



CODE OF ETHICS

Accelerate your essence

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1. OBJECTIVE

To be a formal and institutional benchmark for the personal and professional conduct of all the EMPLOYEES and MANAGERS of the Qintess Group, as well as SHAREHOLDERS or QUOTISTS, and all of them regardless of the position or function they hold, in order to become a standard for internal relations and with its stakeholders: shareholders and quota holders, customers, employees, unions, partners, suppliers, service providers, competitors, society, government and the communities where it operates, and also:

- Enable ethical behavior based on the beliefs and values of the Qintess Group;
- Reduce the subjectivity of personal interpretations of moral and ethical principles;
- To strengthen the image of the Qintess Group and its EMPLOYEES AND MANAGERS among its stakeholders.

2. TERMS AND DEFINITIONS

Managers: Responsible for planning and directing the work of a particular area or sector, leading, monitoring and controlling the work carried out.

Executive Ethics Committee - Directly and operationally responsible for managing the Integrity Program, it must operate the Compliance Communication Channel, as well as prepare periodic clarifications and reports on the operations and work carried out, to be submitted to the Integrity Council.

Qintess Group Integrity Framework - Has its purpose to improve, develop and monitor the Integrity Program, consisting of the Board of Integrity and by the Executive Ethics Committee, whose duties are set out in the Corporate Anti-Corruption Policy.

Collaborator(s) - Any person(s) who contributes to the work carried out in the Qintess Group, regardless of the contracting regime, position or function they hold.

Foreign Corrupt Practices Act - A law that makes it illegal to offer, pay, promise to pay or authorize the payment of any amount, gift or other item of value to any foreign official, political party or candidate to help the Company or anyone else obtain or retain business.

3. SCOPE

This policy applies to all employees of the Qintess Group, regardless of employment status, position or function.

4. ROLES AND RESPONSIBILITIES

4.1 Human Development Organizational

- Inform employees of the Qintess Group's Code of Ethics;

4.2 New employees

- Participating in the Institutional Integration held by the Qintess Group;
- Respect laws, rules, procedures and the Qintess Group's Code of Ethics;

4.3 Executive Committee of Ethics

- To help maintain upright and ethical behavior in the Qintess Group;
- To investigate any complaints received;
- Properly record the results of the investigation;

- Position the parties on the results of the investigation;

5. POLICY

The Qintess Group promotes a culture of integrity throughout the organization and encourages all its employees, regardless of their position, to conduct themselves in accordance with the highest ethical levels and standards in order to maintain an ethical, safe and healthy working environment.

Therefore, to maintain the highest level of integrity and the best possible organizational culture, the Qintess Group does not tolerate in any way the practice of any form of harassment by its employees, including verbal, written or electronic harassment that is abusive, humiliating or intimidating

5.1 Principles

This Code of Ethics and Conduct is designed to provide employees with mandatory benchmarks for good corporate governance practices and to contribute to the company's sustainable development:

- Integrity - understood as carrying out activities in accordance with current legislation, as well as observing moral and ethical precepts;
- Effectiveness - the use of instruments that can achieve the expected results, always guided by the rationality of processes and actions;
- Transparency - publicizing values and practices, with the active and passive availability of information that affects stakeholders;
- Better Results - optimization of activities according to a short, medium and long-term analysis, adding value in a sustainable way to businesses and stakeholders;
- Socio-environmental Responsibility - integration with the reality of the various publics with whom it relates, in a collaborative and sustainable approach;
- Continuous Improvement - commitment to reviewing methods and critically analyzing processes and actions;

- Secrecy of Information - protection and preservation of personal and confidential data, in favor of

5.2 Relationships at work

5.2.1 In the Exercise of their Position or Function, the Employees of the Qintess Group:

- They always pursue the best overall result for the company, not just worrying about the results of their area or their own;
- They carry out their duties effectively, eliminating situations that lead to errors or to delays in providing the service;

