

# CODE OF CONDUCT AND GOOD PRACTICES

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# Message from the President

# Message from the President

This document reinforces Bold's commitments and our conduct towards our relationship with various audiences, whether customers, shareholders, employees and communities.

It also presents the expected conduct of all of us, BOLD employees and related parties.

It helps us to act responsibly, reinforces relevant legal issues and focuses on ethical conduct that is essential not only for the smooth running of our daily activities, relationships, but also to ensure our image, in the construction and maintenance of a successful trajectory.

It is of the utmost importance that our attitudes consistently reflect the contents set forth herein. We emphasize that we consider the ethical posture to be of fundamental importance for our existence in the short and long term.



Ralf Benedito Sebold  
Founder of Bold

# Presentation

Ethics is present in the day to day, directing our actions in professional and personal relationships. Our ethical conduct is the basis that sustains the development of our company and bold's recognition in the market in which it operates.

BOLD's Code of Conduct and Good Practice is designed to cover and formalize ethical management in accordance with our values. Our Code is established for the purpose of being a public statement of the highest standards of ethics, transparency, respect and integrity in all that we accomplish.

To fulfill our mission of "GROWING quickly, continuously and sustainably, at national and international level by increasing the market and opening new branches, focused on adding value.", not only the formal declaration is enough, but requires everyone at BOLD to engage unconditionally in the execution of our daily work practices. A sustainable company is

first and foremost an ethical company.

We ask that you make a careful reading of the Code of Conduct and Good Practices and use them as guidance tools for your daily professional conduct. Seek clarification on any questions or concerns with your immediate manager or the members of the Ethics Committee and contribute suggestions for improving BOLD's ethical management.

We work with the best raw materials and the most advanced production processes on the market. Offering innovation, reliability, quality and, above all, fast and efficient solutions.

To meet these challenges, we need a relationship of trust with all our stakeholders: consumer, industry, public authorities, civil society and our suppliers, partners and customers.

This daily requirement is what we need to cultivate in all our activities with a simple and strong conviction: a sustainable company is an ethical

company.

Our policy is very clear: follow the principles established with the utmost clarity and transparency in our relations with each other, with customers, suppliers and society.

The principles established by this Code embody our commitment to the fundamental and sustaining ethics of our vision: "GROW, GROW AND GROW".

# Principles

# Principles

This Code of Conduct and Good Practice sits the basis for bold's set of behaviors, of which each of us, regardless of hierarchical position, entity or geographical location, is the promoter and guardian.

This Code defines the 4 fundamental ethical principles that summarize BOLD's ethical commitments, aiming at a general governance structure and organization of ethics and integrity.



## 2.1 Principle 1: act in accordance with laws and regulations

In all circumstances, all BOLD employees or bold employees must comply with international, national, state and local regulations, as well as professional ethics rules relating to their activities.

With regard to optional rules and regulations, all

BOLD employees or BOLD service professionals should pursue best market practices, ensuring efficiency, effectiveness and the common good.



## 2.2 Principle 2: behave with integrity and promote an ethical culture

Honesty and integrity should govern business and interpersonal relationships, as well as daily professional practices. It is essential that each one act righteously in all circumstances and contribute to promoting an honest and wholesome culture. Based on this principle, BOLD attaches the utmost importance to the exemplary behavior of its employees. In choosing its partners, BOLD seeks to maintain a high level of demand for honesty and respect for human rights.

To promote an ethical culture, BOLD provides a whistleblowing channel for reporting ethical incidents and no employee may be punished for having used, in a responsible and good faith manner, a device for communicating these

incidents or for refusing to perform an act that it considered contrary to BOLD's ethical principles.



## 2.3 Principle 3: honor our commitments and comply with internal rules

For BOLD, the quality of a relationship is based on the loyalty of the interlocutors, especially in the execution of contracts. In particular, this requires that we honor the commitments made and there is no promise of any commitment that BOLD cannot honor.

To achieve its goals, BOLD defines standards and procedures, which represent its internal control, mitigating risks and guiding efforts in the most efficient way. Bolders and bold service professionals must comply with such standards, report non-compliance with those responsible, and suggest improvements, where applicable.

However, the principle of transparency does not prevent employees from complying with commercial

secrecy within the framework of applicable sigilo comercial, no âmbito das leis aplicáveis.

BOLD expects its employees to comply with the principles set forth in this Code. If the employee is placed under suspicion or accused of ethical conflict, BOLD undertakes to investigate following the principles of justice and equity.



