



CODE OF ETHICS AND CONDUITE

POL-724-003, REV. 00



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MESSAGE FROM THE MANAGEMENT

Through this Code of Ethics and Conduct (“Code”), COCAM presents its commitment to the society regarding the expected conduct of its Employees and their professional relationships with all interested parties directly or indirectly affected by its business. It is a document that reflects our Basic Values and Policies, a set of guidelines and a reference for moral and ethical conduct to guide our actions and decisions. We believe that our relationships must be based on the respect of differences and to be worked on through responsible and transparent processes, in order to align interests and make sustainability viable. Read, understand, answer your questions and effectively use this guide as a valuable reference for your daily life.

Marcos M. Murari
Diretoria Administrativa

1. PURPOSE



This Code establishes the behavioral rules and guidelines to be observed by its Employees in the exercise of their activities, covering Headquarters and Branches, as well as COCAM's expectations in relation to compliance, when applicable, with the various legal norms (federal, state and municipal), rules and regulations, and other internationally recognized requirements and standards, which include the United Nations (UN) Universal Declaration of Human Rights, the American Convention on Human Rights (Pact of San José de Costa Rica) of the Organization of the American States (OAS), the Declaration of the International Labor Organization (ILO) on Fundamental Rights and Principles at Work and the United Nations Global Agreement. It also reinforces COCAM's ethical commitment in the relationships it maintains with its various stakeholders: Employees, customers, suppliers, service providers, government organs, the community, shareholders, among others. COCAM, founded in 1970, shares with its Employees, the highest standards of conduct and ethical, moral and honesty values. In this way, behavior based on common sense, transparency and truth, and aimed at warding off conflicts and ethical deviations, must be encouraged and adopted under any circumstances, including in the development of personal and professional relationships at COCAM.

2. COCAM AND ITS COFFEE



COCAM industrializes and sells SOLUBLE COFFEE AND DERIVATIVES. There are currently two factories in Catanduva (SOLUBLE and DECAFEINATION) and a Commercial/Financial office in São Paulo - Capital.

SOLUBLE COFFEE or instant coffee is the result of drying the coffee extract, being produced in the form of powder or granules. In preparation for consumption, SOLUBLE COFFEE is rehydrated using hot water.

The speed of preparation, its long shelf life and differentiated flavor are the great advantages of SOLUBLE COFFEE.

COCAM produces: SOLUBLE COFFEE Freeze Dried, Spray Dried and Agglomerated, in addition to DERIVATIVES such as Coffee Extract, Decaffeinated Green Coffee Beans and Anhydrous Caffeine



3. PURPOSE, MISSION, VISION AND VALUES

Vision

Our vision is “To be recognized for the high-quality standard of our instant coffee and for the sustainability of our business, being a competitive company in this segment and with unique characteristics”.

Values

Our core values are: Commitment, Synergy; Respect; Safety; Development; Quality and Continuous Evolution.

4. COCAM'S INTEGRATED POLICY



COCAM Cia de Café Soluble and Derivatives, a soluble coffee and derivatives industry operating in the domestic and export markets, has as its main focus the following policy:

“To be recognized in the market in which it operates, for the quality, safety and excellence of its products and services, carrying out its activities in an ethical and sustainable way.”

For the management of this Policy, COCAM has the following commitments:

1. Developing and supplying products that meet our customers' expectations, ensuring that they are safe for the health;
2. Acting in a socially and environmentally responsible manner, protecting the environment for future generations, preventing pollution, using natural resources properly and managing waste correctly;
3. Providing safe and healthy working conditions, working to eliminate hazards and reducing risks, focusing on awareness, participation and consultation, prevention and protection of Employees and partners;
4. Providing the continuous development of our professionals, cultivating principles of participatory action and promoting an ethical, safe and healthy organizational environment;
5. Providing economic and financial profitability, increasing productivity and reducing costs;
6. Promoting effective communication with our Employees, customers, suppliers, the community and other interested parties;
7. Continuously improving the performance of our processes, products and services;
8. Fully complying with legal requirements and other applicable requirements.

