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1. GOALS

Be a formal and institutional reference for the personal and professional conduct of all Company Employees, regardless of their position or role, in order to become a standard for relationships with colleagues and stakeholders: customers, unions, suppliers, service providers, competitors, society, and the government.

Promote ethical behavior based on fair and relevant values embodied by all.

Reduce the subjectivity of personal interpretations on moral and ethical principles. Solidify the Company's values by practicing them permanently.

Make the Company's values clear, so that all professionals can understand, respect and practice them.

2. SCOPE

Departments and Companies: Mandatory rule for all Employees and Management Members (Officers and Directors) of green4T Participações S.A. and subsidiaries ("green4T Companies").

3. RESPONSIBILITIES

All the Company members must comply with and enforce the provisions of this Code, and the Managers of each department are further responsible for disclosing it to their teams and ensuring compliance at their respective departments.

4. POLICY


4.1. TERMS AND EXPRESSIONS USED IN THIS CODE

Conduct – moral behavior and procedure.

Code – set of rules, laws or regulations.

Code of Ethics - rules that govern the activities of green4T Participações S.A. and its subsidiaries ("green4T Companies"), both Brazilian and foreign, and that define what is expected from its members, including, but not be limited to Employees, suppliers, subcontractors and partners.

Company – the green4T Participações S.A. companies and

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subsidiaries ("green4T Companies").

Employee(s) – any person who has roles within the Company, regardless of position, role or hierarchical level.

Manager(s) - any person who has a management role within a group or team, regardless of position, function or hierarchical level.

4.2. USERS OF THIS CODE

The Code of Ethics applies to all Company Employees, Management Members and Third-Party Intermediaries and regulates the relationship of these professionals inside and outside the Company:

1. With the other professionals in the Company;
2. With suppliers, customers, banks, other partners and competitors;
3. With the public power, at all levels;
4. With the local community and society in general.


4.3. VALUES AND ASSUMPTIONS

The Code of Ethics is a commitment to the quality of our products and services. Quality in its full sense, involving not only what we do, but the way we do it.

This Code of Ethics is based on the following principles: ethics, integrity, transparency, respect, compliance with all laws and regulations in the countries in which we operate, zero tolerance to fraud and corruption, and responsibility for the community and the environment.

All the Company members must comply with and enforce the provisions of this Code, and the Managers of each department are further responsible for disclosing it to their teams and ensuring compliance at their respective departments.

This Code is effective indefinitely. It must be distributed to all members of the Company, who cannot claim, under any circumstances, or under any argument, that they are not aware of the guidelines and principles contained in the code, which will also be available on the green4T Companies' platform.

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4.4. RELATIONSHIP WITH CUSTOMERS, SUPPLIERS, PARTNERS AND THE

GOVERNMENT The Company must conduct its business honestly and ethically at all times, whether with customers, suppliers, subcontractors, partners or the Government.

In addition to ensuring the quality of products and services offered through its business units, the Company is committed to serving customers ethically, efficiently, swiftly, politely and transparently at all times.

The Company, as well as its Employees and subcontractors are committed to maintaining the confidentiality of information received from customers and business partners. Trust is one of the foundations of our relationship with the market.

Decisions on engagement of suppliers must be made solely by the Procurement team and be guided by objective criteria that cover all key aspects of the selection, such as legal and technical compliance, performance, quality, price and payment conditions, terms, warranty conditions, risk, after-sales conditions, and whatever else is relevant in each case.

In business interactions and practices, and in any situation, the Company must adopt the highest ethical and business integrity standards, which

include fully complying with the applicable legislation and the Company's principles and values, as well as its policies and procedures.

The Company's relationship with authorities, politicians and public agents must be guided by fair and professional behavior. Any form of pressure or request from public agents that does not correspond to this definition must be refuted and immediately communicated to the Company management.


The Company's philosophy is the strict compliance with the law, particularly the Law Brazilian Anti-Corruption Law (Law No. 12.846/2013), the US Foreign Corrupt Practices Act - FCPA of 1977, and the UK Bribery Act of 2010, and it expects its professionals to behave accordingly.