#### **2.4 Principle 4: respecting people**

Convinced that a sustainable company is a company that knows how to value people, BOLD attaches the utmost importance to the values of tolerance and respect for others. Diversity is one of the values that makes Bold capable of achieving its goals by cultivating the characteristics of every human being.

Respect for others implies that each one be treated fairly, giving equal importance to all. It requires reciprocity: everyone has rights that they can exercise, but also duties to fulfill, to others, BOLD and society as a whole.

This principle covers, in particular, respect, in

all circumstances, for people's rights, privacy, dignity and uniqueness, and respect for different cultures.

BOLD's policy also guides gender equality, respect for private life, promoting diversity and the fight against all forms of discrimination, protecting health and safety at work and, in particular, preventing and sanctioning all harassment situations.

This is the principle that should be inspiration in the resolution of all conflicts. Tolerance, which translates into kindness and openness to others, excludes any form of extremist behavior.

# General Guidelines

### 3.1 General Guidelines

3.1.1. Not to practice and not to engage in any kind of situation, whether it occurs on a timely or recurrent basis, involving the practice of physical or psychological violence, such as discriminatory attitudes, threat, blackmail, moral and sexual harassment or any other act contrary to BOLD's ethical principles;

3.1.2. Report any risk to the integrity - of people, the environment, business, image, reputation and assets of the company - to its hierarchical superior or to the responsible area, which shall take appropriate measures for the analysis and decision-making on the subject;

3.1.3. Act with honesty, impersonality, respect, and in a transparent manner in its activities, without obtaining undue advantages, in order to ensure the construction of healthy, contributory and lasting relationships between BOLD and its stakeholders.

3.1.4. Do not insinuate, solicit, demand, accept, or offer, promise, give any kind of favor, advantage, benefit, donation, bonus or

kickback, to you or another person, in return for your or third party activities;

3.1.5. Consider, respect and respond to the company's stakeholders, evaluating the relevance of its demands;

3.1.6. Maintain a relationship of respect with internal and external audiences, considering human and cultural diversity;

3.1.7. Preserve cordiality and do not commit any act that may be construed as injury, libel or defamation;

3.1.8. Do not use the working hours defined in a contract to carry out private activities to the detriment of the activities carried out in the company and/or incompatible with them;

3.1.9. Do not practice or engage in any form of child, forced, slave or degrading labor;

3.1.10. Comply with bold's current legislation, policies, standards, guidelines and standards and bold's Code of Conduct and Good Practice.



### 3.2 Image and Reputation

BOLD's image and reputation are influenced by the conducts adopted by everyone acting on its behalf. The company requires:

3.2.1. To ensure bold's image and reputation, acting in accordance with bold's principles of ethics and conduct.

3.2.2. Do not damage bold's image and reputation and workforce through improper and/or improper actions.



### 3.3 Use of The Network and Corporate Equipment

It should be considered the ethical principles, policies and internal procedures and the use of appropriate language when using the corporate network and digital media in the exercise of professional activities or as a result of them.

For proper use of corporate network and e-mail and digital media, the company requires:

3.3.1. Do not make particular use for commercial activities of buying and selling, offering services or advertising;

3.3.2. Do not obtain, store, use or pass on material that violates copyright or intellectual property laws, causes moral harm or is offensive to persons, or that contravenes BOLD's interests;

3.3.3. Do not obtain, store, use or pass on material that has pornographic content, sexual exploitation of children and adolescents, racist, homophobic, transphobic, sexist, against religious freedom or that heeds against diversity;

3.3.4. Do not use anonymity to send messages or post content;

3.3.5. Do not send offensive messages, including through private e-mail or other digital and social media;

3.3.6. Do not attempt to hack, breach security systems or controls, search for vulnerabilities, monitor, break or obtain passwords from systems or computers;

3.3.7. Do not provide or use third-party passwords for systems or computers;

3.3.8. Not to develop or publish in digital media content that contradicts bold's interests;

3.3.9. Not to send, transmit, distribute, make available or store on the Internet information of internal e-mail, data, trade, financial or technological secrets or any other information belonging to BOLD, unless expressly authorized by the manager of the respective information;

3.3.10. Do not engage in activities of a political-party, religious, financial gain, "chain" and self-help;

3.3.11. Use for private purposes is tolerated provided that:

- does not violate the law;
- does not compromise bold's image and reputation or its workforce;
- do not compromise the image of third parties;
- does not harm work activities;
- does not harm the company's processes;
- does not harm the security of information and corporate resources.

3.3.12. In the use of the company's equipment and resources there should be no expectation of privacy, and the company may have access to the content produced or carried over by

them.



