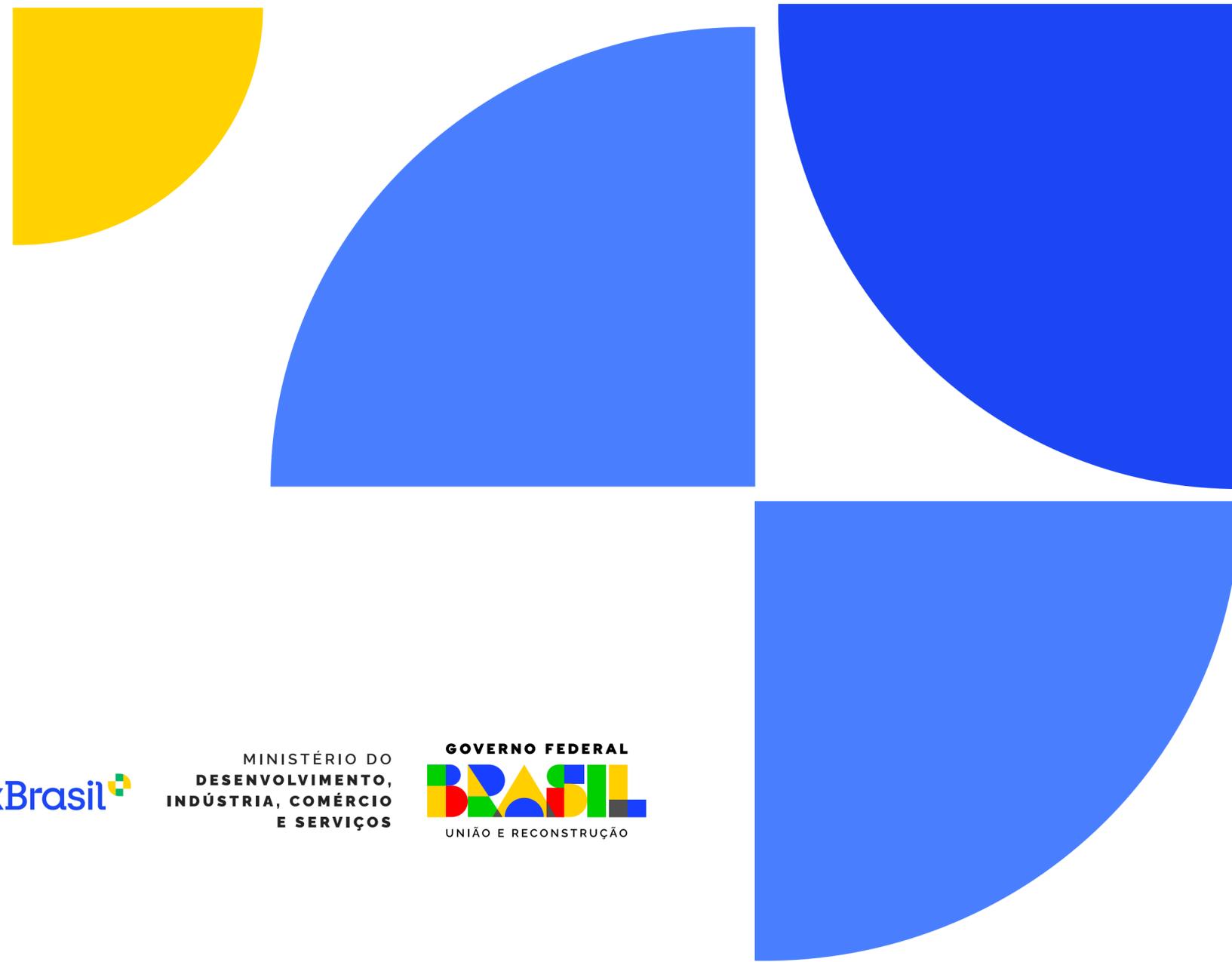




Code of Ethics



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apexBrasil

MINISTÉRIO DO
DESENVOLVIMENTO,
INDÚSTRIA, COMÉRCIO
E SERVIÇOS

GOVERNO FEDERAL
BRASIL
UNIÃO E RECONSTRUÇÃO

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Dear collaborator,

ApexBrasil's reputation is undoubtedly one of its most valuable assets, and it presents an encouragement for partners who share our values and who, together, are willing to build and consolidate Brazil's upright and promising vocation for the world.

We believe it is essential to clearly disclose our values and ethical standards, which are expected from each collaborator in the performance of their duties, and which collectively will be recognized by our partners as the "ApexBrasil way" of cooperating for the development of Brazilian exports and the image of Brazil as a country of talents and opportunities.

