

Bruna Viana de Freitas Treinamentos em Desenvolvimento Profissional e Gerencial LTDA /  
Cúrcuma Participação

Last review date: January 2024

## Code of Conduct

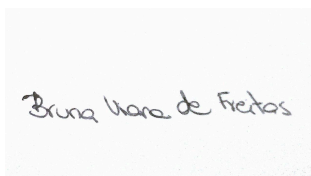
### MESSAGE FROM BRUNA FREITAS, CEO OF CÚRCUMA

The Code of Conduct of Bruna Viana de Freitas Treinamentos em Desenvolvimento Profissional e Gerencial LTDA / Cúrcuma Participação ("Cúrcuma") reflects our commitment to conduct our business in a manner that is professional, ethical and mutually respectful. Based on our values and best practices, the Code of Conduct establishes the standard of behavior we expect from our stakeholders.

Our Code of Conduct is a guide for all the actions and decisions we take. These guidelines apply to all of Cúrcuma's stakeholders, i.e. employees, suppliers, service providers and all those with whom we interact, be they customers, competitors, the government or the press.

We expect from you a commitment to practicing and sharing the moral and ethical values that inspire this Code of Conduct,

Bruna Freitas, January/2024.



Bruna Viana de Freitas

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## **1. Vision, Mission and Values**

### 1.1. Vision

Enhancing the voices of traditionally marginalised actors, involving them transparently in the construction of solutions aimed at transforming their realities.

### 1.2. Mission

Cúrcuma's mission is to promote fair, inclusive and sustainable development by broadening participation of the key actors involved on a circumstance. We work with participatory processes that make it possible to make fairer and more inclusive decisions, to carry out more assertive actions and to evaluate the impact with the engagement of the players involved in the initiative.

### 1.3. Values

The actions developed by Cúrcuma carry the core values of transparency, effective collaboration, inclusion and justice.

## **2. Anti-Fraud, Corruption, and Bribery / Whistleblowing Policy**

2.1. Cúrcuma is committed to maintaining the highest standards of integrity and ethical behaviour.

2.2. Employees and associates must not engage in any form of bribery, corruption, or fraudulent activities, whether involving government officials, clients, suppliers, or any other party to influence or compensate for any action, omission, favourable treatment or decision for the benefit of the company.

2.2.1. A bribe is anything of value that is offered, promised or received to influence a decision or obtain an undue advantage in promoting, improving, obtaining or retaining business. Bribery can take forms other than direct payments, including gifts, travel, entertainment and hospitality, donations, employment opportunities, service supply contracts, excessive discounts or rebates, loans on non-competitive terms, among others.

2.2.2. Brazil's Anti-Bribery and Anti-Corruption Laws not only penalise the individual who pays the bribe, but also those who act in a way that encourages its payment

2.3. No employee or subcontractor shall be retaliated against or penalised due to delay or loss of opportunities resulting from their refusal to pay or receive bribes.

- 2.4. Service providers, partners and other third parties must comply with this policy and undergo a due-diligence process when justified by the level of risk assessed. The due diligence may include meeting with those involved to better assess their business practices and anti-bribery and anti-corruption policies/controls, as well as making enquiries into their reputation and conduct. Other risk mitigation strategies, such as including anti-bribery clauses in contracts, must be implemented.
- 2.5. Whistleblowing is encouraged. Employees and partners are encouraged to report any suspected fraud, corruption, or unethical behavior promptly and confidentially through the established channels ([denuncias@curcumaorg.com](mailto:denuncias@curcumaorg.com)).
- 2.6. It is the responsibility of all Employees and Third Parties to report any violation and suspected violation of this Policy or any illegal or unethical behaviour of which they are aware.
- 2.7. The company and its employees must keep books, records and accounts reflecting, in a detailed, accurate and correct manner, all the company's transactions. To combat corruption, transactions must be transparent, fully documented and classified in accounts that accurately and completely reflect their nature and with sufficient detail so that the purpose and amount of any payment are clear.
- 2.8. The Company reserves the right to take disciplinary action for violations of this Policy that is appropriate to the nature and specific facts of the violation. In more severe circumstances, this may include immediate termination of the contract of service for fair cause and applicable legal proceedings.