## 3.4 Information Processing

### 3.4.1. Information Security

To preserve information security, the company requires:

3.4.1.1. Not to disclose, pass on or comment on privileged information, i.e. strategic and related to relevant acts or facts with economic or financial repercussion, not yet made public;

3.4.1.2. Respect professional secrecy, as well as keep secret the personal information of any other BOLD member to whom it has access due to position, function and/or activity developed, except for the situations provided by law;

3.4.1.3. Comply with the company's information security standards and guidelines for the preparation, handling, reproduction, disclosure, storage, transportation, transmission and disposal of information and business documents, obeying the levels of protection and classification of information established in internal regulations;

3.4.1.4. Observe security protocols related to the use of Information Technology systems and equipment, do not share passwords, or allow unauthorized access to these systems;

3.4.1.5. Immediately report to your superior any disappearance or suspicion of loss of information and/or equipment containing personal or privileged information;

3.4.1.6. Do not alter or destroy original documents of evidential value, keeping them on file for the time limits set by law.

#### 3.4.2. Disclosure of information

BOLD seeks to communicate transparently with its stakeholders, providing objective and accurate information. The company requires:

3.4.2.1. Do not disclose BOLD business information without prior authorization;

3.4.2.2. Ensure that the information contained in documents and communications is true and accurate and compliant with BOLD's Information Security Guidelines.



### 3.5 Fraud and Corruption

Fraud, for the purposes of applying this Code, is any intentional action or omission, for the purpose of harming or deceiving another person, capable of resulting in loss to the victim and/or undue advantage, patrimonial or otherwise, to the author or third parties. It is also characterized by false declaration or omission of material circumstances in order to lead or mislead third parties.

Corruption, for the purposes of application of this Code, is any action, direct or indirect, consistent in authorization, offering, promise, solicitation, acceptance, delivery or receipt of undue advantage, of an economic or non-economic nature, involving individuals or legal entities, public agents or not, with the purpose of practicing or not practicing a particular act.

BOLD repudiates all forms of fraud and corruption at all hierarchical levels, in the public and private sectors. The company requires:

3.5.1. Reject and report situations of fraud and corruption (national and transnational), in any form, direct or indirect, active or passive, involving or not involving monetary values;

3.5.2. Do not insinuate, solicit, accept or receive bribes, bribes or any undue advantage.

3.5.3. Do not insinuate, promise, offer or pay bribes, kickbacks or any undue advantage, including payments to obtain or expedite the processing of government documentation, obtaining licenses, releasing goods, among others; both directly and through intermediaries.

3.5.4. Do not persuade others to act improperly or illegally on behalf of the company.

3.5.5. Not to finance, fund, sponsor or, in any way, subsidize the commission of unlawful acts.



### 3.6 Conflict of Interest

Conflict of interest shall be any situation generated by the confrontation between bold's interests and the particular interests of those covered by this Code that may compromise the interests of the company or improperly influence the performance of the activities of the company's employees. The company requires:

3.6.1. Do not engage directly or indirectly in any activity that conflicts with BOLD's interests;

3.6.2. Not to disclose or make use of inside information, for its own benefit or by third parties, obtained due to the activities carried out;

3.6.3. Do not engage in an activity involving the provision of services or the maintenance of a business relationship with a natural or legal person who has an interest in the decision of the agent, the collegiate of which he participates or the management to which he belongs;

3.6.4. Not to perform, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or function, including activity developed in related areas or materials;

3.6.5. Not receiving a gift from those who have an interest in the decision of the employee, the collegiate, the area or management in which he/she participates, outside the limits established in the regulation;



### 3.7 Gifts, Small Gifts and Hospitality

Faced with an opportunity to receive or offer gifts, gifts or hospitality, one must observe the restrictions of legislation and internal regulations. The company requires:

3.7.1. Not to accept, offer or give gifts, of any kind and in any situation, to or from a natural or legal person, except on the basis of kinship or friendship ties and provided that its cost is borne by the offeror himself;

3.7.2. Not to accept, offer or give gifts or hospitality in exchange for any favor to the offeror, you, BOLD or third parties (natural or legal person);

3.7.3. Obtain prior formal approval from your executive manager or general manager of the operating unit whenever you offer hospitality to third parties who have some business or institutional relationship with BOLD;

3.7.4. Obtain prior authorization from the immediate manager for the receipt of any third-party hospitality that maintains any commercial or institutional relationship with BOLD;

3.7.5. Gifts identified as free distribution (characterized as institutional) may be granted by observing the following guidelines: a) Gifts must be given in small quantities; b) Avoid giving multiple gifts to a single person.

