibility, you must maintain **ALF's** records, books, and accounts accurately and correctly, in compliance with the current legislation and best practices of the market.

Carefully select our partners, always adhering to applicable procurement policies, and ensure that they maintain the same high standards that **ALF** expects from its Recipients.

Unacceptable Conducts

Under no circumstances you can submit expenses using a forged receipt or one that does not correspond to the expense actually incurred. Similarly, expenses cannot be approved by any employee who does not have the authority to do so;

You are not authorized to conceal, alter, forge, manipulate, or intentionally omit any type of information or document, such as balances, reports, tax documents, money, evidence, and notes.

Be attentive to situations like this:

I have a lot of accumulated work and would like to lend my notebook or share my password with someone from my team to handle approvals in **ALF's** systems on my behalf. I have complete trust in this person and wouldn't mind sharing my password. Is this possible? **No!** Recipients should **never** share their personal passwords. Authorization levels are structured so that each employee has responsibilities consistent with their training and maturity. If you disregard these controls, you will weaken the security of our systems, avoid your own responsibilities, and put your team in a delicate position of policy violation — as well as facilitate the occurrence of fraud. If necessary, discuss the matter with your manager.

2.6 ALCOHOL, DRUGS, AND WEAPONS



In order to maintain a healthy and respectful work environment for all our Recipients, certain rules regarding the consumption of alcohol and drugs, as well as the carrying of weapons, must be observed.

Approved Conduct

A. Smoking outside the physical limits of **ALF**, that is, outside the Institution's gates.

Unacceptable Conducts

A. You cannot perform your duties, enter or remain on our premises, or engage in external activities related to **ALF** under the influence of alcoholic beverages, illicit drugs, or narcotics;

B. The consumption of alcohol is not allowed on the premises of the Institution, in any of the Training Centers or Hubs where **ALF** conducts youth training activities;

C. No Recipient or visitor (except individuals with legal firearm permits) is allowed to possess or carry any type of weapon (knives, pocket knives, air guns, pellets, firearms, etc.) on our premises or during external activities related to **ALF**. Service providers who use weapons as tools of their trade must be properly identified, trained, and authorized.

III. CONFLICT OF INTEREST

Our employees have a fundamental goal of always acting in the best interest of **ALF** and our young people and partners. Consequently, a conflict of interest can arise when an employee is in a situation that may lead them to make decisions motivated by interests other than those of **ALF** and its programs. Therefore, communication and vigilance are essential to ensure that no employee places themselves in a situation where their personal interests or relationships could conflict with **ALF**'s interests.

Decisions made by the employee cannot be influenced by any opportunities, financial gains, or other benefits, whether real or potential, for themselves or for third parties, including friends, relatives, or business partners. All employees must avoid situations involving conflicts of interest, even if only apparent. If an employee believes that any of the above situations apply to their current circumstances, they should seek their direct manager or the Compliance and Control Department so they can jointly assess the concrete risks.

Below are specified some situations where there is potential for a conflict of interest, for which you must necessarily consult your direct manager or the Department of Control and



Compliance. This consultation must be done before commencing activities that could trigger a potentially conflicting situation.

Conflict of interest is when your personal interests conflict with ALF's interests

3.1 PARALLEL ACTIVITY

A parallel activity of an **ALF** employee is considered to be the performance of another professional activity, whether paid or unpaid, in addition to that carried out within the Institution. Occasional or sporadic work performed by our employees unrelated to **ALF** is also considered a parallel activity.

Approved Conduct

A. You may engage in parallel activities as long as they are conducted outside of your working hours, do not impair your performance at **ALF**, and do not conflict with **ALF**'s interests or the activities carried out by the organization.

3.2 ROMANTIC RELATIONSHIPS AND KINSHIP

We understand that situations may arise in which our employees have kinship relationships with each other or become romantically involved with another employee. To prevent conflicts of interest in such cases, we have established certain rules that must be observed when there is a romantic relationship or kinship among our employees.

Approved Conducts

A. You may have a kinship relationship or romantic involvement with another employee, as long as there is no level of hierarchical subordination or influence in management decisions between you;

B. Whenever there is a kinship relationship or romantic involvement between you and another employee within the same hierarchical chain, the situation must be immediately reported to your manager and the Compliance and Control Department for evaluation. If necessary, the individuals involved may be reassigned.

