

CODE OF CONDUCT

MRV & CO



SUMMARY

A MESSAGE FROM THE PRESIDENCY	4	C. Relationships with the External Public	46
1. OUR PURPOSE	6	C.1. Public officials	46
2. OUR VALUES	8	C.2. Suppliers, negotiating partners and developers	48
3. WHAT IS THE CODE OF CONDUCT?	10	C.3. Real estate agencies and real estate agents	50
4. WE ARE INTEGRITY	12	C.4. Clients	52
5. ETHICS CHANNELS FOR QUESTIONS AND REPORTS	14	C.5. Communities	52
6. DISCIPLINARY MEASURES	18	C.6. Press and use of social media	54
7. MRV&CO CONDUCT GUIDELINES	20	C.7. Competitors	56
A. Internal Conduct	20	C.8. Unions	57
A.1. Diversity and inclusion	21	C.9. Investors	58
A.2. Professional composure	22	D. Sustainability	59
A.3. Harassment and sexual harassment	24	D.1. Environment	59
A.4. Protection and use of company assets (assets, resources and brand)	28	D.2 Social Responsibility	61
A.5. Security of information	30	D.3 Governance	62
A.6. Protection of personal data and privacy policy	32	8. APPROVAL, COMMUNICATION AND TRAINING	64
A.7. Anti-fraud	34	9. MRV&CO CODE OF CONDUCT TERMS AND CONDITIONS	67
A.8. Health and work safety	35		
B. Conflicts of interest	37		
B.1 Family ties and personal relationships	38		
B.2. Hiring suppliers, partners and real estate agents	39		
B.3. External professional activities	40		
B.4. Gifts, hospitality and entertainment	42		
B.5. Donations and sponsorship	45		

A MESSAGE FROM THE PRESIDENCY

For over 40 years, MRV has skillfully managed to post both growth and evolution, while keeping a keen eye on performance and never losing sight of its roots and core values. The company has transformed itself into the largest home builder and land developer in Brazil and Latin America, and is now one of the three largest developers in the world.

It is never too much to reinforce the commitment that has brought us to this point. MRV strives to set itself ahead of the market, anchored in organic growth, ethics and transparency which has elevated trust in the team and served as a long-lasting partnership between the company and its clients. Growing, also means championing a commitment to integrity and sustainability not only to the business, but also with the country as a whole.

In order to guarantee that this path continues on the rails of success for many decades to come and remains in tune with societal trends, growth of the company and the diverse professional profiles that make up the company, we updated and came up with a new draft of our code of conduct.

The code of conduct is a fundamental roadmap that guides and drives our business, since the success of our company rests on the choices and decisions of each individual staff member.

You are the feature role in our story. We are counting on your help to champion, spread and foster total commitment to our ethical guidelines when dealing with any individual or organization with whom we do business (coworkers, clients, public officials, suppliers, partners, etc.).

Investigate and consult the code of conduct whenever necessary. If you should have any doubts or ethical issues, do not hesitate to seek out the leadership or the proper ethics/compliance channels (talk to compliance or the confidential communications channel).

Working as a team, we have set MRV apart, not only as a leader in business, but a leader in ethics.

Rubens Menin Chairman - board of directors

Eduardo Fischer e Rafael Menin Presidents

1. OUR PURPOSE

Building dreams that transform the world.

MRV believes that each home has the power to transform the lives of people and their families - and therefore, transform the world.

As a result, we build more than simple real estate: we build new perspectives and pave new paths in the form of developments that guarantee quality, reliable infrastructure and technology that benefits everyone. Spaces in which to thrive and live well.

We are building a better life together with our clients. We are driven by making dreams come true and the transformative power of each new home. Every home, every dream, makes the world an even better place.

Today, we are the largest home builder with the greatest capacity to impact the development of the country. And we firmly believe but this should happen while thinking about the collective and the common welfare.

With the **courage** to face new challenges, coupled with steadfast determination and positivity.

With the **sensitivity** to understand the value of each new victory and support each one.

With the **integrity** that comes from being aware of the effect our hard work has on people's lives.

This is the driving force behind our purpose, and this is at our essence.



MRV&CO

Together, we open the doors to new homes. And to new dreams.

In order to embrace all of the people and their different dreams they bring to us; we need to think about each individual. Therefore, we have steadily sought to expanded our business and partners.

Today, **MRV&CO is a complete housing platform** made up of companies aiming to offer housing solutions in order to meet a variety of needs at various moments in life.

The values and ethical guidelines within the code of conduct that guide MRV have also been adopted by our partner companies at MRV&CO.

MRV&CO

2. OUR VALUES

We are ready to build dreams. **And we are doing it ethically and based on steady values.**



MRV&CO has been built on a solid culture of integrity. **We preserve, and even more importantly, live and practice our values each day.** For us, these are paramount - after all, we believe there is only one way to do things: the right way.

WE DO THE RIGHT THING, ALWAYS.

The only way to build dreams is acting both ethically and transparently. Therefore, for MRV&CO to meet these goals and objectives while maintaining values, the commitment of the entire team is fundamental.

We are very proud to be building our history on a daily basis firmly rested on integrity; on what is right. And this history depends on the choices of each and every individual; the result of good decisions, both big and small.

OUR TEAM IS OUR STRENGTH.

Our team is the truest expression of our dna: truly committed individuals aligned with our purpose. Energetic individuals responding to the challenge to transform the world.

Together, we are able to play the starring role of leadership. Individually, each talent can make a difference.

OUR CLIENT IS OUR COMMITMENT.

We believe that a house is not an end, but the beginning of something bigger. **We believe that each home has the power to change people's lives.**

Understanding the different realities of each of our clients is fundamental in bringing dreams to life. Therefore, we strive to bring ourselves ever closer and walk side-by-side with these individuals; to understand their current needs, while predicting new trends that may be around the corner.

WE SHARE OUR VICTORIES.

Tireless efforts to reach better, more sustainable results over the long term plays a central role in our DNA. Furthermore, all of the individuals that take part in our growth and help us to positively impact and add value to surrounding communities, society and the environment are highly valued at MRV&CO.

WE INNOVATE TO TRANSFORM.

We are aware of our contribution in the growth of the construction industry and society. That's why we are constantly seeking to innovate with new practices and ideas; seeking new ways to steadily improve on our way to do things.

We go beyond the square meters of our developments: we keep a sharp eye on the neighborhood, promote a sense of community and make every effort to maximize sustainability. New challenges have increased our courage and have motivated us to continue building our future. We are very proud to be a company that thinks about what is best for all of the people associated with us: this is the fuel that drives our ability to realize **dreams and transform.**

3. WHAT IS THE CODE OF CONDUCT?

Transformation happens everywhere. And it begins inside each individual.

