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MESSAGE FROM THE FOUNDING PARTNER

We are a law firm that is proud to be recognized as a benchmark both in Brazil and abroad. This reputation comes from our commitment to standing alongside those who trust our work, offering not only legal solutions but also security and peace of mind to our clients during critical moments.

More than just providing legal services, our mission is to create tailor-made solutions for even the most complex challenges. We combine technical knowledge, experience, and empathy to deeply understand each situation and deliver results that truly make a difference.

We know that Law is a powerful tool, and with this conviction, we seek to contribute to a fairer future with more opportunities for all. Here, kindness and excellence go hand in hand—because believing in people and their projects is part of who we are.

Our team is made up of specialized professionals who are passionate about what they do, offering legal advice in strategic areas such as Energy, Mining, Steel Industry, Oil & Gas, Heavy Construction, Logistics and Infrastructure, and Industry. We work both in prevention and conflict resolution, always with an attentive and innovative approach.

With offices in Belo Horizonte, São Paulo, and Rio de Janeiro, as well as partners in Brazil and around the world, we take our expertise wherever you need. We are also the exclusive representatives in Brazil of the international network LFW – Law Firms Worldwide, reinforcing our commitment to a connected, modern, and global legal practice.

Alexandre Oheb Sion



I - GENERAL INFORMATION

1 - Goals

This Code of Conduct ("Code") has been drawn up with the aim of reinforcing the principles and values that guide Sion Advogados in the conduct of its relationships with internal and external stakeholders.

This Code also aims to: (i) prevent illicit and undesirable conduct; (ii) manage risks; (iii) ensure legal certainty; (iv) promote knowledge and access to information; (v) train and guide Members to comply with applicable legislation, as well as Sion Advogados' policies and rules; (vi) inform Collaborators about the rules adopted by Sion Advogados and their mandatory nature; (vii) contribute to the formation of an ethical environment, in conjunction with other regulations of Sion Advogados and the Brazilian Bar Association ("OAB"), such as the OAB Code of Ethics and Discipline; (viii) ensure that Sion Advogados and its clients avoid situations that may result in penalties for violations under anti-corruption laws and other regulations.

2 - Application

This Code applies equally to all partners, associates, interns, employees, consultants, and any other person linked to Sion Advogados through an employment contract, corporate contract, internship, apprenticeship, volunteering, or service provision.

"Members" of Sion Advogados include lawyers listed in its corporate contract, interns, employees, apprentices, and temporary workers (collectively, "Members").

"Collaborators" include corresponding lawyers, consultants, freight forwarder, suppliers, and service providers (including outsourced personnel), as well as legal or natural persons acting directly or indirectly for or on behalf of Sion Advogados in serving clients (collectively, "Collaborators").

Members and Collaborators will be duly informed of the content of this Code and requested to adhere to its provisions, as well as other policies and procedures of Sion Advogados, as applicable, regardless of their position or place of activity. They therefore agree to fully comply with the terms established herein and to encourage the reporting of any behavior that does not comply with the norms described.

Sion Advogados' clients will be informed of the existence and content of this Code whenever requested. Likewise, Members and Collaborators will comply, whenever necessary, with the provisions of clients' codes or standards of conduct.

Finally, this Code is applied in conjunction with Sion Advogados' other policies and procedures, and all the rules complement each other.



3 - Complaint

If a Member or Collaborator becomes aware of any fact that may compromise the integrity of Sion Advogados, or has a strong suspicion that an illicit, unethical or contrary act has occurred, they must formally and immediately notify the partners of Sion Advogados.

Members or Employees who report violations or suspected violations, if they choose to identify themselves, will have their identity protected, to the extent permitted by law, and will be protected by Sion Advogados from possible discrimination or retaliation by the violating agent or other Members or Employees.

Alternatively, the Member or Collaborator may choose to file an anonymous complaint via the Whistleblower Channel (email: integridade@sionadvogados.com.br). Even if, during the investigation, the whistleblower's identity is identified, Sion Advogados commits to preserve its confidentiality within the applicable limits.

Sion Advogados encourages the active participation of all its Members and Collaborators in promoting conduct based on integrity, loyalty, and ethical behavior, ensuring an environment of transparency and professional ethics.

To this end, Sion Advogados will assume that all complaints are made in good faith, even if, in the end, an investigation is inconclusive or the report is deemed unfounded. Reports that are proven to be made in bad faith, with the intention of harming third parties or causing undue damage, may result in disciplinary measures, as provided for in this Code.

