

CODE OF CONDUCT

Swedbrasil import & Export AB is committed to building a corporate culture of openness and integrity, based on ethical behavior and compliance with laws. The Code of Conduct reflects this culture, as well as inspires and guides all of the company's employees to comply with the basic principles that include the following:

Safety

The company is committed to a safe workplace that operates following all laws and regulations that protect worker safety.

Respect in the workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory, harassing, offensive or inappropriate behavior.

Conflicts of interest

All employees must avoid and withdraw from any situation where a relationship with another organization or person could damage his/her and Swedbrasil's reputation. Any potential Conflict of Interest should be reported.

Bribery and Corruption

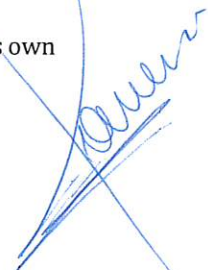
- Bribery¹ and corruption² are prohibited in all business dealings, whether with public officials or private sector business partners. As a rule, Swedbrasil does not permit facilitation payments, directly or indirectly.
- We never offer or accept hospitality or gifts to encourage or reward a business decision. Gifts, entertainment and expenses policy to obtain new businesses are not permitted.
- Political contributions are not permitted.
- Swedbrasil does not make charitable contributions or sponsorships as a subterfuge for bribery.

Fair Competition

The company's policy will prohibit any anticompetitive practices which could affect inbounding, restraining, or distorting competition, as well as any practices of unfair competition.

¹ Bribery is defined as the offering, giving, promising, authorizing, soliciting or accepting of something of value in exchange for or an aim for a particular action, favor, benefit or advantage to which the beneficiary is typically not entitled.

² Transparency International's corruption definition is: "to use one's position to gain an advantage for one's own or another's gain".



Supplier Code

Swedbrasil respects its business partners. We apply a structured and ethical process to select and evaluate its suppliers. Our suppliers are selected based on objective criteria such as quality, competitive pricing, and ethical behavior.

Agreements with suppliers are aligned with Swedbrasil's commitment to integrity in the performance of the contract, including commitments not to violate anti-bribery laws. Suppliers must also maintain integrity standards which are satisfactory to Swedbrasil.

Trade compliance (exports and imports)

We need to comply with international trade rules. Violations can lead to the loss of an import/export license. We must to:

- Investigate export license requirements before exporting a product.
- Follow our procedures for import and export.
- Know and follow the trade restrictions that apply in each country.
- Observe all customs and export control requirements, including documentation related to classification, valuation, and country of origin.

Compliance with the Code

It is the personal responsibility of every staff member to understand and comply with the Code of Conduct. Every member of the staff shall sign.

No employee will suffer negative employment consequences for refusing corrupt practices.

Disciplinary actions

The Company can take prompt and appropriate remedial action in response to violations of the Code.

Once a complaint has been placed, the director will initially analyze it and s/he may meet privately with the applicant to understand the facts. Following a fact-finding, Our Company may have to take disciplinary action that will vary depending on the violation.

The decision should be issued in writing (dated and signed), indicating a summary of the facts, reference to the specific violation and motivations. The sanction may be under the form of:

- Warning;
- Private or public letter of reprimand;
- Termination or removal.

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