True transformation starts from within. We count on each staff member, third-party service provider and supplier to stay true and carry out their roles aligned with our ethical and transparent culture.

In the hopes of building dreams that transform the world, it is essential to take on attitudes that make it possible.



The Code of Conduct **aims to guide** this purpose, contributing to establishing a respectful, transparent relationship with any individual or organization with whom we interact. This code determines and explains **how our team should act and behave while representing MRV&CO**, upholding our culture of integrity and ensuring the credibility of our company.

The code of conduct has been developed through a collaborative effort. The compliance department, staff members and the leadership from a number of different areas have all participated in its development. It is a beacon and is meant to **guide all staff during their daily routines**. In addition to the guidelines included, individuals must be mindful of the current laws, standards and regulations in effect for our business, as well as our policies and internal procedures.

Reading through and understanding the code of conduct is required in order to work at MRV&CO.

More than just being aware, it is imperative that staff understand and adapt these guidelines.

In the event that any circumstances or issues are identified that have not been included in the code of conduct, MRV&CO encourages open, transparent dialogue among staff and the leadership; in addition, and whenever necessary, the Compliance department is available to further discuss any issues.

EVERYONE TAKES PART IN TRANSFORMATION

The code of conduct must be followed by all MRV&CO staff, at all levels of the company and by all board members. This conduct also applies to our partners, suppliers, third-party service providers and any other individual or organization that may represent the company.

4. WE ARE INTEGRITY

Integrity - through and through.

One of the most important responsibilities that we support at MRV&CO is **integrity**. From the bottom to the top, on all levels.

Carrying out one's job with integrity means doing the right thing for MRV&CO and for all of the individuals involved - such as fellow staff, partners and clients.

Making correct, unquestionable decisions as regards MRV&CO, depends on all of us. Therefore, when dealing with each situation it is fundamental to always bear in mind:

- Is this situation legal?
- Does this align with our values, our code of conduct and our policies?
- Would i feel comfortable if my friends or family members knew about this?
- If someone were to read about this in the paper, would i be worried?
- Am i turning a blind eye or protecting someone who has done something wrong?

These are the tough questions that should always be asked. **In addition, if you are in doubt whether a decision you make is correct, MRV&CO encourages everyone to seek out help.** As a result, there are a number of safe, reliable resources that may be sought out in the form of our **ethics channels**.



**"What's wrong is wrong, even if others are doing it.
What's right is right, even if no one is doing it."**

5. ETHICS CHANNELS FOR QUESTIONS AND REPORTS

In order to transform, you must be proactive and speak up.

At MRV&CO, we value open, honest communication. Everyone should feel comfortable to ask questions and raise issues without the fear of retaliation or punishment.

This is an important factor since it **strengthens our culture of integrity and helps the company weed out any possible complications before they grow and spin out of control.** Staff members have the space and freedom to safely raise issues – because in the end, each of us is responsible to carry out our roles based on ethical conduct and transparent behavior.

The **ethics channels at MRV&CO** are ready to handle and deal with questions, concerns, in addition to processing reports. It's one more way for **everyone to be agents of transformation.**

Speak to compliance for any questions you may have.

Seeking out guidance for ethical dilemmas, conflicts of interest, questions about interpreting situations and even situations not included in the code of conduct is another way to demonstrate integrity.

As a result, staff members may call upon **Speak to Compliance**. It is our main ethics consulting channel to answer questions and further discuss and engage with the guidelines together with the compliance department.



ACCESS SPEAK TO COMPLIANCE

The channel is available in the workplace drop-down list under 'network services'.

For reports, confidential communications channel

We believe there is only one way to do things: the right way.

When **faced with, witnessing or becoming aware of any conduct that does not comply** with the guidelines of the code of conduct, current laws or internal procedures, staff members must report the issue to the confidential communications channel.

The confidential communications channel guarantees absolute anonymity. It is **overseen by a third-party service provider** and reports are processed by the internal auditing and risk management department that will assess the situation and investigate any possible violations..

Any reports will be verified independently, cautiously and responsibly, maintaining fair and impartial treatment. **In the event a violation has been proven, all of the legal** and disciplinary measures in effect shall be taken.

Individuals are not required to identify themselves when filing a report with the confidential communications channel if the individual wishes to preserve their anonymity. Individuals may follow the development of a report, while also dealing with questions with the internal auditing and risk management department, and may also include new information in the report through a case number that will be supplied at the moment of contact.

The confidential communications channel exists for both **internal** use (staff members), as well as **external** use (third-party service providers, suppliers, real estate agents, developers and partners). The line is open 24 hours, 7 days a week. All contacts will be handled professionally and any information will be safely processed and remain under guaranteed anonymity.

Confidential communication channel contacts

Website: canalconfidencial.com.br/mrv

E-mail: canalconfidencialmrv@br.ictsglobal.com

Phone: 0800 888 2833 (toll free)

Non-retaliation

We build dreams together, built on trust.

In our open work environment, MRV&CO supports communication and fully encourages staff members and business partners to ask questions and raise discussions regarding ethical issues, in addition to reporting any violations of the code of conduct or other questionable behavior.

Therefore, **retaliation or punishment on any individual that may raise doubts, questions or report questionable acts of good faith** (which is considered the proper, responsible procedure, even if no proof is found of improper behavior) is strictly forbidden.

Any staff members that attempt to retaliate or act out in a retaliatory fashion against whistle blowers or those upholding the guidelines of the **code of conduct** shall be subject to the proper disciplinary measures.



6. DISCIPLINARY MEASURES

**Take part. Support. Be aware.
This is how we build together.**

MRV&CO is committed to **doing business the right way and in fostering a strong culture of integrity**. Therefore, complying with the code of conduct and other policies is mandatory, without exception.

Any **non-compliance with guidelines may be punishable**. The support of each and every individual is crucial.



POSSIBLE PUNISHMENTS

- Written warning
- Suspension
- Dismissal with just cause
- Rescission of contract and blocking of supplier, real estate agent, partner or developer from the MRV&CO supply chain
- Lawsuits and legal actions

OTHER ETHICAL INFRACTIONS

Non-compliance is not the only way to break the code of conduct. There are other ethical infractions that may also result in punishment:

- **Leaving out information on non-compliant behavior or guidelines as stated** in the code of conduct and other policies
- **Spreading false information** in bad faith (false claims, false explanations or the supply/spreading of information that is known to be false).

WE ARE ALL ACCOUNTABLE

No staff member, partner or supplier at MRV&CO may justify improper or illegal behavior that contradicts the guidelines as stated in the code of conduct and company policies by any other staff member or stakeholder, independent of position, station or level of leadership.