5. BASIC PRINCIPLES UNDERLYING THIS CODE



This Code has been developed to provide a guideline for the application to any activities. Employees should seek guidance whenever they are in doubt about the course their actions should take in a given situation, in view of their responsibility to “adopt the correct posture and conduct”, an attribution that cannot be delegated to another person. And they should always be guided by the following basic ethical principles:

- Acting with ethics, good faith, obedience to the law, respecting others, loyalty, transparency, honesty, common sense and responsibility in decision-making and in the performance of all professional activities;
- Avoiding and combating any and all forms of discrimination;
- Avoiding and fighting any and all forms of corruption;
- Avoiding and combating any and all forms of abuse and harassment;
- Valuing and respecting the decisions of the company’s administration (director and management);
- Acting in accordance to the guidelines and rules of work safety, quality and safety of food and preservation of the environment;
- Promoting transparency and commitment to the truth in the disclosed information;
- Avoiding any conduct that may jeopardize COCAM’s reputation;
- Satisfying customer needs with integrity, commitment, transparency, quality and excellent relationships;
- Keeping the company’s interests above private interests.

6. OUR PEOPLE

COCAM is formed by the people who compose it; therefore, our Employees are the main factor in achieving our results and ensuring its success.



6.1. Work and Human Rights

Our products are developed, industrialized and marketed by People. We value respect for diversity and have as an aim to include all people, making no distinction and offering opportunities to all. We expect our Employees to have the same behavior in respect to:

- **Respect for people:** We respect people's dignity, freedom and privacy. We do not allow any behavior that threatens dignity and respect, and we carry out our activities in a loyal, respectful, diligent and honest manner.
- **Fair and equitable treatment:** Everyone is treated with respect. We reject cruel, inhumane treatment or threats, including any kind of physical or mental harassment, abuse and punishment.
- **Diversity and inclusion:** We promote diversity and inclusion, ensuring respect for differences (being physical, racial, cultural, religious, gender, sexual orientation, social, linguistic, regional, age, ideas, origin, ability, appearance, class, marital status or others) and equal opportunities in access, remuneration and job promotion.
- **Free choice of work:** We do not allow any form of forced or slave-like labor.
- **Child and youth labor:** We do not use child labor in our workforce, except as apprentices, in compliance with the current legislation on the subject.

- Freedom of association and collective bargaining: All our Employees have the right to Freedom of Association with the representative Union entity and Collective Bargaining in accordance with the applicable legislation and regulations.
- Salaries and benefits: Employees are remunerated in a dignified manner, including the legal surcharges in accordance to the current legislation (eg overtime, surcharges for night work, among others). Benefits are also granted to meet the health and food needs of the Employee and his/her family.
- Working hours and rest days: We carry out our work in compliance with the legislation in force regarding working hours and overtime, including legal breaks, rest periods and vacations.

6.2 Health and safety

COCAM provides safe and healthy working conditions for the prevention of injuries and diseases, working to eliminate hazards and reduce risks, intensifying the culture of Occupational Health and Safety, focusing on awareness, participation and consultation, prevention and protection of Employees and partners.

- **Working conditions:** We strongly believe that our health and safety are paramount to the work we do. We provide a safe and healthy work environment that contains the right conditions. When necessary, appropriate and well-maintained personal protective equipment (PPE) is distributed free of charge and they are trained on the risks and dangers associated with their work. We must never sacrifice safety for productivity or encourage others to do so.

The Employee is responsible for learning the safety procedures applicable to their work and area, and for reporting accidents, injuries, as well as unsafe practices and conditions to their leader and the Occupational Safety sector.

- **Alcohol, Tobacco and Drugs:** To further maintain the safety of our workplace, we must never work while under the influence of alcohol, drugs or prescription drugs that may jeopardize safety and good judgment. We also prohibit consuming, offering or delivering, in any way, drugs, alcohol or tobacco, or substances that have a similar effect, within the company.

- **Response to emergency situations:** We train our brigade teams to be prepared for emergency situations, including evacuation procedures, training and drills, first aid material, detection and firefighting equipment, among others.



6.3. Our Collaborators

Our culture is to prioritize the personal and professional growth of our Employees, thus seeking to evolve their internal processes and maintain the recognized quality of COCAM's products and services. For this, we have established as a policy the continuous development of our Employees, seeking to acquire skills for everyone to perform their duties. Competencies are defined based on a matrix that identifies the competencies needed for each position, as well as surveys of training needs and identification of shortcomings.