It is in this context that we have developed ApexBrasil's Code of Ethics, so that it can be used routinely as a guide to our conduct, in strict compliance with our values, which is why each staff member must have their own copy to read and refer to whenever necessary.

This is how we emphasize our commitment to the Agency's future, by presenting it as genuinely Brazilian, comprised by upright and ethical people.

Goal

This Code of Ethics aims to establish standards of conduct that must be present in the daily activities of ApexBrasil's collaborators.

Application and Scope

This Code applies to all ApexBrasil's collaborators in Brazil and abroad and encompasses their conduct in relationships with co-workers, partners, clients, suppliers, and service providers, as well as with public authorities, Public supervisory and Control Bodies, and the ApexBrasil Employees Association (AEA).



Values and Commitments



Our Values

The relationships governed by this Code are based on the following values and commitments:



Boldness

We act with courage, promoting and investing in innovation, generating continuous improvement in the Agency's business and management.



Commitment

We are committed to the Agency's purpose, seeking results that positively impact our country, generating transformation and competitiveness for Brazilian companies and providing a favorable environment for creating jobs.



Client Focus

We create value for our clients, acting with leadership and protagonism in search for the best solutions for Brazilian companies, buyers and foreign investors. Each decision, system or process is client-focused.



Transparency

We perform with frankness, honesty of purpose, spontaneity and timeliness. Our actions are a result not only of legal duty, but also of a commitment to share every relevant information with stakeholders.

We understand that the realization of our values is contingent upon the demonstration of conduct that reflects:



Respect for people, valuing diversity and non-discrimination.



Compliance with laws and other norms applicable to ApexBrasil, as well as its internal rules.



Commitment to sustainability.



Diligence in ensuring management transparency, communication with and accountability to stakeholders, as well as respecting privacy rights, intellectual property, and obligations with third parties.



Valuement of cooperation, teamwork, and partnership with other institutions.



Assurance of the availability of correct, consistent, and clear information.

Our Commitments

In the relationship between ApexBrasil and its collaborators:

ApexBrasil commits itself to:

-  Promote working conditions that provide balance between the professional, personal, and family spheres of collaborators' lives.
-  Ground its decisions regarding human resources management on criteria previously established by law and its internal rules.
-  Provide conditions for general well-being by ensuring a work environment with physical facilities and furniture suitable for the activities conducted by its collaborators.

In their professional conduct, ApexBrasil's collaborators are not allowed to:

-  Engage in unlawful practices (such as fraud, bribery, extortion, and corruption) in any of their forms.
-  Use or carry illegal drugs on ApexBrasil's premises or work under their effects.
-  Work under the influence of alcohol.
-  Require subordinates to provide personal services.

Our Commitments

In the professional conduct of collaborators:

We commit ourselves to:

- Act ethically, politely, with integrity and honesty.
- Ensure the quality of work performed.
- Seek opportunities for innovation and improvement continuously.
- Strive for professional self-development continuously.
- Ensure the use of attire appropriate for the institutional and cultural environment in which we operate.

- Adjust the vocal volume when using the telephone or in face-to-face conversations, avoiding disruptions in the execution of other's activities.
- Contribute to the maintenance of cleanliness, organization, and integrity in the shared spaces, such as: breakrooms, bathrooms, meeting rooms, and cafeteria.
- Respect the property of others, whether in shared or working spaces, such as office materials, food, and utensils.
- Be mindful of the appropriate use of language, avoiding profanity.

Our Commitments

In the relationship among collaborators

We base our relationship on the following assumptions:



Respect for differences without distinction of any kind, whether related to race, gender, language, religion, political or other opinions, national or social origin, wealth, birth, or any other condition.



Fostering of team spirit, loyalty, trust, and collaboration so that ApexBrasil's results can be achieved.



Valuing of the exchange of information, knowledge, and experiences, stimulating a process of continuous learning and professional development.



Promotion of an environment open to dialogue as a facilitator for sharing ideas and valuing the contributions of each professional.



Rejection of conduct that may characterize harassment of any nature, especially moral and sexual harassment.

Our Commitments

In the relationship with partner entities:

The relationship between ApexBrasil's collaborators and partner entities must be respectful and professional to ensure the achievement of common objectives, namely the internationalization of Brazilian companies, the attraction of foreign direct investment and the promotion of Brazil's image abroad.

We base our relationship on the following assumptions:

- Decisions guided by technical and impersonal criteria for the establishment of partnerships and definition of the terms of the partnership agreement.
- Implementation of partnership agreements in line with ApexBrasil's Collaboration Agreements Guidelines and other internal rules, always ensuring efficiency and transparency in the management of resources provided by ApexBrasil and the partner entity.



