

CODE OF ETHICS AND PROFESSIONAL CONDUCT

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● 1 Introduction

This document aims to support decisions, reflections and guidelines on behavior, practices and values in line with GOLDEN TECHNOLOGIA's Integrated Management System, including Human Resources and Information Security Policies .

● 2 The magic of GOLDEN TECHNOLOGIA

○ □□Our Goal

“Simplify the delivery of technology services to our customers and partners, with agility and security.”

○ □□Our Dream

"To be a reference in IT services in the Ceará market and recognized as the place where opportunities connect."

○ □□Our Culture

The collective personality of our company will determine our destiny:

- ✓•Company: Our business covers the biggest technological trends;
- ✓•People: We are authentic, humble, bold, informal, fun and we love to win;

○ □□Our values

- ✓•Autonomy with results;
- ✓•Responsible speed;
- ✓•Open mind, creativity and boldness;
- ✓•Honest relationships and family spirit;
- ✓•And always that “icing on the cake” of services.

We believe that forms r we a team confident and proud of the work we do, we will be able to make the Magic GOLDEN TECHNOLOGY happen.

● 3 Scope

This Code of Ethics and Professional Conduct applies to all directors, managers , employees, interns and service providers (PJ) of GOLDEN TECHNOLOGIA, as well as to all suppliers and partners who , directly or indirectly, relate to the company. company.

● 4 Guidelines

- Disseminate this document to the entire public involved in our processes;
- Train and guide for compliance with internal policies, standards and processes;
- To care for the image of GOLDEN TECHNOLOGIA, either through proper conduct or through the representation of the entity before the market;
- Use GOLDEN TECHNOLOGIA's assets and resources in a conscious and sustainable way;
- Intensify the relationship with customers to meet their needs;
- Listen and deal with demands, complaints and suggestions received from customers;
- Guarantee the confidentiality of information;
- Contribute to the continuous improvement of the cooperative Organizational Climate between areas and teams, ensuring a good work environment;
- Refrain from the decision-making that can be conflicts of interest, informing the immediate superior;
- Communicate professional invitations to the immediate superior to participate in events that may interfere with business interests;
- Comply with agreements based on strict compliance with all regulatory instruments that apply to GOLDEN TECHNOLOGIA's operations, including the anti-corruption law.

● 5 Roles and responsibilities

5.1 As a collaborator, my role is:

- Know and understand the Code of Ethics and Professional Conduct;
- Act in a manner consistent with the Code of Ethics and Professional Conduct and, if in doubt, seek guidance from the immediate superior or the Governance team;
- Demonstrate and apply our values, behaviors, principles of action and rules of conduct.

5.2 As a manager, I have additional responsibilities and my role means:

- *Set* an example, maintain, promote and assume the Code of Ethics and Professional Conduct in daily work;
- Ensure that the Code of Ethics and Professional Conduct is alive in my team;
- Ensure me to be familiar with the Code of Ethics and Professional Conduct, as members of my team can ask me for advice and guidance on issues related to *es t* and document;
- Identify compliance risks and make appropriate decisions on issues relevant to the area of my responsibility.

● **6 Basic Principles**

The provisions on health, safety, equality, diversity, inclusion, harassment, behavior and gifts; as well as the payment or reimbursement of expenses for events, meals, travel and accommodation should be guided by the following basic principles:

○ **6.1 Health and safety**

We are committed to ensuring the health and safety of professionals, whether they work in our offices or at our clients' facilities.

- What does this mean?

Follow the rules. GOLDEN TECHNOLOGIA takes its health and safety responsibilities very seriously, and everyone is expected to comply with and apply any relevant emergency legislation and procedure. When working on a customer's premises, they are expected to respect and cooperate with any customer rules regarding health, safety and emergency procedures.

Be supportive. We encourage the managers of our teams to watch over the health and safety of members of their teams.

Pr is the asset. We all have a responsibility to identify and report to the responsible health and safety or to the manager, any form of behavior that may constitute a hazard or risk, or any situation that could compromise the health and safety of our employees.

- What is expected of me?

It is my duty to be familiar with the health and safety policies of the company and my clients, as well as comply with the emergency procedures provided to me in accordance with applicable laws.

