



ALF INVESTING
ÉTICA E PROFISSIONALISMO

CODE OF CONDUCT

ALF INVESTING | ETHICS AND PROFESSIONALISM





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INTRODUCTION

The norms and rules an organization establishes formulating how the work of directors and collaborators shall be specifically expounded are listed in a Regime, in a Code of Regulation, or in a Code of Conduct. The Code of Conduct of **ALF INVESTING** institutes the principles to work with colleagues, and deal with suppliers, clients, governments and local communities. The Code is established and directed towards all collaborators in the company, no matter what professional activity they have. Due to the amplitude of situations that are experienced in the company, the objective of this manual is not to contemplate all conduct principles and practices, but indeed to furnish and clarify relevant questions and doubts and, also, to work as the basis for comprehending what we consider as discipline and ethics. Therefore, in case they have doubts or questions, the collaborator must contact with their direct superior.



TO ALL COLLABORATORS

We herein present to you the Code of Conduct that institutes the ethical principles to be applied in **ALF INVESTING** aiming at guiding both professional and personal conducts of all our collaborators.

This Code also directs the modes of relationship to be built with different groups of interest and reveals our commitment to transparency and trustworthiness in all actions that drive our work environment. Definitely not contracting wrongdoers; negationists of facts and realities; racists; homophobes; fatphobics; people who are prejudice against poverty and religions, e.g. Christianity, Judaism, Muslims, African descendants and all others; ableist, dishonest, misogynist, and xenophobic ones; anti-environmentalists; land invaders, be it in quilombolas, indigeneous or public or private land areas; illegal prospectors; anti-democracy activists; supporters of invasion or violence against democratic institutions; corrupts; thieves; psychopaths.

Hesitating when we have to deal with incompetent people is like walking on a 50-meter high tightrope without any safety equipment and only on one leg.

Antonio Lago Filho
CEO ALF Participações.



ETHICAL PRINCIPLES

- Respect for human beings.
- Respect for the environment.
- Respect for and compliance with established agreements.
- Promise-Keeping & Trustworthiness.
- Respect for the rule of law, cultures and customs.
- Commitment to preserving the company's strategies and confidential information which must be kept even after the company's connection with **ALF INVESTING** has ended.
- Commitment to good practices focused on the value chain.
- Clear and honest communication with stakeholders.
- Transparency, equity, accounting reports and corporate accountability.
- Democracy.
- Ethics and respect for diversity; care for others; human development.
- Excellence in offers and results of educational services; professionalism; commitment and seriousness; being engaged in finding solutions; medical education and professional valorization.
- Technology innovation and creativity.
- Honesty and transparency; compliance with laws and regulations; providing accessibility of information to all.
- Dignity; awareness of your own value.
- Legitimacy; be coherent and do what we believe in.
- Social commitment.

OUR MISSION

To manage operations and finance resources so as to make it viable to reach the best investment with the composition of established risk and return goals, dedicating to the ethics, professionalism and quality of our work.



SOCIAL RESPONSIBILITY

The commitment of **ALF INVESTING** to society goes far beyond generating jobs and incomes. We have had an important social engagement with all the community since the beginning of our foundation, contributing with the Associação de Apoio e Amizade à Criança Portadora de Câncer – Maria Madalena (Association of Friendship and Support to Children with Cancer – Maria Madalena), as well as other projects with charity entities. For believing to potentially promote transformation, **ALF INVESTING** fosters its collaborators and partners to engage with voluntary social responsibility activities and care for others.

Being examples of good actions makes a remarkable difference in our lives. Knowing that companies or individuals are collaborating to reduce famine faced by those in needs is something that drives us towards doing it again or better.

“We are what we repeatedly do. Excellence, then, is not an act, but a habit.”
(Aristotle)

In behalf of those mentioned before, we monthly help 125 (a hundred and twenty-five) families providing basic-needs grocery packages through our charity institution, philanthropic branch of **ALF INVESTING**, Associação de Apoio e Amizade à Criança Portadora de Câncer – Maria Madalena (Association of Friendship and Support to Children with Cancer – Maria Madalena), and we will continue helping, with no expectation to stop doing it. We are doing it now. We will carry it on. These basic-needs grocery packages are brought to the institution by voluntaries from APAC (Apoio e Proteção a Comunidades Carentes e Crianças com Câncer – Support and Protection of Communities in Need and Children with Cancer), located at Rua José Bonifácio, 269, São Cristóvão, Pedreira Prado Lopes, in Belo Horizonte/MG, telephone number 55 (31) 99262-0902. Contact: André da Silva Cunha.