4 - Punitive Measures

Any violation of this Code, of the other policies and procedures of Sion Advogados, or any applicable law or regulation may subject the Member or Collaborator to the appropriate punitive measures, always observing the principles of proportionality, graduality, and immediacy. Sanctions may include, but are not limited to: (i) oral or written warning; (ii) suspension for up to 30 (thirty) days; (iii) dismissal for just cause; (iv) immediate termination of the service contract and/or partnership; and (v) termination of the relationship with Sion Advogados.

The application of any of these measures by Sion Advogados does not preclude legal the sanctions provided by law or the adoption of any other appropriate legal actions by Sion Advogados, including those related to compensation for damages or communication to competent authorities.



5 - Monitoring and Training

Sion Advogados will conduct continuously monitor compliance with this Code and, whenever necessary, may edit supplementary rules or make adjustments deemed relevant to improve its provisions. Any updates will be communicated to all Members and Collaborators.

All Members and Collaborators must participate in training sessions whenever requested by Sion Advogados. The content covered will include matters related to organizational culture, institutional positioning, and commitment to complying with applicable laws and regulations governing the firm's activities, such as this Code and other internal and external regulations related to labor laws, integrity, data protection, compliance, among others.

6 - Disclosure

This Code will be widely disclosed, both internally and externally, and will be accessible at: www.sionadvogados.com.br.



II - PROFESSIONAL ETHICS

1 - Ethics

In carrying out its activities and defending the interests of its clients, the work of Sion Advogados' Members and Employees requires interaction with public agents from the Executive, Legislative and Judiciary branches, as well as with representatives of foreign governments and international organizations. To ensure the compliance of these interactions, Sion Advogados adopts a set of policies and procedures that must guide the conduct of its Members and Collaborators, with the aim of preserving its professional reputation and preventing the practice of unlawful acts, unethical conduct, and/or inappropriate behavior.

All conduct must be in accordance with the highest ethical standards required of legal professionals, based on strict compliance with laws, especially the Anti-Corruption Law (Law No. 12.846/2013), the Advocacy Statute and its General Regulation, as well as the OAB's Code of Ethics and Discipline and the practices outlined in this Code.

By way of example, the Members and Collaborators of Sion Advogados must:

- act with honor, respect, integrity, and dignity, safeguarding the essential and indispensable character of practicing law;
- act with courage, independence, honesty, decorum, truthfulness, loyalty, morality, dignity, and good faith;
- treat all other Members and Collaborators, authorities, or public servants with respect and discretion:
- maintain professional confidentiality and loyalty to the client; and
- carry out their activities within the limits established by applicable regulations.

2 - Confidentiality and Secrecy

The Members and Collaborators of Sion Advogados must maintain absolute secrecy and treat with strict confidentiality any information and documents to which they have access as a result of their activities. This obligation extends to all information obtained and, in particular, as a result of the tasks performed as a Member and Collaborator of Sion Advogados, regardless of the form of access or the means of communication used.

Information and documents will be treated as confidential and secret unless they are of a public nature, widely known, or intended for disclosure due to the nature of the work performed.

Even if not considered secret or confidential, documents or information that could compromise the reputation of clients or Sion Advogados should not be disclosed. The commitment to confidentiality and secrecy includes a prohibition on discussing matters related to clients or Sion Advogados in any contexts that are not strictly professional.



As an example, the confidential and secret information that must be protected includes:

- names of clients and contact list of Sion Advogados;
- correspondences, including electronic communications, of any Members or Collaborators of Sion Advogados with clients or any third parties;
- existence and content of contracts, declarations, titles, documents, agreements, lawsuits, administrative processes, and other instruments signed by or involving clients of Sion Advogados, as well as any related drafts;
- the content and progress of any discussions or negotiations regarding the documents mentioned above;
- existence and content of corporate, contractual, or any other kind of relationship between clients of Sion Advogados or between clients of Sion Advogados and any third parties;
- models, standards, examples of contracts, statutes, declarations, titles, documents, legal theses, and other instruments used by Sion Advogados;
- any information regarding Sion Advogados, its activities, and its clients that are of an environmental, labor, tax, accounting, financial, commercial, or any other nature; and
- notes, analyses, compilations, studies, summaries, and other documents that reflect, in whole or in part, the information mentioned in the above items.

3 - Use of Information, Materials, and Properties of Sion Advogados

The information, materials, and properties of Sion Advogados may be considered: (i) those belonging to Sion Advogados itself, as the holder of autonomous interests, and (ii) all client information in possession of Sion Advogados, its Members, and Collaborators, for any reason.