Unacceptable Conducts



A. Under no circumstances can you intervene in the hiring or evaluation process of a person with whom you have a romantic relationship or kinship;

B. You must not omit the existence of a romantic relationship or kinship relationship between you and another employee within the same hierarchical chain, as such omission will be considered a serious fault.

3.3 POLITICAL INVOLVEMENT

As a non-governmental organization, **ALF** encourages debate, as long as it is conducted democratically and peacefully. It is expected that no Recipient will use their relationship or position at **ALF** to disseminate any political positions and/or ideologies. No asset or information owned by **ALF** should be used to make any form of political contribution to a candidate or political party. This not only applies to direct contributions but also to indirect support of candidates or political parties through the purchase of tickets for fundraising events, as well as the provision of goods, services, and equipment to political parties or committees.

Every employee is obligated to disclose if they fall under the definition of a Politically Exposed Person¹ at the time of their hiring, providing details on the matter.

IV. POLAR OR TRAINING CENTER ENVIRONMENTS OF ALF

All the facilities where ALF conducts youth training activities are committed to ensuring a quality training and learning environment. For this to become a reality, ALF:

1. Promotes the rights and safety of every Center or Training Facility.
2. Values the diverse identities and skills of the Young Learners, recognizing the value of cooperation.
3. Ensures accountability for the actions and behaviors of each Center or Training Facility member.
4. Discourages discrimination, prejudice, intolerance, harassment, and other potentially offensive conduct.
5. Ensures the maintenance of an inclusive environment in all dimensions.
6. Ensures the existence of a training environment that provides the best conditions for our

¹ Politically Exposed Persons are considered to be political agents who currently or have held, in the last five years, significant public positions, jobs, or functions in Brazil or in other foreign countries, territories, and dependencies, as well as their representatives, family members, and close associates.



Young Learners to be intellectually free, autonomous, and aware of themselves and the world around them.

7. All members of the Center or Training Facility are subject to these terms. They apply within the spaces of the Center or Training Facility, in the vicinity, or any activity related to the Center or Training Facility, regardless of the location.
8. It is important to remember that with broad access to technology, many dangers and risks also occur in the virtual environment. Therefore, all conduct rules applicable to the physical environment of the Center or Training Facility should also apply to expressions made via the Internet, social networks, and other forms of virtual communication, such as instant messaging applications.
9. It is essential for all educators and other staff of each Center or Training Facility to be familiar with these terms and to sign the Commitment and Receipt Agreement of ALF's Code of Ethical Conduct, declaring their awareness and agreement. Ensuring the application of this Code of Ethical Conduct is a commitment of all members of the Institution and, primarily, the responsibility of the Management of each Center or Training Facility.

ALF prioritizes the safety and well-being of its Young Learners, both in the physical and psychoemotional realms. A student can only fully develop their abilities and competencies in an environment in which they feel welcomed and secure.

BE ALERT!

1. If you have any reason to believe that any of our collaborators is the perpetrator of a dangerous situation or is exposed to risk, immediately contact the Management of the Center or Training Facility and/or ALF's Compliance and Control Department, so measures can be taken;
2. All members of the Center or Training Facility are subject to these terms. They apply within the spaces of the Center or Training Facility, in the vicinity, or any activity related to the Center or Training Facility, regardless of the location.
3. It is important to remember that with broad access to technology, many dangers and risks also occur in the virtual environment. Therefore, all conduct rules applicable to the physical environment of the Center or Training Facility should also apply to expressions made via the Internet, social networks, and other forms of virtual communication, such as instant messaging applications.



4. It is essential for all educators and other staff of each Center or Training Facility to be familiar with these terms and to sign the Commitment and Receipt Agreement of ALF's Code of Ethical Conduct, declaring their awareness and agreement. Ensuring the application of this Code of Ethical Conduct is a commitment of all members of the Institution and, primarily, the responsibility of the Management of each Center or Training Facility.

This chapter is not intended to exhaust the issues involving the day-to-day operations of an ALF Center or Training Facility. Therefore, if you have any questions or comments about such rules, please contact the Management of the Center or Training Facility and/or ALF's Compliance and Control Department.

4.1. DISCRIMINATION AND PREJUDICE

The Center or Training Facility houses Young Learners of different ages, levels of psychosocial development, genders, races, social conditions, and with special needs. Differences are a part of human nature, but how we handle them is socially constructed. Therefore, it is the responsibility of the Center or Training Facility to provide spaces for Young Learners that expand the discussion on discrimination and prejudice, their different types, origins, and consequences. In addition to fostering this discussion, the staff of the Center or Training Facility must conduct their activities in a way that respects differences and includes all staff and Young Learners, without exception.