We, members of **ALF INVESTING** are doing our best. If you –who is reading this text– would like to collaborate, contact us, please. We buy basic-needs grocery packages every month, on the 26th. If you want to donate one package or more, get in touch and we will make your donation. Your collaboration and donation will always be welcome and the most vulnerable families will be absolutely grateful.



OBJECTIVE OF CODE OF CONDUCT

The objective of this Code of Conduct is to establish guidelines to direct all ALF INVESTING collaborators and directors concerning ethical and moral conducts to be adopted in internal and external corporate relations, independently of the attributions, responsibilities, and positions they have. The rules mentioned in this document apply to all locations and circumstances in which ALF INVESTING businesses are carried out, and to all the events organized by ALF INVESTING.

COMPLIANCE WITH CODE OF CONDUCT

We expect all collaborators preserve integrity in their professional conduct, being compatible with the company's values, and responsible for complying with the Code of Conduct.

Therefore:

- When finding out situations of illegal, discreditable or wrongful conduct, the Company shall be immediately informed by the main manager of the affected area. Anonymity will be ensured.
- Any type of forged or deceitful information is definitely unallowable, as well as its propagation.
- Participation in acts that violate the Code of Conduct, and violate its connivance, authorization and omission in facts related to it is also unallowable.
- Eventually committed errors must be honestly recognized and immediately informed to the leadership or the one responsible for the area to make the necessary correction.
- All collaborators must know and follow the company's policies and rules.
- It will be considered that all collaborators are aware, agree and go along with the terms established in this Code of Conduct. For that reason, **ALF INVESTING** is in charge of divulging broadly this Code every time the Code of Conduct is updated.
- In case there are any doubts in the interpretation or application of the Code of Conduct, the directors of the area must be informed and they will evaluate it and state an opinion on the issue. Unquestionably, if acting in noncompliance with the rules and norms herein established, the collaborator will be subjected to disciplinary actions.



RELATIONSHIP WITH COLLABORATORS

WORK ENVIRONMENT

The work environment must be reinforced by an ethical conduct of all collaborators and directors independently of their hierarchic position, keeping themselves entirely exempt from interpersonal offenses, coercion, defamation, restraint, intimidation, moral or sexual harassment, verbal and nonverbal aggression, any type of discrimination, favoring and other unethical and inaccurate conducts.

ALF INVESTING understands that every collaborator is responsible for their personal and professional development. However, **ALF INVESTING** believes in their career development, so the collaborators receive our support and motivation.

ALF INVESTING ensures safety and security in the workplace for its collaborators, offering an adequate environment and continuously investing on collective protection of collaborators from risks of accidents and health injuries, highlighting that we will continue to freely provide suitable individual protection equipment in perfect conditions of preservation and operation.

For **ALF INVESTING**, working under effect of illegal drugs or alcohol is considered a grave error, as we understand that the use of illegal drugs or alcoholic drinks damages health and professional performances, posing risks to themselves and others in the Group, affecting the work environment and the organization's image. We also notify that for the use, portability or commercialization of illegal drugs, the person can be under judgment, and, inclusively, can also be dismissed. **ALF INVESTING** understands that self-defense weapons pose risks to other collaborators or third parties in the work environment. Therefore, it is not allowed to carry firearms, cold steel, collectible and/or replicas, in the company's facilities.



HUMAN RESOURCES

Hiring will only be effected after going through recruitment process involving Human Resources areas and applicants, and must integrally meet the competence and potential principles. Such process is also applicable in an eventual case of hiring family members.

For admission and promotion, basic requirements concerning the position must be met. Any form of discrimination will be certainly not accepted or tolerated in the selection processes, nor in dismissing, training, remuneration, promotion or transference of collaborators.

Any form of harassment is strictly prohibited, and it will definitely not be accepted the use of position to request collaborators to do personal favors or services.

