

# Code of Ethical Conduct



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## 1. Message from the President

We do have ethics as a commitment, and respect as an attitude in relationships. Our Code of Ethical Conduct reflects the values to be observed and cultivated by all levels of the Organization in the relationship with the various segments of society, whether in Brazil, or abroad. We strive to build lasting relationships based on respect for the needs and expectations of our different audiences.

It is our duty to act in accordance with the guidelines of this Code and to disseminate the principles contained herein, in order to maintain an honest, reliable and socially responsible work environment.

We seek excellence in service to all our business partners and do not condone fraud, corruption or any other conduct that violates internal policies and undermines the trust placed by our stakeholders.

Such premises bring Cooxupé thoroughly together on the efforts towards developing sustainable businesses, and contribute to the achievement of our objectives. Otherwise, our rules of ethical conduct, more objectively, indicate the responsibilities of the Boards, Senior Management and Employees in the exercise of their work, thus ensuring the credibility and trustworthiness of our Organization.

Dialogue is essential for the proper application of our Code of Ethical Conduct. Thus, in case of doubts about its application, as well as the reporting of situations that, in any way, may violate this Code, we maintain a structured channel - Ombudsman - ([www.cooxupe.com.br/ouvidoria](http://www.cooxupe.com.br/ouvidoria)) to address possible manifestation over misconducts observed, in addition to ensuring total secrecy in the conduct of the investigation and non-retaliation against complainants.

We cultivate, promote and disseminate the continuous search for the highest standards of ethics and governance.

We are an innovative Cooperative and we are committed to working together to ensure the integrity of the organization and the good relationship with our partners.

Carlos Augusto Rodrigues de Melo  
Chairman of Administrative Board

## **2. Presentation**

The Code of Ethical Conduct is an instrument to disseminate the values and ethical principles that we cultivate, and to guide the way we exercise our mission and seek to meet our vision of future. The content presented reflects our Organizational Identity in line with our history of achievements that contributed to building the Cooxupé that we are today.

The objective of the Code is to guide us in the performance of our professional and personal activities that are reflected in the internal and external environment of Cooxupé. It is up to us to know and comply with these guidelines, highlighting that leaders have even greater responsibility, since they must lead by example, serving as positive and inspiring models.

The principles, behaviors and attitudes highlighted here help us walking through the most appropriate path in the face of everyday situations and challenges, facilitating decision-making, clarifying doubts and resolving conflicts. In conjunction with Cooxupé's Bylaws, rules and procedures, and current legislation, the Code of Ethical Conduct offers guidelines for activities to be carried out in an integral manner, prioritizing ethics, in accordance with Cooxupé's objectives.

## **3. Whom is it applicable to**

This Code applies to all audiences that have relationship with Cooxupé: Members, Directors, Board Members, Employees, Public Sector, Customers, Suppliers, Service Providers, and Society, characterizing the stakeholders.

Its objective is to guide the expected behavior of professionals in all of our businesses and units, as well as to guide the relationship with different audiences.

The principles described here serve as guidelines for Cooxupé's internal rules and procedures, in addition to the laws that drive our activities, and ethical precepts that guide our actions.

## 4. Organizational Identity

### ***Mission***

To promote the sustainable development of cooperative members.

### ***Vision***

To be a cooperative that adds value to its members, through their effective participation.

### ***Values***

Trust, work and cooperation.

### ***Cooxupé Policy***

To gain the satisfaction clients, offering products and services that meet the requirements applicable to the business, with qualified and committed personnel, and with continuously better processes.

## **5. Principles of Conduct and Relationship**

### **5.1 - Members**

The relationship between us and the members is based on the Bylaws and the principles established in this Code.

### **5.2 - Board Members and Directors**

The Administrative Board, Fiscal Board, and Executive Directors in their attributions, competences and responsibilities must act in accordance with guidelines defined in the Bylaws, Internal Regulations and the principles established in this Code.

### **5.3 - Employees**

We must comply with what is agreed in the Employment Contract, acting in accordance with the guidelines established in this Code, and responsibilities defined in the Job Description and in the internal rules and procedures.

### **5.4 - Business Partners**

Business partners must act in accordance with current and applicable laws and regulations, comply with the principles established in this Code and comply with contractual terms.

### **5.5 - Competitors**

All information and interaction about the market and competitors must be obtained through lawful practices, respecting confidential data and intellectual property rights.

We do not agree and do not authorize any representative to enter into agreements with competitors, formally or informally, with the intention of intervening in free competition, either by aligning prices or other conditions of sales and offers.