Assertive, professional, and timely communication.



Non-fulfillment of partnerships with disreputable entities or entities which are known to:



Discriminate against people based on race, gender, language, religion, political or other opinions, national or social origin, wealth, birth, or any other condition.



Employ directly or indirectly child labor or slave, slave-like, degrading, or undignified labor.

Our Commitments

In institutional cooperation:

Cooperation between ApexBrasil and other national or foreign institutions must be respectful and professional to ensure the achievement of common institutional goals.

We will seek cooperation opportunities through the exchange of information, technologies, and good practices that add value to the initiatives of both parties.

We base our relationship on the following assumptions:

- Assertive, professional, and timely communication.
- Operation in a transparent and impersonal manner.
- Compliance with our internal rules and applicable legislation.

In the relationship with clients:

The relationship between ApexBrasil's collaborators and our clients must be assertive, professional, and transparent, in which collaborators seek to understand the clients' needs in line with the Agency's legal institutional and strategic goals.

We base our relationship on the following assumptions:

- Efficiency, effectiveness, and courtesy in client service.
- Provision of accurate, reliable, and timely information.
- Provision of services with quality and technical excellence.
- Receptiveness to client statements through relationship channels, seeking to improve information and services provided.
- Impersonality in client service.

Our Commitments

In the relationship with suppliers:

The relationship between ApexBrasil's collaborators and our suppliers must be respectful and transparent, grounded on the principles of impersonality and impartiality to guarantee quality and reliability in the contracted services or the goods and materials supplied.

When operating in contract management, we are responsible for monitoring strict compliance with the obligations assumed by suppliers in contracts with ApexBrasil and adopting the appropriate measures in case of non-compliance.

We base our relationship on the following assumptions:

- Observance of ApexBrasil's Biddings and Procurements Guidelines and other internal rules, always seeking the most advantageous contract for the Agency.
- Non-fulfillment of business with disreputable suppliers or suppliers who are known to directly or indirectly employ child labor or slave, slave-like, degrading, or undignified labor.
- Non-hiring of companies or self-employed professionals whose partners are spouses or who have a 1st, 2nd, or 3rd degree of kinship with ApexBrasil's collaborators.

Our Commitments

In the relationship with Public Authorities:

ApexBrasil operates in cooperation with Public Authorities to promote Brazilian exports and investments, as well as the internationalization of Brazilian companies.

We base our relationship on the following assumptions:

- Responsibility in the management of public funds transferred to ApexBrasil.
- Transparent and impersonal actions conducted in technical cooperation.
- Compliance with the applicable legislation, above all, the precepts of the specific legislation that deals with liability for the commission of acts against the Public Administration, either national or foreign, and with the internal rules of ApexBrasil.

In the relationship with public supervisory and control bodies:

The relationship between ApexBrasil's collaborators and public supervisory and control bodies must be professional, respectful, and transparent to ensure compliance with current legislation and the fulfillment of demands made during inspections and audits.

We base our relationship on the following assumptions:

- Accuracy in gathering information.
- Promptness, objectivity, and collaborative attitude.
- Diligence in fulfilling the commitments assumed.

Our Commitments

In contribution to sustainable development:

We act with social and environmental responsibility by adopting and encouraging the adoption of sustainable practices.

Therefore, we base our actions on:



Permanent commitment towards raising awareness about sustainable development.



Support and encouragement for the development of sustainable processes and products as a competitive advantage for Brazilian companies.



Maintenance of an ethical conduct with the publics we engage with.



Contribution to the preservation of the environment by conducting and encouraging sustainable practices (such as the rational use of natural resources, energy efficiency, the practice of conscious consumption, and the minimization of negative environmental impacts).



Permanent improvement of internal processes and guidance of our strategy of action aiming to contribute to sustainable development.



Dissemination of social and environmental legislation of Brazil and other countries among the public we engage with in favor of sustainable development.

Our Commitments

In the management of conflicts of interest:

We must use our best efforts to avoid situations in which personal interests or those of third parties conflict with the interests of ApexBrasil in the exercise of our activities.

To avoid conflicts of interest, ApexBrasil's collaborators must not:

- Conduct activities that conflict with the mission and the strategic and institutional goals of ApexBrasil.
- Conduct activities as an owner or manager of or establish a working relationship of any nature with an institution that maintains a partner, supplier, or client relationship with ApexBrasil.
- Make use of a position, function, role, influence, or privileged information to obtain any advantage for themselves or for third parties.

- Accept any personal benefits that may raise doubts and/or interfere with the safeguarding of ApexBrasil's strict interest in its decisions.