- They always adopt a transparent, respectful and collaborative attitude towards their work colleagues, suppliers, union representatives and representatives of community bodies;
They promote actions that make it possible to improve internal communication;
- they emphasize integration and the development of teamwork;
- They do not use their position, function, activity, facilities, position or influence to obtain any favor for themselves or others;
- They do not create artificial difficulties in the exercise of their position, function or assignment, with the aim of overvaluing their professional performance;
- They do not alter or misrepresent the content of any document, information or data;•
They promote diversity and inclusion, with integrity, respect and honesty;
- They respect the company's guiding principles, and the human rights provided for in local laws, international agreements and universal declarations of human rights;
- They respect and guarantee their human rights and can in no way be physically or psychologically forced into any kind of complaint because of their work;
- They do not discriminate against any employee on the grounds of race, gender, sexual orientation, marital status, pregnancy, religion, political opinion, nationality, ethnic origin, social status, disability, age or political party or trade union membership.

5.2.2 Relationships with Immediate Superiors and Colleagues

- They do not damage the reputation of colleagues or managers through prejudiced judgments, false testimony, unsubstantiated information or any other subterfuge;
In their professional life, they always act loyally towards colleagues or managers;
They do not seek to obtain exchange of favors that appear or could give rise to any kind of personal commitment or obligation;
They act courteously, with availability and attention to all the people with whom they interact, respecting individual differences;
- They encourage the expression of ideas, when aligned with the company's strategic planning objectives;
- They have no prejudices of origin, race, sex, color, age, religion, social, party political or any other form of discrimination.

5.2.3 As for intimacy, the Group's employees Qintess:

- They respect the hierarchy, but immediately report any irregular behavior to senior management, if it is duly substantiated;
They don't tolerate threats or harassment of any kind;
- Do not submit to situations of moral harassment (understood as the act of repeatedly disqualifying, by means of words, gestures or attitudes, self-esteem, safety or image of colleagues as a result of the hierarchical link) and denounce the harasser; Immediately report to their superiors, for the appropriate measures, any enticement, act or omission that they deem contrary to the interests of the company. Do not give in to pressure aimed at obtaining undue advantages;
- They do not tolerate discriminatory behavior, abuse of authority or other harassment, including sexual, social and party-political harassment;
- They do not make jokes, insults or any other comment based on a particular condition, be it age, disability, sex, condition, social class, race, religion, sexual preference or orientation, political party orientation or that in general is (or could be) considered discrimination or harassment;
- Immediately inform their hierarchical superiors and the Executive Ethics Committee of the existence of a family relationship with another employee who is under the same immediate leadership.

5.2.4 Regarding Tolerance of Error, the Employees of the Qintess Group:

- They learn from their own mistakes or those of others, eliminating their causes and avoiding their repetition;
- When they feel they are not capable of carrying out a task, we look for colleagues, managers and supervisors in order to obtain the means to overcome these limitations;
- They systematically evaluate their mistakes and successes, with the participation of their immediate management and supervisors, with the aim of continually improving the quality of their work;
- They always try to share their mistakes to prevent others from making them too.

5.2.5 Regarding Personal Information, the Group Qintess:

- The Qintess Group guarantees that personal information, including medical information and information on benefits, is restricted to the employee and the personnel responsible for keeping, maintaining and processing this information. Requests, analyses and transfers of this information are only made by those who have the legitimacy to do so, in the exact terms of the legislation and regulatory provisions, as well as providing evidence in court, in accordance with the guidance of the legal department;
- The Qintess Group guarantees employees access to their functional information;
- The Qintess Group discloses its policies on reimbursements and the use of company cash; The
- Qintess Group guarantees its employees the right to request and receive clarification on the rights and advantages they have, such as legal benefits and benefits and advantages offered by the company;
- The Qintess Group must be constantly updated on the personal data of its employees.

5.2.6 Regarding the Work Environment:

- Individual rights are legitimate and respected, and are always compatible with the collective well-being and values of the company;
- The Qintess Group guarantees its employees a suitable working environment, aimed at safety, hygiene, health and well-being;
- In carrying out their activities, Qintess Group employees preserve the company's assets in the form of equipment, materials and strategic information;

5.2.7 Regarding the Use of Electronic Mail, Qintess Group Employees:

- They use e-mail for matters relevant to their work, always taking care of information security and do not disseminate messages with illegal, pornographic, racist, religious or political content; Urgent matters, which may in some way cause damage to the company or to
- your employees, should not just be dealt with by e-mail.