The use of this information, materials, and properties by the Members and Collaborators must be governed by the principle of functionality. This means that Members and Collaborators should have access only to what is strictly necessary for the performance of their activities. If they become aware of information, materials, and properties that are not necessary for their roles, they must immediately notify the sender and inform the partners of Sion Advogados if necessary.

Members and Collaborators of Sion Advogados must ensure that no information, materials, and properties are disclosed by following these guidelines: (i) not copying or reproducing, by any means, confidential or secret information without the prior consent of Sion Advogados; (ii) not taking, nor allowing confidential or secret information to be taken, outside of the premises of Sion Advogados or clients, whether physically or virtually; (iii) immediately informing the partners of Sion Advogados about any violation of confidentiality or secrecy of information they become aware of; and (iv) adopting all necessary measures, as well as any measures requested by Sion Advogados, to ensure the confidentiality and secrecy of the information.

Sion Advogados' data storage environment and communication services are protected by effective technological solutions, guaranteeing information security and preventing unauthorized access.



4 - Conflict of Interests

The Members and Collaborators of Sion Advogados are expressly prohibited from accepting invitations, tasks, cases, or any other activity that may conflict with the interests of the clients or Sion Advogados.

Conflict of interest means any situation involving interference with the interests of active clients of Sion Advogados.

Members and Collaborators must also strictly observe the rules on conflicts of interest established in the OAB Code of Ethics and Discipline. In particular, Members and Collaborators must inform the partners of any conflict situation, even if potential, suspicion, impediment, or any other circumstance that may affect the performance of the Member or Collaborators or Sion Advogados, or the reputation or relationship of Sion Advogados with its clients, including, but not limited to, any relationship of kinship or affinity, up to the 2nd degree, with individuals who are, or have been in the last 5 years: (i) employees, collaborators, service providers, or professionals linked to or attending to any client of Sion Advogados; (ii) public servants; (iii) members of the executive, legislative, or judicial branches; (iv) politically exposed persons; and (v) individuals involved in or acting in competing activities with Sion Advogados, its clients, or activities contrary to their interests.



II - LAWS AND CORPORATE INTEGRITY

1 - Anti-Corruption

Sion Advogados does not tolerate acts of corruption by its Members and Collaborators, establishing this principle in all its institutional and professional relationships.

For this reason, its Members and Collaborators have the duty to ensure full compliance with anti-corruption regulations, as well as to advise clients to observe them, particularly the Brazilian Penal Code, the Anti-Corruption Law (Law No. 12,846/2013), and relevant national and foreign legislation, when applicable. Examples of the latter include the Foreign Corrupt Practices Act (USA, 1977) and the United Kingdom Bribery Act (UK, 2010).

In particular, Members and Collaborators of Sion Advogados are expressly prohibited from: (i) promising, offering, giving, or paying, directly or indirectly, or through third parties, any monetary value or undue advantage to public agents or third parties related to them; (ii) acting as intermediaries in requests from third parties (clients or not) to offer undue advantages; and (iii) engaging in any act with the objective of obtaining undue favoritism or similar benefits, such as:

- expediting or favoring the analysis of judicial, administrative, or arbitration proceedings;
- obtaining licenses, authorizations, grants, concessions, or permits of any nature; and
- influencing regulatory or supervisory decisions.

Gifts may only be offered or received if they are mere courtesies commonly accepted in the market and do not exceed the annual value of R\$100.00 (one hundred reais), except in cases of institutional gifts.

2 - Money Laundering

Members and Collaborators of Sion Advogados must commit to fully complying with all laws against corruption, money laundering, and terrorism financing. In particular, they are prohibited from participating, directly or indirectly, in any activity related to money laundering, as well as assisting Sion Advogados' clients in engaging in such practices.

Money laundering consists of a set of financial operations and transactions aimed at concealing or disguising the illicit origin of assets, rights, and values obtained through criminal activities, integrating them into the economic-financial system with an appearance of legality. This practice typically involves multiple transactions used to obscure the origin of illicit financial assets, allowing them to be utilized without implicating the criminals involved.

All Members and Collaborators of Sion Advogados have the duty to immediately report to the partners any suspected illicit activity related to money laundering, ensuring compliance with applicable regulations and institutional integrity.