Hierarchic superiors are responsible for the practices of their subordinates or representatives, and in charge of the professional guidance required, the supervision and check-out of the regular accomplishment of the tasks they have been set, as well as observation of conformity to the ethical norms established by this Code.

Collaborators must be able to perform the tasks assigned, as well as, besides being oriented; they must also be previously trained and kept updated, according to the company's needs.

- Corporate e-mail address and telephone number shall be used exclusively for the execution of **ALF INVESTING's** activities and within business hours. The use of corporate e-mail address and telephone number outside the work shift is not permitted. This norm applies to classified and specified work shifts of collaborators. Those who have a work shift non-compliant with classified work shift shall, preferably, use the e-mail address and telephone number within business hours.
- The freedom of consciousness and belief is inviolable; however, collaborators are not allowed to use the facilities or the name **ALF INVESTING** without previous authorization, to practice political and/or ideological activities.

The objectives and goals of the Company must always be above the interest of individuals, working towards the growth and perennality of the business.



FORCED AND CHILD LABOR

ALF INVESTING repudiates forced and child labor. For that reason, the Group does not permit the use of forced labor, child labor or any other form of exploitation that is an affront to human dignity. Business relationships must be established with companies that respect labor laws and do not use forced, child labor or slave labor.

INTERPERSONAL AFFECTIVE RELATIONSHIP

Affective relationships can coexist between professional. However, private matters must not interfere in the work routine. The company is not against interpersonal affective relationships between collaborators, but situations that characterize direct or indirect subordination, or conflicts of interest will not be accepted.

MEDIA RELATIONS

Media relations must be carried out exclusively by the company's chief manager, who will authorize publications, divulgations and/or interviews to the media.

ROLE OF LEADERS

The leader must:

- Know the Code in detail to apply it with their followers and resolve any doubts. If it is not possible to resolve it, they must forward it to hierarchically superiors or directors.
- Provide their team with support, delegating tasks and developing their collaborators' potentials.
- Treat equally all their collaborators, considering their rights and duties.
- Be an example of honesty, integrity and transparency with their team, advising them correctly and indicating which situations are identified as a conflict.
- Contribute to the establishment of a climate of harmony and respect so that all members feel comfortable to express their different points of view.
- Identify infringements of the Code of Conduct and take actions to resolve the matter or forward it to their superior and/or directors.



CONFLICT OF INTERESTS

Different situations may lead to conflicts, being, in fact, impossible to list them in here. It is not always easy to distinguish which situations are appropriate and which are inappropriate. In case of doubts, ask your direct leader.

The following guidelines refer to most conflict situations:

- Financial interests are prohibited, as well as interests of any other nature, of a collaborator or of their immediate family members in any the businesses or organizations that maintain commercial relationships with **ALF INVESTING**.
- Collaborators must be careful when accepting or doing small favors that may lead to do bigger favors. It is important that Collaborators be familiarized with the Code of Conduct so that other individuals, insiders or outsiders, do not feel they have the right to have or request different relation, imagining that, with gifts or favors, it is possible to influence a decision is made in the company.
- A conflict of interests occur when private interests somehow interfere, or seem to interfere in the interests of **ALF INVESTING**. A conflict of interests may occur when a collaborator or director holds an interest that might make it difficult to do their work in **ALF INVESTING** with efficacy and objectivity. It also occurs when a family member is in a position which unduly benefits them with the result of their relationship with **ALF INVESTING**. We expect that all collaborators and directors avoid external activities, financial interest or relationship that might present potential conflict of interest.
- It is required that every collaborator or director reveals any conflicts of interest to a shareholder.

Collaborators must:

- Avoid to personally assume opportunities, goods or rights they know are required for ALF INVESTING or that the Group is interested in.
- Abstain in using, for their own benefit or for others, the information that they know, including about commercial opportunities, as well as services, assets, goods, credits or industrial property rights of **ALF INVESTING**.

Inform directors about the fact that they have relatives – up to third-degree, that participate in the management or control of competitor companies, suppliers or clients, and abstain in taking part in the decisions regarding business of **ALF INVESTING** with these companies.