7. MRV&CO CONDUCT GUIDELINES

A. INTERNAL CONDUCT

With integrity, we build dreams.
Yesterday, today and forever

MRV&CO is aware that a welcoming, trustworthy work environment is important. Therefore, we value:

- **Harmony** among staff members
- **Commitment** to the company
- **Transparency** and **trust** in relationships
- Collective **entrepreneurship**
- Continuous **improvement**

All of these factors help to contribute to a more productive day-to-day routine, focusing on increased results and better quality of life for our staff members, and this relies on the collaboration and practice of every one of us.



A.1. DIVERSITY AND INCLUSION

Our team is talented and diverse, and this is very highly valued at MRV&CO. We are committed to **creating an inclusive, exceptioning workplace where everyone**, without exception, feels comfortable to be who they are.

We are also committed to implementing actions that ensure equal work opportunities. **This means equal treatment at all times:** hiring, promotions, training, compensation, rescission and corrective actions.

We will not tolerate discriminatory attitudes by any staff member, supplier or third-party service provider.

IT IS PROHIBITED AT MRV&CO



- **To discriminate** such as:
 - Gender discrimination.
 - Racial, ethnic discrimination or discrimination resulting from the color of one's skin
 - Discrimination resulting from aesthetic choices such as haircuts, tattoos, piercings, etc.
 - Discrimination resulting from sexual orientation (lgbtqi+)
 - Discrimination due to disabilities (whether intellectual, cognitive, physical, auditory, or visual)
 - Discrimination resulting from political convictions and beliefs
 - Religious discrimination
 - Any other forms of discrimination
- **Speculate** on an individual's sexual orientation or gender identity disrespectfully, outing an individual or making them the target of prejudicial commentary.
- **Discriminate, block or retaliate** against any interested staff member in participating in the internal recruitment process as a natural alternative for career advancement
- **Make jokes, slurs, imitations or undesirable comments** on any person with the intent of discrimination

A.2. PROFESSIONAL COMPOSURE

Professional composure is the **way an individual carries themselves and acts within the workplace**. It involves the relationships among staff members, the practice of company values and each staff member's behavior, in addition to reflecting directly on how our staff and the company are viewed.

At MRV&CO...

ALL STAFF MEMBERS SHOULD



- Treat everyone **cordially, loyally and respectfully**
- Aim for complete **transparency and honesty** when dealing with co-workers, suppliers, clients, public officials and any other individuals with whom they may interact in the name of MRV&CO
- **Uphold the company values** wherever staff members may be, whether on construction sites, store fronts and in public places, as well as training courses, corporate events or when dealing with authorities and/or public departments, in both the general public and the professional work space
- Be wholly committed to **optimizing resources and reducing costs and expenses** when carrying out all company activities, while maintaining the quality of the products and services offered mantendo a qualidade dos produtos e serviços oferecidos.

STAFF MEMBERS MAY NOT



- Take advantage of their title or position within MRV&CO companies to **acquire favors or personal benefits**
- **Improperly use company** workspace such as workstations, meeting rooms, bathrooms, break rooms, elevators, lunch rooms, etc.

WARDROBE AND THE WORKPLACE

MRV&CO respects individual expression and gives staff members flexibility to dress according to their own style. However, it is key to remember to **use good common sense when identifying what attire may be considered inappropriate for the workplace.**

Attire not allowed in the MRV&CO workplace are:

- Short clothing and low-cut tops
- Soccer jerseys and t-shirts with religious or political themes
- Sleeveless men's t-shirts
- Shorts (except where permitted during campaigns and other moments were deemed acceptable)



A.3. HARASSMENT AND SEXUAL HARASSMENT

Harassment is considered disrespectful behavior, and has no place within our company culture or MRV&CO offices.

Our goal is to guarantee that everyone is treated with respect, empathy and care, under all circumstances, as well as treating other people in the same fashion. Furthermore, **it should remain everyone's commitment to avoid and to stand up to any harassment and sexual harassment within working relationships.**

HARASSMENT: WHAT IS IT?

Harassment is any **repetitious, offensive behavior** such as gestures, words, behavior aimed at exposing a person or creating an intimidating, hostile, depreciative, humiliating circumstances for any individual. This kind of habitual (recurring, repetitious) conduct and intentional misbehavior are clear demonstrations of harassment.

HOW TO DIFFERENTIATE HARASSMENT FROM THAT OF MANAGEMENT?

Acts of management are part of the daily routine in the workplace and are part of the relationships among staff members, particularly members of different hierarchical levels. This type of act is carried out in the interest of the company and **should always be fair and reasonable.**

Some examples are:

- Motivation to achieve results and goals
- Evaluation and feedback on behavior and deliverables
- Increased volume of work activities
- Under certain circumstances, transferring staff member to another department

It is essential to highlight that these **acts of management may not be carried out discriminatorily or with the purpose of humiliation or intimidation.**

ISOLATED PSYCHOLOGICAL AGGRESSION X HARASSMENT

An isolated psychological act of aggression should not be confused with harassment – but it also may be a reason for disciplinary measures to be carried out, depending on the severity.

IT IS STRICTLY PROHIBITED AT MRV&CO TO: 

- **Intimidate or threaten** any individual
- **Curse** at or use unacceptable, deprecatory language
- **Spread** rumors of any kind
- **Carry out abusive behavior** toward another individual (unfair or unjustified solicitations, abuse of power, among others)
- **Create or participate in smear campaigns** (negative exposure), offensive or awkward behavior, whether by gesture, words, text messages, or any behavior damaging the moral or physical integrity of another individual
- **Submit** an individual to demeaning conditions in the workplace
- **Demean or exclude** an individual from team activities as a means of social exclusion.
- **Show or disclose content that may be considered offensive, whether by email or personal or corporate social media or other virtual channels**

SEXUAL HARASSMENT: WHAT IS IT?

Sexual harassment is characterized by the **discomfort resulting from (advancements) or repetitive insinuations aimed** at gaining sexual advantages or favors.

Sexual-harassment can be **clear or subtle, straightforward or simply insinuated, written or through the use of gestures**. It may also take place in the form of coercion or blackmail.

Anyone may be a victim. Sexual harassment may take place among people of the opposite or same sex/gender, among individuals of different levels within the company or in and out of the workplace. Harassment may occur in the physical, verbal or non-verbal or even in written form (text message, emails, social media, etc.).

As is the case of harassment in general, sexual harassment is a serious offense that severely compromises relationships in the workplace and negatively affects the work environment.