- Represent in committees on behalf of ApexBrasil without due prior authorization from the Executive Board.

- Sign articles and hold lectures on behalf of ApexBrasil without due prior authorization from the immediate supervisor.

Faced with these or any other situations that may raise doubts about possible conflicts of interest, the collaborator must notify the Ethics Committee for evaluation*.

**Considering ApexBrasil's Internal Regulation, approved in 2022, evaluation by the Ethics Committee must be ratified by the Prevention, Ombudsman and Transparency Division under the Integrity Department.*

Our Commitments

In offering and receiving gifts or presents:

To preserve impartiality in the performance of our roles, we adopt the following conduct when offering and receiving gifts and presents:

- We may accept or offer gifts that have no commercial value or are distributed by an entity of any nature as a courtesy, advertisement, regular disclosure, or during events or commemorative dates of historical or cultural significance.
- We do not demand, imply, accept, or offer any kind of favor, advantage, benefit, or gift for ourselves or for any other person in return for our professional activities.

In information preservation:

Regarding access and disclosure of information, we commit to ethics when processing information that we may have access to because of our activities, based on the following assumptions:

- Use in accordance with ApexBrasil's strict institutional interest, refraining from any use for personal benefit or for the benefit of third parties.
- Respect for intellectual property in our possession, whether our own or belonging to third parties.
- All data, information, and materials developed internally in connection with employment relationship are for exclusive use and property of ApexBrasil.

In responsible use of resources:

We understand that ApexBrasil's resources, whether tangible or intangible, are tools available to achieve desired goals.

Therefore, we are guided by the following assumptions:

- Diligence in preserving ApexBrasil's image and visual identity.
- Conscious, rational, and careful use of resources, whether financial, technological, material, natural, or others, while fighting any forms of waste.
- Pursuit of the best benefit–cost ratio in the using of resources.



Code Management



Violation of the Code of Ethics

After being regularly investigated by the Ethics Committee, violations of this Code may result in:

- Clarification, education, and training measures.
- Adjustment of processes, situations, or behaviors.
- Application of disciplinary sanctions provided for in ApexBrasil's Normative Instruction (INA) No. 016 – Disciplinary Process*.

*Repealed on Sep 22, 2017, by Board Meeting of May 09, 2017. INA No. 049-00 – Disciplinary Code is currently in effect.





Glossary



Glosario

Preliminary Investigation

Confidential procedure aimed at gathering evidence to assess the merits of the complaint, to provide support for initiating an inquiry.

Client

Brazilian companies or foreign investors that may prospect or demand ApexBrasil's products or services

Collaborator

Any and all individuals who provide services to ApexBrasil or its offices abroad, including employees, outsourced workers, and interns.

Conflict of Interests

There is a conflict of interest when someone is not independent in relation to the matter under discussion and can influence or make decisions motivated by interests other than those of the organization.

Source: Code of Best Corporate Governance Practices – Brazilian Institute of Corporate Governance (IBGC).

Sustainable Development

Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

Source: Brundtland Report

Employee

Individual who maintains an employment relationship with ApexBrasil.

Partner Entity

Public and/or private entity, whether for-profit or non-profit, that presents a project proposal and/or implements a project through a collaboration agreement with ApexBrasil.

Stakeholder

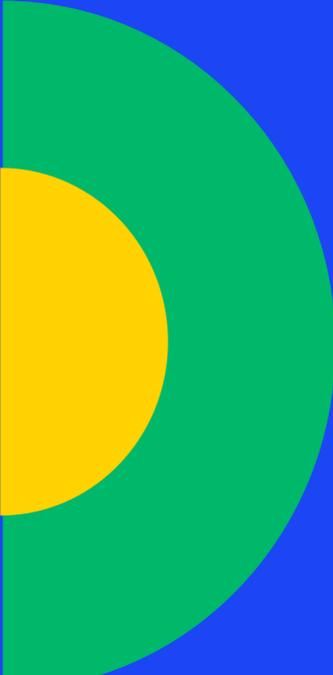
Individuals or organizations that interact in the internal and external environment of the organization and hold interests, expectations, or demands from the organization because they affect it or are affected by it.

Source: Dom Cabral Foundation (FDC).

Intellectual Property

Sum of the rights related to literary, artistic, and scientific works, artistic interpretations and performances, phonograms and radio broadcasts, inventions in all fields of human activity, scientific discoveries, industrial models and drawings, industrial, commercial, and service brands, as well as trade names, protection against unfair competition and all other rights inherent to intellectual activity in the industrial, scientific, literary, and artistic fields.

Source: Convention Establishing the World Intellectual Property Organization (WIPO)



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Oportunidades sem limites.

