

COMPLIANCE MANUAL

Code of Conduct



Fazendas Dutra

Fazendas Dutra have origins that coincide with the cultivation of sustainable coffees. Therefore, the values that drive our multiple operations must also reflect these roots.

Our company was founded on the basis of not only hard work, but also integrity, as we believe that only effort accompanied by integrity is capable of building a true legacy.

Over time, the growth of our business brought the latent need to deepen our commitment to the highest standards of Corporate Governance and Ethics.

Thus, the Compliance Manual ratifies these values and expresses our respectful and efficient way of moving the world, guiding conduct, ponderations and decisions,

The commitment to this legacy belongs to all of us.



Missão e Visão

Mission

We are committed to growing high quality organic coffee and the future of sustainable mountain coffee growing, improving the social, economic and environmental well-being of our community. We are dedicated to contributing to the development of a sustainable coffee culture based on organic philosophy and organic principles, neutralizing our carbon footprint and inspiring other producers and the entire chain to follow the same path.

Vision

Our vision is to be recognized as a family-owned coffee farm that is a benchmark in growing high quality organic coffee beans in a 100% sustainable way. For us, that means a commitment to excellence in everything we do and a commitment to continuous innovation. We want to grow organic coffees that provide everyday experiences in coffee cups around the world. We want to be the reference farm in organization, work environment and leader in sustainable coffees.



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Compliance and Integrity

For the good development of our business, we need to comply with the laws of the country, with the company's internal rules and with the principles that make up the ethical culture in our business.

The Compliance program aims to maintain the integrity of the company in terms of these sets of rules and values, which must guide all our conduct and relations with the public - customers, employees, suppliers, service providers, shareholders, investors, the press , society and government.

The Compliance Manual you have in your hands is a very important tool in maintaining a healthy, ethical and correct work environment. Consult it whenever necessary, and use it to your advantage. When faced with a situation in which, even after consulting the Manual, you are still in doubt about how to act, ask yourself the following questions before making a decision:

- » Does my conduct match the interests and values of the company?
- » Will I have peace of mind to explain how I acted?
- » Can my conduct be taken as an example for my co-workers?
- » Am I acting without any violation of legislation or internal regulations?
- » Have I evaluated all available information and risks in making decisions?

If even after answering "yes" to all these questions you still have hesitations, talk to your immediate supervisor so that he/she can guide you. Remember that you are the business card of this institution and the main reason for our success. Let's go together?

Code of Ethical Conduct

Fazendas Dutra Code of Ethical Conduct brings together the guidelines and principles that must be observed and adopted by all partners, employees and directors to guide actions and relationships with internal and external audiences, with regard to ethical and moral aspects. These principles must be observed in order to achieve increasingly high ethical standards in the exercise of our activities and to guide the personal and professional conduct of all, regardless of the position or function they hold.

The Code of Ethical Conduct is intended to clarify doubts regarding the expected behavior of everyone who is part of Fazendas Dutra, consolidating and disseminating our culture. This Code is not intended to anticipate every issue we may encounter. It is possible for situations to arise that raise doubts as to the conduct to be adopted and it is expected that employees and partners act with common sense and strive for ethical and upright behavior.

Fazendas Dutra Code of Ethical Conduct is a dynamic document and is constantly being improved. For suggestions or clarification of doubts about any issues in this document, please contact us by e-mail compliance@fazendasdutra.com.br

Ethical Principles

Honesty; Integrity; Respect; Justice; Transparency; Equity; Solidarity; Professional responsibility; Socio-environmental responsibility; Commitment; Citizenship.

In all our relationships, we reaffirm our commitment to:

We fight and do not tolerate any type of discrimination. We repudiate slave or informal labor, child exploitation, and inhuman and degrading working conditions at Fazendas Dutra and in every link in our value chain, and we commit ourselves to strive to eliminate sexual exploitation of children and adolescents, especially women and girls. We support racial and gender equality. In addition, we have our Human Rights Policy across the Value Chain, in which we foster our commitments and criteria to eliminate slave, child, or any degrading working condition. We repudiate acts of moral and sexual harassment.

We are committed to preventing fraud, money laundering and terrorist financing; Prevention and fight against corruption; transparency and impartiality; privacy and confidentiality of non-public information, confidential and protected by law; Socio-environmental responsibility; Compliance with laws, regulations and standards applicable to Fazendas Dutra.

Purpose, Values and Principles

Our base is strong! Purpose, values and well-defined principles that govern our way of doing business. It is essential that employees, customers and partners not only know this base but also be inspired and guided by it in all their actions.