### **3. Policy for Purchases**

- 3.1. All purchases must adhere to a transparent and competitive procurement process. The selection of proposals for purchase or contracting must be made through objective judgement, with criteria established in each process and which are generally known, in order to guarantee ethics and transparency in decision-making, always in line with the Anti-Corruption Policy.
- 3.2. All purchases of goods and contracting of services must comply with the established budget base, so that the Company can adequately honour its financial commitments and maintain the principles of good governance.

- 3.3. Purchases are made based on value, quality, and compliance with ethical standards.
- 3.4. The company's purchasing policy must be widely known and understood by all employees and suppliers.
- 3.5. It is the Buyer's duty to build and consolidate good negotiating relationships and transparency with suppliers.
- 3.6. Every process of purchasing goods and contracting services must be documented, analysed and kept under the Company's custody so that there is no doubt about its legality and integrity.

#### **4. Travel and Subsistence Policy**

- 4.1. Travel expenses must be reasonable, necessary, and incurred in the best interest of the organisation. Air travelling will always be by economy class and hotels of no more than 4 stars will be chosen.
- 4.2. Employees must adhere to the established travel and subsistence guidelines and seek prior approval for travel-related expenses.
- 4.3. Detailed records of expenses must be maintained and submitted promptly for reimbursement.

#### **5. Recruitment, Staffing and Anti-Slavery Policy; Anti-bullying and sexual harassment policy**

- 5.1. Cúrcuma's leadership team is committed to fostering a culture that respects human rights, ethical conducts, and responsible business practices.
- 5.2. Recruitment processes must be fair, transparent, and free from discrimination.
- 5.3. Cúrcuma Participação is committed to preventing and combating all forms of modern slavery, human trafficking, forced labour, and any other violation of human rights within our organisation and across our supply chains. This Policy outlines our commitment to ethical business practices and compliance with Brazilian anti-slavery legislation.
  - 5.3.1. The organisation acknowledges and complies with the Brazilian legal framework, including the Anti-Slavery Law (Section nº 149 the Brazil Criminal Code, which criminalizes practices related to modern slavery, human trafficking, and forced labour.

- 5.3.2. The organisation has a zero-tolerance approach to modern slavery, human trafficking, forced labour, and any other form of exploitation.
- 5.3.3. This Anti-Slavery Policy will be communicated to all employees, suppliers, and relevant stakeholders. It will also be made available to the public through the company's website ([www.curcumaorg.com](http://www.curcumaorg.com)).
- 5.3.4. Contracts with suppliers and contractors will include provisions confirming their commitment to anti-slavery principles.
- 5.3.5. Cúrcuma and its suppliers and contractors are committed to a zero-tolerance policy for sexual and moral harassment (bullying).

## **6. Policy for Sub-contract Management**

- 6.1. Subcontractors must adhere to the same ethical standards outlined in this code of conduct.
- 6.2. The assessment of suppliers and partners must necessarily observe the legal status of the companies and their partners, so that the company's ethical principles are preserved, ensuring good governance and the legality of actions.
- 6.3. Regular evaluations and audits of subcontractors ensure ongoing compliance with policies.

## **7. Conflict of Interest Policy, Including in Subcontracts**

- 7.1. All situations that could lead to conflicts of personal and company interests, compromising or influencing the actions of employees or suppliers, must be reported to the company in advance so that the appropriate analyses can be carried out.
- 7.2. Employees and associates must avoid conflicts of interest that could compromise the organization's integrity or impartiality.
- 7.3. Transparent disclosure of any potential conflicts of interest is mandatory.
- 7.4. Subcontractors must adhere to the same ethical standards outlined in this policy.

## **8. Gifts and Entertainment**

- 8.1. Inappropriate gifts and entertainment opportunities can harm Cúrcuma and lead to improper business decisions.
- 8.2. It is forbidden for employees and subcontractors to take advantage of their positions to solicit personal favours, obtain any type of gift or from any person, supplier or service provider, including soliciting gifts on behalf of the Cúrcuma for internal draws.
- 8.3. Examples of gifts are samples of new products, gifts, drinks and/or any other object.
- 8.4. Examples of entertainment are dinners, concert tickets and sporting events.
- 8.5. Participation in fairs and events in the area of activity is permitted, provided that additional expenses such as travel and accommodation are paid by Cúrcuma or by the employee.