3 - Personal Data Protection

Sion Advogados has access to personal data of individuals both inside and outside the organization. For this reason, data must be handled, managed, and administered effectively and securely, always in compliance with applicable legislation. The processing of personal data is subject to various legal and regulatory requirements, making it essential to ensure its protection and proper handling.

Personal data includes any information related to an identified or identifiable natural person that can be used to identify or locate them. This includes, but is not limited to, names, dates and places of birth, addresses, emails, ID numbers, taxpayer identification numbers (CPF/CNPJ), driver's licenses, public identification numbers, social media accounts, and data related to such identifiers.

The personal data of clients, Members, and Collaborators will be retained by Sion Advogados only for as long as necessary and/or required by law.

3.1 - Responsibilities of Members and Collaborators

All Members and Collaborators of Sion Advogados must:

- understand and adhere to applicable regulations regarding personal data protection, ensuring its proper handling;
- ensure that third parties comply with the privacy policies established in agreements signed with clients and Collaborators whose personal data is processed or accessed by Sion Advogados;
- collect and use personal information exclusively for the provision of services and activities related to Sion Advogados;
- whenever possible, use "non-identifiable" data (i.e., with names removed or anonymized) or "aggregated" data (summarized so that individuals or companies cannot be identified);
- restrict access to personal information to those who need it to perform their duties and only for the necessary duration to fulfill the intended purpose;
- require third parties, when applicable, to sign confidentiality agreements and comply with data protection laws and obligations; and
- immediately notify the partners of Sion Advogados if they become aware of unauthorized access, acquisition, disclosure, processing, or misuse of personal data held by Sion Advogados.

4 - Fair Labor Practices

Sion Advogados, along with its Members and Collaborators, must commit to full compliance with labor laws and fundamental rights, ensuring a work environment guided by ethics, respect, and equity.



This commitment includes the observance and promotion of the following principles and rights: freedom of religious belief, philosophical or political conviction; right to association and unionization; protection of privacy, intimacy, honor, and image; equality of working conditions; actions of respect, inclusion, and encouragement of diversity; recognition and appreciation of collective bargaining; compliance with immigration, working time, and wage regulations; guarantee of a fair and adequate working hours; express prohibition of forced, compulsory, child labor, or labor in conditions analogous to slavery; and rejection of any form of discrimination in the work environment.

If any conduct violating these principles is identified, the partners of Sion Advogados must be immediately informed so that appropriate measures can be taken.

5 - Intellectual and industrial property

The Members and Collaborators of Sion Advogados must respect the intellectual and industrial property of third parties and Sion Advogados, ensuring its correct use and protection.

The intellectual and industrial property of Sion Advogados, including elements such as brand, logo, and visual identity, differentiates it from its competitors and represents the firm in terms of brand and reputation.

Any use of these elements must be previously communicated and authorized by the partners of Sion Advogados, specifying the purpose, duration of use, and any other necessary information for evaluation and approval.



IV - WORK ENVIRONMENT

Sion Advogados expressly prohibits its Members and Collaborators from adopting any disrespectful, discriminatory conduct or any violation of human rights in their relationships with each other, with clients or third parties, whether through violence, prejudice, harassment, or discrimination.

1 - Non-Discrimination

For the purposes of this Code, discrimination is defined as any distinction, exclusion, or unjust preference based on characteristics related to race, color, ethnicity, sex, gender identity or sexual orientation, social origin or family situation, age, physical condition or appearance, nationality, religion, opinion or political affiliation, personal conscience, ideological conviction, or any other characteristic or personal choice.

2 - Diversity and Inclusion

Sion Advogados values and promotes the principles of diversity and inclusion, aiming to nurture a respectful, welcoming, and inclusive environment where all people have the opportunity to thrive both personally and professionally.

3 - Harassment

Sion Advogados does not tolerate any form of harassment (sexual, moral, psychological, among others).

For the purposes of this Code, harassment is defined as any unsolicited, uninvited, and abusive or degrading behavior that could be considered, by an average citizen, as undesirable or offensive, intended to intentionally harm the image, dignity, or physical or psychological integrity of another person.

Harassment may also take the form of bullying when an individual or group seeks to intimidate, degrade, humiliate, or belittle a colleague. Furthermore, harassment can occur inside or outside of Sion Advogados, or through social media, and is independent of hierarchical or functional status, potentially coming from a superior, an equal colleague, or a subordinate.