The purpose of Fazendas Dutra is to: Cultivate excellent organic coffees with respect for people and the environment. To achieve this purpose, we have the following basic values: Integrity & Trust, Relationship, Evolution and Sustainability.

Based on these values, guiding principles were defined. Are they:

- Respect for people and the environment;
- Passion for what we do;
- Commitment to excellence;
- Sustainable growth;
- Ethics in all relationships;
- Self-criticism to always do better.

Company Commitments

Fazendas Dutra recognizes its primordial and exemplary role in the observance of Compliance rules and in the creation of an environment and conditions conducive for employees and partners to act accordingly.

In this way, a series of commitments of the company will be listed below.

COMPANY COMMITMENTS:

People

With the purpose of growing organic coffees of excellence and respect for people, we understand that the observance of human rights must guide the Fazendas Dutra conduct in the interaction with all individuals.

To this end, the company undertakes to always offer fair and equal treatment to people, to the extent of their inequalities, promoting diversity, valuing respect for individual freedoms and repudiating manifestations of harassment, prejudice or discrimination based on ethnic origin, color of skin, nationality, social position, age, religion, gender, sexual orientation, personal aesthetics, physical, mental or psychic condition, marital status, pregnancy status, opinion, political conviction, or any other differentiating factor.

In addition, Fazendas Dutra complies with the principles and norms of the Universal Declaration of Human Rights of the United Nations and the Declaration of Fundamental Principles and Rights at Work of the International Labor Organization.

COMPANY COMMITMENTS:

Environment

Fazendas Dutra must adopt responsible measures to mitigate negative impacts on the workplace and the environment.

Fazendas Dutra understands that environmental responsibility is necessary if we hope to preserve the world for future generations. Our commitment to contribute positively to the environment is of utmost importance to the company.

We are aware that nature is a good for all and the source of the resources necessary for our survival as people and as a business. Our goal is to preserve and even improve the conditions of the environment. We do not support institutions that execute or encourage deforestation that is not permitted by law.

We want to work in an integrated way with partners so that our raw materials are always sustainable and our by-products and waste feed other industrial activities. We encourage innovations and initiatives that lead to environmental quality and the reduction of the effects of climate change.

We seek the continuous reduction of Greenhouse Gases (GHG) emissions through direct and indirect reduction actions, in addition to banning the practice of deforestation and degradation; Fazendas Dutra continually evolves and expands its definition of environmental responsibility and what it means to be an environmental leader.

COMPANY COMMITMENTS:

Political Participation

Fazendas Dutra will remain politically impartial and will not provide support to political parties in electoral campaigns;

In addition, the individual right of employees to get involved in civic affairs and participate in the political process is guaranteed, as long as they are outside the company's premises and working hours.

Union membership

The free association of employees with unions and class associations will be respected.

The company recognizes union entities as legal representatives of employees and seeks constant dialogue to resolve conflicts of a labor or union nature.

COMPANY COMMITMENTS:

Anti-Corruption

Fighting corruption is everyone's responsibility. The practice of any form of corruption is contrary to and harmful to the mission of Fazendas Dutra and will not be tolerated. Fazendas Dutra repudiates and does not tolerate practices of active corruption, passive corruption, bribery, kickbacks, payment of facilitations, lobbying, fraud, use of privileged information, prevarication, embezzlement, money laundering, extortion, among other inconsistent practices with the law. No act of corruption of any kind will be considered acceptable under any circumstances. Failure to comply with anti-corruption laws can result in serious penalties up to and including criminal liability for the natural person involved.

Fazendas Dutra activities are based on principles of legality, probity and transparency. The company is aware of the Brazilian anti-corruption law (Law n. 12.846/13) and fully complies with it, as well as international laws.

Therefore, any practices that configure the typifications provided for in it are vehemently repudiated.

“Corruption” is understood to be the abuse of a power conferred on someone for their own benefit. In other words, corruption means:

"Offering/receiving, promising or granting any kind of advantage (e.g. money, gifts, discounts, contributions, loans, fees or rewards) to (or from) any person (not just public authorities or officials) as an inducement to act dishonestly or illegally or to break trust in the management of services or in the company's business".

Therefore, if Team Members and Third Parties find themselves and/or identify themselves in situations similar to any of the forms of corruption detailed above, they should seek assistance through the e-mail: compliance@fazendasdutra.com.br, in order to ensure that these situations are resolved in the best possible way.