PROHIBITED BEHAVIOR AT MRV&CO INCLUDE



• Any **undesirable physical conduct or inappropriate, non consensual act such as:**

- Whistling
- Touching
- Pinching
- Pushing, purpose for rubbing up against
- Grabbing
- Obscene gestures

• Any **inappropriate verbal expression such as:**

- Insinuations
- Sexual innuendos
- Undesired tips or hints
- Sexual advances such as hitting on or chatting up individuals

- Commentary with sexual connotations such as double entendres
 - Jokes related to sex
 - insultos relacionados a sexo.
 - Insults related to sex
- **Influence or attempt to influence another person** with the promise or offer of employment, promotion, benefits in exchange for sexual favors
 - **Using threats as of disciplinary actions or dismissal** to gain sexual favors



It is also important to remember that sexual harassment is not only an infraction of our Code of Conduct. It is also a crime and punishable by the law.

A.4. PROTECTION AND USE OF COMPANY ASSETS (ASSETS, RESOURCES AND BRAND)

MRV&CO assets include not only material goods, but also immaterial goods.

Therefore, other assets may be considered information, knowledge produced, software, installations and objects, materials, financial assets, intellectual property rights and the company brand or logo.

The preservation and proper use of our company assets is the responsibility of each and every individual. Every day.

EXPECTED AND RECOMMENDED CONDUCT INCLUDES



- **Preservation of goods** against loss, damages and abuse
- **Respecting** the MRV&CO and partner company **name brands and logos**, upholding all of the guidelines suggested in the brand manual. The manual is put out by the marketing team and is available on the company website
- **Using professional email** adequately and only for MRV&CO activities
- **Proper use of the workplace** only for activities permitted by MRV&CO
- **Respecting the directives and laws of intellectual property**, in other words, maintaining files, documents, models, methodologies, formulas, research, projects, forecasts, analyses and reports solely for MRV&CO business activities
- **Soliciting formal authorization** from area directors and the compliance department before using information and expertise belonging to MRV&CO in external publications and activities such as classes, congresses, speeches, academic works, books, etc.
- **Understanding the use of equipment and company resources are strictly designated to work activities** and, as a result, MRV&CO bear the right to any material produced or handled by staff members



STAFF MEMBERS MRV&CO MAY NOT

- **Inappropriately use goods and materials**, damaging them or wasting them
- **Use or take out any other resources** MRV&CO resources for either personal use or as a favor from offices, construction sites or storefronts
- **Share personal employee information** (ids, passwords or personal id badges). The use of this information is personal and non-transferable
- **Acquire unauthorized access to systems** or give other people unauthorized access to systems
- **Install equipment or use equipment to make illegal copies/pirate software, personal copies of software or copies of third-party information.** The company uses only licensed, original software
- **Transmit unlicensed software** through company systems
- **Copy, reproduce, transmit, distribute or inappropriately use** documents, files, models, methodologies, formula, research, projects, forecasts, analyses and reports produced as a result of company activities
- **Use information or intellectual property** (knowledge, technology, methods, systems, etc.) Belonging to MRV&CO for personal interest, or to assist outside individuals or other companies

STAFF AND OUR COMPANY IMAGE

While at work, staff members are an **outward representation of the MRV&CO brand image** – an invaluable, priceless asset. And for many, external individuals and companies with our staff is one more way to contact and build relationships with our company.

As **a result, the behavior and composure of each staff member plays a fundamental role in strengthen our company image** with our clients, suppliers, partners in the market in general.

MESSENGER APPS

Applications created to exchange messages are personal. Therefore, they are not considered as the best tool for professional contacts.

The company does not recommend using apps such as whatsapp, messenger, telegram or other similar messaging apps to communicate with public officials (federal, state, municipal servants). This means of communication should only be used with these individuals in the absence of any other official communication method available.

In order to communicate with coworkers, MRV&CO has engaged and recommends the use of workchat.

A.5. A5 SECURITY OF INFORMATION

During our daily work routines, while carrying out professional roles, staff members have access to **strategic and/or confidential** MRV&CO information such as financial results, acquisitions or sales, industrial secrets, investments and other professional information.

This information must always be restricted to company use. Every staff member must preserve the confidentiality and integrity of company information, as well as carefully restricting its availability so that it may not be accessed through inappropriate sources.

EMPLOYEES MUST



- **Respect** professional **confidentiality**
- **Maintain the confidentiality** of MRV&CO's personnel and technical information, as well as partner company information to which they may have access as a result of their role or any other activity they may carry out
- **Uphold the sanctity** of confidential information

EMPLOYEES MAY NOT



- **Disclose, pass on or comment privileged or strategic information** regarding relevant facts or any situations that result in economic or financial repercussions that may still not have been made public
- **Take pictures or screenshots** of unauthorized content
- **Access inappropriate sites** during work hours
- Carry out intentional acts that may **damage or compromise MRV&CO's computer network**
- **Use unauthorized equipment or equipment that has not been security approved** within the MRV&CO network
- **Share information** with other coworkers or third-party service providers that do not need them to carry out their role through any means of communication (printed, electronic or oral). For example:
 - Client databases
 - Land banks
 - Commercial databases
 - Sales tables
 - Salary tables.
 - Contract banks
 - Other MRV&CO documentation

- **Permit unauthorized access** to information by means of documents and materials left on desks, meeting whiteboards, etc.
- **Carry out meetings or speak on public telephones** about MRV&CO business issues
- **Bring copies** of information, processes, software or any other type of information belonging to MRV&CO upon termination with the company
- **Send MRV&CO information or documents through personal email, unauthorized third-party servers or personal (non-corporate) cloud servers or store information on remote devices such** as pen drives, personal computers or tablets, etc., Save when previously authorized.

A.6. PROTECTION OF PERSONAL DATA AND PRIVACY POLICY

It is of the utmost importance to guarantee the proper **treatment of personal data** - following safe, transparent methods, aligned with the guidelines, as set out in the personal data protection laws - thus ensuring the success of MRV&CO business activities.

Once again, this is a collective effort that relies on the constant efforts of each individual. We must **protect the personal data of our clients, staff and partners** in order to protect the credibility of our brand image, in addition to complying with the guidelines as stated by the national authority of data protection.

MRV&CO STAFF MUST



- Use personal data to which we are given access **only for the proper purposes**
- Use the **minimum amount of personal data necessary** in order to carry out business activities and to thoroughly complete their role
- Store and process personal data in safe physical or **digital environments that the company has set up**
- **Respect the rights** of the holders of personal data



MRV&CO STAFF MAY NOT



- **Misuse or mistreat personal data** for the proper purposes
- **Use or take personal data for personal use or for third parties**, or any information controlled by MRV&CO and their partners
- **Share** any personal data controlled by MRV&CO without express consent of the individual or **without legal consent**
- **Use personal data for any purposes other than those from which data was acquired**
- **Store data on work stations or personal computers** such as notebooks without express consent

A.7. FRAUD

Fraud, of any kind, strongly contrasts and compromises the integrity of MRV&CO, and all staff members play an integral role in preserving the company's integrity.

