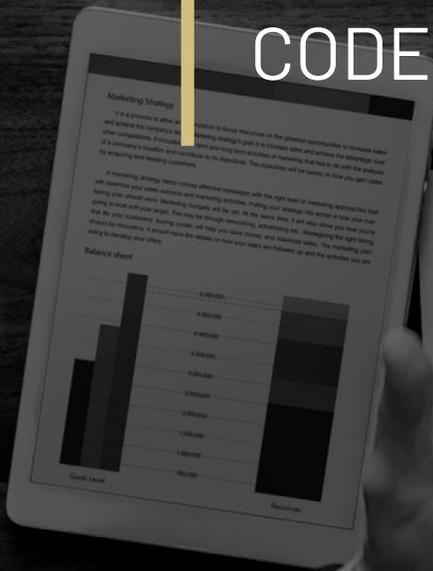




CODE OF CONDUCT



Business Company

123 Commercial Street
Tel: 123 456 7890

Product	Quantity	Revenue
Product A	240	53
Product B	855	175
Product C	498	675
Product D	450	74
Product E	300	40
Product F	400	50
Product G	450	60

Company's Growth

It is a process to allow...
...to achieve the company's...
...to increase sales and achieve the company's...
...to work within budget. This may be through re-evaluating advertising mix, decreasing the right place...
...to increase your sales.

Category	2015	2016	% Growth
Product A	112	108,287	-11%
Product B	718	81,828	+37%
Product C	108	125,819	+42%
Product D	9,128	278,161	+78%
Product E	1,283	11,827	+18%





MESSAGE FROM OUR **CEO**
NELSON WILIAN



OUR CODE OF CONDUCT REFLECTS OUR HISTORY

Character building is one of the most valuable acquisitions along this journey. And our reputation is just a reflection of our character, forged by the various choices, not always easy or simple. Our character determines the place we choose to stand in our professional and personal trajectory, before our Clients, work environment, social circles, and, above all, before ourselves.

Therefore, we can only be guided by the principles and values inherited, learned, and accumulated in our journey, which should guide our professional and social responsibility.

NWADV's Code of Conduct is designed to ensure that each professional on our team knows the principles that should guide our choices and behavior in the firm's activities. It defines the values that should guide our professional conduct towards Clients, coworkers, suppliers, business partners, and the market in general.



It also reflects **our commitment to align our policies and actions with the principles of Human Rights, Fair Labor Practices, Environment, Anti-Corruption, Information Security, and Privacy of Personal Data.**

This Code of Conduct reflects NWADV's commitment and standards of behavior **and** should be reflected by all professionals.

Seek guidance when in doubt and report any infractions or suspicions, always respecting the applicable labor legislation and privacy standards.

We all benefit from NWADV's excellent reputation in the marketplace.

It is our responsibility to preserve and protect it.

Thank you for doing your part

NELSON WILIANS
CEO

1. TO WHOM THE CODE APPLIES

2. INTEGRITY RULES IN NWADV



- 2.1 Healthy work environment
- 2.2 Diversity and Inclusion
- 2.3 Harassment and Abuse of Power
- 2.4 Safe Work Environment
- 2.5 Use of NWADV's technological resources and goods
- 2.6 Use of social networks
- 2.7 Press Relations
- 2.8 Customer Relations
- 2.9 Courtesy and Entertainment
 - Public Entities
 - Clients and Potential Clients
- 2.10 Prevention of conflicts of interests
- 2.11 Relationship Communication
- 2.12 Interaction with Government and Public Agents
- 2.13 Protection of privileged and confidential information
- 2.14 Commitment to information security and personal data privacy
- 2.15 Commitment to the Environment



3. RELATIONSHIP WITH THIRD PARTIES

- 3.1 Compliance with Anti-Corruption Laws
- 3.2 Fighting kickback, extortion, bribery, corruption and money laundering
- 3.3 Donations, political and community activities
- 3.4 Fair Competition
- 3.5 Relationship with suppliers and service providers

4. PROCEDURE AND DISCIPLINARY MEASURES

- 4.1. Integrity Committee
- 4.2. Channel for support, doubts and complaints
- 4.3. Disciplinary Measures
- 4.4. Validity and application of the code

1. TO WHOM THE CODE APPLIES



This is the Nelson Willians Law Firm's Code of Conduct and should be followed without distinction by our **Members, Directors, Associates, Employees, Trainees, Third Parties and other employees**, regardless of their geographic location.

It is through it that the Firm expresses its commitment and engagement in the adoption of ethics-based conducts.