COMPANY COMMITMENTS:

Prevention of Money Laundering and Terrorism Financing

In compliance with the determinations of laws n. 9.613/1998 and 13.260/2016 and other applicable regulations - including any subsequent laws in the same sense – Fazendas Dutra undertakes to guide the conduct of its employees, customers, partners towards the best practices to prevent money laundering and terrorist financing.

In this sense, we have a Money Laundering and Terrorism Financing Prevention Policy, available to all employees, instructing them on the procedures to be adopted for this purpose.

The instructions described in this Policy provide compliance, assertiveness and security in the operations of the company and its business partners.

Our objective is to prevent our products and services from being used for the crime of money laundering and to provide all possible collaboration with the competent authorities.

Knowledge and compliance with the provisions of the Policy are mandatory for all employees during the execution of all company operations.

COMPANY COMMITMENTS:

Conflict of Interest

Conflicts of interest are situations in which the best interest of the company does not correspond to the best interest of a partner, employee or other third parties, interfering with their power of judgment and decision regarding the business.

Fazendas Dutra ensures that its employees and partners comply with clear and objective rules and procedures, in order to mitigate the existence of conflicts of interest, in addition to providing means of evaluating doubts on the subject to bring clarification to the treatment of possible occurrences.

For this reason, all situations that could generate such conflicts must be avoided and, if they occur, reported to management.

COMPANY COMMITMENTS:

Work Environment

Relationships in the work environment will be based on trust and transparency, with the objective of personal development and the preservation of the Company's image and reputation. Fazendas Dutra is committed to providing a healthy and safe work environment for its employees, always seeking to reduce the risk of accidents at work or occupational diseases.

Child labor and any form of forced labor that reduces man to the condition of slavery or equivalent is repudiated.

- **Child Labor:** No person shall be employed under the age of 18 or under the age of completion of compulsory education, whichever is greater.
- **Forced Labor:** There will be no use of forced labor, including prison labor, forced labor, slavery labor or other forms of forced labor.

Contracting suppliers: Contracting suppliers must always observe the company's basic principles, so that our contracts produce positive commercial, economic, social and environmental impacts.

To this end, the company performs Due Diligence on suppliers prior to establishing commercial relationships, monitoring the health of the companies with which we have a relationship, evaluating financial, legal, labor, social, environmental and reputational aspects.

COMPANY COMMITMENTS:

Privacy

Fazendas Dutra understands the importance of preserving privacy and the responsibility inherent in the processing of personal data, and therefore undertakes to comply with the provisions of the General Data Protection Law.

The collection and use of personal data are always accompanied by information to the holders about their rights and about the measures adopted by the company to implement the due protection, through our internal Privacy and Cookies policies, among others.

COMPANY COMMITMENTS:

Collaborators

Our employees are responsible for giving life to our business, and in the mission to develop them accordingly, we depend a lot on everyone's commitment.

- Compliance with the precepts of this Manual is mandatory, and any non-compliance may lead to the application of disciplinary sanctions.
- Fazendas Dutra has procedures and internal rules specific to the functions and which stand out in their importance for the development of operations safely and efficiently, being the obligation of employees to be attentive to their compliance.
- Below, some of them will be highlighted, but we remind you that being in compliance is not limited to fulfilling these obligations, but implies acting in accordance with and in favor of the values and best interests of the company at all times.

COMPANY COMMITMENTS:

Remuneration

Every worker has the right to a remuneration respecting the minimum wage of the current labor law that is sufficient to meet the basic needs of the worker and provide income for himself and his family. Fazendas Dutra must pay at least the minimum wage or the appropriate prevailing wage, whichever is greater, comply with all legal wage requirements, and provide any fringe benefits required by law or contract.

Work hours

Fazendas Dutra must not require workers to work more than the regular and overtime hours allowed by the Brazilian current law. The regular work week must not exceed 44 hours. Fazendas Dutra must allow workers at least 24 consecutive hours of rest in every seven-day period. All overtime must be consensual. Fazendas Dutra must not request overtime on a regular basis and must compensate all overtime with a premium rate. Except in exceptional circumstances, the sum of regular and overtime hours in a week must not exceed 56 hours.

COMPANY COMMITMENTS:

Harassment or Abuse

We support diversity and respect the personal dignity of our co-workers. Fazendas Dutra respects the personal dignity, privacy and personal rights of all its employees and is committed to maintaining a work environment free of discrimination and harassment. In this sense, employees must not discriminate based on origin, nationality, religion, race, sex, age or sexual orientation, or carry out any type of verbal or physical harassment based on any of the above reasons or any other.

