

Machado  
Meyer

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# CODE OF CONDUCT



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# TITO ANDRADE

CEO

**“**The success of a law firm relies not only on the individual talent of its professionals, but on the culture that unites and drives them. The legal market is more dynamic than ever. Clients expect not only technical excellence, but also a genuine connection with their challenges.

To continue growing, we need something that goes beyond the "Machado Meyer" name and our reputation: we need a strong culture that aligns us, empowers us, and prepares us for the future.

This Code of Conduct transforms our values into concrete actions, shaping and guiding the behavior expected of all Machado Meyer professionals and staff, as well as our suppliers. It underscores the importance of ethical conduct at every stage of service delivery, in our interactions with public authorities, and with society as a whole.

Alongside the firm's institutional policies, the Code of Conduct guides the decisions, attitudes, and behavior of all employees, regardless of their role or seniority—something that must be evident to our clients.

Upholding our values and rules, and seeking guidance whenever in doubt, is the responsibility shared by all of us. Only by doing so can we continue to strengthen and uphold the standard of excellence and ethics that has brought us this far. **“**

# INTRODUCTION



This Code, as well as its principles and all applicable laws, is mandatory for all our staff members, whether they are partners, lawyers, trainees, administrative staff, or young apprentices ("Members"). It should serve as a basis for our relationship with clients, suppliers, public authorities, and society in general ("Third Parties").

In the practice of law, the client's trust and the firm's credibility are key assets. For this reason, it is essential to formalize in this Code the main guidelines that guide our actions, always based on ethics and strict compliance with the law.

Its objectives include:

- Formalizing and institutionalizing the rules of ethics and professional conduct, guiding the provision of services and the relationship of Members with their various publics, both internal and external.
- Guiding the actions and decisions of Members and our suppliers, reducing the risks of subjective interpretations of moral and ethical issues.
- Promoting alignment of Members with the values of Machado Meyer, which values ethical and collaborative behavior in the workplace.
- Establishing consequences for non-compliance with

the rules set out herein, which may include disciplinary sanctions, termination of contract for cause or removal from the firm, without prejudice to other legal measures. The same applies to suppliers who do not comply with the conduct set out herein or do not agree with the guidelines of this Code. In this case, they will be subject to evaluation for subsequent termination or non-hiring.

- Reinforce application of the Code of Ethics and Discipline of the Brazilian Bar Association (OAB), which must be fully known to and followed by all members of the legal profession.

In the event of a conflict between this Code and the OAB Code, the most restrictive rule or the one that best reflects the values of the legal profession and our firm shall control.

## OUR VALUES



### PEOPLE

We challenge people to go further.



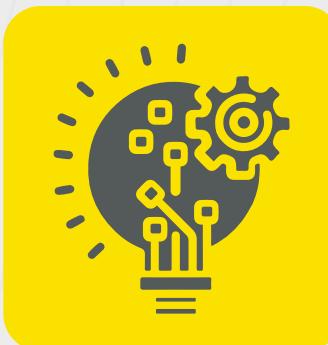
### CLIENT

We work to do the best for our clients.



### ETHICS

We do what's right.



### INNOVATION

We *innovate to make a difference*.



### PRIDE

We care for Machado Meyer on a daily basis.



## PEOPLE

**WE CHALLENGE PEOPLE TO GO FURTHER**

We are driven by the challenge of making a difference for our clients and developing legal intelligence to deliver complete, consistent, and often pioneering solutions.

To this end, we value entrepreneurial, hands-on people who invest in continuous learning and are always ready to take on commitments with responsibility.

We lead by example and practice meritocracy, recognizing different behaviors within a stimulating, diverse, collaborative, open, and creative environment, in a culture of feedback and effective performance evaluations.



## CLIENT

**WE DO WHAT IS BEST FOR OUR CLIENTS**

We are committed to our clients, building partnerships and long-term relationships. We get to know our clients and build innovative solutions with them that have a positive impact on their business.

We act with flexibility, excellence, and responsibility to assure outstanding results.

Sabemos que as questões do cliente são desafiadoras e relevantes e por isso trabalhamos em equipe, de forma multidisciplinar para fazer a diferença.



## ETHICS

**WE DO WHAT'S RIGHT**

We act with integrity, respect, transparency, in compliance with the law, our Code of Conduct, and internal values.



## INNOVATION

**WE INNOVATE TO MAKE A DIFFERENCE**

We believe in innovation to ensure the continuity of our success story. We use our talent, curiosity, and knowledge to ensure the excellence of our processes and services, without forgetting that a combination of specialties generates more creative and effective solutions for us and our clients.

