



CODE OF ETHICS AND CONDUCT

OAKBERRY Group

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MESSAGE FROM THE CEO

This Code reflects the fundamental values of the OAKBERRY Group, outlining the essential policies and behaviors expected to guide our actions and help us achieve our commitments and goals.

We believe that by adhering to the rules and principles contained in this Code, we can more easily and swiftly accomplish our primary mission, which is to offer sustainable *superfood* products that meet the quality expected by our customers, promote a healthy lifestyle, prioritize environmental protection—especially the Amazon rainforest—and engage in the legal and fair trade of açaí, focusing on product quality, customer and employee satisfaction, and the protection and development of traditional peoples and local communities that produce açaí.

To cultivate this ethic in our daily lives, it is crucial that each OAK Stakeholder embraces this Code as their guide and commitment to adopting impeccable and irreproachable actions, measures, and conduct.

Learning from experiences, staying informed, and seeking guidance when necessary are essential steps to preserving a strong ethical culture.

I thank all OAK Stakeholders for their commitment to our values, principles, and goals: remain vigilant, act with integrity, and, upon identifying deviations, correct them to ensure a sustainable and successful future for the OAKBERRY Group, society, and the environment.

Sincerely,

Georgios Puccetti Frangulis
OAKBERRY Group CEO

INTRODUCTION

The OAKBERRY Group values ethics, integrity, and transparency in all its relations with "OAK Stakeholders" (OAK Representatives, OAK Franchisees, Public Sector Stakeholders, and Private Sector Stakeholders).

OAK Stakeholders must adhere to internal and external regulations, as well as our principles and standards of conduct. The Code of Ethics and Conduct ("CEC") is regularly updated to educate and guide the actions and behaviors expected of OAK Stakeholders.

We also expect OAK Stakeholders to report any improper practices through the channels described in this CEC so that we can take all necessary measures to correct them and prevent their recurrence in the future.





OBJECTIVES

This Code of Ethics and Conduct (CEC) aims to provide guidelines for decision-making and actions, and to ensure increasingly higher standards of professional and ethical conduct for OAK Stakeholders.

The CEC reflects the cultural identity and the commitments made by the OAKBERRY Group to society, the environment, and all those with whom we maintain relationships, both internal and external.



SCOPE

The CEC applies to all OAKBERRY Group companies and all OAK Stakeholders in their professional and personal relationships and in the exercise of their activities, whether within or outside the premises of OAKBERRY Group companies.

WHO ARE THE OAK REPRESENTATIVE S?


Individuals or companies that represent or perform professional activities on behalf of the OAKBERRY Group: Partners, administrators, directors, board members, and employees.

WHO ARE THE OAK FRANCHISEES ?

Individuals or companies that have joined the "OAKBERRY Franchise System."

WHO ARE THE STAKEHOLDERS?

End customers, distributors, suppliers, business partners of a private nature, and the press ("Private Sector Stakeholders"), as well as public agents and institutions, authorities, and business partners of a public nature or mixed-economy companies ("Public Sector Stakeholders").



The OAKBERRY Group and OAK Stakeholders must strictly adhere to the Federal Constitution, Brazilian and foreign laws applicable to the countries where the OAKBERRY Group has investments, subsidiaries, offices, or affiliates, in addition to this CEC and other internal norms and policies of the OAKBERRY Group.



PRINCIPLES AND PURPOSES

- ✓ Building a sustainable *superfood* brand.
- ✓ Raising awareness about the importance of a healthy lifestyle.
- ✓ Protecting the environment, particularly the Amazon Rainforest, while respecting the fauna, flora, traditional peoples, and local communities, ensuring their sustainable development.
- ✓ Ensuring the legal and fair trade of açaí with traditional peoples and local communities, respecting and supporting the preservation of their customs and traditions, and providing the necessary conditions for their current development and that of future generations with responsibility and safety.
- ✓ Commitment to the quality of its products and the satisfaction of its customers and employees.

COMPLIANCE WITH NATIONAL AND FOREIGN LAWS, WITH THIS CEC, AND WITH INTERNAL RULES

OAK Stakeholders, in the exercise of their activities and professional and personal relationships, commit to fully complying with National and Foreign Laws, with this CEC, with Internal Rules, and other principles, understood as Norms.