3.7.6. Return promptly any gifts, gifts or hospitality, received in disagreement with the guidelines of this Code or with internal rules, to their respective senders.



### 3.8 Health and Safety

With regard to health and safety, the company requires:

- 3.8.1. Know and comply with health and safety policies, standards and procedures;
- 3.8.2. Never initiate any activity that does not provide the necessary security;
- 3.8.3. Identify, correct or immediately communicate activities outside health and safety standards;
- 3.8.4. Provide a safe environment for the performance of the activities;
- 3.8.5. Carry out your activities and processes safely;
- 3.8.6. To ensure the defense of life, ensuring its physical integrity, of the other.
- 3.8.7. Do not consume, distribute, buy or sell illicit drugs on BOLD's premises or be under the effect of these substances during the working day;

- 3.8.8. Do not consume, distribute, buy or sell alcoholic beverages on BOLD premises or be under the influence of alcohol during the working day. Exceptions for moderate consumption of alcoholic beverages will be allowed at official events, provided they are previously reported;
- 3.8.9. Do not smoke in the workplace;
- 3.8.10. Wear uniforms and personal protective equipment, as established by the company's safety standards.



### 3.9 Respect for Diversity

Diversity is considered, in the environments and work relationships, the social and cultural characteristics of a group of workers, recognizing the differences between individuals and treating them with equality, equity and respect. Discriminatory attitudes are considered to treat individuals or groups of individuals according to preconceived ideas that attribute

negative qualities to them. In situations and circumstances that constitute distinctions between individuals, compromising equal treatment, excluding and degrading the dignity and rights of the individual.

The company requires:

- 3.9.1. Respect human and cultural diversity in work environments and relationships;
- 3.9.2. Repudiate any form of discrimination, communicating any cases experienced or witnessed.
- 3.9.3. Accept and respect everyone regardless of ethnicity, skin color, religion, age, gender, political conviction, nationality, regionality, marital status, sexual orientation, physical and intellectual condition, among others.



### 3.10 Political and Religious Activities

BOLD recognizes the constitutional right, also expressed in the Code of Conduct and Good Practice, to political and religious freedom. Respecting and guarding the rights of all, the company requires:

3.10.1. Not to promote or participate in political-party activities during working hours or make use of the company's resources for this purpose, or even the association of its trademarks;

3.10.2. Not to promote or participate in religious activities during working hours or make use of the company's resources for this purpose, or even the association of its trademarks, unless in the cases promoted by the company;

3.10.3. Not to carry out any kind of political-party or religious propaganda on the premises of the company;



### 3.11 Psychological Violence and Harassment

Psychological violence is characterized by gestures, words, attitudes or offensive actions, explicit or subtle, disqualifying, discriminating, humiliating and embarrassing, resulting from work relationships, which act against the dignity of the person and are potentially capable of compromising the professional career, causing damage to his physical and psychic integrity, which may cause deterioration of the work environment.

Moral harassment is characterized by repeated and lasting occurrence in the time of psychological violence at work, which can compromise the professional career, cause damage to its physical and psychological integrity and cause deterioration of the work environment, illness and even death.

Sexual harassment is characterized by conduct of a sexual nature, manifested physically, by words, gestures or other means, proposed or imposed on people against their will, causing embarrassment and violating their sexual freedom. The company requires:

3.11.1. Do not engage in or engage in actions involving repeated acts of psychological violence, such as bullying and sexual harassment, or specific acts of an offensive, humiliating, impertinent or hostile nature committed individually or in groups, regardless of hierarchical relationships or representing abuse of authority.

3.11.2. We do not tolerate offensive, intimidating or hostile behavior, which may characterize situations of embarrassment, disrespect, abuse of power and harassment, regardless of hierarchical relationship.



### **3.12 Use of resources and assets**

Everyone must ensure the preservation of the resources and assets made available for the execution of the activities.

3.12.1. Immediately notify the person responsible when identifying bold's misuse of assets and resources;

3.12.2. Ensure the preservation and make good use of equipment, tools and facilities;

3.12.3. All resources must be used intelligently, avoiding waste.

# Application, Governance and final provisions

# Application



## 4.1 Employees

BOLD expects its employees to act in accordance with these principles of ethics, in all circumstances and regardless of their activity, their level of responsibility and their interlocutors.

Everyone, from the Board and Board of Directors to the employee, has an obligation never to act in a way that raises the slightest doubt about bold's ethics. Leadership by EXAMPLE. We do what we say.