4.5. RELATIONSHIP WITH COMPETITORS

The Company respects its competitors and seeks to outperform them in a healthy way, by offering better products and services. It does accept attitudes that could be seen as undue advantage, or slander or defamation of competitors.

4.6. RELATIONSHIP WITH POLITICAL PARTIES

The Company will not restrict the political activities of its Employees. However, they must do them on a personal level and in a manner that does not interfere with their professional responsibilities.

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Political activities at work and that involve, in any way, the Company's resources are strictly forbidden.

Disseminating any form of political propaganda on the premises, or in any publications or at any other property of the Company is strictly forbidden.

Employees who participate in political activities do so as citizens and not as representatives of the Company.

4.7. MEDIA RELATIONS

The Company considers the press important in shaping the organization's image before the public opinion, and provides information or responds to requests, when pertinent, considering the right not to comment on issues that are contrary to its interests, or in order to maintain the confidentiality of information considered strategic.

Only certain Company professionals are authorized to speak on its behalf, as well as make comments about it to the press or other stakeholders. Such authorization must be an express consent in writing.

If you are asked to give information, write articles or give interviews and statements on behalf of the Company to any media vehicle, please report to your superior or the Marketing department.

4.8. RELATIONSHIP WITH THIRD-PARTY INTERMEDIARIES


The Company's third parties that act as intermediaries include Business Consultants, Sales Representatives or others that operate on behalf of the Company, whether or not related to the government.

Additionally, any third party engaged, fully or partially, to facilitate business with the government, enable a government action, or in any legal manner, act on behalf of the Company before government authorities, is also included in the definition of an intermediary.

When engaging, paying or working with an intermediary covered by our policies, you shall:

Have a solid and documented base to rely on the intermediary;

Take the necessary measures to monitor and prevent misconduct and, where appropriate, train the intermediary;

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Respond appropriately to indications of possible misconduct.

There are four steps you must follow to engage a new intermediary or renew an existing agreement/contract:

1. Due diligence – Research the intermediary's background, reputation and qualifications.
2. Communicate the Company's rules – Communicate to the intermediary the Company's expectations regarding anti-corruption and ask the intermediary to sign the Code of Ethics.
3. Contractual protections – Document the relationship in an agreement in writing containing the standard contractual protections considered mandatory.
4. Signs of danger – Check the "signs of danger" that could indicate some risk. Such signs include situations in which the intermediary:
 - Appears to not be qualified or has an understaffed team;
 - Is specified or recommended by a public official;
 - Requests the concealment of its identity;
 - Asks to be paid in cash or in advance or that payments be made in a foreign country;
 - Asks the Company to create fake/irregular documents;
 - Asks for a very high payment that is not usual for the services provided;
 - Asks for reimbursement of expenses that are disproportionately very high and unusual, or of expenses that had not been documented.

The following requirements apply to payments to any intermediary:

1. Payments must be made to the account specified in the intermediary's contract;
2. No payments in cash or to the bearer;
3. No payments to another person other than the intermediary, at the intermediary's usual place of business;
4. No payments to an account outside the country where the intermediary performs the service.

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4.9. RELATIONSHIP WITH RELATED PARTIES

Transparency and open communication are key to all relations of trust, including with related parties.

Any natural or legal person that falls under any of the situations below is considered a related party of green4T Companies:

Holds shares of the Company or has significant influence over it. Is directly or indirectly controlled by the parent of, or is under common control of a shareholder that has control or significant influence over the Company.

Is a key personnel, or his/her close relative, of the Company, its subsidiary, its parent, or of any legal person that has significant influence over the Company.

Is a company controlled, jointly or separately, by any person mentioned in the item above, or that is under his/her significant influence.

Is a Third Party whose equity interest is held by a subsidiary.

For any reason or circumstance, it is in a condition or situation in which there is well-founded fear that there are no conditions to engage it on an arms' length basis.