All Members and Collaborators of Sion Advogados are responsible for ensuring that no conduct that could be understood as harassment occurs in the work environment, and must:

- treat everyone with respect and dignity, respecting colleagues' individuality and promoting a healthy, open work environment for dialogue.
- promote a work environment free from humiliating and embarrassing situations, especially those that become repetitive and prolonged during working hours or in the performance of their duties, whether privately or in front of third parties.



- encouraging colleagues to adopt appropriate conduct; and
- align their behavior with the culture of Sion Advogados, in line with institutional values and principles.

The prohibition of harassment applies to all Members and Collaborators, and those responsible for inappropriate conduct are subject to disciplinary and legal sanctions. Any conduct that could be interpreted as harassment must be immediately reported to the partners of Sion Advogados so that appropriate actions can be taken.

4 - Behavior

Sion Advogados is committed to maintaining a healthy and safe work environment where interpersonal relationships are based on civility, cooperation, open dialogue, and mutual respect among Members and Collaborators at all levels.

Sion Advogados does not tolerate dangerous, abusive, violent behaviors, or behaviors that contravene applicable laws and safety standards, nor any threats of such conduct by its Members and Collaborators.

Sion Advogados also prohibits the sale, possession, distribution, or use of alcohol, illegal substances, guns, and the misuse of controlled medications in the workplace and during the performance of duties by Members and Collaborators. Working under the influence of drugs, alcohol, or other substances that compromise safety and efficiency also constitutes a violation of this Code. As an exception, responsible and moderate consumption of alcohol is permitted at events sponsored or authorized by Sion Advogados.

5 - Social and Environmental Responsibility

Sion Advogados is committed to complying with all environmental, urban planning, occupational health, and safety laws, ensuring the protection of its Members and Collaborators.

Recognizing the importance of sustainability, Sion Advogados expects all Members and Collaborators to make efforts to reduce, reuse, and recycle energy, natural resources, and materials in the performance of their duties, as well as to integrate sustainability into Sion Advogados' strategies, operating models and processes.

From a social perspective, Sion Advogados strongly encourages its Members and Employees to engage in social causes, economic empowerment, poverty alleviation, social and fiscal justice, citizenship, transparency, and institutional maturity, in order to promote positive impacts for the community.

6 - Use of Social Media

The guidelines of this Code also apply to virtual environments, and it is the responsibility of all Members and Collaborators to safeguard their image, as well as the image of Sion Advogados and its clients.



CODE OF ETHICS AND CONDUCT

Sion Advogados prohibits the use of its equipment, internet networks, phone lines, computers, and corporate emails for actions that harm third parties, clients, or the firm itself.

Sion Advogados does not restrict access to social media for its Members or Collaborators. However, the use of social media must adhere to legal and ethical responsibilities, including the protection of privacy, confidentiality, and the legal interests of Sion Advogados and its clients, as well as ensuring that these platforms are not used for advertising legal services in violation of applicable regulations.

Additionally, the use of social media during work hours should be limited to strictly essential situations, so as not to compromise productivity, concentration, and the quality of deliverables. Members should prioritize their professional activities and ensure that personal use of these platforms does not interfere with their job performance.



V - RELATIONSHIP WITH THIRD PARTIES

1 - Authorities, Politicians, Public Agents, and Government and Regulatory Institutions

In interactions with authorities, politicians, public agents, and government and regulatory institutions, Members and Collaborators of Sion Advogados must be aware that such professionals are subject to specific conduct rules, including: (i) the Statute of Public Servants (Law No. 8.112/1990); (ii) the Administrative Improbity Law (Law No. 8.429/1992); (iii) the Conflict of Interest Law (Law No. 12.813/2013); (iv) the Code of Professional Ethics for Civil Public Servants of the Federal Executive (Decree No. 1.171/1994); and (v) the specific conduct regulations of each branch, level of government, agency, or entity.

The aforementioned regulations impose restrictions on public servants, especially regarding the acceptance of gifts, presents, or benefits, the provision of services during working hours or in conflict with their official duties, as well as the acceptance of job offers within certain time frames after leaving office.

Thus, offering any gifts, benefits, presents, entertainment, travel, or other similar advantages to public agents is prohibited, regardless of the reasons involved, but especially when there are interests of Sion Advogados or its clients at stake.

If, during the performance of their duties, Members or Collaborators of Sion Advogados are approached by public servants requesting an undue or seemingly undue advantage, they must immediately: (i) reject the request clearly and explicitly, leaving no room for ambiguity, informing that the request cannot be fulfilled by Sion Advogados; (ii) avoid discussions that could be interpreted as acceptance of the request; (iii) emphasize that the regular procedures of the public agency and Sion Advogados must be followed; and (iv) immediately report the situation to the partners of Sion Advogados for appropriate measures.