Any violation of a Norm by OAK Stakeholders may be considered grounds for termination for cause of any contract entered into by the OAKBERRY Group. The Compliance Department may also immediately involve the competent authorities, regardless of whether an internal investigation is initiated.

The investigation and sanction process makes no distinction between parties, applying equally to all OAK Stakeholders.

OAKBERRY GROUP LEADERS ACCOUNTABILITY

LEADING BY EXAMPLE. Board members, partners, , managers, and other holders of leadership, management, or supervisory positions within the OAKBERRY Group ("**Leaders**") must set an example of conduct for all OAK Stakeholders.



OAK Leaders must contribute to a work environment based on respect, courtesy, transparency, and teamwork, encouraging the adoption of best Compliance practices and adherence to this CEC and Internal Rules.



At OAKBERRY Group, it is essential that Leaders recognize and value the merits of OAK Representatives, providing equal access to professional growth opportunities for all OAK Representatives, according to their individual qualities.



Under no circumstances should Leaders make decisions affecting the individual career of OAK Representatives based on personal relationships, nor use their position within the OAKBERRY Group to request personal favors or services from any OAK Stakeholder.

Everyone at OAKBERRY Group and OAK Representatives commits to adopting criteria and policies that comply with the Law and Internal Rules, maintaining a transparent relationship both internally and externally. Compliance with anti-corruption, personal data protection, environmental, tax, and competition laws is a commitment for all!

EXPECTATIONS FOR OAK REPRESENTATIVES IN THEIR INTERACTIONS WITH OAK FRANCHISEES, PUBLIC SECTOR STAKEHOLDERS AND PRIVATE SECTOR STAKEHOLDERS

Relationships with OAK Franchisees, Public Sector Stakeholders, and Private Sector Stakeholders should not only contribute to the development of society as a whole but should also be guided by **ethics, morality, legality, quality, transparency, and sustainability**, aiming for partnerships and contracts that benefit the OAK Group, OAK Franchisees, and/or Public and Private Sector Stakeholders.



ETHICS

MORAL

LEGALITY

QUALITY

TRANSPARENCY

SUSTAINABILITY

PUBLIC SECTOR STAKEHOLDERS

OBSERVING INTEGRITY.

When interacting with any Public Sector Stakeholder, OAK Stakeholders must fully comply with all applicable Norms, act with **respect, professionalism, and transparency**, avoid conflicts of interest, illegal or unethical acts, and also commit to participating in meetings and/or providing information or documents whenever officially requested.

If an OAK Representative receives a meeting request or information request from any Public Sector Stakeholder, they must forward it to the Compliance Department within 24 hours, in accordance with this CEC and other Internal Rules.

In conversations or meetings with representatives of Public Sector Stakeholders, the presence of at least two representatives from each participating party should always be requested. It is also recommended to record the conversations or meetings; and, if recording is not authorized, a written record signed by all present should be prepared and sent to the Compliance Department.

If there is any suspicion of illegality in interactions with representatives of Public Sector Stakeholders, OAK Representatives should politely end the conversation, immediately leave the location if in person, and promptly report the incident to the Compliance Department.



RESPECT

PROFESSIONALISM

TRANSPARENCY



WHAT IS PROHIBITED?

In the exercise of their activities, OAK Stakeholders must avoid engaging in any professional or personal activities that may conflict with the principles, rules, or activities established by the OAKBERRY Group, such as:

- *Obtaining unauthorized information from any Public Sector Stakeholder;*
- *Creating uncomfortable or disrespectful situations with any Public Sector Stakeholder;*
- *Offering or receiving courtesies, trips, meals, money, products, services, or favors to/from Public Sector Stakeholders, unless authorized by the Norms;*
- *Offering harmful products to Public Sector Stakeholders;*
- *Participating in procurement processes suspected of irregularities;*
- *Using one's position to obtain privileges;*
- *Entering into agreements with third parties that pose legal risks to the reputation or business of the OAKBERRY Group or OAK Stakeholders;*
- *Making donations or payments to any Public Sector Stakeholder, unless authorized by the Norms;*
- *Using OAKBERRY Group resources to support political campaigns or political parties.*