BUSINESS GIFTS

Common sense and moral sense must be practiced when accepting gifts given by suppliers, clients, collaborators (superiors or not), and so on, as they might influence, even just apparently, over making decisions on business. The purpose is to avoid any indication of inadequacy or conflict of interests. Again enhancing the importance of common sense, it will exclusively be allowed to accept and offer symbolically valuable kindness, as well as other sorts of offers, such as:

1. Gifts that in general bear the names of companies such as pens, diaries, clocks, notebooks, card-carrier wallets, key chains etc.
2. Lunches or dinners related to the company's activities.
3. Cultural and sports entertainments, provided that they are sponsored for clients of the supplier or institution, which the company to be represented is respectively interested in.
4. Travelling invited by suppliers to deal with the interests of the Company.

For items 3 and 4, they shall be approved by the immediate superior.

All employees in the unit should be entered into a draw of gifts such as electronic equipment and household appliances of lower value, Christmas hampers, beverages, foodstuffs, among others.



PROTECTION AND UTILIZATION OF ASSETS AND INFORMATION

Trade secrets and industrial secrets, property information of **ALF INVESTING**, as well as most of in-company information, are valuable. The protection of this type of information, and maintenance of its secrecy and privacy, play a fundamental role in our capacity to grow and compete. Therefore, **ALF INVESTING'S** assets must be used exclusively to perform functions of each collaborator, being thus prohibited to use it to any other purposes. Then, it is not allowed to use facilities, materials or the equipment made available for any purposes that are not related to the purposes of the company.

Collaborators understand that the information they have, know or can access due to their position and attributions, are sensitive information and cannot be transferred to any collaborators that are strange for the department/area and/or third-party people that have no commercial or professional relationship with **ALF INVESTING**. In case it is verified there is a breach of secrecy, the collaborator responsible for the act might be accountable to the losses or damages caused to the company, as well as be subject to legal penalties applicable under the terms of the contract they have.

Hence, it is noteworthy to point out the obligations of all collaborators in regard to this type of information:

- Do not publicize or share it with people outside **ALF INVESTING**.
- Do not use it for your own benefit or for third-parties'.
- In case of dissolution of a contract or dismissal from the company the collaborator still has the obligation to continue protecting it until the information becomes public, or **ALF INVESTING** no longer considers it as sensitive information.
- Concerning any financial information or business information requested by the media, financial community or the public, the request must be submitted to directors. It is fundamental that nobody personally responds to such requests since any inappropriate or inadequate response might harm the company's legal position.
- Information Technology resources, mainly equipment, access to internet and e-mail, shall be objectively used by collaborators for their work, using it all with prudence and according to the orientations and procedures determined by the Information Technology Department.
- Do not use the company's commercial logos or brands. Except when it was previously approved.



Totally prohibited:

- Messages that characterize harassment, discrimination, offenses, defamation, disorder, fraud, or threats, including those that offensively refer to race, sex, age, sexual orientation, religion, religious beliefs, nationality, deficiency, war veterans, or any other characteristics protect by law.
- Non-authorized distribution of information that is a commercial secret, an industrial secret, that is confidential or owned by **ALF INVESTING**.

ALF INVESTING's Information Technology Resource users shall not presume they have right to personal privacy or confidentiality when using the company's resources.

Collaborators are aware that the company has specialized computer information system to control the access and use of the Internet. The system is able to identify, track, control and prove unconformity in the use, according to the rules, safety norms and policy specifically adopted by this Code of Conduct. It is important to highlight that the use of it for other purposes and/or against the norms adopted will be characterized as a grave error, and collaborators will be responsible for indemnifying **ALF INVESTING** in case it is verified that there were damages caused by the errors and disrespect for the norms of using the Internet, E-mail and specific policy adopted by the company.



An important part of **ALF INVESTING's** assets and of the trustworthy relation we establish with our partners is on the information about our business. Carefulness and discretion when dealing with the information that flows in the company is a responsibility that is shared with our third-party members. For that reason, when circulating all information and subjects dealt with by the company, or those that are about the company, it is essential to maintain confidentiality and professional secrecy.

Access to information must be strictly done by people who have the need to receive it for being directly involved with the matter. Such information shall only be used for the specific purpose of rendering services with **ALF INVESTING**. In some cases, our collaborator(s) can request the signature of a Confidentiality Agreement of the company.