5.2.8 As for Clients, Partners, Suppliers and Competitors, the Employees of the Qintess Group:

- They do not use tricks that cause delays or damage to the regular exercise of the rights of suppliers, customers, service providers and others;
They don't leave customers and suppliers waiting for a solution, keeping them informed of the actions that are underway to help them;
- They treat customers, partners, suppliers and competitors in a respectful and cordial manner, seeking to improve communication and relationship processes.

• 5.2.9 Regarding Information to Customers, Partners, Suppliers and Competitors, Qintess Group Employees:

- They only pass on documents to the external public when duly authorized by the relevant areas, always identifying the author;
- They always disclose truthful information, making it available equally to all interested parties. When they are not authorized to answer a query, they inform the applicant;
- They do not divulge strategic or confidential information;
- They do not disclose company information, such as customer contracts, customer information and internal results.

5.2.10 When in Conflict Interest, Group Employees Qintess:

- Do not misuse the Qintess Group's resources (information, micros, printers, telephone, working hours, etc.) to serve private interests;
- They do not engage in any activity that is of conflicting interest with the business of

Qintess Group;

- They do not provide technical assistance or consultancy of any kind to current suppliers, clients and service providers of the Qintess Group or those who are in the process joining the register or, except when formally authorized by the respective managers;
They do not get involved in any activities that conflict with their working hours.
- attention and time to the Qintess Group.

5.2.11 In Customer Relations, the Group's Employees Qintess:

- They maintain a strictly professional relationship and, in the event of any kind of close relationship, they immediately inform their immediate manager so that he or she can take the necessary measures and avoid any kind of conflict of interest between the parties.

5.2.12 In the Relationship between Employees with a Direct Reporting Line, the Employees of the Qintess Group:

- They avoid relationships that go beyond the professional with direct hierarchical lines, with the intention of eliminating possible conflicts of interest or even wear and tear on relationships;
- In the event of a relationship between employees with a direct reporting line, the employee must report the incident in writing and have their management supervised periodically. Any decision involving related parties (raises, promotions, job changes, concessions) must be escalated to ensure transparency and thus avoid any kind of conflict of interest.

5.2.13 As for Personal Advantages, Group Employees Qintess:

- They do not accept personal invitations to stay, travel or other attractions that could damage the company's image and/or interests;
- They don't allow themselves to be influenced by decisions by personal relationships with customers, suppliers, partners and competitors;
- They do not maintain private business relationships with customers, suppliers, partners or competitors of the Qintess Group;

They do not ask for, solicit, suggest or receive any kind of financial aid, gratuity, prize, commission, donation, gift or advantage of any kind, for themselves, their family members or any other person, for the exercise of their professional activities or to influence another colleague for the same purpose;

They do not accept lunches, dinners or any type of meal from clients, suppliers, partners or competitors, the value of which exceeds R\$ 300.00 (three hundred reais);

They do not accept gifts from customers, suppliers, partners or competitors, the value of which exceeds R\$ 100.00 (one hundred reais).

5.2.14 Regarding the Anti-Corruption Commitment, the Employees of the Qintess Group:

- They behave with honesty and integrity, avoiding fraudulent behavior or behavior that could be interpreted as such, paying special attention to complying with all anti-corruption and/or money laundering laws;
- They do not accept or offer, directly or indirectly, any kind of payment, gifts or gratuities from or to a third party internally or externally to obtain or maintain business or any other advantage;
- Inform the Executive Ethics Committee and their immediate leadership of the existence of a relationship with a supplier, when the latter is a majority shareholder or has decision-making power in relation to the activities pertaining to the contract.

5.2.14.1 Present:

- Subject to all the other parameters and limits of this Policy, gifts may be accepted or offered, if they are modest, common in a business environment, unsolicited, with no money involved (or equivalent), in accordance with the law and without the intention of influencing professional judgment and/or working relationships.

5.2.14.2 Bribes and blackmail:

- It is strictly forbidden to ask for or accept, offer or practice any kind of bribe, blackmail or any other illegal benefit. Employees must inform the company immediately whenever they become aware of any offer, proposal or intention of bribery or blackmail.