### **5.6 - Government and public agents**

We maintain political neutrality; we do not practice contributions or favors to political parties and organizations, people in elective positions or in the process of electoral competition.

However, we respect the individuality of people involved in terms of political participation, as long as their manifestations take place outside the institution's premises and without ties to Cooxupé.

Any interaction with the public sector, whether for bidding, use of services or commercial negotiations, must be conducted in accordance with our values and the guidelines of this Code.

## 5.7 - Trade unions and class associations

We do appreciate keeping good relationship with trade unions and class associations and we do recognize the importance of the performance of such institutions as representatives of the interests of our members and employees. The relations between us and these audiences are guided by the following principles:

- Ensure that negotiations and dialogue are carried out by formally authorized persons.
- Respect collective initiatives and agreements resulting from negotiations between union entities or trade associations.
- Relate in an ethical and transparent way always aiming at the community.

## 6. Work environment

We recognize the importance of adopting and promoting operations following the principles of human rights and labor legislation to build an ethical environment, in which there is respect for individual working conditions, the dignity and diversity of human beings, guaranteeing equitable treatment to all. Therefore:

- We do not admit practices of moral or sexual harassment, discrimination, prejudice, coercion, abuse, threats and / or aggression.
- We do not use and do not agree with any form of forced, child or slave labor or outside the guidelines defined by the Consolidation of Labor Laws.
- We respect all religious beliefs and manifestations and understand that our audiences should act in the same way.
- We do not allow the consumption and / or possession of any illicit drug or the ingestion of alcoholic beverages on the premises of Cooxupé, nor working under the influence of such substances.
- We guarantee safe working conditions and respect for labor laws.
- We do not allow employees to buy and sell goods, products or services of particular interest or benefit in Cooxupé's facilities or environments.
- The use of uniforms and identification badges, as well as the use of cell phones on the premises of Cooxupé, must follow the criteria established in the internal policies and guidelines for use.

## 7. Conflict of interest

Conflicts of interest can occur when a member of the organization (employees, directors or board members) influences a decision that results in personal gain, direct or indirect, for him/herself, his/her family members or another person and organization with which he/she has a relationship. For this reason, **we do not allow:**

- The influence of personal interests over the Cooperative's business decisions.
- The use of Cooxupé's property, information or resources for self-benefit or that of third parties.
- The receipt of personal or financial benefit while providing services or any work for certain supplier, customer, competitor or cooperative.
- The maintenance of another activity that negatively affects one's performance in his/her position, or that intervenes with the responsibilities and / or decisions within Cooxupé.
- Participation in the social composition or ownership in partner companies, clients or competitors.
- Employees who are cooperative members, Directors and Board members to carry out or approve operations at Cooxupé for themselves or cooperative family members.

## 8. Fraud and Corruption

We do not engage in, and do not condone acts of fraud, corruption, bribery or tax evasion, directly or indirectly; funding for illegal activities, such as trafficking and / or smuggling drugs, weapons, animals, human beings or any other kind; practice of money laundering and activities which are characterized as terrorist act or its incentive, and we repudiate any activity, agreement or partnership that may involve illegal practices, in compliance with the applicable legislation in force.

Corruption occurs when a person authorizes, promises, offers, pays or receives undue advantages for himself or others.

Fraud occurs when a person hides, alters, falsifies, omits information with the intention to obtain benefits for her/ himself or third parties, and when she / he uses the organization's resources without authorization or when she / he acts as a representative without having the powers to do it.

It is understood that undue advantage is the act of accepting, offering or promising gifts, undue discounts, loans, invitations, favors or other situations that may influence or lead to believing that there was a favor, even if it is not of an economic nature, being harmful to the performance of a given duty.

We do not allow payments, exchange of favors or illegal acts performed with the aim of obtaining personal benefit, business advantage or to influence commercial and / or legal agreements.

## 9. Receiving courtesies, gifts and favors

We do not allow employees to receive courtesies, gifts, awards and other offers from business partners, whether in cash (monetary value) or not, with the exception of promotional / advertising gifts.

It is allowed to receive travel, accommodation and meals, offered by business partners, provided that it has a commercial, technical or training purpose and it is previously noticed to the immediate superior or Human Resources Department.

## 10. Offering of contributions, sponsorships and donations

The following contributions, sponsorships and donations are allowed, once they are specifically proposed and approved by the Board of Directors.