For the development of formal education, Employees can count on support (scholarships) so that they can acquire technical training, graduation or specializations. We value people and have Social Services, promoting psychosocial well-being and quality of life, through social assistance to Employees and their families. The Social Service promotes projects aimed at leisure, health and well-being of Employees. Learn more about our Human Resources Guidelines with the Human Resources Development sector. In this sector, you can find out more about the Selection Process, Career Development, Skills, Training, Scholarships, Positions and Salaries Policy, Performance Evaluation.



7. OUR PRODUCTS



7.1. Product Quality and Safety

COCAM is committed to manufacturing high quality products that meet our customers' expectations, ensuring that they are safe for health and that they comply with applicable requirements.

For all collaborators and suppliers involved with the development, handling, packaging or storage, we also establish as additional guidelines:

- The knowledge of food quality and safety standards, procedures and rules that apply to its processes;
- To follow good manufacturing practices and HACCP;
- To comply with all the applicable food safety laws and regulations.

Learn more about the Certifications achieved by COCAM through our website (www.cocam.com.br).



8. OUR ENVIRONMENT



8.1. Environmental Sustainability

We believe that the comprehensive concept of sustainable development is capable of meeting the needs of the present generation without compromising the ability to meet the needs of future generations. This is possible, with social and economic development being applied simultaneously to the reasonable use of the earth's resources and the preservation of species and natural habitats.

Aware of the Company's role in this process, we are committed to incorporating corporate sustainability principles and practices into the day-to-day management of the company's business.

Such commitments are defined in our Sustainability guideline through five principles:

- **Legal Compliance:** Applying legal frameworks, acting in accordance with sustainable public policies (Environment, Social Responsibility and Governance).
- **Sustainable Action:** Stimulating and supporting the adoption of sustainable practices in the company's projects and operations, expressing the commitment to life first and social, environmental and economic responsibility.
- **Sustainable Corporate Management:** Supporting and encouraging the incorporation of the sustainability theme into our administrative and operational processes, within technical, financial, operational and strategic limits and, in line with the search for the continuous improvement of the management practices adopted by the company.
- **Ethics:** maintaining ethical and transparent relationships with all stakeholders, through the adoption of codes of conduct and sustainability practices.
- **Biodiversity protection:** Protecting and conserving biodiversity, maintaining the benefits of ecosystem services, not producing in areas of high biodiversity value and areas of high carbon stock (areas of permanent preservation APP, legal reserve, mangroves, etc.).

8.2. Relationship with the Community

We participate in and support initiatives to improve the quality of life of the community with which we interact and take actions to minimize the environmental impact of our activities.

We pay special attention to the families of our employees who form the “COCAM Family”.

These commitments guide our planning and decision-making. The realization of these principles depends on each one of us. Therefore, we invite you to learn more about our COCAM Sustainability guidelines through POL-724-002.



9. OUR RELATIONSHIPS

We seek to have partnership relationships with all our stakeholders, such as customers, suppliers, employees and others. We strive for trust, honesty and ethics in our business practices, acting in a transparent, impartial and integral manner.

9.1 Customers

We have as one of the commitments established in our policy the customer’s satisfaction through the supply of safe products and in accordance to what is specified.

We serve all our customers by offering fair and honest treatment in every deal. We seek to understand the needs of each client and develop products suitable for each one of them.

9.2 Suppliers

We maintain a partnership with our suppliers based on dialogue, transparency and respect, seeking to establish relationships of reciprocal equality, based on technical and impersonal criteria.

We request that our suppliers commit to complying with all the applicable legislation and have an ethical posture, signing our Code of Conduct for Suppliers. Get to know our Code of Conduct for Suppliers on our website www.cocam.com.br.

9.3. Competition

We have the same respect for our competitors as we do for our business partners, and we never seek to obtain information about them through illegal or unethical means.

9.4. Corruption, Fraud and Bribery

We understand that corruption is not limited to fraud and bribery, but also by any intentional form of abuse of power or authority by a person, who seeks to obtain private advantages unlawfully, illegally or irregularly, whether passively or actively. COCAM prohibits corrupt practices of any form, including fraud and bribery. It is recognized by its employees, customers, suppliers and the community as an ethical company that respects legal norms, rules and regulations.

9.4.1. Anti-corruption

COCAM and its management are responsible for conducting operations ethically and in compliance with the current legal regulations.

COCAM's policy prohibits bribing, directly or through third parties, to any government authority with the intention of influencing decisions, or obtaining any kind of advantage for themselves.

Included in the category of government officials are:

- Municipal, state and federal officials and public servants, including the military;
- Candidates for public office and political parties;
- Managers and employees of companies and other municipal, state and federal government organs, not limited to these only.

