



CODE OF  
ETHICS

**pl**brasil  
MAKES IT EASY

## About PLBrasil Group

With more than 15 years of tradition and ethical consolidation in the market, **PLBrasil Group** is structured to serve companies of all segments, legal departments and law firms inside our country and abroad, providing excellent paralegal services (constitution and regularization of company licenses and registrations), legal representation and virtual address (corporate and tax), registration of foreign capital inside the country and Brazilian capital abroad, digital certification, Due Diligence and administrative/forensic certificates.

Besides optimizing and solving the processes in public and private agencies so that companies and their professionals can fully dedicate to their strategic areas and their clients, our work and team expertise is dynamic, intellectual, and, consequently, faster.

In 2017, **PLBrasil Group** has consolidated an important milestone: the expansion of its operation areas, including services of translation, insurance brokerage and coworking in its portfolio.

We recently carried out two important expansions, one of them is the creation of Business Process Outsourcing (BPO) solutions, comprising the following fields: accounting, tax, financial and payroll. And PLBrasil Health&Safety, a service that includes a set of technical, medical and educational measures aimed at preventing accidents and diseases in workplaces, protecting the worker's physical and psychosocial integrity.

Our primary goal is to offer the best business solutions, with efficiency and quality, to companies and investors and foreigners who wish to expand their investments and have a quality back office in our country.

**Makes it easy.**



START



BACK

2



NEXT

The word Ethics is derived from the Greek word 'ethos' and refers to the set of values that guide the behavior of a person in relation to other people in the society in which he lives, ensuring social welfare. Such word has its origin in Socrates' time (469 B.C.), and it investigates and explains the moral rules, which lead a person to act not only by tradition, education and habit, but also by conviction and intelligence. In classical philosophy, ethics seeks not only morality. It obtains theoretical foundations for finding the best way to live and coexist in the search for private and public lifestyles.

Unlike Moral, which is based on obedience to received customs and habits, ethics is structured in actions directed by reason for the sake of a greater good, in which no individual can be compelled to do so. However, such values are expected to be part of the behavior of person living in society to ensure human and social well-being around him or her.

Therefore, **PLBrasil Group** issues this Code of Ethical Conduct ("Manual") so that all members have their conduct based on the values presented herein, aiming to value and establish responsibilities, duties and obligations.

The goal is to always maintain and develop better relationships and work efficiency, with dynamism, organization, and responsibility, whether with members of all the company's business units, clients, suppliers, service providers, or even family members.

Meeting willingly, understand, and cooperate are essential behaviors for us to do a good job and keep harmony in professional and social environment

We hope that all the actions and plans of **PLBrasil Group** are always based on respect for the human being, with ethical values and transparency in its commercial and professional relationships, being forbidden any kind of discrimination. That is the reason why this Manual was created, once it expresses the need to clarify to all its members, also known as "PLBrasilians", the expected conducts for a better performance of their professional activities and harmony in work environment.

**Thus, we present below our terms and Code of Ethics for the PLBrasil Group.**



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ANTERIOR



PRÓXIMA



## 1. Corporate values and sustainability

**PLBrasil Group** guides its ethical principles based on the following values:

- Legality
- Transparency
- Reliability
- Integrity
- Social Responsibility

Based on these values and principles, the **PLBrasil Group** defines its business sustainability in the sum of the company's and its members' practices that aim the sustainable, economical, civil, business and social development. Therefore, the respect to the human right and the awareness to the ethical principles and values form the basis of the **PLBrasil Group** reputation before the society, in order to stamp its image and build its business identity.



## 2. Behavior

**PLBrasil Group** values a healthy and harmonious work environment. To achieve this, we rely on courteous, polite interpersonal relationships, avoiding double meaning jokes and also the use of personal or moral offenses.



## 3. Unconditional respect

The union of the team makes the success of **PLBrasil Group** and consequently the success of each member. Thus, we appreciate unconditional respect to co-workers, not only professionally, but also morally.



## 4. Equality, transparency and anti-discrimination

**PLBrasil Group** does not allow any kind of discrimination in its activities or service supply chain regarding race, color, ethnicity, nationality, gender, marital status, age, sexual



START



BACK



4



NEXT



orientation, religion, physical disability, position, or any other condition that realizes priority or exclusion, valuation or devaluation of any human being.



## 5. Forced Labor

**PLBrasil Group** does not condone any kind of forced, slave or involuntary labor in our activities, supply chain or even in disagreement with the CLT (Brazilian Labor Laws) rules and legislations.



## 6. No use of child labor

We do not tolerate or condone child labor of any kind in our activities or service supply chains.

**PLBrasil Group** does not accept any type of inappropriate labor condition that is not in accordance with the CLT rules and other legal regulations and demands from its employees, suppliers and service providers the same attitude, and shall not tolerate any contrary practice.



## 7. Due diligence processes

We follow the due diligence (investigation process) practices, external and internal audits for controls and monitoring of company activities, and we do not accept undue advantages or promotions due to positions or services rendered. **PLBrasil Group** also conducts training programs and the inclusion of FCPA-compliant contractual provisions in contracts with representatives. Accordingly, in **PLBrasil Group** is forbidden all types of bribery and requires its employees to comply with all applicable anti-corruption and related laws.



## 8. Moral and sexual harassment

**PLBrasil Group** does not admit any kind of moral harassment, including any disrespect, intimidation, humiliation or threat in the relationship among co-workers, which negatively affects the work performance, denigrates the dignity of any person or generates a hostile or offensive work environment, regardless of their hierarchical level. Attitudes such as repetitive proposals or verbal, gestural, or physical sexual innuendo or any conduct perceived to be offensive or unwelcome, including images



START



BACK

5



NEXT

on mobile phones and e-mail content are strictly forbidden and considered as sexual harassment. Therefore, all employees shall be treated with dignity and respect.