We are uncompromising and committed to staying ahead of the curve, seeking innovative solutions - resources and technology - for our clients, our firm, and the legal market.



## PRIDE

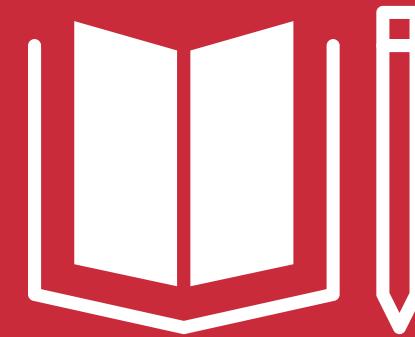
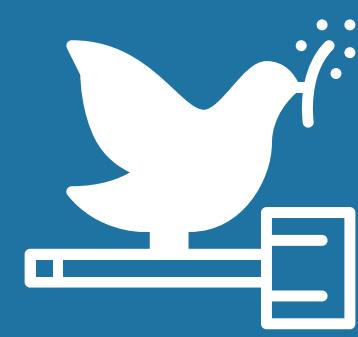
**WE CARE FOR MACHADO MEYER ON A DAILY BASIS**

We care for our firm, our brand, and our business.

We value actions that inspire our employees and build client loyalty. We seek results that contribute to the constant growth of Machado Meyer and to the career and development of its staff members

We have built a united, competent team that reflects the strength of our brand and the values of our culture.



**SDG 5 - GENDER EQUALITY****SDG 4 - QUALITY EDUCATION****SDG 10 - REDUCED INEQUALITIES****SDG 16 - PEACE, JUSTICE, AND STRONG INSTITUTIONS**

## **UNITED NATIONS GLOBAL COMPACT AND BRAZIL PACT FOR BUSINESS INTEGRITY**

Machado Meyer is a signatory to the United Nations Global Compact and the Brazil Network for Business Integrity, reinforcing its commitment to responsible and sustainable business practices.

This action is based on respect for and promotion of universal principles of human rights, strict compliance with labor standards, preservation of the environment, and the fight against corruption.

## OUR RELATIONSHIP WITH CLIENTS

Members' relationships with clients must be guided by professional ethics and integrity, observing, among other issues, the rules on conflicts of interest, exclusivity in the provision of services, preparation of fee proposals, service agreements, and granting of discounts.

Members must ensure the confidentiality of the data and information provided by clients, while also respecting the other restrictions set out in this Code.

In addition, the provision of legal services to clients or potential clients must take place exclusively through the firm.



## FAIR DEALING

At Machado Meyer, we conduct our negotiations ethically, honestly, and fairly. We rigorously fulfill our contractual obligations and are dedicated to ensuring that our services always meet the highest quality standards.

Fair dealing also means maintaining an irreproachable attitude in our dealings with suppliers, competitors, and government representatives.

Members and Third Parties acting on behalf of, in the interest of, or for the benefit of Machado Meyer or its clients are prohibited from sharing with partners or competitors any information that may represent a potential violation of this Code, internal rules, or applicable laws and regulations.





## OUR RELATIONSHIP WITH THE GOVERNMENT AND ITS OFFICIALS

We interact with public officials in an ethical, transparent, and legal manner.

### WHO ARE PUBLIC OFFICIALS?

Qualquer pessoa que exerce, ainda que de forma transitória, mandato, cargo, emprego Any person who holds, even temporarily, an office, position, job, or function, directly or indirectly linked to public administration bodies, whether national or foreign. This includes all branches of government, as well as state-owned companies and government-controlled companies, such as judges, prosecutors, bailiffs, mayors, city councilors, firefighters, police officers, tax auditors, and employees of state-owned companies and regulatory agencies, among others.

For the purposes of this Code, public officials are also those who represent their interests or act on their behalf, including family members and persons with close ties.

The firm keeps a permanent record of its Members' family relations with public officials. If a member of Machado Meyer or one of their family members holds a public office, this information must be communicated by e-mail to the People and Culture Department, ensuring that the data is always up to date.

### OUR CONDUCT

Relations with the Public Administration and its officials must be guided by transparency, ethics, and legality, in order to preserve the firm's reputation and values.

Thus, whether acting on behalf of Machado Meyer, representing a client or even under its guidance, it is unacceptable and expressly forbidden to promise, offer, or grant any type of advantage that is, or may appear to be, undue to national or foreign public officials, as provided for in our Anti-Corruption Policy.