The following principles must be respected under market conditions: Competitiveness (service prices and conditions compatible with those used in the market);

Compliance (the services provided must comply with the contractual terms and responsibilities used by the Company, as well as with adequate information security controls);


Transparency (adequate reporting of the agreed conditions, as well as their impact on the Company's financial statements); and

Equity (implementation of mechanisms that prevent discrimination or privileges, and of practices that ensure that insider information or business opportunities are not used to individual or third-party benefit). Related-party transactions must be in writing, and the respective instrument must specify the main conditions and characteristics, such as the contractual provisions, prices, terms, warranties, and the main rights and obligations.

It is prohibited to enter into related-party transactions that:

Do not follow the rules set forth herein;

Relate to loans to the controlling shareholders of the Company and their related parties;

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Are approved without compliance with the applicable legislation, articles of incorporation and the Company shareholders' agreement.

4.10. GIFTS, MEALS AND ENTERTAINMENT

As a general rule, we do not receive nor offer gifts.

Give gifts and provide hospitality (meals, travel, entertainment) is often considered a form of courtesy and is common in daily business in many countries. However, anti-corruption laws prohibit offering or giving anything valuable, including gifts and hospitality to third parties, in order to gain inappropriate advantage or unreasonably influence an authority.

Giving small personal gifts is often part of the local culture. The Company defined the maximum price of gifts at one hundred US dollars (US\$100), provided that they do not interfere in the other party's business decision.

Receiving gifts, favors or anything valuable or useful that could give even the mere appearance of inappropriate conduct or have a potential impact on the Company's business decisions is forbidden.


All Company members are strictly prohibited from receiving money, any other goods or services offered by third parties (even in a raffle or contest) in any context related, directly or indirectly, to their activities in the Company, regardless of the amount involved. Conducting business over a meal is customary all over the world. A meal may be offered to third parties without prior approval, provided that all the items below are complied with:

The amount is equivalent to one typical business meal, based on local standards (expensive drinks and refined dishes/delicacies should be avoided);

In general, business meals do not include the guest's spouse or his/her guests. In exceptional cases, such as spontaneous invitations during unplanned meetings (for example, at a business fair or congress organized by third parties), those accompanying the guest may be invited if it is considered unacceptable to exclude them;

If the proposed guest has the power to influence government or business decisions, only meals related to a required meeting or activity can be offered, within the limits established in the expense reimbursement policy, and upon approval of the meal offering form, in accordance with the approval policy;

Invitations to external events (travel, social gatherings, trainings, social events), as well as sponsorship of corporate events for Employees, can only be accepted when in the Company's interest, and they must be communicated to the executive officer in charge for review, and reported to the Compliance department;

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Donations or sponsorships are not allowed, unless approved in accordance with the approval policy, the Articles of Incorporation, and the legislation in force.

4.11. RELATIONSHIP AT WORK

Mutual trust and dedication to the Company must guide the relationships with our co-workers. We have, for ourselves and for the Company, the responsibility to treat each other with respect and dignity.

Successful workplace relationships are based on trust.


At the Company, we are proud of our people's dedication and of the excellent results produced by this dedication. The relationship with our co-workers, whether our peers, subordinates or superiors, should be a partnership, in which the individual behavior is guided by a commitment to the Company's success.

The relationship with those we work with should be like that of members of a winning team. These are the people who work in harmony and focus on a set of common goals to drive our Company. For this team relationship to work, each individual must comply with his/her responsibilities and feel that the others also comply with theirs. No individual or department should allow their priorities to take precedence over the priorities of the Company.

The Company will be attentive to the behavior of its Managers. The Managers have obligations such as:

- a) Be a role model for all subordinates and other Employees of the Company;
- b) Disclose to their subordinates the content of this Code and make them aware of how necessary it is and that they must follow it, thus avoiding that any Employee or service provider commits any violation due to misinformation;
- c) Identify Employees who may have violated this Code and discuss the matter with the Board;
- d) Create a culture that creates compliance with this Code and encourage Employees to raise questions and concerns regarding its application.

Discrimination in any form will not be tolerated, whether based on religion, nationality, philosophical or political conviction, economic situation, origin, gender, color, ethnicity, disability, age, sexual preference, biotype, health or marital status.