I must comply with the guidelines and company on mobility, displacement and security, whenever I travel.

○ 6.2 Equality, diversity and inclusion

We are proud of our diversity. It enriches us and enables us to be leaders in the markets we choose. As individuals, we are entitled to equal opportunities and to fair treatment.

● What does this mean?

Performance counts. GOLDEN TECHNOLOGIA is committed to being a “Talented Company” and seeks to reward people based on their achievements and performance. We evaluate our professional and applicants for vacancies based on merit and qualifications directly related to professional competence and the behavior.

Equal opportunities and fair treatment. We aim to provide equal opportunities and treatment, regardless of social, cultural, ethnic or national origin, religious or other beliefs, sex, marital status, sexual orientation, disability, age, education and union membership. We are committed to complying with all legislation regarding discrimination in employment.

Freedom. We respect the cultures and customs of individuals, including each person's religious beliefs. The Company does not affiliate with any religious organization.

● What is expected of me?

I evaluate colleagues, team members, based on professional competence, behavior and achievements.

I am expected to not tolerate any joke, language, gesture or other behavior that may offend people, make them feel discriminated against or create a hostile environment.

I collaborate with my colleagues, regardless of social, cultural, ethnic or national, religious, gender, gestational status, marital status, sexual orientation, disability, age or union membership.

○ 6.3 Harassment

We all have the right to be treated - and the duty to treat others - with respect and courtesy.

● What does this mean?

Respect in the workplace . GOLDEN TECHNOLOGIA should maintain a workplace environment free from harassment, which includes intimidation, threats and acts of violence, in addition to not complying with sexual approaches .

Zero tolerance. We do not tolerate any form of harassment or violence or any other action that creates a threatening work environment, which includes any attitude, form

of behavior or situation that can be specified as harassment. Any violation of the rules can result in disciplinary sanctions.

- What is expected of me?

I do not make comments, jokes or display materials that may offend a member of a particular race, religion or sex. I must respect others and I must not accept any form of harassment or violence in the workplace.

I must not tolerate or participate in any form of retaliation, revenge or persecution with respect to an individual who claimed to be harassed.

○ 6.4 Behavior

As representatives of GOLDEN TECHNOLOGIA, our behavior at work and in activities related to the company can have an effect on GOLDEN TECHNOLOGIA and on its own professional reputation. We are expected to respect socially acceptable rules of behavior.

- What does this mean?

Professionalism. We are expected to respect personal and cultural differences to ensure that everyone enjoys a comfortable environment at work and at related events. We need to make sure that there is no feeling of exclusion, discrimination or harassment.

- In any event related to the work, we are responsible for ensuring that our behavior is professional, reasonable and adequate and that does not cause damage to the GOLDEN TECHNOLOGIA or own professional reputation.

- What is expected of me?

May I be sensitive to personal beliefs and cultural differences and not want to impose my opinions on others.

At work and at related events, I must not let alcohol affect my behavior and my judgment. I must not carry any illicit or illegal chemical substances and must comply with applicable smoking policies.

If I am at a business event, I must remember that I represent GOLDEN TECHNOLOGIA. Therefore, I need to be aware that my behavior will be perceived by others.

○ 6.5 Gifts

The offering of small personal gifts is often part of local customs or culture. An employee of the company GOLDEN TECHNOLOGIA is not allowed to order, request or demand a gift.

- What does this mean?

A non-monetary gift given or received from a third party (for example, a customer or service provider) or from a government official is permitted, provided that all of the following conditions are met:

- ✓ It must be of symbolic value ;
- ✓ It should not be frequently given to the same recipient (that is, not more than once in a six-month period) ;
- ✓ It must be assigned only to the employee and not to the individual's family members or friends;
- ✓ It should never be given in cash or equivalent (for example, gift cards or prepaid vouchers).

- What is expected of me?

I must not accept gifts frequently and / or from the same source;

I must not accept and / or offer gifts with significant monetary value ;

I relate to my immediate supervisor any conflict of interest or omissions related to the present; that possibly escape me to the basic principles of GOLDEN TECHNOLOGY.

- **6.6 Events and Entertainment**

Invitations to entertainment events or marketing events (such as plays, concerts, sports games, conferences, visits to museums, seminars or GOLDEN TECHNOLOGIA events) are legitimate opportunities to create intimacy with customers or suppliers. And therefore and less can also bring the risk of creating an appearance of impropriety.