It is important to note that, for the purposes of this Code, the definition of public servant includes executives, employees, and staff of regulatory agencies, state-owned companies, and public service concessionaires or permissionaires, candidates for public office, representatives of foreign governments, and agents of international organizations.

2 - Partners, Suppliers, and Collaborators

Sion Advogados does not do business with individuals or legal entities of questionable reputation. The hiring of Members by Sion Advogados should be based exclusively on technical and professional criteria, free from any real or apparent conflict of interest.

The irregular or illegal conduct of Members or Collaborators may result in legal penalties and reputational damage for both clients and Sion Advogados. Practices involving serious crimes, such as bribery, money laundering, and the offering or acceptance of undue advantages, may have severe legal and financial consequences, affecting all stakeholders of Sion Advogados.



In the final instance, the image and credibility of Sion Advogados, its Members, and its clients can be compromised due to the actions of Collaborators hired to perform services or supply products, even if on a small scale or temporarily.

To mitigate risks, proper precautions should be adopted during the selection and management process of Collaborators. Before hiring, the following aspects should be evaluated:

- reputation and technical competence of the Collaborators, ensuring no involvement in scandals, undue political exposure, or non-compliance with applicable laws regarding the performance of their duties;
- compliance of the hiring proposal with legal and regulatory requirements;
- possible conflicts of interest between the Collaborators, their clients, Sion Advogados, and its clients;
- commitment to the guidelines of this Code, ensuring alignment with the ethical and regulatory principles of Sion Advogados.
- negotiations and contracts should, whenever possible, be formalized through written agreements, signed by authorized individuals, containing explicit clauses of respect for corporate integrity laws. These contracts ensure legal security for Sion Advogados and should reinforce the commitment to ethical standards and compliance.

The guidelines established in this section also apply to any company, firm, or professional with whom Sion Advogados agrees to work for the benefit of its clients. This includes: other law firms; correspondents; experts; consultants; technical consulting services; and other specialized service providers.

3 - Relationship with Other Law Firms

Sion Advogados is committed to acting in the legal environment with fairness and integrity, basing its competitiveness exclusively on the quality of its Members, Collaborators, legal advice and services provided. Unfair or unethical practices are expressly prohibited.

Thus, the Members and Collaborators of Sion Advogados are strictly prohibited from: (i) making misleading, derogatory, or defamatory statements about competitors, and (ii) failing to comply with competition laws, which prohibit the practice of acts that may infringe the economic order.

4 - Relationship with Clients

Sion Advogados considers the provision of services to its clients to be the central focus of its activities, guiding this relationship with respect, transparency, and mutual trust.

Committed to excellence in the quality of the services provided, Sion Advogados values close relationships with its clients, aiming to establish long-term partnerships. To ensure a solid and ethical professional relationship, Members and Collaborators must observe, among other guidelines:



- involvement of Sion Advogados' partners when required by clients in presenting service proposals, ensuring the proper preparation of documents and preventing conflicts of interest;
- maintaining a strictly professional focus during meetings and invitations, avoiding discussing confidential or sensitive matters in inappropriate settings;
- absolute commitment to the quality of services provided, promoting knowledge sharing for excellent service, and
- professional and contractual obligation to provide accurate, complete, and timely reports to clients, detailing the progress of services and, when necessary, the time spent on each task performed.

The partners at Sion Advogados undertake to work personally to resolve the demands made by clients, clarifying any doubts and, above all, advising on the legal risks involved in each case.

5 - Relationship with the press

Communication with the press and the public must be timely, complete, truthful, accurate, consistent, and in compliance with all legal and regulatory requirements.

Only Sion Advogados' partners and authorized professionals are allowed to speak on behalf of the firm, whether to respond to media inquiries, give interviews, clarify doubts, or address sensitive and strategic issues related to Sion Advogados.

If any Member or Collaborator is contacted by the press regarding matters related to the interests of Sion Advogados or its clients, the partners must be immediately informed. No Member or Collaborator may publicly comment on behalf of Sion Advogados without proper authorization.



VI - FINAL PROVISIONS

This Code was approved by the partners of Sion Advogados in February 2025 and will be periodically reviewed to ensure that it is up to date and complies with best practices.

In case of doubts regarding the application of this Code, the partners of Sion Advogados should be consulted.



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