9.4.2. Negotiation

All businesses carried out by COCAM, in the person of authorized employees, are done legally and ethically, in all aspects.

These should:

- Show absolute honesty and integrity in all their activities.
- Avoid any and all conflicts of interest between their personal life and their work.
- Respect the dignity and values of all individuals.

Everyone should be able to answer “yes” to the following questions before taking any action on behalf of COCAM:

- Is this attitude consistent with COCAM's ethical and moral values, honesty and integrity?
- Will this attitude stand up to public scrutiny?
- Will this attitude protect the reputation of COCAM recognized as a company of quality and excellence of its products and services?

If you cannot answer “yes” to all of these questions, but still believe that the proposed action is legal and ethical, it should be reviewed with the person who represents the area or the board.

9.4.3. Gifts / giveaways

The act of providing and receiving gifts and entertainment is common in the corporate environment and is a practice used to strengthen business relationships. This practice is acceptable by COCAM, as long as it is carried out in a transparent and adequate manner, when it is not carried out with the intention of obtaining any type of advantage and/or favor in return.

Cash gifts as well as a gift that could be viewed as excessive (reference above US\$150) should never be accepted or offered.

9.4.4. Conflict of Interest Policy

Practices that could generate conflicts of interest, such as:

- Having another job where this other employer is a direct or indirect competitor, distributor, supplier or customer of COCAM.
- Have another job or consultancy that affects your performance in carrying out your activities.
- Using COCAM information for your own gain or to the advantage of others, including buying or selling information related to businesses in which COCAM is interested in acquiring, selling or otherwise establishing or terminating such relationships.

9.4.5. Organizations and Political Parties

COCAM does not belong to any type of political organization, but recognizes the legitimacy of these entities and respects their initiatives and activities, in addition to always being willing to dialogue in any situation.

COCAM does not make donations to political parties. It respects the right of employees to join parties and make donations to such entities, if they so wish. Donations must always be made under their own name, and never in the name of COCAM.

9.4.6. Business and financial records

Negotiations must be made by carrying out at least 3 quotes from different suppliers.

All books, records and financial accounts must accurately reflect operations and events, and comply with required accounting principles and COCAM's internal control systems.

Records must not be distorted in any way to hide, disguise or alter the company's actual financial position.

Employees who violate legal regulations or this Code are subject to appropriate disciplinary action, including demission.

10. OUR INFORMATION



10.1. Information Security

The products developed, industrialized and marketed by COCAM are the result of research and investments by the company. Therefore, we understand that we should all value and protect what we develop, including information!

Remember, all internal, registered and/or patented data, documents and information are the property of COCAM. Employees are responsible for both preserving the company's intellectual property and respecting the intellectual property of our customers and business partners, and all the data and information to which they have access, during and after the end of their employment relationship must be maintained CONFIDENTIAL.

We must be aware of these responsibilities when using the telephone, e-mail and other physical and electronic means of storing and transmitting information. We must not discuss confidential information in public areas, read confidential documents in public places, or leave or discard confidential documents where they can be retrieved by others. You can learn more by accessing our Information Security Guideline (POL-721-001) available on our intranet.

10.2. Data protection

We are permanently committed to the principles established in the current legislation regarding the treatment of personal data, including in digital media, in order to guarantee the best practices and strictest standards of physical or digital information security, privacy and protection of personal data, valuing thus our employees and other interested parties, in all activities and businesses, always observing the principle of GOOD FAITH.

You can learn more by accessing our Privacy Policy (POL-728-001) available on our website www.cocam.com.br and on our intranet.



11. COMMUNICATION

We all have an obligation to uphold this Code.

If you observe behavior that is worrisome or that could represent a violation of this Code, immediately take the matter to your leader or report the event through our reporting channels (**www.aloetica.com.br/cocam** and **cocam@aloetica.com.br**). Your anonymity will be guaranteed!

COCAM values the help of employees who identify potential problems that need to be addressed. Any retaliation against an employee who honestly raises a concern constitutes a violation of this Code. If an employee raises an honest concern or participates in an investigation, it cannot be grounds for adverse employment action, including dismissal, demotion, loss of benefits, threats, harassment or discrimination.

Any questions or clarifications about the Code of Ethics and Conduct can be made by e-mail: **gqualidade@cocam.com.br**.

Cocam