Therefore, we will not tolerate any staff members hoping to benefit from acts of fraud during their business activities for themselves, third parties or even the company.

WHAT IS FRAUD?

Fraud is any act carried out in order to **illegally or illicitly gain benefits from the loss** of other individuals or organizations. Fraud includes:

- Falsification of documents or doctors' notes
- Altering accounting information, managerial results or client data
- Payments carried out unofficially
- Granting unwarranted discounts
- Among unsavory practices

In addition to infringing on our code of conduct, **fraud is also considered a crime** and maybe defined as identity fraud, or ideological or material misrepresentation, and may be punishable under the penal code.



A.8. WORKPLACE HEALTH AND SAFETY

A safe, healthy workplace is a fundamental right for all workers.

We are **committed to providing a safe, healthy workplace for all our staff members, partners and suppliers** while they are in our care.

MRV&CO RECOMMENDS AND REQUIRES ALL STAFF TO

- **Carry out their role aiming to avoid work accidents** by complying with workplace health and safety standards and procedures
- Eliminate, substitute or control any dangerous or risky situation when identified through the **use of collective protection equipment (cpe)**
- **Use personal protective equipment (ppe)** when necessary
- **Communicate any ppe** deemed unworthy or unsafe for use and any accidents that may occur
- **Guarantee cleanliness, sanitation, safety and safe noise** levels in all work environments (offices, storefronts and construction sites)
- **Communicate any medical treatment or medications** that may interfere with reflexes and, consequently, work safety during work hours to the workplace health and safety department and the leadership.

MRV&CO STRICTLY PROHIBITS ANY STAFF MEMBER, SUPPLIER OR DEVELOPER TO

- Carry out activities or operate equipment **without the proper training, qualification and/or authorization**
- Operate **defective equipment**
- **Improvise patches** or fixes on machinery and/or equipment

- Create or contribute in the **creation of waste, disorganization, noise pollution or unsafe conditions** in all of our work sites
- **Consume or carry out activities under the influence of alcohol or any other drug** while at work or during work hours
- **Carry any type of weapon** within company installations or while carrying out activities related to work (except for staff members that may use weapons such as work tools, having been granted authorization and received proper training, identification and technical ability)



B. CONFLICT OF INTEREST

Credibility and trust come together with integrity

Conflicts of interest are situations in which a staff member, **due to personal interest, may be influenced or swayed to act against the company's principles, objectives or interests.** Under the circumstances, individuals may make a decision, behave inappropriately or fall into non-compliance with their roles and responsibilities.

Any behavior or choices that have been influenced by conflicts of interest may damage the company's trust and credibility. **The success of MRV&CO also depends on our ability to make decisions without being influenced by conflicts of interest.**

The occurrence of conflicts of interest (or even rumor of conflicts) may be as prejudicial to the company's brand and reputation as real conflicts of interest. As a result, we all bear the responsibility to **avoid situations with the potential to open doors** to question our judgment and our objectivity.

There are a variety of situations that may open doors for conflicts of interest within the company. Family associations, personal relationships and financial ties with staff members, or staff with personal associations with individuals from MRV&CO's supply chain are some examples.

PERSONAL ASSOCIATION DECLARATION

It is the duty of every individual to transparently declare any personal association to compliance department, after which compliance will assess the situation for conflicts of interest, or potential issues resulting from conflicts of interest.

B.1. FAMILY TIES AND PERSONAL RELATIONSHIPS AMONG STAFF MEMBERS

MRV&CO's role and purpose are based on human relations. Therefore, **we profoundly respect the bond between our staff members.**

Nevertheless, some limitations are necessary in order to avoid situations such as conflicts of interest. Proper behavior and conduct will **ensure there will be no favoritism or privileges**, independent of the degree of family connection or the personal relationships in question.

MRV&CO ALLOWS



- **Family ties or personal relationships** among staff members that do not have:
 - A subordinate relationship
 - Influence in decision making in the management process (activities)
 - Influence in decision-making regarding remuneration, promotion and performance
- **Indication of family members** for the hiring and interviewing process in situation where:
 - The family relationship has been clearly stated
 - The family member is removed from the process and does not participate, aiming to ensure the candidate goes through all stages of the hiring process without exception

MRV&CO DOES NOT ALLOW



- **Hiring a staff member** with any degree of family or personal relation to **carry out a direct subordinate role**
- **Hiring a staff member** with any degree of family or personal relation for **positions that involve operational relationships** with staff members such as supervising, analyzing or influencing work assessment performance assessment, approving hours, payments or benefits (even in non-subordinate roles)



B.2. HIRING SUPPLIERS PARTNERS AND REAL ESTATE AGENTS

Transparency in our hiring process for business partners is highly valued, in addition to helping to preserve our reputation and brand image.

Therefore, **the rules for hiring** suppliers, partners and real estate agents must be carried out clearly and impartially, in compliance with complete integrity and transparency throughout the hiring process.

STAFF MEMBERS MAY



- **Suggest suppliers, partners and real estate agents** to MRV&CO and other companies within the group (including family members), **as long as individuals do not have any influence in the decision-making process** for hiring



- **Gain or attempt to gain direct or indirect personal or financial advantage** from suppliers, third-party service providers or institutions that have or wish to have working relationships with MRV&CO (in the form of money, or objects of value)
- Use their title or role to **gain personal advantage or services from suppliers under the same conditions negotiated with MRV&CO** for personal benefit for themselves, family members or third parties
- Hire, influence the hiring of or be in charge of the management of **suppliers or autonomous real estate agents with whom they share family ties** of any degree
- Hire suppliers or third-party service providers that have **partners or staff members that hold or carry out public service or have business dealings with MRV&CO**
- Hire suppliers or third-party service providers that **subcontract services with public departments that share business dealings with MRV&CO**

B.3. EXTERNAL PROFESSIONAL ACTIVITIES

We are all in the constant search for excellence, doing our best to contribute to MRV&CO. In addition to these contributions, we may carry out other external professional activities.

However, we would like to reiterate that these situations may **not interfere with our professional roles in the company**. We value the commitment that each of our staff members has to MRV&CO. As a result, it is important to establish guidelines for any parallel professional activities.