OAK FRANCHISEES, SUPPLIERS, CLIENTS, PARTNERS, AND OTHER PRIVATE SECTOR STAKEHOLDERS

The OAKBERRY Group is committed to adhering to good commercial, competitive, social, and environmental practices in its relationships with OAK Franchisees, suppliers, clients, partners, and other Private Sector Stakeholders, aiming to optimize and enhance the efficiency of its economic and social activities and objectives. This includes maintaining a respectful, professional, and impartial relationship, always avoiding conflicts of interest and engaging in unfair, illegal, immoral, or unethical actions.

POLITICAL MANIFESTATIONS

In the exercise of their functions, OAK Representatives must treat all political parties and agents impartially, avoiding actions that could harm the reputation of the OAKBERRY Group, OAK Representatives, or OAK Franchisees; however, they must not favor any political party or agent unless expressly authorized by the Ethics Council for participation in social or cultural events.



PROFESSIONAL, BUSINESS, OR CONTRACTUAL RELATIONSHIPS WITH RELATIVES OR FRIENDS



OAK Representatives must conduct their professional relationships with common sense, transparency, and impartiality.

Their professional, business, or contractual relationships with relatives up to the third degree (spouse, partner in a stable union, parents, grandparents, siblings, children, grandchildren, brothers/sisters-in-law, cousins, nephews/nieces, uncles/aunts, sons/daughters-in-law, fathers/mothers-in-law, stepparents, and stepchildren), friends (persons with whom they have an emotional relationship or regular companionship, which may lead one to favor the other), or a friend's company (where the friend has any direct or indirect connection) within the scope of their activities at the OAKBERRY Group, require prior authorization from the Ethics Council for their execution.

Romantic or emotional relationships between OAK Representatives holding related hierarchical positions or with individuals connected to any OAK Stakeholders, external auditors, or competitor companies must be reported to the Compliance and Human Resources Departments.

ANTI-CORRUPTION, ANTI-TERRORISM, MONEY LAUNDERING AND WHITE-COLLAR CRIMES

The OAKBERRY Group prohibits any practices of corruption or fraud related to money laundering, white-collar crimes, and involvement with practices of terrorism financing (AML-CFT). We are subject to the anti-corruption and anti-money laundering laws of Brazil, the United States, the United Kingdom, and other countries where we operate!





PROHIBITIONS FOR OAK STAKEHOLDERS:

- *Promising, offering, or giving gifts, favors, entertainment, or any benefit to public or private agents, or third parties related to any Public Sector Stakeholder or Private Sector Stakeholder, unless authorized by the Norms;*

- *Entering into agreements, contracts, or bids, or making donations, payments, or business deals that pose a risk of involvement in practices of fraud, corruption, money laundering, white-collar crimes, or terrorism;*

- *Performing or failing to perform any act that may be considered by the Norms as fraudulent, embezzlement, extortion, use of false information, money laundering, white-collar crimes, crimes against the national economy, or acts of terrorism;*