5.2.15 Relationship with Public/Government Officials

- You cannot offer any payment or professional kindness to an employee public and/or government official, if this can reasonably be interpreted as having any connection with the Qintess Group's business, even if it has a nominal value or no value at all; You should be aware of what may be permitted in negotiations with commercial companies
- can be considered illegal and possibly criminal when negotiating with the government;

It is responsible, in Brazil or abroad, for full compliance with the Foreign Corrupt Practices Act.

- This law makes it illegal to offer, pay, promise to pay or authorize the payment of any amount, gift or other item of value to any foreign official, political party or candidate to help the Company or anyone else obtain or retain business;
- All managers must monitor ongoing compliance with the Foreign Corrupt Practices Act, in addition to accessing the compliance programs of the partners involved in the development of their business.

5.3 Relations with Trade Unions

The Qintess Group maintains a respectful relationship with trade unions and does not discriminate in any way. Regardless of their hierarchical level, they must not adopt any practices that could violate ILO Convention 87, as well as the fundamental rights related to freedom of association, collective bargaining and strike action.

The Qintess Group strictly prohibits its employees, regardless of their hierarchical level and/or the position they hold, from engaging in anti-union acts, such as

- Dismissal and other discriminatory conduct due to issues related to trade union rights;
- Acts that violate the right to membership, participation in assemblies, meetings and other union activities;
- Act in such a way as to prevent the free exercise of the right to strike;

- The inclusion of any clause in employment contracts that prevents employees from union membership (yellow dog contracts), as well as close shop, union shop and maintenance of membership clauses.

It should be noted that the points mentioned above are only examples and should be consulted.

the other anti-union acts on the website:

https://mpt.mp.br/pgt/publicacoes/manuais/atos-antissindicais-manual-de-atuacao/@@_display_-file/arquivo_pdf#:~:text=Classifica%2Dse%20como%20atos%20antissindicais,seja%20ela%20praticada%20pelo%20Estado

5.4 Relating to the Community

The Qintess Group seeks to support actions aimed at the exercise of citizenship and local, regional and national development, especially those aimed at improving the living conditions of the communities where it operates:

- Constructive relationship with society;
- Concern for the environment and support for sustainable measures, rejecting the waste of environmental resources;
- Encouraging volunteering and social action.

5.5 Commitment to Ethics

- Considering their exercise of citizenship, Qintess Group employees always seek to respect the laws, rules, procedures and the company's Code of Ethics;
- Violations of the Ethical Principles or the Code of Ethics are subject to disciplinary measures, as set out in the Code;
- The ethical culture will be disseminated in the company, encouraging the reporting of any breaches of the law and the Organization's policies, with no retaliation for reports made in good faith;
- Employees, guided by their commitment to integrity, must act with fairness and ethics in the bidding processes for attracting public clients, as well as for attracting private clients, guided by compliance with internal rules and policies;
- The employee must be impartial, not acting in a way that generates suspicious attitudes, always informing the department responsible of any suspicious activity.

5.6 Disciplinary Sanction

- The Qintess Group has the power of management, i.e. the power to organize its activities, as well as to control and discipline work, in accordance with the purpose of the enterprise. As such, the Qintess Group has the power to impose penalties on employees who fail to comply with the obligations set out in the employment contract and internal policies, with the aim of maintaining order and discipline in the workplace;

However, this power has limitations, since the Consolidation of Labor Laws (CLT) protects workers from arbitrary actions that may be taken by the employer, who must be attentive to the relevant legislation, applying fair, reasonable and proportional sanctions to the fault committed by the employee;

Without prejudice against the disciplinary and contractual sanctions provided for in the legislation and instruments entered, the Qintess Group may forward to the competent authorities' information, evidence or found suspicion of the commission of an administrative, civil or criminal offense by its Employees and Managers, whenever it has knowledge and control of such elements.