STAFF MEMBERS MAY



- **Carry out external professional activities** as long as:
 - They are handled **outside of work hours**
 - They do not use MRV&CO infrastructure or information
 - **They do not diminish performance** at work
 - **They do not conflict with MRV&CO businesses, interests or the sector**
- Use **locations and hours previously authorized** by MRV&CO for business activities or swap/trade of goods for personal interest
- Supply to MRV&CO, as long as they are in compliance with the transactions with related parties policy and observe market conditions

STAFF MEMBERS MAY NOT



- **Use MRV&CO time and resources** to carry out external activities or private commercial activities such as offering services or advertising
- Maintain parallel activities or direct or indirect partnership in companies in **direct competition with MRV&CO businesses and/or with conflicting business dealings**
- Associate personal/private business matters with **the MRV&CO** name or **brand**

POLITICAL PARTICIPATION

MRV&CO **respects staff members' rights to participate in political** activities, as long as individuals are involved with activities outside of work hours and without the use of the brand or company uniforms.

In the event candidates wish to hold public or elected offices, they should leave the company before taking over office in order to avoid possible conflicts of interest.

B.4. GIFTS, HOSPITALITY, ENTERTAINMENT, TRIPS AND MEALS

Offering and receiving gifts, hospitality and invitations to participate in corporate entertainment events are considered common courtesy practices in the business world.

However, they may raise suspicion among those interested and involved.

A degree of reservation and caution should be employed in order to avoid expectations of favors or influencing decision making.

We should always strive to avoid situations that may interfere in decisions or cause any discredit to staff members or the company.

There is only one exception to this rule which applies to items received at events such as congresses or forums, distributed in a general nature to all participants (including institutional events offered by MRV&CO).

We do not recommend accepting gifts from the same supplier, partner or third-party provider more than twice in a 12 (twelve) month period.

DECLARING GIFTS RECEIVED

It is mandatory to declare any gifts, presents, tickets and invitations as regards corporate entertainment with the speak to compliance department - including the value, whether bearing company brand or anonymous, applicable to all MRV&CO staff, regardless of level or title.



STAFF MEMBERS ARE AUTHORIZED TO

- **Keep gifts with brands** after declaring them
- **Keep edible products such** as chocolates, cookies, panettones, etc. After declaring them
- **Distribute MRV&CO gifts** developed for institutional marketing purposes that have been pre-approved by the compliance department
- **Take part in business meals**, as long as:
 - Each party pays for their own expenses.
 - They do not take place during the negotiation and/or hiring phase
 - Take place during work hours. Therefore, business dinners are not recommended
- **Except payment for travel and hospitality** to participate in speeches, congresses and other events, as long as:
 - The individual's participation has been formally approved by their immediate director
 - There is no association and no favors are gained from the commercial relation
 - They do not expose staff members to conflicts of interest
 - Hospitality expenses are not extended to staff member associates, such as family members

MRV&CO RECOMMENDS



- **Edible items such** as chocolates, cookies, cakes, panettones, etc. Be shared with teams/department co-workers, therefore contributing to a harmonious working environment and boosting team spirit
- **Staff members in the supply area** should **refuse any type of gift due** to their direct contact with suppliers, explaining that receiving gifts of any kind goes against the MRV&CO code of conduct



• **STAFF MEMBERS SHOULD NOT** _____



- **Keep gifts that do not bear name brands, alcoholic beverages or hospitality** (such as tickets for shows or sporting events). In this case, after declaring gifts, the products should be put up for drawing among staff members, handled by the internal auditing department
- **Except money or cash equivalents**, independent of the quantity
- **Except gifts or favors when there is an intention or possible expectation for the other party to gain an unfair advantage or influence** in the decision-making process (such as during contract review or contract renewal periods), therefore avoiding any suspicious or inadequate behavior
- **Receive gifts, entertainment and hospitality outside of the workplace** (at home for example). Should this occur, the staff members should declare the items received and follow compliance department advice and instructions.
- **Directly or indirectly offer or give** favors, money, gifts, entertainment or hospitality **to public officials or any individuals related to them** in the name of MRV&CO

- Internally or externally **sell** gifts, entertainment, tickets to sporting events or shows that have been raffled off in the company

B.5. DONATIONS AND SPONSORSHIP

Contributions in the form of donations or sponsorship carried out by MRV&CO must follow the highest standards of transparency, legitimacy and follow all legal channels. In order to guarantee integrity, the compliance department should carry out a full investigation of the institutions and entities to be benefited, in addition to the motivation of the contribution.

Contributions may be carried out to support reputable project/institutions and respectable organizations as long as they are of an educational, sporting, cultural or philanthropic nature. **Any donations or sponsorships should have a positive impact on the company brand image and logo and be in line with MRV&CO's strategic objectives and values.**

STAFF MEMBERS MAY



- **Make political donations using their own resources**, as long as they respect electoral laws in effect and are not affiliated with MRV&CO

STAFF MEMBERS MAY NOT



- **Offer, promote or make donations or sponsorships to gain any unfair advantage** or influence any the actions of any public official, regardless of the unquestionable reputation of individual
- **Make donations** to organizations directly or indirectly administrated by **public officials carrying out activities with MRV&CO** business interests or administrated by MRV&CO staff, in order to avoid potential conflicts of interest
- **Make donations** to organizations with a **history of involvement in corruption or fraud**

C. RELATIONSHIPS WITH EXTERNAL PUBLIC

While building dreams, we deal with the world.

One of the strongest foundations supporting MRV&CO's business dealings is being able to **reach the most diverse public** possible. Building dreams involves a complex chain of activities and constant contact with individuals, groups, other companies and institutions.

The way in which we carry ourselves with them also tells a rich story about who we are and how we do business. Therefore, our professional behavior must be **perfectly aligned with MRV&CO's core values and what the company truly believes.**

C.1. PUBLIC OFFICIALS

MRV&CO is a founding member of the **business pact for integrity and against corruption** and remains fully committed to following **anti-corruption standards** – particularly brazilian anti-corruption laws and the foreign corrupt practices act – fcpa.

Infringing on any brazilian anti-corruption laws may result in severe legal penalties to MRV&CO, in addition to criminal action for any individuals involved.



Our relationship with all municipal, state and federal departments such as city governments, urban and environmental licensing agencies, public records registries and departments and regulatory and oversight agencies has always been, and shall always be, legal and transparent. Always.

HOW SHOULD MEETINGS WITH PUBLIC OFFICIALS TAKE PLACE?

All meetings with public officials should preferentially take place **in the presence of at least two staff members and within public department offices**. In order to guarantee transparency, it **is important to officially record meeting minutes** in order to ensure an official record of meetings and decisions.