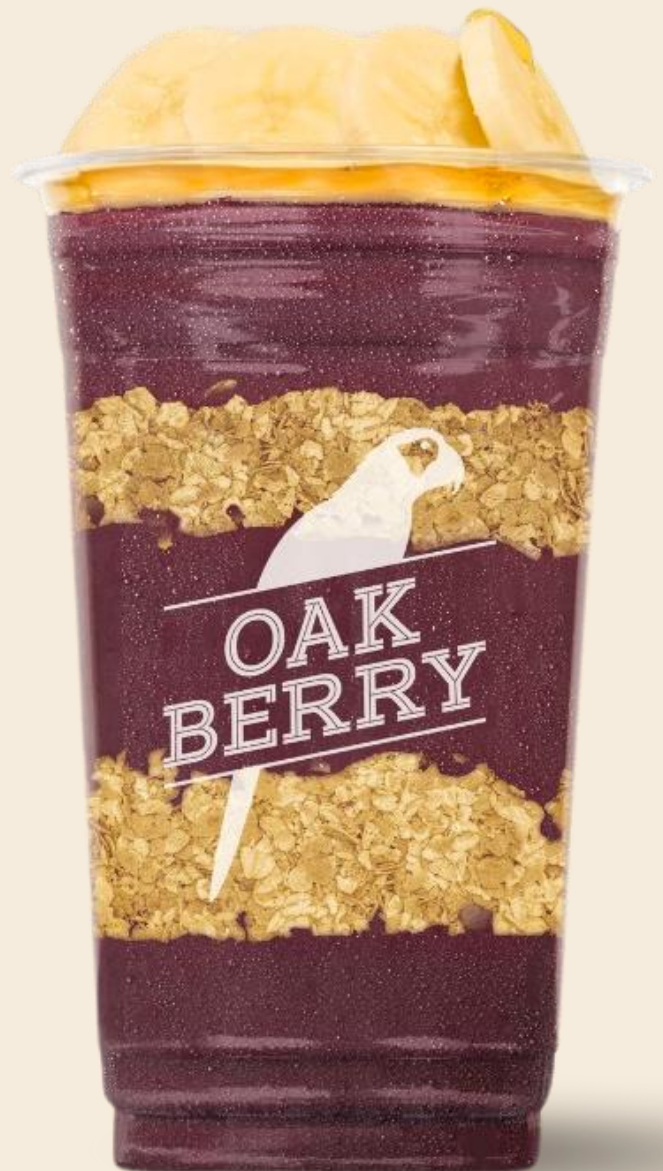
- *Obstructing and failing to fully cooperate with official investigations conducted by agencies, entities, or public agents, as well as internal investigations by the OAKBERRY Group, related to any act or practice carried out by any OAK Stakeholder that may put the name, image, or reputation of the OAKBERRY Group at risk, especially those associated with corruption, fraudulent acts, money laundering, white-collar crimes, crimes against the national economy, and terrorism financing; or*

Using international correspondence or any means of facilitating interstate/international trade in a corrupt manner to promote any offer, payment, promise of payment, or authorization of payment of money or anything of value to anyone not expressly authorized under the company's policies.

Any of these practices will be considered a serious offense, and the OAKBERRY Group will take internal and external measures to punish those responsible and to prevent and deter its recurrence.

PRESERVATION OF ASSETS, RESPECT, AND USE OF BRANDS, IMAGE, AND REPUTATION

The OAKBERRY Group values the preservation of its intellectual property (creations, inventions, etc.) developed internally and externally, as well as the information related to these and other tangible or intangible assets belonging to the OAKBERRY Group. Therefore, OAK Representatives, collectively and individually, are expected to use the tangible and intangible assets of the OAKBERRY Group correctly, efficiently, and without waste.



CONFIDENTIALITY AND DATA PROTECTION



The OAKBERRY Group is committed to fully complying with data protection laws, including the LGPD, GDPR, and other national and international regulations, ensuring their application in all internal spheres and the custody chain determined in the OAKBERRY Group's Data Policy.

Please also see our Privacy Notice.



SECURITY AND INFORMATION TECHNOLOGY

The OAKBERRY Group's information technology resources, such as hardware, software, internet, and networks, are the exclusive property of the OAKBERRY Group and should only be used for the activities of OAK Representatives, with responsibility and in accordance with the Norms.

Improper use, including the transmission of false, discriminatory, defamatory, or illegal content, or accessing or sending material from pornographic sites, pedophilia, sites that incite violence, terrorism, hatred, or misogyny, is strictly prohibited.

OAK Representatives and Stakeholders may refer to the Internal Rule on Security and Information Technology.

HUMAN RIGHTS



GENERAL ASPECTS

The OAKBERRY Group is committed to supporting, valuing, promoting, and acting in accordance with Human Rights, ensuring that OAK Stakeholders or any third party apply and respect all fundamental and basic individual and collective rights in the performance of their professional activities.