In the training environment, prejudice and discrimination can manifest in various ways, such as:

1. Jokes, intentional or unintentional, that imply a negative message or offend a group or individual.
2. Verbal and/or physical aggression.
3. Omission by the Management and/or educators in selecting books, toys, tools, graphic communication materials, and decorations that align with the appreciation of diversity (racial, gender, cultural, among other types).
4. Aggressive and/or prejudiced expressions in the press, social media, or any other form of media.
5. Political, religious, ethnocentric expressions, or any form of exclusion of individual identity and any partisan or discriminatory content from instructors, in any ALF Center or Training Facility, whether within or around our premises or in events they organize.



Prejudice and discrimination, aside from violating the principles of Human Rights, undermine the right to equality, a fundamental right of individuals. When individuals experience prejudice and/or discrimination during childhood or adolescence, it can hinder their socioemotional development, leading to serious consequences. Therefore, ALF is committed to maintaining an environment free from any form of prejudice and discrimination toward Young Learners, parents, and staff.

Did you know:

- The Statute of the Person with Disabilities (Law No. 13,146/2015) aims to ensure and promote, under equal conditions, the exercise of rights and fundamental freedoms by people with disabilities.
- For this purpose, the Statute of the Person with Disabilities defines a person with a disability as someone who has some type of long-term impairment, of a physical, mental, intellectual, or sensory nature, that could hinder their full and effective participation in society on equal terms with others.

4.2. BULLYING AND HARASSMENT

Bullying refers to all forms of abuse and violence, whether physical or psychological, intentional and repetitive, exerted by one or more individuals to intimidate or harm a person who cannot defend themselves, within an unequal relationship of strength or power. Bullying can also occur through the Internet and social media, in which case it's referred to as cyberbullying. Among the most common actions of cyberbullying are sending intrusive messages invading privacy or altering photos and personal information to create psychological and social embarrassment.

Psychological harassment, also known as mobbing, is a type of violence in which a person humiliates, embarrasses, offends, and attacks the dignity of another. It's characterized by frequent abusive and humiliating behaviors, expressed through gestures, words, and actions that harm the physical and mental well-being of the individual.

Sexual harassment is a form of abuse and violence in which the person's discomfort is directed solely toward obtaining sexual advantage or favor. When committed against children and adolescents, both moral and sexual harassment are condemned by the United Nations Convention on the Rights of the Child and the Statute of the Child and Adolescent.



DID YOU KNOW...

That according to the Anti-Bullying Law (Law No. 13.185/2015), systematic intimidation (bullying) is characterized by physical or psychological violence in acts of intimidation, humiliation, or discrimination, as well as in forms of:

1. Physical attacks;
2. Personal insults;
3. Systematic comments and derogatory nicknames;
4. Threats by any means;
5. Degrading graffiti;
6. Prejudiced expressions;
7. Deliberate and premeditated social isolation;

And it can be classified, based on the actions performed, as:

1. verbal: insulting, cursing, and giving derogatory nicknames;
2. moral: defaming, slandering, spreading rumors;
3. sexual: harassing, inducing, and/or abusing;
4. social: ignoring, isolating, and excluding;
5. psychological: pursuing, frightening, terrorizing, intimidating,
6. dominating, manipulating, blackmailing, and tormenting;
7. physical: punching, kicking, hitting;
8. material: stealing, robbing, destroying others' belongings;
9. virtual: belittling, sending intrusive messages about intimacy, sending or altering photos and personal data that cause suffering or are intended to create psychological and social embarrassment.

Stay alert!

If you have any reason to believe that someone is experiencing or perpetrating a situation of harassment, abuse, or bullying, you must immediately contact the Management of the Polo or Training Center and/or the Compliance and Control Department of ALF. This way, all measures within ALF's reach will be taken to address this situation.

4.3. RELATIONSHIPS AND CONDUCT IN THE CENTER OR TRAINING FACILITY



ENVIRONMENT

We believe that all our staff members, regardless of their positions, have a significant influence over the Young Learners in the Center or Training Facility. Therefore, everyone should base their behavior on principles of solidarity, ethics, tolerance, respect, and honesty. When educators interact with Young Learners, regardless of their age, they should recognize that they are in a position of trust and authority. This position should always be exercised to guide the student in their learning and social interactions, never for activities that go against the principles and rules of this Code of Ethical Conduct, the conduct norms of each Center or Training Facility, and Brazilian legislation. It is a fundamental duty of every professional at **ALF** to respect the social codes and moral expectations of the community in which the Institution operates.