STAFF MEMBER MAY NOT



- **Influence or pressure** authorities or public officials to carry out any act in violation with their legal duties, such as overlooking legal standards when assessing demands, providing sensitive information, etc.
- **Offer, promise or grant favors, money, gifts, entertainment or hospitality to public officials or any individuals related** to them, whether directly or indirectly, in the name of the MRV&CO in order to gain unfair advantage and/or reduce timelines, authorization, permission, decision, etc.
- **Carry out or offer bribes** to speed up or fast track analysis of the authorization of licenses, authorizations and permits or any other routine action that the company may require
- **Interact with any public official in the name of MRV&CO** with whom they have family ties or personal relations, or with the department in which the individual works

BROKERS

Brokers are considered any consultants, brokers, **legal counsel, correspondents, real estate agents and any other third-party service providers that carry out duties in the name of MRV&CO**, with or without a power of attorney, as regards public departments or the private sector. **It is strictly forbidden** to hire any individuals or organizations aiming to fast track processes by **using their influence** to resolve or speed up problems, processes or bureaucratic red tape.

C.2. SUPPLIERS, NEGOTIATING PARTNERS AND DEVELOPERS

Transparency and integrity set the tone and the manner in which MRV&CO deals with suppliers, carries out partnerships and works with third-party service providers.

We seek out suppliers and third-party service providers that are more than just providers of material, services and equipment: we seek to solidify partnerships that uphold **sustainable development in a strong culture of integrity** within the business environment.

As a result, the choice of a **supplier** is based on a number of criteria which are all equally important such as: technical staff, financial statements, quality, ohse (operational health, safety and environment), sustainability and integrity. In addition, the best conditions regarding the cost/benefit relationship to MRV&CO over the long term are also taking into consideration.

Our **developers** and partners also play a fundamental role in our business: they supply the workforce for the construction of our real estate. Therefore, it is of the utmost importance that they are aligned with our core values, internal policies and adhere to all legislation in effect.

WE AT MRV&CO MUST

- **Be impartial** during all of the hiring procedures processes, guaranteeing that all candidates have access to the same level of information, without discrimination or privilege
- **Open procurement processes be clear and objective** when seeking and choosing suppliers

WE MUST DEMAND FROM OUR SUPPLIERS

- **Confidentiality** of information from having prior access to or receiving after the hiring process
- **Confirmation of lodging** for all staff members complying with the proper legislation and offering guaranteed health and well-being
- **Use of personal protection equipment** (ppe) of the entire staff
- **Punctual payment** of salaries, taxes and benefits to all staff members, as well as any of the legal costs required by legislation and social security

STAFF MEMBERS MAY NOT



- **Carry out business dealings with business partners that have a history of involvement in illegal activities or behavior** such as corruption, money laundering, improper administration, tax evasion, fiscal in fractions, contraband, bribery, kickbacks, etc.
- **Use their position** in the market or the reputation of MRV&CO to obtain or try **to obtain any undue advantages** during negotiations with suppliers and business partners
- **Omit any reports of any and all irregularities**, fraud, falsification, etc. All occurrences must be reported
- **Hire any companies indicated by public officials** without participation of the sourcing department
- **Hire companies that do not meet the requirements** for the standards of MRV&CO contracts

**MRV&CO does not allow any behavior associated
with corruption in the private sector.**

According to anti-corruption laws, MRV&CO may be held responsible for any actions carried out by their suppliers, third-party service providers, brokers and any other business partners **if they should participate in illegal acts of corruption or bribery that may benefit the company – independent of the company's knowledge of any illegal behavior.**

ASSESSMENT OF INTEGRITY, CALL ON COMPLIANCE

The compliance department may be called upon to carry out an integrity assessment should any doubts or suspicions arise about third-party service providers. To this point, we avoid hiring any companies with a history of involvement in corruption or any other illegal, unethical

C3 REAL ESTATE AGENCIES AND REAL ESTATE AGENTS

Real estate agencies and licensed real estate agents/realtors – are fundamental in the development of our business. They connect the dreams that we build to our clients.

The only way to close the sale of an MRV&CO property is to follow the path of honesty. Our behavior aims to ensure solid, quality relationships and guarantee that the real estate industry and realtors reflect our core values and our way to do business.



GOOD MRV&CO PRACTICES ARE



- Aiming for long-term hiring and licensing of real estate agencies and realtors, establishing a **mutual respect and trust**
- **Clarity and professionalism** in activities carried out with real estate agencies and licensed professionals, defining a common set of rights and duties for each part
- **Guarantee that real estate agencies and realtors are fully aware** of the customer service policies and carry out their duties within the guidelines
- **Protecting the MRV&CO brand**, upholding and promoting the conditions so that real estate agencies and licensed professionals may also use them

POOR PRACTICES ARE



- **Falsifying** client **documents**
- **Receiving payments** of any kind or bank deposits **without issuing proper company invoices**
- **Carrying out sales** of mrv properties **without the proper real estate registrations or real estate licenses within company systems**
- **Issuing approved improper discounts**

C.4. CLIENTS

We believe that a home is not a means to an end, but the beginning of something greater. We build dreams, and our customers play the feature role.

Therefore, **the client is our number one commitment. Our relationship with our clients should be based on mutual trust.**

In order to make this happen, we must adopt clear, transparent lines of communication about our products and services, in addition to meeting our clients needs cordially, agilely and efficiently.

We should strive to be one step ahead of their needs and provide services **that add to their experience of living** in one of our developments. Even better: to make dreams come true.

MRV&CO RECOMMENDS STAFF MEMBERS



- Provide **the highest quality services** to our clients
- **Promise only what MRV&CO is able to provide** including reservations, discounts, promotions, prices, payment plans for our real estate
- Act **promptly and transparently**, informing our clients about situations that may be out of the companies control and that may compromise the delivery date of our developments
- **Treat client information carefully and privately**, guaranteeing their right to privacy and protection of their personal data
- Direct any client issues and questions to the customer service department to be dealt with through **the official customer service channels**

C.5. COMMUNITIES

We go well beyond square meters. An MRV&CO development transforms not only the lives of our clients – but reaches out to the entire surrounding community.

Promoting well-being, harmony and sustainability are fundamental.

We believe in contributing to the social development and people of the communities in which we are present. As a result, **we highly value a deep respect for building relationships and cooperation with the surrounding communities** of each of our developments.



TRUE COMMITMENT

The interactions with a community should always be positive, aiming to ensure transparency and bring it out demonstrate our true commitment.