Bold's directors and managers are the promoters, par excellence, of the Code of Conduct and Good Practices and its day-to-day application to employees and stakeholders." They should verify the knowledge of their employees with regard to their ethical and regulatory obligations, but, above all, they must ensure that their practices comply with their obligations.

When a penalty is imposed for violation of

ethical and/or legal obligations, this is carried out in accordance with local laws and practices.



## 4.2 Customers and Related Parties

BOLD applies its principles of ethics to its relationships with all market stakeholders, in particular customers, partners, suppliers, service providers and subcontractors (including intermediaries or commercial consultants) or non-governmental organizations (NGOs).

As far as customers are concerned, BOLD attaches the utmost importance to their satisfaction, based on the quality of products and services, open dialogue, transparency of procedures, compliance with commitments and competition rules.

In their relationship with stakeholders in the market, BOLD employees adopt a fair behavior and demonstrate fairness and impartiality in negotiations. They ensure that the ethical concerns of bold partners, suppliers, service providers and

subcontractors are compatible with BOLD's and inform them of BOLD's Code of Conduct and Good Practice.

BOLD requires the inclusion in contracts concluded with its partners, suppliers, service providers and subcontractors of a clause providing for the knowledge and compliance with the principles of this Code, where applicable. BOLD certifies the integrity and reputation of its partners, suppliers, service providers and subcontractors.



## 4.3 Society

BOLD applies its ethical principles wherever it is present. It carries out its activities, respecting the rights of the human being in all its places of operation.

Socially responsible, BOLD participates in social projects contributing to the development of local communities.

BOLD's ethical commitment is promoted at the highest level of the company: the Advisory Board and the Executive Board.

# Governance

O compromisso ético da BOLD é promovido ao mais alto nível da empresa: o Conselho Consultivo e a Diretoria Executiva.

## 5.1 Internal Audit Area

BOLD's Internal Audit Area assists in integrating ethics into the company's vision, strategy, management and practices. It proposes the reference texts on ethics and compliance, supervises its application by functional departments, supports training actions and participates in the necessary control activities together with the other BOLD Areas.

## 5.2 Whistleblowing Channel

It is essential that anyone immediately reports any acts or suspected non-compliance with BOLD's Code of Conduct and Good Practice, preventing acts of corruption and preserving the company's image in the market and in front of its stakeholders.

In this sense, we provide the Whistleblowing Channel:

- E-mail: [comitedeetica@bold.net](mailto:comitedeetica@bold.net)
- Website: [www.bold.net/canaldedenuncias](http://www.bold.net/canaldedenuncias);

This channel is operated by a specialized company, ensuring even more confidentiality and security. It is not necessary to identify yourself when using the channel, but it is essential to act responsibly when making reports, which must be consistent and truthful.

## 5.3 Ethics Committee

BOLD's Code of Conduct and Good Practice, chaired by The People and Management Management, monitors the application of the company's commitments of ethics, monitors the identified failures and makes sure that they are

properly addressed. Your action allows you to give the company's departments reasonable assurance that BOLD's ethics program is applied and controlled.

## 5.4 Investigations and Sanctions

All incidents reported of suspected conduct violations will be investigated immediately and appropriately. If, after the investigation, it is found that conduct has occurred that violates the rules of this Code, immediate and exemplary corrective measures will be taken, always in accordance with the circumstances, severity and applicable law.

Any employee, third party or partner who violates any provision of this Code will be subject to disciplinary sanctions under BOLD's Code of Conduct and Good Practice, listed below:

- Verbal warning;
- Written warning;
- Suspension;
- Dismissal for just cause;
- Contractual termination;
- Legal action.

# Final provisions

**I.** The Ethics Committee shall promote wide dissemination of this Code and periodic training for employees and company administrators.

**II.** BOLD shall make express reference to this Code when hiring the service providers, and shall require them to comply with their employees.

**III.** This Code will be periodically revised and updated under the responsibility of BOLD's Ethics Committee.

**IV.** Failure to comply with the guidelines provided for in this Code shall be subject to the relevant administrative measures and sanctions, as stipulated in the company's disciplinary rules as well as any liability provided for by law.

**V.** Any non-compliance with the guidelines of this code by an employee of a service provider shall be informed to his employer.

**VI.** All information regarding possible ethical violations or illegal activities will be received and treated confidentially.

**VII.** When confronting any situations not contemplated in this Code, it should be consulted with the hierarchical superiors or the Ethics Committee for guidance on the conduct appropriate to the situation.

**VIII.** It is up to the Ethics Committee to resolve doubts regarding the interpretation of this Code and to decide on omitted cases.