4.4. PRESERVATION OF THE PHYSICAL WORK ENVIRONMENT

The physical facilities of each Center or Training Facility, such as classrooms, laboratories, and bathrooms, must be maintained by everyone who uses them, including educators and Young Learners. It is of utmost importance that the entire internal community develops a sense of citizenship, respecting and conserving the Institution's assets. Just like physical assets, documents should be carefully preserved and shared only to the extent authorized by the Management of the Center or Training Facility.

Likewise, all our staff members, regardless of their positions, must maintain confidentiality regarding information about our Young Learners, including research, exams, grades, reports, financial information, and other data to which they have access during their activities at **ALF**. Data and information related to our Young Learners must be kept confidential, and their disclosure can only occur in strict compliance with Brazilian legislation concerning personal data protection and privacy.

4.5. PHYSICAL SAFETY OF YOUNG LEARNERS AND STAFF

ALF is strongly committed to ensuring the physical safety of its Young Learners. Our team is dedicated to the safety of our Centers or Training Nuclei, actively identifying and addressing potential risks related to their infrastructure and facilities as quickly as possible. It is the responsibility of all members of the Centers or Training Nuclei to identify and report to the Management any installation or building condition that may pose a potential risk to the Young



Learners and staff.

4.6. OTHER BEHAVIORS

ALF is concerned about the health and well-being of instructors and Young Learners and adopts a stance regarding alcoholic beverages, drugs, and all types of narcotics within the Center or Training Facility that is fully compliant with applicable laws.

Approved Conduct

It is the responsibility of all recipients of this Code of Ethical Conduct to report the use/consumption of alcoholic beverages, drugs, and all types of narcotics by any Young Learner, educator, or staff member within or around **ALF** premises, or in external activities sponsored or organized by the Institution, to the Management of the Center or Training Facility or the Compliance and Control Department.

Unacceptable Behavior

Carrying, consuming, trading, or promoting alcoholic beverages, drugs, and all types of narcotics within the premises of the training centers or nuclei, their surroundings, and any other environment that could be considered an extension of the learning environment, such as in external activities sponsored or organized by **ALF**, as stipulated by law.

IN CASE OF NEED, THE TEAM OF THE ALF CENTERS OR TRAINING NUCLEI IS OPEN AND PREPARED TO DISCUSS, ASSIST, AND GUIDE ANY EDUCATOR, STAFF MEMBER, OR YOUNG LEARNER REGARDING ISSUES RELATED TO ALCOHOL AND DRUG DEPENDENCY.

THE ATTITUDES OF ADULTS, AT ALL TIMES, SERVE AS EXAMPLES FOR OUR YOUNG LEARNERS.

DID YOU KNOW...

1. According to the ECA (Statute of the Child and Adolescent): "selling, supplying, serving, administering, or delivering alcoholic beverages or other products with components that can cause physical or psychological dependency to a child or adolescent, even if free of charge," is a crime. That this type of crime is punishable by imprisonment from 2 to 4 years, in addition to a fine, if the act is not considered a more serious crime (for example, drug



trafficking)

2. That no member of the ALF Center or Training Facility, whether an educator, staff member, or Young Learner, is allowed to possess or carry any type of weapon within the premises of the Center or Facility or during external activities related to the Institution. Service providers who use weapons as tools for their work must be properly identified, trained, and authorized.
3. That if you have knowledge of or witness anyone with weapons within the physical space of ALF or its vicinity, it is your responsibility to immediately report the incident to the Management of the Center or Training Facility or the Compliance and Control Department, so that appropriate measures can be taken.

5 COMPLIANCE PROGRAM

ALF's Compliance Program is based on the five pillars recommended by the Ministry of Transparency and Comptroller General of the Union (CGU) for integrity programs, which are as follows:

1. Commitment of top management;
2. Responsible and independent body;
3. Profile and risk analysis;
4. Structuring rules and instruments;
5. Continuous monitoring.

For the implementation of such a Program, we rely on mechanisms for prevention, detection, and remedy of actions contrary to ALF's values of integrity and ethics, developed and managed by the Compliance and Control Department.