Employees who feel that their work environment is not in line with the aforementioned principles are encouraged to report their concerns and impressions to the Human Resources division.

Every employee must be treated with dignity and respect. No employee shall be subjected to physical, sexual, psychological or verbal harassment or abuse. Fazendas Dutra will not use or tolerate any form of harassment, abuse or corporal punishment.

- **Moral Harassment:** Moral harassment is an extreme process of hostility in the work environment. It is identified by the occurrence of embarrassing and serious situations and by their continuity over time. Because it is a situation of extreme psychological violence, it is usually accompanied by intense experience of humiliation and embarrassment that affect the dignity of the person. Occasional conflicts, even if they are harsh, cannot be considered moral harassment, but must also be reported and followed up. Moral harassment is characterized by persecution (action) or isolation (omission), by insistent, offensive and rude behavior, evident or subtle, expressed in words, gestures, written messages or by managerial and organizational procedures. It can be practiced either by the hierarchical superior or by co-workers, regardless of the hierarchy.
- **Religious Harassment:** Religious harassment is a type of moral harassment that occurs when, in the work environment, there is embarrassment caused by the imposition of religious belief in a repeated and prolonged manner. This type of harassment violates the freedom of belief provided for in the Brazilian Constitution.
- **Sexual Harassment:** Situations of sexual harassment occur through acts, insinuations, forced physical contact and impertinent invitations with the aim of obtaining sexual advantage or favors, the agent taking advantage of his/her status as a hierarchical superior or ancestry inherent to the exercise of the job, position or function. In order for the practice of sexual harassment to be identified, there is no need for physical contact between those involved. Even if the situation does not legally constitute the hypothesis of sexual harassment, inappropriate conduct can characterize serious disrespect, illegal embarrassment and even more serious crimes. Therefore, the relationship must be respectful in any type of professional relationship, whether with customers, suppliers, employees, managers, directors, among others, regardless of the hierarchical relationship.
- **Abuse of Power:** It is configured by the use of power illegally, coercively or in disagreement with its purposes. In other words, he abuses power who uses his rights unlimitedly, to the detriment of others. Abuse of power can occur in situations resulting from subordination affecting the employment relationship, as well as externally, in relationships with stakeholders, suppliers, partners, among others.

COMPANY COMMITMENTS:

Human Rights

We respect, protect and promote human rights in our activities and relationships, seeking to raise everyone's awareness on the subject. Our mission is to improve people's quality of life and, by commitment, offer decent working conditions in safe, healthy, respectful and inclusive environments. We work for growing sustainable coffee to develop in an integrated, innovative and sustainable way, which implies promoting the dignity of the human person, in order to reject any type of discrimination; child labor; labor analogous to slavery; sexual abuse and exploitation of children and adolescents; among other situations of exclusion and vulnerability.

Internal and External Complaints Procedures

Fazendas Dutra sees complaints from employees, collaborators and third parties (complaints from outside the organization) as an opportunity to learn and improve for the future, as well as a chance to make things right for the person or organization that made the complaint. Our policy is:

- provide a fair internal and external complaints procedure that is clear and easy to use for anyone wishing to make a complaint;
- publicize the existence of our internal and external complaints procedure so that people know how to contact us to make a complaint;
- ensure that everyone in the institution knows what to do if an internal or external complaint is received;
- ensure that all internal and external complaints are investigated in a fair and timely manner;
- ensure that internal and external complaints are, where possible, resolved and that relationships are repaired; It is to collect information that helps us improve what we do.

Internal and External Complaints Procedures

Definition of Complaint: An internal and external complaint is any manifestation of dissatisfaction, justified or not, about any aspect of the company.

Internal and external complaints can come from employees, collaborators, customers, suppliers and other people we contact about our work, or anyone else in contact with our company.

An internal and external complaint can be received orally, by phone, by email or in writing.

- **Confidentiality:** All complaint information will be handled sensitively, only informing those who need to know and following all relevant data protection requirements.
- **Responsibility:** Overall responsibility for this policy and its implementation lies with the Board of Directors of Fazendas Dutra.
- **Review:** This policy is reviewed regularly and updated as needed.

Final considerations

The standards and policies contained in this code of conduct apply to the partners, collaborators and partners of Fazendas Dutra in any specific country. All partners, collaborators and partners have an ongoing obligation to familiarize themselves with the applicable laws related to the responsibilities of their position and with all Fazendas Dutra policies. Violation of these standards, Fazendas Dutra policies or the law may result in disciplinary action, including removal from office and/or dismissal.

Fazendas Dutra
Code of Conduct – January 2023