We must take extra care in our interactions with the government, ensuring that our conduct is and appears to be fully legal, ethical, and in line with the principles of the firm. Relations with public officials must always be formal and documented, in order to avoid misinterpretations or suspicions of improper conduct.

Members are forbidden from discussing issues related to party or governmental politics on behalf of the firm under any circumstances. It is also forbidden to use Machado Meyer's name to deal with personal matters with government entities, regardless of their nature. Furthermore, political donations or contributions are not allowed.



# GIFTS, PROMOTIONAL ITEMS, ENTERTAINMENT, AND HOSPITALITY

Our actions follow ethical principles.

## GIFTS

These are valuable items with a non-institutional purpose, relevant commercial value, and targeted distribution, such as baskets of products, boxes of chocolate, and wines, among others.

## PROMOTIONAL ITEMS

Their purpose is to promote the brand and they usually contain the company logo. They are of low value and distributed widely as a courtesy, such as planners, calendars, and notebooks.

## ENTERTAINMENT ITEMS

They are related to participation in events in general, such as parties, invitations to concerts or sports competitions, and high value meals, among others.

## HOSPITALITY

This refers to the cost of accommodation, transportation, meals, and other travel-related expenses that are not directly linked to the client's case activity.

## OUR CONDUCT

The value limits for receiving or offering gifts, presents, entertainment items, or hospitality by the firm or its Members in interactions with private agents are defined in the Anti-Corruption Policy in force.

It is expressly forbidden to offer or accept such items in any circumstances involving public officials, even when acting on behalf of clients.

Any exception to these guidelines must be approved in writing in advance by the firm's Standardization, Risks, and Compliance Committee (CPRC).

Furthermore, it is strictly forbidden for Members, Suppliers, or Third Parties involved in the firm's activities to make facilitation payments - i.e. payments to public or private officials with the aim of obtaining personal benefits, speeding up routine procedures, or favoring the review and granting of licenses, registrations, records, among other acts.

## RELATIONSHIP WITH THIRD PARTIES

We select our business partners based on ethical criteria and after effective due diligence into their credentials.

### ⌚ WHAT IS REQUIRED OF THE THIRD PARTIES WE HIRE?

Our commitment to our ethical values goes beyond the conduct of our Members.

It is mandatory that all our partners, i.e. any individual or legal entity acting on behalf of or for the benefit of the firm, even if not directly hired, are aware that misconduct will not be tolerated.

Suppliers, business partners, correspondents, brokers, experts, translators, and any third parties they hire must be aware of and comply with the guidelines and ethical principles set out in this Code of Conduct.

### ❓ WHAT CONDUCT SHOULD WE OBSERVE IN ORDER TO HIRE THIRD PARTIES?

Our business partners must maintain the same standard of ethical conduct and commitment to quality that we adopt in the firm. All contracts must fully comply with our Code of Conduct and internal policies, and must be preceded by due diligence into the partner's credentials, as well as be subject to continuous monitoring regarding compliance, fulfillment of contractual obligations, and the quality of the services provided.

The contracts entered into by the firm must contain provisions that ensure the secrecy and confidentiality of the information shared, respect for human rights, and commitment of suppliers to

strict compliance with Brazilian anti-corruption law, including prohibition of practices aimed at speeding up the performance of routine administrative acts

or unduly influence the obtaining of licenses, registrations, records, and other authorizations.

## BOOKS, RECORDS, AND CONTROLS

We ensure transparency, ethics, and integrity in the maintenance of our books, accounting records, and controls, always in accordance with applicable law.

We expect the same commitment from our suppliers, who must ensure the veracity of all transactions, without omission or manipulation of information.

All records must be legible, transparent, and accurately reflect the transactions and payments made.