## **9. Donations and Sponsoring**

- 9.1. Unless approved, associates, partners and suppliers are prohibited from using the Company's name, resources or business contacts to solicit donations.
- 9.2. All requests for corporate donations to charities and other non-profit organisations (such as schools, hospitals, libraries, etc.) must be approved in advance by the person(s) designated to approve such donations, and due diligence must be carried out.
- 9.3. The company prohibits any Donations and Sponsorships to individuals or legal entities, whether public officials or not, that are intended to influence, directly or indirectly, or be considered influential in a business decision, as well as for events organised by people or institutions with objectives that are incompatible with the company's business principles or that could damage its reputation.
- 9.4. Financing of Social Programmes to charitable causes should only be made to institutions registered under the terms of the applicable legislation, for legitimate philanthropic reasons to serve humanitarian interests and to support cultural and educational institutions. Funding for social programmes through sponsorship must be based on formalised contracts between the company and the third parties that will receive the benefit.

- 9.5. Financing political parties, political campaigns and/or candidates for public office with company funds is prohibited in accordance with current legislation.

## **10. Data Protection Policy**

Cúrcuma Participação is committed to protecting the privacy and security of personal data in accordance with the Brazilian Data Protection Law (Lei Geral de Proteção de Uso de Dados - LGPD) and other applicable data protection laws. This Data Protection Policy outlines our approach to data protection and our commitment to handling personal data responsibly.

This policy applies to all personal data processed by Cúrcuma, whether collected online or offline, including data collected through our website, surveys, interviews, or any other means.

If you have any questions or concerns about our data protection practices, please contact us at [contato@curcumaorg.com](mailto:contato@curcumaorg.com).

By using our services, you acknowledge that you have read and understood this Data Protection Policy and agree to the collection, use, and disclosure of your personal data in accordance with it.

### **10.1. Data Collection and Processing**

- 10.1.1. Lawful Basis: We will only collect and process personal data when we have a lawful basis to do so, such as with the data subject's consent or for the performance of a contract.
- 10.1.2. Purpose Limitation: Personal data will be collected for specified, explicit, and legitimate purposes, and will not be further processed in a manner incompatible with those purposes.
- 10.1.3. Data Minimization: We will only collect data that is necessary for the intended purpose and will not process excessive data.

### **10.2. Rights of Data Subjects**

- 10.2.1. Cúrcuma guarantees to the data subjects the rights and guarantees provided for in the LGPD and other current privacy and data protection legislation.

### **10.3. Data Security**



10.3.1. Confidentiality: We will ensure the confidentiality, integrity, and availability of personal data.

10.3.2. Data Breach Response: In the event of a data breach, we will take appropriate measures to mitigate the impact and comply with notification requirements under the LGPD.

#### 10.4. Data Transfers

10.4.1. Cross-Border Transfers: If personal data is transferred to countries outside Brazil, we will ensure adequate safeguards are in place to protect the data.

### **11. Safeguarding and Ethics Policy for Research Participants**

11.1. Special attention is given to research involving children under the age of 18 and vulnerable adults to ensure their protection and well-being.

11.2. Stringent safeguards are in place to obtain informed consent, protect confidentiality, and respect the dignity of all research participants.

11.3. Research involving human participants must adhere to ethical principles, ensuring respect, honesty, and integrity in all interactions.

11.4. Compliance with relevant ethical guidelines and obtaining necessary approvals is mandatory.

### **12. Risk Management Policy**

12.1. A comprehensive risk management framework is in place to identify, assess, and mitigate various risks, including travel risk, financial risk, and reputational risk.

12.2. Periodic risk assessments are conducted to adapt and update risk management strategies.

## **Conclusion**

Adherence to this Code of Conduct is mandatory for all employees and stakeholders. Violations will result in appropriate disciplinary action, which may include termination of employment or business relationship.

By adhering to these policies, Bruna Viana de Freitas Treinamentos em Desenvolvimento Profissional e Gerencial LTDA / Cúrcuma Participação ensures ethical conduct, legal compliance, and the preservation of its reputation as a responsible and trustworthy consultancy and research company.

[Signature]

[Name]

[Title]

[Date]