Dissemination of information: classified and confidential information, or information that is a property of **ALF INVESTING** can only be used and disseminated if authorized by the company's Directors or Compliance area. It is important to exercise caution so that misinformation is not disseminated, even if for carelessness, since such cases are not allowed. This commitment with confidentiality must be maintained even after ending the business relationship.

Basada en su Política de Medio Ambiente, la Compañía les exige a sus colaboradores y colaboradoras y a la alta administración el respeto por el medio ambiente, incentivándolos a adoptar prácticas ambientales sostenibles.

It is a responsibility of us all to maintain the confidentiality and secrecy of the information from our clients and partners. So, it is not allowed to broadcast data, be it on photographs from cellphones, storage in inner servers or other sharing media. There are specific channels which are the only ones designed to disseminate and broadcast to our clients and partners.

Compliance with Personal Data Protection Regulation: with the objective to protect fundamental rights of freedom and privacy, according to Law 13.709 (LGPD), every partner of **ALF INVESTING** shall ensure due treatment of any personal data they have access to when supplying or rendering service, maintaining secrecy and confidentiality.



USE OF PASSWORDS

As users' passwords are personal and inalienable, they cannot be shared, disseminated to third parties, cannot be written on paper, or used on visible systems, or with unprotected access. In case a third-party's password and login is obtained, be it permitted, accidental or any other, the collaborator shall immediately communicate the hierarchic superior or inform the Information Technology area.

It is absolutely prohibited that collaborators, under any circumstances, use user's logins and passwords that are not their personal password.

CLIENTS

With the objective to maintain with clients a relationship based on the norms presented by this Code Conduct, it is required that:

- Clients are well served based on a clear and honest relationship, focusing on their needs.
- Collaborators are clearly aware of the importance of the client and they must be committed to searching for solutions that satisfy and meet the client's interest, in consonance with the company's objectives.
- In case of conflict of interests, collaborators shall act with transparency explaining to the client and clarifying key issues in question.
- There is no discrimination of ages, gender, color, race, religious creed, ancestry, among others, when serving clients.



RELATIONSHIPS WITH SUPPLIERS

With the purpose of maintaining a relationship, also with suppliers, accordingly to the norms and rules established in this Code of Conduct, it is required that:

- Suppliers are considered as an extension of the company, sharing the same ethical principles and continuous improvement of quality all along the partnership engagement.
- The contract takes in consideration the best practices established by the Global Pact, such as: elimination of all forms of forced or compulsory labor; abolition of child labor and any form of discrimination; and social and environmental responsibility.

RELATIONSHIP WITH COMPETITORS

ALF INVESTING performance is conducted by the free competition principle. All information disseminated about the market and competitors, legal and necessary for the business, must be collected by means of transparent and suitable practices, being definitely inadmissible collection of illicit or morally unacceptable information.

It is prohibited that employees adopt any attitudes that defame the image of the Company's competitors. The relationship with competitors must be guided by ethical standards, avoiding any actions or practices that may characterize unfair competition, formation of groups or cartels, or any infringement of economic rules.

No collaborator is authorized to provide any information about the company to our competitors.

RELATIONSHIP WITH INVESTORS

The communication with shareholders shall be made through the Investors Relationship area and be transparently and adequately performed, thus allowing that **ALF INVESTING** performance and activities are monitored.

The relation established with shareholders is independent of the quantity of shares they own.



COMMUNITIES

All business units of **ALF INVESTING** must develop a strong and collaborative relationship with their respective communities nearby. The organization always tries to understand and attend the necessities and worries of the local community, and work together with people and authorities responsible for the solution of eventual problems.

RELATIONSHIP WITH PUBLIC OFFICES

It is definitely prohibited that all **ALF INVESTING** members offer any gifts and/or benefits to civil servants, their relatives or similar ones, be it directly or via third-parties. The guidelines regarding gifts are described in item 11 of this Code of Conduct.



ANTICORRUPTION POLICY

ALF INVESTING will definitely not tolerate any corruption acts, be it done by our collaborators, or by third-party members performing in behalf of the company. The companies carry out relation with public services in an ethical and transparent manner, with absolute clarity that laws direct their business activities and actions, as in Law nº 12.846/13. **ALF INVESTING** does not condone or tolerate any practices of corruption, nor any form of offers, promises, bribery or receiving doubtful values paid by Public Offices, mainly as a way to influence the determination of fraudulent contracts with Public Administration.