As such, our Code determines what attitudes are expected and instructs on the main situations that may generate doubts and on how to conduct our business ethically, serving as a guide for decision making.

It is of utmost importance that this document be read carefully in order to have full identification between text and reader. **Questions must be clarified with the Integrity Committee through the communication channels mentioned here.**

Finally, we inform you that the rules contained herein are of a general nature and will be dealt with in depth and with particularities in our own internal policies.



INTEGRITY RULES
IN NWADV



2. INTEGRITY RULES IN NWADV

2.1 HEALTHY WORK ENVIRONMENT

At NWADV we value a healthy work environment, based on integrity, respect, and professionalism.

All NWADV professionals must be committed to maintaining a respectful work environment, promoting diversity, dialogue and civility in all their interactions, regardless of their position and rank in the organizational chart.

2.2 DIVERSITY AND INCLUSION

NWADV values diversity and promotes inclusion in its working practices.

Disrespectful, discriminatory, or human rights abusing conduct is prohibited in the relational dynamics between NWADV professionals or involving third parties.

NWADV has as a guideline to be followed by all its business areas that decisions involving the processes of admission, delegation of tasks, compensation, training and development, promotion and dismissal, are not based on race, ethnicity, gender, religion, sexual orientation, nationality, descent or origin, political position, social class, age, marital status, pregnancy, disability, weight, height, lifestyle or any other physical or personal characteristic of its professionals.



2. INTEGRITY RULES IN NWADV

2.3 HARASSMENT AND ABUSE OF POWER

Everyone must assume the commitment to promote a respectful work environment, in which offensive, intimidating or hostile behavior that could characterize situations of embarrassment, disrespect, prejudice, discrimination, threats of any nature, abuse of power, moral or sexual harassment, regardless of hierarchical relationship, are not tolerated.

NWADV does not condone the attitude of spreading rumors, rumors or making untrue, malicious, ironic or derogatory comments about the firm, its professionals, clients and/or partners.

We must treat all our colleagues and business partners inclusively, with dignity and respect.

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2. INTEGRITY RULES IN NWADV

2.4 SAFE WORKING ENVIRONMENT

Protecting the health and safety of all professionals is a priority for NWADV.

Therefore, our professionals must assume the commitment of maintaining a safe work environment, complying with the internal norms and procedures related to the subject, as well as the pertinent legislation.

It is forbidden to work while under the influence of drugs, alcohol, or other substances that impair the professional activity or the safety of the work environment. Carrying weapons is also prohibited in the firm's premises.

We expect our professionals to take responsibility for their own safety and that of their colleagues, avoiding dangerous, abusive or violent behavior.

NWADV supports the efforts of its leaders and managers in creating a safe work environment through the application of effective controls.



2. INTEGRITY RULES IN NWADV

2.5 USE OF NWADV'S TECHNOLOGICAL RESOURCES AND GOODS

It is everyone's duty to make careful use of the goods provided by NWADV, taking care that they are not damaged or depreciated.

It is prohibited to use the technological resources and goods of NWADV not in compliance with the firm's policies, for strictly personal interests, as well as misuse that incurs in illegal and / or unethical practices such as discrimination, marketing of products unrelated to the business, terrorism, pornography and obscenity among others.

The information saved, transmitted or registered in the technological resources provided by the Firm can be monitored and accessed at any time, without the need for prior communication or authorization from the user. The information security policies, internet and technology resource usage policy, and privacy policy can be found on the Firm's Intranet.

2.6 USE OF SOCIAL MEDIA

NWADV uses social media for corporate communication with the market.

In this context, NWADV recommends attention and caution whenever the use of social networks by its professionals may imply association with the firm's image. We do not publish content from third parties without their prior authorization, we do not use offensive, discriminatory or degrading language or content, and we do not discuss or comment on confidential information. The internal rules for social media must be complied with by everyone.



2. INTEGRITY RULES IN NWADV

2.7 PRESS RELATIONS

Only those professionals expressly authorized by the Communication area may speak on behalf of NWADV to the press or other media on issues that are sensitive or significant to the firm.