- What does this mean?

Entertainment invitations are permitted, provided that all of the following conditions are met:

- ✓ A GOLDEN TECHNOLOGIA employee must be present at the event;
- ✓ Entertainment must be legal and socially acceptable;

✎ The additional benefits must have a symbolic value . And examples of gifts or benefits that are consistent with the event are USB flash drives or promotional folders .

- What is expected of me?

Be honest with the company regarding the content of the event and / or entertainment ;

There sure of that puts me event content in a conflict of interest, I discuss it with my top immediately.

○ **6.7 Meals**

Doing business over a meal is common practice in the corporate world.

- What does this mean?

A meal can be offered to third parties without prior approval , provided that all of the following conditions are met:

- ✓•The value equivalent to a meal does not exceed R \$ 40.00 per person ;
- ✓•Do not include a spouse or other guest who is not directly part of the deal ;
- ✓•Participants are not public officials or politically exposed people empowered to influence government or business decisions.

- What is expected of me:

Make calls with defined agenda, Approve to the top right away ;

I have a number of suitable guests ;

I present invoices to prove expenses.

○ **6.8 Travel and accommodation**

In certain circumstances, you may need to ask for reimbursement of travel expenses and lodging of interest GOLDEN TECHNOLOGY , for example, visits to the client or participation in event s .

- What does this mean?

Travel distance and length of stay must be reasonable and appropriate, and must be justified by legitimate business reasons ;

It is assigned only to the employee , not to the individual's family members or friends;

The reimbursement of expenses must be subject to accountability , in a legitimate and sufficient manner , with presentation of invoices ;

- What is expected of me?

I must request approval from the immediate superior ;

I have b om sense to seek passage ns and hospedage ns ;

I turn over documents that prove (s) activity (s) run (s) on the trip , such as meeting s training s and / or event s;

I must present all invoices and documents necessary to prove expenses.

- **7 Fences**

GOLDEN TECHNOLOGIA employees are prohibited from:

- Make use of the information in order to obtain a personal advantage or use GOLDEN TECHNOLOGIA resources to serve its own interests;
- Reveal outside the professional scope, fact or restricted information of GOLDEN TECHNOLOGIA;
- Practice any act of discrimination;
- Promote harassment of any kind, causing other people's embarrassment;
- Establish commercial relations with companies and individuals that do not observe ethical, health and safety and human rights standards compatible with the values of GOLDEN TECHNOLOGIA;
- Use the logo GOLDEN TECHNOLOGY to other professional activities, when there is a service and company;
- Use electronic resources from GOLDEN TECHNOLOGIA or third parties to access, store, send, post or publish pornographic, sexually abusive, obscene, racist, sexist and in any other discriminatory, threatening or harassing, personally offensive, defamatory, illegal or illegal manner.

- **8 Final Provisions:**

- The implementation of basic principles must be pursued permanently, to ensure that the actions, behaviors and attitudes are consistent with the mission and essential values of GOLDEN TECHNOLOGIA, in accordance with this Code of Ethics and Professional Conduct.
- Doubts and omissions regarding this document should be communicated to the immediate superior and / or the Governance team;
- This Code of Ethics and Professional Conduct will be revised whenever necessary by the Governance team, who will present proposals for changes to the Senior Management of GOLDEN TECHNOLOGIA.

- **9 Penalties:**

Failure to comply with the items described in this document, even for mere ignorance, will subject the violator to administrative sanctions, including, the application of verbal or written warning, dismissal for just cause or contractual termination, as well as subject the

violator to other administrative penalties, civil and criminal laws provided for in Brazilian law.

The application of sanctions and punishments will be held according to the analysis of the Integrated Management System Committee (CSGI) and should be considered the gravity of the offense, as well as the effect achieved, the recurrence and the situations covered by Article 482 of the Consolidated Laws Labor, and the CSGI, in the use of the disciplinary power attributed to it, can apply the penalty it deems appropriate when the serious offense is typified.

● 10 Review Board

Review Board		
Date	comments	Revised / Approved by:
24 /09/2020	Document creation	Ricardo Gomes / Jefferson Farias