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Any type of harassment in the Company is strictly prohibited, especially those of a mental and sexual nature, involving any verbal or physical humiliation, coercion or threat.

If you are a victim of such humiliation or know someone who has been in this situation, report to your immediate superior, to the People and Compliance department Managers, or use the whistleblower hotline.

Upon hiring and while the employment relationship with the Company lasts, those who have a direct family relationship with another Employee(s) must ensure that there are no conflicts of interest. Moreover, any hierarchical relationship between relatives is prohibited.

Child labor is not allowed in any way. Unless local regulations stipulate a higher age limit, no individual with age lower than the one established for compulsory education, or lower than 15 years old (or 14 years old, according to the rules of Convention no. 138 of the International Labor Organization) may be hired.

As regard minors authorized to work, the Company Executive Board is responsible for providing safety and work conditions, hours and wages commensurate with their age and, as a minimum requirement, in accordance with the local current legislation.

No forced or involuntary labor is tolerated. This includes slave labor and all forms of work that harms the individual's free will or choice.


Any form of protectionism or privilege in the relationship between Managers and subordinates is unacceptable.

In order to avoid favoritism and/or conflict of interest, as well as discomfort of other professionals, an intimate personal relationship between a leader and a subordinate, either direct or indirect, is not allowed. We recommend that professionals involved in a relationship do not work in the same project and Business Unit. Such situation should be reported to the Department Manager or the Managers of the People or Compliance Department.

The privacy and confidentiality of the personal information of the Company's Employees must be respected.

The Company must provide a safe and healthy work environment, so that preventive actions prevail over corrective actions.

Possession of drugs or firearms is not allowed in any way at work, and is considered a serious offense subject to labor and criminal sanctions.

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In compliance with the current legislation and in order to safeguard the health of Employees, smoking in any closed space in the Company is prohibited.

The Company does not admit intrusion into the private life of employees, inside or outside the work environment. Control or intrusion of any kind will be repudiated.

The Company members may not have economic or financial interests in competitors, customers, partners, suppliers, to the extent such interest may influence any actions conducted on behalf of the Company.

Any work that is not related to the Company's activities is forbidden, as well as sale of products or services of any kind on the Company premises, irrespective of whether such activities occur during or out of normal working hours.

Using Company assets such as telephones, sundry devices, materials or information for work that is not part of any activities developed by the Company is not allowed.


Employees in Management and leadership positions are prevented from influencing or assessing jobs or salaries of relatives or close relationships.

The approval of each professional's expenses must be done, at least, by his/her immediate superior.

Employees are also prohibited from occupying public office without first explicitly communicating the People and Compliance department Managers, for a prior evaluation of any conflict with the rules of the Company.

In performing their duties, the Company Employees shall:

- a) Behave in accordance with the laws of their country;
- b) Follow the guidelines of the Company's internal policies;
- c) Seek the best overall result for the Company, behaving transparently, and respecting and collaborating with colleagues, representatives of the Employees, and their stakeholders;
- d) Perform their duties and authority with an entrepreneur spirit, aiming at overcoming challenges, and to the best interest of the Company;
- e) Not use their title, role, activity, facilities, position and influence to obtain any favor for themselves or for others;
- f) Not create artificial difficulties in performing their duties, aiming at overvaluing their professional performance;

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- g) Perform their duties effectively, eliminating situations that may lead to errors or delays in providing the services;
- h) Respect intellectual property;
- i) Not alter or misrepresent the content of any document, information or data;
- j) Promote actions intended to improve internal communication;
- k) Emphasize integration and development of team work;
- l) Involve all employees in achieving the Company's strategic goals;
- m) Behave politely, making themselves available and being attentive to all people with whom they relate, and respecting any individual differences;
- n) In their professional live, be loyal to colleagues or Managers at all times;
- o) Not harm the reputation of colleagues or Managers by means of biased judgment, false testimony, ungrounded information, or any other subterfuge;
- p) Not exchange favors that appear to be, or may give rise to any type of commitment or personal obligation;
- q) Encourage ideas, if they are in line with the Company's goals and discussed on appropriate forums.