# RELATIONSHIP WITH THE MEDIA

## Publications, conferences, and seminars.

- The firm's Marketing, Communications, and Business Development department is responsible for media relations. Therefore, any contact between Members and press outlets must have the participation or prior approval of this department.
- No information about the firm, its clients, or transactions may be disclosed without the authorization of the partner in charge.
- It is the duty of the Members to inform the Marketing, Communications, and Business Development department if they identify information that is incorrect or untruthful published in media reports about the firm or its operations.
- Members may participate in lectures, conferences, and seminars, as well as collaborate with publications related to the firm's areas of practice, provided they identify themselves as its representatives. The content resulting from this participation must first be submitted to the partner responsible for approval.
- When participation in events is exclusively due to academic activities, the Member must expressly state that the opinions presented reflect his personal and academic point of view and do not represent the institutional position of the firm.
- It is forbidden to mention client names or transactions not disclosed to the market in lectures, conferences, seminars, or publications.
- Members should be aware that, in many cases, their image may be associated with that of the firm. It is therefore advisable to avoid personal exposure on social networks that could be linked to your professional activities or institutional image.
- Under no circumstances should Members' use of social networks compromise the image or reputation of other Members, the firm, or its clients.
- As stated in our Good Practice Guide for Social Media, it is essential to remember that everything that is posted or shared on social media can have positive or negative consequences that go beyond the personal sphere, also affecting the professional environment and the image of the firm.
- Inappropriate behavior and content, even outside the workplace, can compromise the trust, the organizational climate, and the reputation of Machado Meyer. So always act with awareness, responsibility, ethics, and common sense.



# PREVENTION OF CONFLICTS OF INTEREST

We act transparently for the benefit of our clients and our people.

## **WHAT ARE CONFLICTS OF INTERESTS?**

A Conflict of Interest occurs when Members find themselves in a situation where their personal interests may overlap or misalign with the interests of the firm, compromising or influencing in a real or apparent way their judgment and decision-making.

Conflicts of interest also include representing the interests of one client in conflict with those of another client, of former clients, or previous professional relationships.

It is not necessary for there to be financial compensation or receipt of undue benefits for the conflict to be established. The mere fact that an action could be interpreted as favoring personal interests to the detriment of the interests of the firm or its clients is itself enough.

The Conflict of Interest can be:

- I. Real: when the conflict actually exists;
- II. Potential or apparent: when, even without actual damage to the firm or its clients, the situation may be perceived by third parties as conflicting.

## **WHAT IS OUR CONDUCT?**

Transparency and communication are key to preventing Conflicts of Interest in the firm.

According to the internal policy, any situation that may constitute or be interpreted as a Conflict of Interest must be reported immediately, upon knowledge or suspicion, to the partner and manager responsible for the work, as well as to the Internal Compliance team.

This communication should be formalized by email, describing the situation and those involved. The Standardization, Risks, and Compliance Committee and the Executive Board will be involved whenever necessary.

If you are in any doubt as to whether a situation constitutes a conflict, please contact **Internal Compliance**.



## INFORMATION SECURITY AND THE OBLIGATION OF SECRECY AND CONFIDENTIALITY

Professional secrecy is inherent in the firm's activities. All Members must respect the confidentiality of information received internally, whether it relates to client work, third parties, or the firm's own internal affairs.

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### WHAT IS CONFIDENTIAL?

All information obtained by any Member in the course of their activities must be treated as confidential and handled with the utmost care. This information should only be shared with authorized persons, in accordance with the guidelines of the Information Security Policy and other internal rules of the firm.

The Information Security department is responsible for guaranteeing confidentiality from a technical point of view. However, it is everyone's responsibility to ensure the confidentiality of information on a daily basis. It is the duty of each Member to adequately protect any information related to the firm, regardless of the topic.

Internal or client information should not be discussed in informal conversations or mentioned in public places where it can be overheard by third parties, such as taxis, elevators, restaurants, etc. Pay attention to the guidelines of the Information Classification Standard.

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### TRADING OF SECURITIES

Information obtained by Members in the performance of their duties may not be used for their own benefit or for the benefit of Third Parties. Much of the information we access on a daily basis has the potential to impact on the securities market.

It is therefore essential that all Members observe the guidelines and restrictions set out in the firm's Securities Policy before making any investment in shares or other assets.

# PRIVACY

## WHAT IS PERSONAL DATA?

Any information relating to an individual, directly or indirectly, identified or identifiable, must be considered confidential.

Protecting personal data is an essential part of the conduct expected of all our Members and Third Parties.

With this commitment, Machado Meyer has implemented a Privacy Program whose objective is to preserve the fundamental rights of freedom and privacy of data subjects, in addition to reinforcing the trust of clients,

partners, staff members, service providers, and suppliers in the processing of their personal information.

This program has a governance structure aligned with the principles of the General Personal Data Protection Law (LGPD) and is made up of management and monitoring mechanisms that are appropriate to the relevance of personal data in the firm's activities.

The Program has a governance structure connected to the principles and fundamentals of the General Personal Data Protection Law and is composed of a set of management and monitoring mechanisms appropriate to the role of personal data within our professional activity.