All collaborators, there including leadership and third-party members are prohibited to, directly or indirectly, promise, offer or deliver or give any type of bribery, or undue advantage or any valuable item to public servants, agents, workers and officials from government organizations, including autarchies, government companies, semi-public enterprise, international organizations, political parties, candidates for elective positions, members of the Executive, Judiciary or Legislative Powers. Definitions which are more precise than improper advantages and valuable items are listed in the Policy of Relationship with the Public Service. The prohibition also extends to people who have close relation with civil servants, such as spouses, partners, girlfriend/boyfriend, relatives and similar, and any other people who receive the promise, offer or benefit to influence any decision to be made by a public agent.

Anticorruption laws are applicable to individuals who enact towards incentivizing the payment, that is, any person who:

- Approves payment or promise of unfair advantage.
- Supplies or accepts forged invoices.
- Relays instructions for payment or promise of unfair advantage.
- Conceals payment or promise of unfair advantage.
- Consciously cooperates with the corruption act.

For the purpose of acting ethically permanently, we expect collaborators will perform monitoring the activities of third parties, and shall always:

- Not tolerate any commercial practice that involves promises or offers of unfair advantages to representatives of our suppliers or partners.
- Monitor the activities of third-parties during their performance.



FRAUD, FINANCIAL INTEGRITY AND ACCOUNTING INTEGRITY

Organizations with inefficient in-company control will, in general, pose risks of poor administration of assets, conflict of interests, or business conflicts with partners, frauds, bribery, misappropriation of assets, corruption, facilitation payment, disguised illicit conducts or irregularities, and others.

ALF INVESTING does not accept the register of operations which do not match up with a real and exact counterpart funding, and the company carries out activities of internal control and prevention of frauds. Frauds are in general practiced with the goal to obtain undue advantages, frequently by means of omission of their duties, use of fake information and documents, data tampering, breach of trust etc. Therefore, everyone must carefully collaborate so that there are no opportunities that such situations will occur. Do what is right:

- Maintain account books and registers in a way they are understandable, on a level that sufficiently informs in details, transactions that correspond to each expenditure or asset deployment.
- Neither change or misinform accounting data, nor provide or register fake or incorrect data in the books and registers of ALF INVESTING.
- Expenses made only after permitted by the manager in charge, with an appropriate voucher, reports and controlling documents.
- Protect and keep all the documents as long as determined by law.
- Refuse and do not provide false or incomplete documents.

We remind the fact that the approval of expenditures made by collaborators, who are not within the scope of responsibility for doing it, is forbidden



THE ENVIRONMENT

Based on the company's Environment Policy, **ALF INVESTING** demands that all collaborators – up to the top administration, respect the environment, encouraging them to adopt sustainable and environmentally-friendly practices.

Your mission as an **ALF INVESTING** collaborator starts now.

An organization will exist when there are people able to interact and available to contribute and jointly act to reach results. Your professional result depends deeply on you, that is, on your knowledge, attitudes, efficiency, interest, availability and, finally, on your ability to assume grander responsibilities. Together, we will be more.



ALF INVESTING
ÉTICA E PROFISSIONALISMO

DECLARATION

Name: _____

Sector: _____

I declare to have received a presentation copy of Grupo ALF Participações | AGEI | AproMed Code of Conduct. I also declare to have been oriented to read it carefully and encouraged to follow all orientations provided by the Code, since they are fundamental guidelines in the company. In the event that there is noncompliance with the norms, procedures and instructions of this manual, I am aware that the company might take measures to avoid recidivism.

_____, ____ / ____ / ____.

Signature

We believe in you!

We are sure that you will have no problems to adapt to your new professional life. The Human Resources Department is at your disposal should you need any type of help, and ready to provide you with clarifications about possible doubts.

Your mission as collaborator of Grupo ALF Participações | AGEI | AproMed starts now. An organization will exist meanwhile there are people able to interact and are willing to contribute to group working to achieve results. Your professional success depends a lot on you, that is, on your knowledge, attitudes, efficiency, interest, readiness and, finally, on your capacity to assume greater responsibilities.

Together, we are more!



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