4.12. RECORD KEEPING AND ACCURATE ACCOUNTING

The Company's tax and accounting books and records must be kept with reasonable detail and accuracy so that they accurately reflect all transactions.

All control and approval procedures must be followed.


The Company's tax and accounting books and records may not contain any false, misleading or artificial information.

4.13. CONFLICT OF INTEREST

In conducting professional responsibilities and personal actions, the Company members must ensure that there is no conflict of interest or a perception of conflict of interest.

Conflicts of interest can arise in different ways and are, in general, easily perceived, and should be avoided.

Conflicts of interest occur when a particular interest of one individual, or the interest of a close relative or friend of such individual, interferes, or appears to interfere, in his/her capacity of fair judgment that is expected in performing

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his/her responsibilities or when acting in the interest of the Company. Conflicts of interest also arise when a member, or his/her close relative or friend, receives personal benefits that are inappropriate for his/her position in the Company.

Although this document does not mention all the possible conflict of interest situations, the following situations constitute common examples of potential conflicts of interest, and if they occur, they should be reported in a specific conflict of interest form, to the People and Compliance department:

Use confidential information that, if used to make decisions, could result in personal benefits.

Acquire, or intend to acquire, shares of customers, competitors or suppliers of the Company, based on insider information, or provide such information to third parties.

Accept an external position, task or responsibility of a personal nature that may affect his/her performance and productivity at the Company or that may benefit the activities of competitors.

Accept a position, task or responsibility or receive some kind of compensation from a customer, competitor, supplier or partner of the Company, in case it may affect the Company's business relationship with them.

Accept a position, task or responsibility or receive any type of compensation from a competitor of the Company.

Hire, either directly or indirectly, close relatives, friends or a former employee, or influence another member to hire them, disregarding the established principles of competence and potential.

Use the Company's resources for personal interests.


Have any personal interests that may conflict or be interpreted as conflicting with his/her professional obligations.

4.14. OTHER RESPONSIBILITIES

4.14.1 RESPONSIBILITY FOR THE USE OF INSIDER INFORMATION

Each Employee must safeguard the information owned by the Company or related thereto.

Confidential information is any information that has not been disclosed or made available to the public in general, such as financial and commercial data, strategy plans, new products, marketing campaigns, personal information of

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Employees, important contracts, expansion plans, financial transactions, substantial changes in management, or other developments of the Company.

Disclosure of non-public information to others, including family and friends, is a violation of the Code of Ethics, and may be a violation of the law. In this regard, it is also forbidden to use email or any other electronic or physical means to exchange information.

Only the Chief Executive Officer or the Chief Financial Officer may disclose any information to the market. Any requests made by financial analysts and shareholders must be directed to the CFO office.

All matters relating to the media, such as information and/or interview requests, must be sent to the Marketing department.

4.14.2 RESPONSIBILITY FOR THE COMPANY'S ASSETS

The Company's assets are intended to be used by Employees while performing their duties, and not for personal use.

The Company's assets include their working hours and the product of their work, as well as equipment, vehicles, computers and software, information, trademarks and the name of the Company.


Employees may not use the Company's assets for his/her personal benefit or for the benefit of anybody other than the Company.

Employees cannot take advantage of any opportunity for personal gain, using their position at the Company or any information or assets owned by the Company.

The abusive use of the Company's assets may be considered theft, and result in termination of the employment contract or in a criminal lawsuit.

Employees must have permission from their Manager before using any Company asset – including information, work product or trademark – outside their responsibilities within the Company.

Prior to accepting payment for lectures or presentations related to the Company or their work at the Company, Employees must get the approval of their department at all times.

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The Company's computer systems and equipment are for the Company use only. They must never be used for outside business, illegal activities, gambling or pornography.

Users of the Company's Information Technology resources should not presume any right to personal privacy or confidentiality when using such resources.

The Company reserves the right to monitor network equipment, systems and activities, including, but not limited to, email, voice mail, use of the Internet, and any stored information, under appropriate circumstances and in accordance with the effective laws. In addition, for maintenance, security, business, legal or regulatory requirements purposes, authorized personnel or outsourced service providers will have unrestricted access to information on the Company's Information Technology resources.