It is the duty of all Members to:

- I. Follow the guidelines of the Privacy Program and applicable laws and regulations in all operations involving the processing of personal data, whether in physical or digital form.
- II. Immediately report to the Data Protection Officer (DPO) any incident involving the destruction, loss, alteration, disclosure, or unauthorized access to personal data processed by the firm. Contact should be made using the e-mail:

**dpo@machadomeyer.com.br**.

Machado Meyer's Privacy Policy, which must be complied with by all Members and Third Parties, contains all the necessary guidelines on the processing of personal data in the context of our professional activities.



# ESG AGENDA

## ENVIRONMENTAL, SOCIAL, AND GOVERNANCE

- Machado Meyer is committed to adopting positive social impact initiatives that inspire its Members, clients, third parties, and the community in which it operates. In addition, its actions are guided by high ethical standards, strict compliance with applicable laws and regulations, and the obligations it undertakes with its stakeholders.
- The firm's ESG Policy was created to formalize this commitment and consolidate the practices already adopted within the ESG (Environmental, Social, and Governance) agenda, establishing clear guidelines for all stakeholders.
- As a law firm, Machado Meyer does not generate significant direct environmental impacts. For this reason, its environmental actions focus on raising awareness and changing the behavior of Members, clients, and suppliers, promoting sustainable practices in everyday life.
- Social action is part of the DNA of the firm, which has a Corporate Social Responsibility department dedicated to acting on the pillars that make up the social dimension, in its various cross-cutting issues.
- The social dimension is also connected to valuing the diversity of Members in the workplace, with efforts dedicated to the rise of women to senior leadership, to the inclusion and development of black and brown people, LGBTQIA+ people, and people with disabilities at Machado Meyer, as well as to fulfilling the social function of the legal profession, guaranteeing access to justice by providing pro bono services to non-profit organizations.
- We have a department dedicated to managing internal compliance, in addition to the commitment of all Members to internalizing the premises related to corporate governance. This commitment is reinforced by continuous investment and engagement actions led by top management (tone at the top).
- The ESG Committee, together with the relevant committees Social Responsibility and Pro Bono Committee, Diversity and Inclusion Committee, and Standardization, Risks and Compliance Committee, is responsible for promoting and continuously monitoring actions related to the ESG agenda, as well as reporting progress and results to the Executive Board.



## HEALTH, WELL-BEING, AND SAFETY

Machado Meyer is committed to safeguarding the health, well-being, and safety of its Members. To this end, the firm maintains a comprehensive health management program structured around three core dimensions: physical, emotional, and social well-being. A range of initiatives is offered based on the specific needs of each Member, supported by specialized professionals on site who conduct assessments and provide guidance on the most appropriate programs in each case.

In addition, Machado Meyer maintains a zero-tolerance policy for any form of harassment (moral or sexual) and for physical, psychological, or verbal violence, whether in the workplace or in any professional interaction. All Members are expected to act with respect, integrity, and empathy, fostering a collaborative, respectful, and inclusive environment. To reinforce this commitment, the firm conducts regular training sessions, provides guidance materials on these topics, and operates an internal reporting channel, TEMM VOZ. Further information regarding this channel is available in the TEMM VOZ Guide.

With respect to the physical safety of our Members and the protection of the firm's assets, we implement security measures that include the monitoring and control of the movement of people, materials, documents, and vehicles. We also maintain specific policies and procedures governing the management of our physical assets and information technology resources.

The firm further works with specialized external partners to support the development and implementation of programs and initiatives such as vaccination campaigns, leadership training, and other actions aimed at promoting health, safety, and well-being in the workplace.



## DOCUMENT MANAGEMENT

The firm is concerned with providing clear guidelines to ensure the protection and preservation of physical and digital documents produced and received in the course of its activities.

To this end, it is essential that all Members, as well as Third Parties who may handle or access firm documents, follow the guidelines set out in our Document Management Policy.

All documents must be preserved in their entirety, without dispersal, defacing, transfer, unauthorized destruction, or undue addition. The quality and organization of our document collection is essential to ensure that Members have quick and efficient access to the information they need to perform their duties.



## **CORPORATE RISK MANAGEMENT AND BUSINESS CONTINUITY**

We have established a structured internal process for the effective and efficient management of the risks to which we are exposed, covering the stages of identification, assessment, treatment, and monitoring.

We have a Business Continuity Plan and a Crisis Management Plan to ensure that the firm maintains an adequate level of operation and provision of service, even in situations where human, material, or technological resources are unavailable.