5.7 Penalties

5.7.1 Warning

- Thus, in the case of a warning, it means a statement made by someone to someone else, to draw attention to the occurrence of a certain fact, so that a requirement can be met, such as, for example, that the employee complies with the clauses laid down in the employment contract, administrative rules or internal company policy;
- A warning can also mean admonition, in which case it will be applied as a criminal sanction for infringing administrative rules or regulations. In the case of a minor offense, the employer may reprimand or admonish the employee who committed it, either verbally or in writing, although it is recommended that it be done in writing. In either, it will be recorded in the employee's record book or file, as it is considered a penalty;
- By means of a warning, the collaborator will be made aware that repeated misconduct may result in the termination of your employment contract for just cause.

5.7.2 Disciplinary Suspension

- Suspension of employment is a disciplinary measure imposed on an employee as a sanction for a regulatory infraction or for failure to comply with a duty imposed on them. Suspension entails the loss of salary and any other benefits during the period of suspension;

- Employees can be suspended for 1, 3, 5 or 10 days depending on the offense committed. Suspension results in the loss of pay for the days not worked, as well as the loss of length of service, as these days will not be counted.

5.7.3 Dismissal

- Just Cause will occur on the grounds set out in Article 482 of the CLT. It is the maximum penalty that can be imposed on a worker, because as well as losing their job, their rights on termination will be limited.

5.7.4 Application of penalties

To apply the sanctions, we must follow the procedure below:

- Verbal warning;
- 3 Written Warnings;
- Suspension of 1 day;
- 3-day suspension;
- 5-day suspension;
- 5-day suspension;
- suspension.
- The last measure is dismissal of Just Cause.

5.7.5 Employee's refusal to receive the penalty

- When the employee, without just cause, refuses to receive notice of the penalty being imposed, the immediate superior must read the contents of the notice to the employee, in the presence of two witnesses. After reading it out, a note should be inserted at the bottom of the notice, as suggested: "Due to the employee's refusal to acknowledge receipt of this notice, its contents were read out by me, in his presence and that of the witnesses below, on (date)"; Afterwards, the reader and the witness signed. If, on the occasion described here, the employee physically or verbally assaults the person responsible for handing out the penalty, they will be subject to immediate dismissal for just cause.
- The entire penalty process is also described in GDP-POL-007 - Consequences Policy.

6. COMMUNICATION CHANNELS

The Organization will maintain communication channels where questions can be answered, complaints made or concerns raised about possible non-compliance with this Policy, the Corporate Anti-Corruption Code or applicable legislation;

General guidelines will be provided to help assess most of the situations that Qintess Group employees may face, but not necessarily all possible problems and situations, as others may arise daily;

Occasionally there may be doubts about a behavior or act, in which case the superior must be informed before any decision is made. Any doubts should be reported to the relevant authority;

Any questions regarding the interpretation and application of the provisions of this Policy can be addressed to the Qintess Group Ethics Channel, available on the Qintess Group, where details of the means of communication available can be found;

Those covered by this Policy have the commitment to report, in a timely and immediate manner, any act or suggestion of any act that may be harmful to the Public Administration, carried out or proposed by employees, companies providing services to the Public Administration, or any other company.

outsourced services and/or their employees, public officials and/or their representatives, so that this can be promptly verified, stopped and the appropriate corrective action taken.

6.1 Lack of Compliance and Irregular Conduct

- It is the responsibility of each employee to comply with and ensure full compliance all the terms of this Code. Whenever necessary, employees can seek guidance from their immediate hierarchical leadership, the People Management Committee or the Ethics and Conduct Channel;

- Without prejudice to the other consequences provided for by law and contracts, failure to comply with this Code implies, and at the sole discretion of the Organization, disciplinary action, contract termination, and/or applicable sanctions.

6.2 Complaints

- Complaints regarding possible misconduct, acts harmful to the Public Administration or others that may affect the image and reputation of the Qintess Group will be treated in a completely confidential manner;
- Any practice or action that could be considered inappropriate according to this Code of Ethics must be reported;
- Concerns and suspicions raised in good faith will never be the subject of screening and investigation and any kind of retaliation against the whistleblower is prohibited;
- Doubts, concerns and complaints should be registered through the company's channels, in a confidential manner, admitting anonymity, through the following communication channel: Website <https://qintess.com/etica-e-integridade>