The Company reserves the right to cancel the access of any user to the IT resources at any time, with or without prior notice.

4.14.3 RESPONSIBILITY FOR THE USE OF SOFTWARE

The Copyright Law prohibits the installation, copying, sale or distribution of software and related manuals without a legal use license, and any product without these characteristics will be considered a PIRATE item.

The Company strictly prohibits the use of any pirate software inside its facilities.

Any software demand within the Company must be conducted through the relevant department, and such software must be installed only by Employees who have been trained and hired for that end.


The use of pirate items is considered a serious offense, and may cause termination for cause.

The department that controls the Company's information system will analyze the deployed system/software on a regular basis, on any equipment in use.

When pirate software is identified on any Company equipment, it will be immediately uninstalled. Once a disciplinary measure is determined, it will be applied immediately.

4.15. FRAUD, THEFT, CORRUPTION AND MONEY LAUNDERING

In the event theft, fraud, corruption, bribery or money laundering committed by any Employee is identified, such misconduct must be reported immediately to the Compliance department.

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4.15.1 FRAUD

Means any misrepresentation intended to take personal advantage, causing loss of time, resources and property for the Company.


Examples:

- a) Misuse medical leave, i.e. take medical leave even when in good physical and mental health.
- b) Abusively use telephone, computers and other equipment for personal business purposes;
- c) Conduct personal activities on a customary basis, using the Company's facilities and hours;
- d) Misuse the Company's money;
- e) Remove, without authorization, any equipment, parts, software and office materials;
- f) Resort to reimbursement of travel expenses, when traveling for personal purposes;
- g) Receive or offer personal advantage from/to suppliers and customers;
- h) In case of suspected fraud, an initial investigation will be conducted to determine the facts and submit any measures to the Ethics Committee.

4.15.1 THEFT

Means the misappropriation of assets and resources owned by the Company. Examples:

- a) Forge or omit receipts. - Steal money from the Company or from other employees.
- b) Steal goods, tools or other equipment.
- c) Overestimate expenses.
- d) Buy materials for own use.
- e) Steal intellectual property or misuse confidential information.
- f) In case of suspected theft, an initial investigation will be conducted.

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- g) If theft or robbery is confirmed, the Police will be involved and the employee will be terminated for cause.

4.15.3 CORRUPTION

Means using a position, money or other resources dishonestly, in order to obtain illegal or personal advantage for himself/herself, for others or for the Company, irrespective of whether such actions were intended for the public or private sector. Active or passive corruption is not tolerated, nor extortion, bribery and money laundering.

Examples:

- a) Ask a lawyer or accountant to offer a 'gratuity' to a tax auditor for him/her to 'slacken the audit';
- b) Pay a gratuity to a public agent, either national or foreign, for him/her to defend the interests of a company in closing a business;
- c) Pay a gratuity to a public servant for him/her to accelerate the preparation of an export analysis document.

Corruption can occur when dealing with business partners or government authorities. Although Law No. 12846/2013 focuses on bribery of government officials, for the purposes of the Company Policies, its principles are also applicable to the private sector.


However, as the risks are different, our policies, procedures and Compliance controls sometimes distinguish these two sectors.

The Company is firmly committed to strictly complying with the legislation applicable to its operations and business, and its members must faithfully comply with this commitment.

In case of suspected corruption, a preliminary investigation will be conducted to verify the facts and submit recommendations to the Audit Committee. In case of doubt and for further details, refer to Anticorruption Policy of green4T Companies on the Intranet.

4.15.4 MONEY LAUNDERING

The purpose of money laundering is to mask the nature and source of money associated with an illegal activity, by introducing this money into the local economy through integration of illicit money into the business flow, so that it appears to be legitimate or its true origin or owner cannot be identified.


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The Company members must comply with the laws and regulations that address money laundering and illegal financing in all countries in which it operates. Facilitation is strictly forbidden in any form or context. The violation of these laws could result in serious civil and criminal penalties to the Company and its members, individually.