These plans also aim to minimize the financial, operational, reputational, and legal impacts of unforeseen events.

By implementing these measures, we aim to assure re-establishment of the most critical processes within appropriate timeframes, minimizing the negative effects on our services and ensuring the continuity of operations.

## MANDATORY TRAINING

Every year, the firm's Compliance Program, in conjunction with the Standardization, Risks, and Compliance Committee, defines the mandatory training schedule applicable to all Members. These trainings cover topics related to organizational culture, internal rules, labor legislation, integrity, and data protection, among other subjects applicable to our activity.

In addition to the annual training campaign, the firm has a well-structured Integration Program, which guides new Members from the start of their journey, presenting Machado Meyer's main rules, guidelines, and values.

Both the training program and the Integration Program are monitored by the Internal Compliance Department, which keeps track of the adherence to and effectiveness of the actions.



## WHAT IS TEMM VOZ?

TEMm VOZ (Transparency and Ethics at Machado Meyer) is the firm's official whistleblowing channel. The tool can be accessed by different means and is managed confidentially by the Ethics Committee, with the support of a partner company that is specialized and independent.



## WHO CAN USE IT?

The channel is available to all our audiences: Members, clients, service providers, suppliers, and other third-party business partners.



## HOW TO USE IT?

- A report can be submitted by:
- Telephone: 0800 591 0153
- E-mail: [comitedetica@machadomeyer.com.br](mailto:comitedetica@machadomeyer.com.br)
- Website: <https://canalconfidencial.com.br/temmvoz/>
- In person, with the members of the Ethics Committee

Whistleblowers can choose to identify themselves or remain anonymous, depending on their preference. In any case, we assure the confidentiality of information and protection against retaliation.

When filing a complaint, it is important to describe clearly the facts that require investigation, detailing the situation in an objective and explanatory manner. Whenever possible, include elements that contribute to understanding and identifying the case.

To find out more about how the channel works, what can and can't be reported, and what topics are outside the scope of TEMM VOZ, see our guide with complete information on the subject.

# APPLICATION OF OUR VALUES IN OUR DAILY ROUTINE

## WE REFLECT ON OUR ACTIONS

Continuous reflection is one of the main tools to ensure that our actions are in line with the rules that govern society, our Code of Conduct, and the values that guide Machado Meyer.

Constantly questioning the legality and ethics of our actions is essential to ensuring the integrity of our decisions. Whenever we are acting on behalf of the firm, it is worth reflecting on the questions below:

- Is the action I intend to take legal? Would I be considered ethical by my colleagues and society in general? Is it in line with the firm's values and our professional standards?
- Would an outsider observing this action have the same perception of its legality or ethical character? Would I be able to justify it with peace of mind if I had to answer to third parties?
- Does this decision make me feel good? Will I still be comfortable if family, friends, or work colleagues find out about it?
- Is this action properly documented? If it isn't, would there be any problem recording it formally?
- If this action were publicized, would it strengthen my reputation and the image of the firm and its clients?

A response in the **negative** to any of these questions is an indication that the action you intend to take may not be in line with the firm's values and the rules and principles set out in this Code.



## DISCIPLINARY MEASURES AND QUESTIONS ABOUT THE CODE OF CONDUCT

Violation of this Code, as well as other Machado Meyer policies, rules, and procedures or any applicable law or regulation may subject the Member to sanctions, applied exclusively by the Ethics Committee. Penalties may include:

- Verbal or written warning;
- Temporary leave of absence for a period defined by the Ethics Committee, limited to 30 days;
- Termination of employment or removal from the company.

Any sanction will be applied on the basis of the principles of proportionality and gradualness. Any decision not to apply one of the above sanctions does not prevent the firm from adopting the appropriate legal measures, including those aimed at repairing damages and/or reporting to the competent authorities.

**Questions regarding the Code of Conduct should be directed to the e-mail [complianceinterno@machadomeyer.com.br](mailto:complianceinterno@machadomeyer.com.br)**



QUESTIONS? GET  
IN CONTACT WITH

[COMPLIANCEINTERNO@MACHADOMEYER.COM.BR.](mailto:COMPLIANCEINTERNO@MACHADOMEYER.COM.BR.)

**PORTAL INTELIGÊNCIA JURÍDICA**

Nossa visão para as questões que impactam seus negócios

Acesse nosso conteúdo: [www.machadomeyer.com.br/inteligenciajuridica](http://www.machadomeyer.com.br/inteligenciajuridica)

MACHADO MEYER ADVOGADOS

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