

Ethic and Conduct Code

CREATION: February 18, 2021.

1. SCOPE

Agromentoria has the commitment and corporate responsibility and as main scope to build confidence with all employees and partners, customers, government entities, and the community. This commitment is expressed primarily by our Ethic and Conduct Code, which is thought, structured and repeatedly revised around the standards that reflect our culture, mission and values, with the aim of perpetuating a culture of integrity, sustainability, honesty, transparency and policies of good conduct.

2. MISSION

- To create the connection of our customers' interests with the management of business strategies for the acquisition of farms, sale of assets, judicial and administrative auctions, investments, fundraising, management and settlement of rural credit liabilities, through experienced counseling in the agribusiness area so that the best business strategy is found and successfully carried out, always focusing on cost reduction, increased profits, and solution in the shortest time with the use of online technologies and in-person or remote service.

3. VISION

- To be a reference in the agribusiness advisory area, able to define the best negotiation strategy in accordance with the productive capacity, payment, and desired time in the solution of our customer's demand.

4. VALUES

(I) Stimulating and valuing agribusiness as the main source of support for the world population;

(II) Professional ethics with the ability to fully manage the responsibilities of the commitments made;

(III) Valuing the customer with respect and attention to their specificities;

(IV) Collaborative environment with the ability to accept great challenges and lead them to the end;

(V) Constant research and innovation in the agribusiness area.

5. TOP MANAGEMENT COMMITMENT

This program is designed and structured by the Board of Directors in conjunction with the Compliance Committee, which is fully committed to the

effective implementation and effectiveness of the standards of conduct devised here.

Ethic and Conduct Code

This Ethic and Conduct Code includes the main ethical and moral guidelines that should lead the internal, business and governmental relations of the company. It is applicable to all employees, including partner companies, suppliers, and outsourced service contractors.

6. COMMITMENT AND PROFESSIONALISM

Among the company's values, the search for excellence with ethic and transparency, is a pillar of historical support and the growth of Agromentoria, for this reason, the board of directors and employees are committed to this code and compliance with the laws, valuing its applicability and efficiency.

7. DECISION-MAKING

Any decision to be taken internally, business-wise, or in any way related to the corporate structure, must be taken observing the following guidelines:

- Is this a decision contrary to the law? It shouldn't be taken.
- Is this a decision contrary to this Code of Ethics? It shouldn't be taken.

If in doubt about any of the above questions, or if there is a conflict of interest, the direct Compliance supervisor must be consulted.

8. CONFLICT OF INTEREST

Conflict of interest occurs whenever there is some benefit to oneself that confronts the company's ethics or interests. For the purpose of avoiding such situations, it should be avoided:

- Receiving advantages and gifts;
- Buying company shares based on inside information;
- Purchasing products or services under privileged conditions from the company's suppliers;
- Acquiring shares from suppliers;

when in doubt about any situation above, the direct compliance supervisor must be consulted.

9. INTERNAL RELATIONSHIP AND MUTUAL RESPECT

- We must ensure the establishment of a dignified and healthy working environment, guiding relations by respect and cordiality, regardless of the position exercised in the organization.
- We respect the diversity of the people who form the work environment and have a relationship with Agromentoria.
- We encourage the culture of respect and repudiate violence. - We must guide our relationships by respecting differences, whether they are

physical, racial, cultural, religious, sexual orientation, social, regional linguistic, age, ideas, origin, capacity, appearance, class, marital status or gender identity. It is not admissible under any circumstances:

- Conduct that causes any intimate or public embarrassment;
- Conduct that disrespects any labor norm or regulation;
- Conduct that puts any employee at risk;

10. EXTERNAL RELATIONSHIP - CUSTOMERS

All work built and developed by the company is based on customer satisfaction and inspiration. To this end, any and all customer relationships should observe:

- Transparency in the relationship, granting with priority and clarity all and any information of the customer's interest which is not protected by industrial secrecy;
- Prioritizing customer satisfaction without infringing on any ethical norms or company culture;
- Respect consumer protection regulations, in particular by acting honestly in advertising and sales;
- Special attention shall be given to the channels offered by Agromentoria to its partners, customers and suppliers, as well as the broad access and clarification of assistance or questions about the service provided. -Observance of the provisions of the Law n° 13.709/18 (The Brazilian General Data Protection Act - which acronym in Portuguese is LGPD) and Law n° 12.965/14 (Brazilian Internet Civil Rights Framework);
- Ensure the customer's safety in all its spheres.

when in doubt about any situation above, the direct compliance supervisor must be consulted.

11. EXTERNAL RELATIONSHIP - PUBLIC CUSTOMERS

Based on the Anti Corruption Law, Bidding Law, Law of Administrative Improbability, among other correlated norms, in the relationship with public entities, the company will observe the following guidelines:

- Proposals and contracts will be conducted strictly as provided in the Public Bidding and Contracting Law;
- No additional advantages, proposals or contacts will be tolerated, other than those strictly regulated.

12. CONFIDENTIALITY AND INDUSTRIAL SECRECY

Any and all internal information is protected by industrial secrecy, and cannot under any circumstances be disclosed, shared or reported externally

without the company's express consent. This confidentiality also reaches information related to employees.

13. COMPANY IMAGE AND CULTURE

Every collaborator carries the company's image, and conduct that violates ethics, morals, and the current laws, both inside and outside the work environment, is not tolerated.

14. SUPPORT CHANNELS

Whenever there is any doubt regarding the compliance or non-compliance with this code of conduct, every collaborator will have access to the Support Channel, accessible through the following address: contato@agromentoria.com.br.

15. REPORTING CHANNELS CANAIS DE DENÚNCIA

Whenever there is any conduct that infringes or puts at risk the observance of this Code of Ethics, every collaborator will have access to the Reporting Channel, accessible through the following address: denuncia@agromentoria.com.br.

16. REPORTING PRIVACY PRIVACIDADE

Every complaint, support, questioning, or communication will be kept in complete confidentiality, which shall be handled and concluded only between the Compliance Committee and those involved.

17. TREATMENT OF NON-COMPLIANCE DOS TRATAMENTOS ÀS NÃO CONFORMIDADES

Once a non-compliance is identified, whether through the Reporting Channel, auditing, or any other means, immediate treatment with the adoption of coercive measures must be given and repaired within a maximum of 7 working days of registration.

18. SANCTIONS AND PROCESSES OF ADEQUACY

Any collaborator who acts or is involved in unethical conduct will be subject to the following measures:

- Advice and suitability process, in the case of non-serious conduct, considered those that do not confer risk to the customer and do not represent any ethical or legal infraction;
- Dismissal for due cause, without prejudice to the applicable civil and criminal actions in cases of conduct contrary to this Ethic Code or the law.

19. GENERAL TERMS AND CONDITIONS

This Code does not exhaust all possible ethical issues related to business activity, and does not restrict possible coercive measures to any conduct that offends common sense, ethics and morals.

This Ethic and Conduct Code is effective as of its disclosure, with no predetermined expiration date.