## 9. Anti-bullying and abuse of power

We forbid any kind of bullying situation and abuse of power that may affect psychologically, morally, physically, personally or professionally any person who is part of the **PLBrasil Group's** business chain.



## 10. Privacy Criteria

We encourage everyone to adopt a privacy policy that affirms their commitment to the confidentiality of clients, shareholder, employee, or supplier information. Commitment not to disclose to third parties any confidential information to which you have access in commercial relations with the **PLBrasil Group**.



## 11. Secrecy and confidentiality

**PLBrasil Group** is committed and honors its commitments, with integrity in all negotiations, and we protect the confidentiality of information from all contact audiences.



## 12. Honesty and trust

We honor our commitments with integrity in all negotiations and services, as well as we establish a relationship of transparency and trust in our activities with our entire business chain.



## 13. Human rights

We treat everyone fairly and impartially, without prejudice of color, nationality, religion, sexual orientation, marital status, age, or disability.



START



BACK



6



NEXT



## 14. Health and safety at work

**PLBrasil Group** ensures the guarantee of access and training as to compliance with the legislation in force, including traffic, labor safety laws and those concerning the use of Personal Protective Equipment (PPE), when necessary. We focus on the welfare of our business chain.

We guarantee to all our members proper working conditions, based on the highest principles of hygiene and safety, carrying out and continuously evaluating preventive and corrective actions.

However, it is the responsibility of the members to be aware of the rules and procedures for carrying out their professional activities, preserving their physical integrity and that of their colleagues, both internally and when providing external services.



## 15. Company Citizen Program

We are a company that cares for and supports the family institution of our employees, so we extend the period of their maternity and paternity leaves. To this end, **PLBrasil Group** joined the Company Citizen Program, which was established by Law No. 11.770 in 2008, which aims to

extend from one hundred and twenty (120) to (i) one hundred and eighty (180) days the period of maternity leave and from five (5) to (ii) twenty (20) days the period of paternity leave (Law No. 13.257 of 2016). Doing that, **PLBrasil Group** aims to offer more quality of life to its employees so that they feel motivated and engaged with the company's purposes.



## 16. Corporate excellence and knowledge spread

We invest in training our employees and in the spread of technical knowledge among our team, strengthening our expertise and corporate excellence. The practice of knowledge spread generates the basis for the formation of a corporate school, in which we humbly learn and teach together, as a team, besides highlighting the specific competencies of the **PLBrasil Group's** business.

Our corporate excellence spread as knowledge keeps the **PLBrasil Group** ahead of the market and its competitors.



START



BACK



7



NEXT



## 17. Conflicts of interest

We avoid and communicate any conflicts of interest before and/or during the provision of services, whether of a personal, economic or professional nature. Therefore, it is essential to declare any possible conflict of interest by any party or other that relates to any member of the **PLBrasil Group** and that may interfere in its business relationships.



## 18. Relationship with co-workers and other employees

We appreciate good relations and follow the applicable laws in hiring and labor conduct. In addition, we keep a due diligence process in our relationship with co-workers, aiming for maximum transparency, ethics, and respect in our business partnerships.



## 19. Relationship with clients

We respect the guidelines of the Brazilian Consumer Defense Code, and quality, clarity, credibility and agility must be easily identifiable characteristics of our actions. Any attitudes that may create

embarrassment, as well as making derogatory or offensive comments about any subject, including about competing companies, are forbidden.



## 20. Social and environmental responsibility

We support social and philanthropic causes, giving back to society part of what we earn and achieve with our work. In this way, we make the sustainable development of our activities one of our principles. Our responsibility is to consciously contribute to the preservation of good habits to society and the environment so that future generations have guidelines and references of valuable actions and social and environmental responsibility.

**PLBrasil Group** also produces internal actions that contribute to the preservation of the environment through reduction and recycling programs, promoting environmental sustainability in the medium and long term.



START



BACK



8



NEXT





## 21. Channels for listening and reporting

**PLBrasil Group** supports and encourages employees, clients and co-workers to report any sign of transgression and violation of ethical principles, laws and regulations, policies, corruption, and improper or illegal conduct.

So **PLBrasil Group** makes the reporting channel available through the website or e-mails, ensuring the confidentiality of the denunciation and of the parties involved.

To ensure impartiality and secrecy in the investigation process, it is determined not to disclose the names or positions of the members of the Investigation Committee, who may be from different hierarchical levels within the company.

A member of the Committee shall be responsible for receiving the complaint through the channels made available by the **PLBrasil Group** and pass it on to the other Committee members for further investigation of the facts.

The following process is determined:



START



BACK



9



NEXT



## 22. Non-Retaliation Policy

**PLBrasil Group** promotes and ensures an environment of protection against any kind of retaliation to reporters, aiming to create a safe, independent and impartial environment for those who report the practice of improbity acts, violation of rules and laws or any illicit act foreseen in the company's anti-corruption policies and ethical conducts.



## 23. How to make the report

Reports require concrete facts, especially if there is any connection to moral or sexual harassment, discrimination, or any act of violence or physical or psychological abuse. For this, **PLBrasil Group** will need data such as: aggressor's name, situation occurred, dates, places of occurrence, names of eventual witnesses. The absence of data will compromise the investigation and verification of the facts and their results.

We emphasize that the complaints must be made based on concrete facts, and we do not support any kind of actions in bad faith, the channel must be used consciously



# Reporting Channel

[etica@plbrasil.com.br](mailto:etica@plbrasil.com.br) | [www.plbrasil.com.br](http://www.plbrasil.com.br)



START



BACK

10



NEXT



# Reporting Channel

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