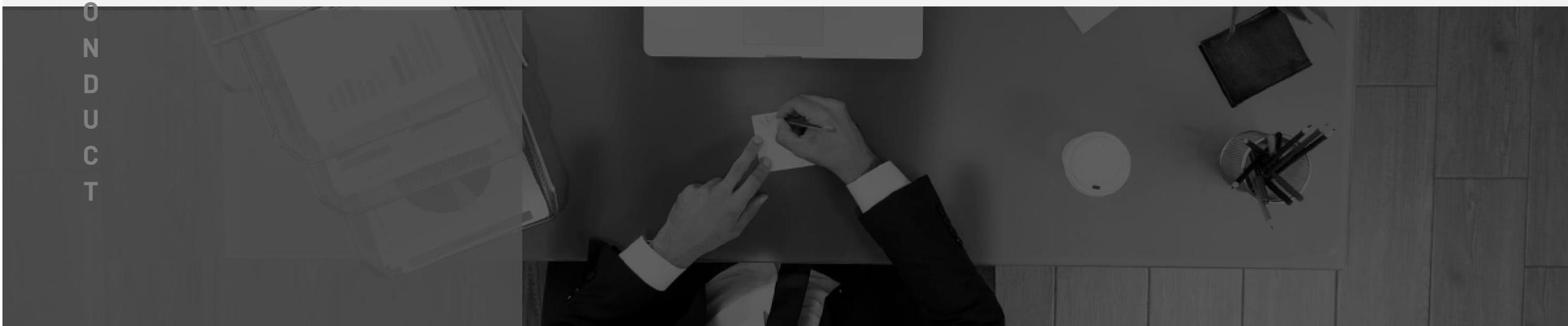
The Communication area is responsible for defining the strategies of dialogue with the press and other media, including the publication of articles, legal opinions, responses and positions on current and relevant issues by the professionals of the firm on behalf of NWADV.

NWADV also recommends that its Member-Directors be careful when dealing with the press and avoid verbal or written statements that may affect their own image or contribute to the spreading of rumors, since any inappropriate manifestation may generate reputational damage to the Firm.

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2. INTEGRITY RULES IN NWADV

2.8 CLIENT RELATIONS

Our Clients are our most valuable asset and must be served with excellence, which is reflected in our work ideals and behavior.

The firm's reputation and, as a result, that of its professionals, is based on the quality of our deliveries, translated into professionalism in the relationship with our clients, and in the excellence of our legal advice and performance in general.

Our members, leaders, managers, and their respective teams are committed to performing with excellence and quality, seeking to deeply understand our Clients' business, to deliver the best results, and to exceed expectations.

2.9 COURTESY AND ENTERTAINMENT

PUBLIC ENTITIES

It is forbidden to offer or receive courtesies, presents, gifts, hospitality, pecuniary values or benefits of any kind to or from Clients in the public sector and public agents in general, defined as any person holding a position or function in agencies or entities of domestic or foreign Public Administration, either directly or indirectly, in all spheres.



2. INTEGRITY RULES IN NWADV

2.9 COURTESY AND ENTERTAINMENT

CLIENTS AND POTENTIAL CLIENTS

NWADV supports its professionals in seeking closer and stronger business relationships, but we need to be particularly cautious about offering or accepting courtesies, especially when it comes to our Members, Directors, Leaders, and Managers.

NWADV professionals should be especially careful not to offer, give, solicit or accept gifts, entertainment or other similar benefits in order to obtain or retain business or to improperly influence decisions involving Clients, Prospective Clients, proposals, business or the behavior of any firm’s professional.

The courtesies offered and received by our professionals and the firm must serve the strategic functions of brand remembrance or gratitude, according to each situation, always anchored in a clear and lawful purpose.

If in doubt, share the situation with the channels posted here.

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2. INTEGRITY RULES IN NWADV

2.10 PREVENTING CONFLICTS OF INTEREST

Our professionals must see to the interests of NWADV, so they are not permitted to engage in activities that compete and conflict with the firm's business.

Conflicts of interest are characterized whenever concerns, personal goals, or those of third parties influence our professionals' ability to act with the expected impartiality and impartiality. Likewise, whenever the professional or someone close to him/her (family member, friend, relationship person) has something to gain or lose with the choices that will be made in a certain context, the conflict of interests will be characterized.

In general terms, Members, Directors, Associate Attorneys, or any of the professionals in our team are prohibited from using their position or position to obtain benefits for themselves or others.

2.11 KINSHIP COMMUNICATION

NWADV professionals must expressly communicate to the Integrity Committee, via e-mail compliance@nwadv.com.br if their spouse, companion, direct or collateral relative, by consanguinity or affinity, up to the third degree, occupies a public position or a position of trust, managerial position or of Senior Management position in any Public Administration Body or Entity, either directly or indirectly, at all levels of the Federation.



2. INTEGRITY RULES IN NWADV

2.12 INTERACTIONS WITH THE GOVERNMENT AND PUBLIC AGENTS

It is incompatible the exercise of activities / functions in management positions linked to political parties, as well as the candidacy for any electoral office, by Members, Directors, Associate Attorneys or Employees of NWADV.