In addition to this Code of Ethical Conduct, which must be known and followed by all our recipients without exception, ALF has an array of internal policies covering topics such as third-party contracting, anti-corruption measures, corporate card usage, expense reimbursement and advances, procurement, and travel, among others. If you have difficulty finding information about any internal policy of ALF [<https://www.amorimlawfirm.com/termos-legais-privacidade>] or have questions about the topics covered, do not hesitate to reach out to the Compliance and Control Department for clarification.

5.1. COMPLIANCE AND CONTROL DEPARTMENT

ALF's Compliance and Control Department is responsible for assisting all Recipients with their



inquiries related to appropriate behavior and the values and ethical principles promoted by the Institution. The responsibilities of the Compliance and Control Department include:

1. Analyzing reports submitted through the Ethics Channels and conducting corresponding internal investigations, recommending suitable preventive and remedial measures.
2. Implementing training and communication programs to disseminate the content of this Code of Ethical Conduct and **ALF's** internal policies regarding moral and ethical practices to all Recipients.
3. Periodically reporting the results of internal investigations to the Ethics and Risk Committee.
4. Ensuring the implementation of decisions taken regarding cases of misconduct.
5. Distributing this Code of Ethical Conduct and **ALF's** Policies to all Recipients and ensuring that such documents are understood and upheld by all.
6. Addressing any potential queries related to the Code of Ethical Conduct, the Anti-Corruption Policy, and other internal **ALF** policies.

5.2. ETHICS AND RISK COMMITTEE

ALF has an Ethics and Risk Committee, a statutory body established to safeguard the respect for the Institution's ethical principles and values, as well as to assist the Compliance and Control Department with general recommendations and in investigating potential violations of the rules, values, and principles contained in this Code of Ethical Conduct.

The internal regulations of **ALF's** Ethics and Risk Committee approved in a Board of Administration meeting, stipulate a composition of five members. The responsibilities of the Ethics and Risk Committee include, among others:

1. Discussing and deciding on cases of more sensitive ethical misconduct that are identified.
2. Determining training and corrective measures for ethical misconduct.
3. Ensuring compliance with this Code of Ethical Conduct and **ALF's** Anti-Corruption and Good Practices Policy and its Confidentiality and Information Security Policy, adopting necessary measures to ensure their applicability.
4. Overseeing internal investigations conducted by the Compliance and Control Department.
5. Ensuring the confidentiality of received reports and the anonymity of those who provide reports.
6. Approving changes to this Code of Ethical Conduct, the Anti-Corruption and Good Practices Policy and the Confidentiality and Information Security Policy of **ALF**.



6. FINAL PROVISIONS

All recipients of this Code of Ethical Conduct who have questions or deem it necessary to report a concern or violation of the established principles and conduct criteria should do so through the following communication channel:

Website: www.amorimlawfirm.com

The matter will be submitted to the Ethics and Risk Committee, which will ensure that appropriate and reasonable measures are applied.

6.1. EFFECTIVENESS AND APPLICATION

This Code of Ethical Conduct is valid indefinitely from the date of its publication and applies to **ALF** in all locations where the Institution operates.

6.2. DUTY TO DISSEMINATE

All recipients must disseminate this Code of Ethical Conduct, reporting any violations to it through the following communication channel:

Website: www.amorimlawfirm.com

6.3. COMMITMENT TO THE CODE OF ETHICAL CONDUCT

Upon the implementation of this Code of Ethical Conduct and in all its revisions, all recipients will receive a paper copy of it. All recipients are required to sign a declaration confirming receipt and reading of its updated version. The absence of a declaration attesting to the receipt and reading of the updated version of this Code of Ethical Conduct or non-attendance at training sessions does not release recipients from adhering to the principles established here.

All contracts entered into by **ALF** with third parties must contain a clause regarding acknowledgment and commitment to adhering to the principles and conduct criteria contained in this Code of Ethical Conduct. All recipients must participate in training sessions conducted by **ALF**.

DECLARATION OF RECEIPT AND COMMITMENT

You are receiving the **ALF** Code of Ethical Conduct and reading it is very important, as it contains rules of ethical conduct to be fulfilled by you and values that must be considered in all your relations with **ALF**. By taking part in any of **ALF**'s activities through a contractual relationship, you express



your commitment to fully comply with its codes and policies and disseminate their content.

For further information, advice, and guidance on **ALF's** code of conduct and ethical values, it is advised to carefully read the Confidentiality and Information Security Policy and the Anti-Corruption and Best Practices Policy, available at the link [<https://www.amorimlawfirm.com/termos-legais-privacidade>]. Professionals, Partners, and clients are also encouraged to closely review the policies for additional instructions.