The Company may only conduct business with third parties of good reputation, including agents, consultants and business partners who are involved in licit activities and whose resources are of legitimate origin.

Below are some examples of warning signs that could help identify possible indications of suspicious activity related to money laundering and terrorism financing:

1. An agent or business partner that is reluctant to provide complete information, that provides suspicious, false or insufficient information, or that wants to circumvent accounting and reporting requirements.
2. Payments made with monetary instruments that do not appear to have an identifiable link with a third party, or that do not comply with market practices.
3. Payments made in cash by a third party or a business partner.
4. Early amortization of a loan made in cash or cash equivalent.
5. Orders, purchases, or payments that are unusual or inconsistent with the third party's trade or business.
6. Exceptionally complex business structures and payment patterns that do not clearly indicate the purpose of the business, or whose terms are extremely favorable.
7. Unusual fund transfers to or from countries not related to the transaction or that are not logical for the third party.
8. Transactions involving places identified as tax havens or areas known for terrorist activities, drug trafficking or money laundering.
9. Transactions involving shell banks or banks in tax havens, unlicensed money transmitters or foreign exchange agencies, or non-bank financial intermediaries.
10. Inability or difficulty to check an entity's history or an individual's history

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and expertise.

11. Negative publications on the media or in the local business community on the integrity or legitimacy of an entity or individual.
12. Transaction structured in a manner intended to circumvent accounting or reporting requirements, such as multiple transactions below the minimum amounts reportable.
13. Requests to transfer money or to reverse deposits to a third party or to an unknown or unrecognizable account.

4.16. THE CONSEQUENCES OF MISCONDUCT

Non-compliance with the provisions contained in this Code will be treated as an extremely serious matter. Depending on the legislation, the following measures may apply:

- a) Formal warning;
- b) Cancellation of variable compensation;
- c) Transfer to another position;
- d) Termination.

A disciplinary proceeding may be invoked by the Company's Ethics Committee, depending on the offender's position and the nature of the violation.

In interpreting and using this Code, common sense shall prevail. Additionally, the provisions of this Code do not exempt Employees from adopting the behaviors that are expected for a professional environment, which may not be described herein.


4.17. DOUBTS AND VIOLATIONS

The guidelines of this Code make it possible to assess most situations and minimize the subjectivity of personal interpretations on moral and ethical principles, but they do not necessarily detail all situations that may arise in the day-to-day routine of each Employee. Thus, in case of doubt in applying the guidelines of this

Code, please consult with your Manager and/or the People or Compliance department Managers.

Employees are expected to comply with these guidelines under any circumstances.

Any Employee who violates the provisions of this Code, fails to comply with the law or any Company Code or procedure, or allows a team member to do so, or who is

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aware of any violation and fails to report it, shall be subject to the appropriate disciplinary measures, even to termination.

Retaliation or any attempt to prevent, obstruct or dissuade Company members in their efforts to report what they believe to be a violation of the commitment defined herein is forbidden, and it will also be subject to a disciplinary measure, including termination.

Depending on the nature of the violation, the obligation or convenience of reporting it to the authorities or third parties must also be evaluated, which may result in other penalties.

In case of doubt, consult your immediate superior and read and refer to the Code of Ethics at all times, as well as other internal policies of our Company, which are available on the green4T Companies' websites or on the Intranet, and use the website or the phone number 55 11 96850.3293, or the following email to report a violation: canaldaetica@green4t.com.

4.18. DISCLOSURE / PUBLICITY

All Employees and Management Members will receive a copy of this Code, and they shall formalize its receipt and their compliance with its content.

5. REFERENCE DOCUMENTS

NA.

6. RECORD CONTROL

NA.

7. REVISION HISTORY

Revision	Date	Description of amendment	Approved by the Manager	Approved by Management and Quality
00	12/03/2020	The policy was separated. New sequential numbering.	Vaner Silva	Vaner Silva
01	12/03/2020	Exclusion of email in 4.17.	Eduardo Rasi	Vaner Silva