It is also incompatible with working for NWADV to hold any position in the direct or indirect public administration.

In the performance of their professional duties, the Members, Directors, Associate Lawyers, and other professionals have the duty to interact with the members of the direct or indirect public administration in a transparent and ethical manner, for the exclusive purpose of addressing legal and/or technical matters, being forbidden to offer or the perception any direct or indirect advantage.

The Members, Directors, Associate Attorneys and other professionals of NWADV should have the utmost compliance with the Anti-Corruption and Anti-Money Laundering Laws and the legislation in general that govern the relations with the Government.



2. INTEGRITY RULES IN NWADV

2.13 PROTECTION OF PRIVILEGED AND CONFIDENTIAL INFORMATION

It is natural that in the performance of their work activities, NWADV professionals have access to privileged and/or confidential information of the Firm itself, its Clients, suppliers or business partners.

In this context, our professionals have the obligation to maintain the confidentiality of such information, except when its disclosure is expressly authorized by the competent Member or Director, permitted under professional liability rules to which we are subject, or required by law.

If you receive any confidential information or data by mistake, report it to the Firm's Information Security area and to the Integrity Committee (compliance@nwadv.com.br).

2.14 COMMITMENT TO THE PROTECTION AND PRIVACY OF PERSONAL DATA

NWADV is committed to Information Security and the Protection and Privacy of Personal Data. This means that NWADV handles, responsibly and in compliance with data protection legislation, all information and personal data that can be used to identify individuals.

NWADV understands that it is a pillar of business sustainability to adhere to data protection legislation, and makes this commitment to its clients, professionals, and business partners.



2. INTEGRITY RULES IN NWADV

2.15 COMMITMENT TO THE ENVIRONMENT

NWADV is committed to the protection and preservation of the environment and encourages its professionals to adopt sustainable practices, as well as to behave in a manner that is sensitive to the adverse impacts caused by the irrational use of resources.

It is the duty of all our professionals to be aware of the rational and responsible use of the resources provided by the firm, using them conscientiously and without waste.





INTEGRITY RULES
RELATIONSHIP WITH THIRD PARTIES



NWADV seeks to maintain close and lasting relationships with its clients, suppliers, and other business partners.

The members, directors, associate lawyers, and professionals of the firm must act in a corporate and loyal manner, solidifying the business relationships, always in compliance with the ethical standards of this code, as well as complying with the legislation in force.

We do not tolerate unethical or illegal practices.



3. RELATIONSHIP WITH THIRD PARTIES

3.1 COMPLIANCE WITH ANTI-CORRUPTION LAWS

NWADV does not tolerate corrupt practices of any kind. Therefore, its professionals must strictly comply with the rules related to the Brazilian anti-corruption legislation, in particular Law No. 12,846/2013 and the Criminal Code, as well as foreign legislation, such as the United Kingdom Bribery, of the United Kingdom, and the Foreign Corrupt Practices Act-FCPA, of the United States, and similar laws in other jurisdictions, when these apply to the activities of our Clients.

NWADV prohibits the offering or receiving of pecuniary values or benefits of any kind from public Clients and public agents in general, defined as any person occupying a position or function in organs or entities of the Public Administration, domestic or foreign, direct or indirect, in all spheres.

3.2 FIGHTING KICKBACK, EXTORTION, BRIBERY, CORRUPTION AND MONEY LAUNDERING

Any practice consisting of demanding, inciting, accepting or receiving promises of benefits or any kind of undue advantage is widely repudiated by NWADV.

In the performance of their activities, including the analysis of demands for legal services, NWADV professionals must remain alert to any situation that may indicate or be framed as money laundering.

If you suspect or are aware of any act of corruption, bribery, kickbacks, or money laundering, report it immediately to the Integrity Committee.



3. RELATIONSHIP WITH THIRD PARTIES

3.3 DONATIONS, POLITICAL AND COMMUNITY ACTIVITIES

NWADV prohibits the use of its name for the practice of any donation or sponsorship to politicians, labor unions, political parties, candidates for political office, or public officials.

In order not to incur in illegality or generate image risk, it is vital that this type of relationship is carried out under special care, through authorizations, understanding of who the beneficiaries are, transparency, evidence, contracts, and accountability.

Therefore, any donation involving the Firm's name will depend on prior authorization from the Vice President.

NWADV has a responsibility to society and encourages its professionals to have a sensitive eye for social gaps and to support projects that play an active role in social transformation.

Its social contribution takes place specifically through **Instituto Nelson Wilians**, supporting the empowerment of people in needy communities, as a condition to overcome inequalities.