OAKBERRY



THE OAKBERRY GROUP COMMITTS TO PROMOTING:

- ✓ Equality, equity, and inclusion of OAK Stakeholders and third parties, ensuring equal opportunities for all, meeting diverse individual needs, free from any form of discrimination and prejudice.
- ✓ Diversity in the workplace, such as the plurality of cultures, gender identities, race, religion, age, culture, among other characteristics, experiences, preferences, and individual differences.
- ✓ Protection of labor rights, promotion of safe and secure working environments for all employees throughout its value chain.
- ✓ Support, promotion, and contribution, through its fair trade policy, to inclusive and sustainable economic growth in all links in its value chain.
- ✓ Pursuit of best practices in environmental preservation and sustainable development throughout its value chain.
- ✓ A healthy lifestyle, aiming for well-being for all, guided by the values of quality, respect, sustainability, and the appreciation of life.
- ✓ Continuous improvements in its due diligence and audit processes, to prevent, detect, and act on any form of child, slave, or forced labor.



FUNDAMENTAL RIGHTS OF CHILDREN AND ADOLESCENTS

The OAKBERRY Group is committed to respecting and valuing the rights of children and adolescents, prohibiting any form of neglect, discrimination, cruelty, violence, sexual exploitation, pornography, child labor, or illegal employment of minors under 16 years old, except where permitted by national or foreign law, such as for apprenticeships at 14 years or educational roles in the case of traditional peoples and communities. It also prohibits the exploitation of minors under 18 years old in illegal activities, including nighttime work, unhealthy conditions, or those that pose risks to their physical or mental health.



SLAVE OR FORCED LABOR

The OAKBERRY Group rejects and prohibits any form of slave labor, labor analogous to slavery, coercion, punishments, confinements, severe disciplinary measures, or punishment for exercising fundamental rights within its network of relationships and value chain, including OAK Franchisees and Public and Private Sector Stakeholders.



OCCUPATIONAL HEALTH AND SAFETY

The OAKBERRY Group is responsible for ensuring the comprehensive health and safety of OAK Representatives, providing a safe work environment, promoting the proper use of personal protective equipment, and encouraging the cautious performance of duties to avoid accidents.



ENVIRONMENT AND SUSTAINABILITY

The OAKBERRY Group is guided by the topics of the SASB (Sustainability Accounting Standards Board), including greenhouse gas emissions (GHG), electric energy and water management, worker health and safety, food safety, genetically modified products, ingredient supply, and socio-environmental impact in the value chain, to keep its Sustainability strategy aligned with the company's purposes.

Among these, the highlights include the empowerment of riverside communities, nutritious and healthy foods, climate impact and minimal use of natural resources, promotion of a circular economy, and inclusion and diversity in the workforce.



THE OAKBERRY GROUP IS COMMITTED TO:

- *Supporting, valuing, and acting in accordance with environmental legislation, promoting the best practices of preservation and sustainable development throughout the value chain.*
- *Combining a healthy lifestyle with a positive impact on the Amazon Rainforest, valuing the açaí value chain, supporting local communities, and preserving the biome.*
- *Promoting the conscious use of environmental resources, ensuring sustainable production standards, and environmental responsibility.*
- *Seeking technological improvements for efficient waste management, preserving extractive practices, and protecting local communities in açaí production.*
- *Encouraging a culture of environmental preservation and valuing the practices and traditions of local communities and traditional peoples of the Amazon Rainforest throughout its network of relationships and value chain.*



MORAL AND SEXUAL HARASSMENT

Any form of moral, sexual, or any other abusive conduct by any OAK Stakeholder will not be tolerated, even if it does not occur in the workplace or in the exercise of their duties or relationship with the OAKBERRY Group.

The companies of the OAKBERRY Group are committed to ensuring and encouraging the continuous promotion and improvement of an anti-harassment corporate culture, in accordance with Law 14.457/22, through training and the availability of an accessible, available, and anonymous Whistleblowing Channel, which encourages and protects good-faith whistleblowers.



WHISTLEBLOWING CHANNEL AND COMPLIANCE DEPARTMENT

Training and the Whistleblowing Channel will be available to everyone.

HOW TO ACCESS?



Website:

<https://www.contatoseguro.com.br/oakberry>



Phone:

0800 810 8100



If in doubt, talk to the Compliance Department.