- **Fiscal benefits from income tax:** These are free transfers of cash, on a definitive basis, from Cooxupé to a beneficiary towards carrying out activities and / or social projects, encouraged by the Public Treasury by means of specific tax legislation, which allows the deduction of the amount donated from the amount due to Income Tax.
- **Commercial character:** They aim at the financial return to Cooxupé. Example: donations to fairs and events, where the exhibition of Cooxupé products takes place.
- **Promotion of the institutional image** (cash / products resale stores / roasted and ground or industrialized coffee): They aim to promote the institutional image of Cooxupé, where the financial return occurs indirectly and provide social assistance to the entity or public benefited. Examples are: local parties (kermesses), school events, etc.
- **Gifts:** These are goods that can or cannot constitute a normal object of Cooxupé's activity and are duty-free distributed to the client or end user, such as: pens, caps, backpacks, among others. They are offered by Cooxupé to people and external entities on specific occasions, such as visits by customers, representatives of companies, personalities, etc.
- **Non-compulsory contributions:** These are voluntary, optional contributions that defend the interests of the class (Commercial Association, CNC, ABIC, CECAFÉ, etc.).
- **Donation of Movable** (Computers, tables, chairs, machines, etc.): Must be carried out according to internal policy.

## **11. Use and protection of assets**

People authorized to use any assets of Cooxupé - assets, equipment, supplies, material resources, information technology, information and even access to premises and physical facilities - must make use of it solely for professional purposes, and according to the established objective.

During the use of any property, in the event of loss or theft while under one's responsibility, a police report must be opened.

## **12. Disclosure of information, privacy and security**

Employees are not permitted to speak on behalf of Cooxupé, in any form and by any means of communication, without prior authorization, in accordance with the internal corporate communication policy.

Corporate, cooperative, employee and business partner information is restricted, whether for internal or external use and circulation, to authorized persons and for use in accordance with the appropriate purposes.

## **13. Communication and statements to the press**

All communication related to Cooxupé must be carried out by authorized people, according to internal policy, preserving Cooxupé's image, identity and reputation.

## **14. Internet, e-mail and social media**

The use of internet, e-mail and social media by any professional who relates to Cooxupé must be done in a responsible, ethical manner and follow the premises contained in this Code and the Company's Internal Policies for Data Security, and Corporate Communication.

We do not allow users to respond to comments, questions or complaints from users on social media. The ideal is to guide the use of the official channels of Cooxupé or direct the case to the leadership so that the areas involved are informed, and appropriate measures might be taken.

It is strictly forbidden to use the Cooperative's means of communication to disseminate messages with illegal, pornographic content, with any discriminatory meaning, of a religious, political-party, ideological nature or in disagreement with our ethical and moral principles.

## **15. Brand Protection**

Cooxupé brand has a solid identity. It conveys our commitment to cooperativism and, therefore, we must take care of it.

This means that people's perception of Cooxupé brand can be influenced by our attitude, as representatives of the Cooperative. For this reason, it is necessary to follow the guidelines that ensure the strengthening of this asset.

All strategic and brand guidelines are available in *Cooxupé Brand-book* ([www.cooxupei.com.br](http://www.cooxupei.com.br)).

## **16. Intellectual property**

All developments that imply intellectual creation are considered to be property of Cooxupé. Individual use, or assignment of such development to third parties is permitted, only with formal authorization from the Board of Directors.

## **17. Scientific Research**

Innovation activities, by means of research, must be developed in accordance with the guidelines of this Code, and in accordance with international agreements, laws, regulations and standards in force.

## **18. Social Environmental Responsibility**

We do lead and encourage our employees, cooperative members and the society which we operate in and we are part of, to adopt sustainable practices of social and environmental responsibility, according to defined internal policy.

## 19. Administration of the Code

Conducts that violate this Code must be reported to the Compliance Department, through the Ombudsman Channel ([www.cooxupe.com.br/Ouvidoria](http://www.cooxupe.com.br/Ouvidoria)), with sufficient information to allow the Ethics Committee to understand the occurrence, for evaluation, investigation, negotiations, and feedback to interested parties.

Reports of violations of this Code may be anonymous, confidential or open, according to the complainant's option, and will be treated confidentially and free from reprisals or retaliation, with ethical, moral and professional principles.

We commit to respect the rights of complainants and indicted ones. Retaliation and / or exposure by people with the intention of undermine one's image is not allowed.

The Ethics Committee is a multidisciplinary group, defined by the Board of Directors, responsible for monitoring compliance with the Code of Ethical Conduct, ensuring the independence of analyses and assessing compliance with corrective and control actions against proven violations.