3. RELATIONSHIP WITH THIRD PARTIES

3.4 COMMITMENT TO FREE COMPETITION

NWADV is committed to competing fairly and with integrity, always and only on the basis of the quality of our professionals, our advice, and our legal services; never using unfair practices to favor business.

NWADV complies with competition protection laws, in particular Law 12.529/2011, the current Brazilian Antitrust Law, which prohibits the discussion or execution of formal or informal agreements regarding activities that may restrict commercial activity.

NWADV professionals must not extract or share privileged information with our competitors that could influence or secure an advantage for either party in ongoing business negotiations and transactions. This includes: bid rigging, price fixing, dividing or allocating specific market territories with competitors.

NWADV professionals are prohibited from making misleading or derogatory statements about our competitors.



3. RELATIONSHIP WITH THIRD PARTIES

3.5 RELATIONS WITH SUPPLIERS AND SERVICE PROVIDERS

NWADV seeks suppliers and service providers who share its ethical values, who adopt good practices, and who comply with all current legislation.

Suppliers approved by NWADV must comply with laws protecting human rights and workers (including prohibition of forced labor, slavery and child labor), labor, environmental, anti-corruption, fair competition and intellectual property laws, the General Data Protection Law - LGPD, in addition to acting with honesty with regard to tax obligations and other requirements of the applicable Regulatory Bodies.

NWADV applies free competition, transparency, and fairness in the contracting process of its suppliers, as well as strict adherence to contracts.



PROCEDURE AND DISCIPLINARY MEASURES



4. PROCEDURE AND DISCIPLINARY MEASURES



If any action contrary to the Code of Conduct occurs, according to evidence and form of action, disciplinary sanctions will be applied in proportion to the severity and gravity of the infractions, including possible termination of the contract.

4.1. INTEGRITY COMMITTEE

NWADV Integrity Committee is the body responsible for the investigation of cases of breach of this Code of Conduct and other policies deriving from it, as well as the application of the sanctions provided.

Its duties are: (i) to provide guidance, (ii) to answer consultations, (iii) to inspect and demand compliance with the Code of Conduct and the Policies deriving therefrom, (iv) to bring ethical-disciplinary administrative proceedings, (v) to apply sanctions provided for in its own policies, (vi) among others provided for in its by-laws.

The Integrity Committee will be composed of the Vice-President, Compliance Director, Legal Controllorship and Operations Director, Human Resources Management, Communication Director, President of INW (Instituto Nelson Wilians), as well as a member-director, who will be elected by the other committee members for a one-year term.

In the event an accusation is made against any member of the Integrity Committee, he/she must be immediately removed, being replaced by a member to be indicated to occupy the position temporarily until the final investigation of the accusation.



4. PROCEDURE AND DISCIPLINARY MEASURES

4.2. CHANNEL FOR SUPPORT, DOUBTS AND COMPLAINTS

Any suspicion or knowledge of irregularity or breach of the provisions set forth in this Code of Conduct must be reported immediately to the Integrity Committee, through the channel <http://nwadv.care-br.com/reclamacao>

When making a report, it is preferable, when possible, for the reporter to reveal his/her identity, as this will help NWADV conduct a more thorough investigation.

However, in case he/she does not feel comfortable in identifying him/herself, the report can be made anonymously, and confidentiality is fully assured.

The Firm prohibits acts of retaliation against anyone who submits, in good faith, a report of ethical non-compliance. Any retaliation against those who participate in the investigations is also prohibited.

4.3. DISCIPLINARY ACTION

After the Integrity Committee has analyzed the results of investigations into non-compliance with our Code and policies, corrective measures of a disciplinary or punitive nature may be imposed.



4. PROCEDURE AND DISCIPLINARY MEASURES

Examples of measures of a disciplinary nature are:

- imposition of training;
- adjustment to the work process;
- implementation of a new control and monitoring point;
- administrative intervention.

Examples of punitive measures are:

- withdrawal/abatement of bonus/dividends/return of fees;
- written warning;
- suspension;
- termination with/without cause;
- termination of contracts with third parties.

The Members, Directors, Managers, and Leaders to whom the whistleblower is directly subordinated may suffer penalties if it is found that, even though they were aware of the illicit fact, they did not intervene to minimize or prevent the misconduct.

4.4. VALIDITY AND APPLICATION

NWADV's Code of Conduct is effective as of its publication and shall continue indefinitely. Nevertheless, it may undergo updates during the periodic review process of the risks to which we are exposed due to our activity.

Thank you!



NELSON
WILIANS
ADVOGADOS