STAFF MEMBERS SHOULD



- **The interactions with a community** should always be positive, aiming to ensure transparency and bring it out demonstrate our true commitment.
- **Contribute to improving the quality of life** in the surrounding communities in which we are present, through ideas, attitudes, outreach and community engagement
- **Carry out preventative actions** and minimizing impact on the communities in which we develop

C.6. PRESS AND USE OF SOCIAL NETWORKS

Throughout these years of excellent service, MRV&CO has earned more than results. We have earned a reputation for integrity and quality. Of doing things the right way.

We have fought hard for this reputation – and it is also the role of each and every staff member to carry on this goal.

PRESS

Whether it's in the press in general, or any news channel, information or content, **our statements and outlook should be officially issued only by the communications department or a previously authorized spokesperson.**

MRV&CO COMMUNICATION

For more information please see our official press communication **manual found in the communications** department

STAFF MEMBER RESPONSIBILITIES ARE



- **To care for the MRV&CO brand image and reputation**, while expressing themselves through means of communication on behalf of the company **only when acting as a spokesperson**
- **To pass** on any requests from the press to their director or the communications department

STAFF MEMBERS SHOULD NOT (WHEN NOT ACTING AS AN OFFICIAL SPOKESPERSON)



- **Respond or take action on behalf of MRV&CO** in official press releases such as
 - Stating an opinion.
 - Giving interviews
 - Participating in debate or discussions.
 - Issuing written statements

SOCIAL MEDIA

MRV&CO has an online presence on most of the main social media platforms. Our team relies on staff members to manage the content on these platforms and to engage the market and society in general. But **it is the responsibility of everyone to protect the company's image on social media.**



STAFF MEMBERS MAY



- Use their personal social media profile to publicly disclose the situation of their involvement with MRV&CO, as long as this does not improperly expose the brand or associate the company with inappropriate behavior

STAFF MEMBERS MAY NOT



- **Create webpages/profiles or publish content in the name of MRV&CO**
- **Disclose confidential or false information** as regards MRV&CO and its clients on webpages/profiles, whether personal or through third parties

C.7. COMPETITORS

Fair competition enriches the market and adds value to our sector. We believe in the practice of fair competition, maintaining a **respectful professional relationship and cordiality with our competitors.**

PROFESSIONAL BEHAVIOR IS



- **Taking part in association meetings or events in the construction sector** fully aware that there are types of information that may not be shared in these environments such as:
 - Business strategies or communication strategies
 - Performance forecasts
 - determinados datos de performance.
 - Specific performance data
 - Confidential information
- Being particularly mindful in association meetings and dealing with issues relating to benchmarking

PROFESSIONAL BEHAVIOR IS NOT



- **Sharing or disclosing confidential**, strategic or sensitive information with competitors or business partners
- All relationships between MRV&CO **staff and competitors/competitor staff are subject to competitor defense laws.**

All relationships between MRV&CO staff and competitors/
competitor staff are subject to **competitor defense laws.**

C.8. UNIONS

We value good relations with labor unions. We respect the staff's right to free association and all of the collective negotiating procedures, recognizing collective agreements and making sure to comply with them.

AT MRV&CO IT IS PROHIBITED



- Any discriminatory act or retaliatory behavior **against free union associations**
- **Abuse of power of union leaders** in carrying out functions such as direction, exploitation of statutory powers and legal issues
- **Exclude the human resources department out of any actions** both formal and on formal carried out by the union
- **Carry out payments** or contributions to union leaders without prior authorization of csc directory



C.9. INVESTORS

MRV&CO aims to preserve the interest and protect the rights of our shareholders, investors and stakeholders. We are thoroughly aligned with the **best practices in corporate governance**, in addition to the Brazilian securities and exchange commission (CVM) standards and regulations and the Novo Mercado B3 regulations.

Our practices are transparent: we strive to always provide clear, trustworthy and objective information to our shareholders, investors and stakeholders.

INVESTOR RELATIONS DEPARTMENT

The investor relations department is in charge of **contact with our investors and shareholders**. Any and all shareholder and/or investor requests made with staff members should be immediately directed to the IR department at the following email: ri@mrv.com.br, in order to be properly handled.

For more information, please visit www.ri.mrv.com.br.



AT MRV&CO IT IS PROHIBITED TO



- **Use privileged MRV&CO information** to directly or indirectly benefit from the sale or purchase of company shares
- **Pass on privileged MRV&CO information** to others for their benefit

D. SUSTAINABILITY

The world is a stage on which our dreams are built.

D.1. ENVIRONMENT

Preservation of the environment and fostering sustainable behavior are priorities at MRV&CO.

That begins with choosing land, throughout every stage of construction and even after we have delivered our developments, we demand and remain fully engaged with this commitment. **We must all follow any federal, state and municipal environmental laws, as well as contribute to the sustainable use and consumption of resources.**

PRACTICES SHOULD

- **Follow environmental assessment in the purchase of land, controlling the impacts and risk** to the environment and the surrounding communities in order to minimize/eliminate any sort of environmental damage
- **Manage the resources we use and the waste we produce at work sites**, seeking the continued improvement of our environmental indicators
- **Strive to making our worksites ever more sustainable**, including each step of the construction process
- **Reasonable use of natural resources, mainly water and energy**, within MRV&CO installations (offices, worksites and storefronts), reducing consumption as much as possible

- **Reduce the amount of greenhouse gases** (ghg) emitted
- Remain engaged with small day-to-day actions to preserve the environment, adopting green policies such as:
 - Properly discarding and recycling waste
 - Carpooling
 - Turning off lights and air conditioning in empty rooms

SUSTAINABILITY AT MRV&CO

To learn more about our sustainable policies, please visit:
www.mrv.com.br/sustentabilidade

D.2. SOCIAL RESPONSIBILITY

Human rights protect human lives, guaranteeing basic human rights and ensuring that people have the right to live a dignified life.

MRV&CO obeys all labor laws, regulations and rules, and we demand compliance with all of them.

We do not allow any activities to be carried out by people under the age of 16, or labor contracts that may be characterized as child labor. The only exception is with programs that involve young apprentices.

We also do not support any type of work that may be considered undignified, forced, degrading or exhaustive shifts whether in MRV&CO or within any of the organizations throughout our supply chain (suppliers, third-party service providers, partners, developers, real estate agencies, realtors and others).

STAFF MEMBERS SHOULD



- **Assess** whether our suppliers and developers are properly complying with the requirements as regards human rights
- **Immediately report** any cases or suspicious situations involving child labor infractions or undignified labor conditions to MRV&CO **leadership and the confidential communication channel**

MRV INSTITUTE

The mrv institute maintains the mission to promote social transformation through education and contribute to a better future of the communities in which we are present.

In order to learn more, please visit: www.institutomrv.com.br.

D.3 GOVERNANCE

Governance with transparency. In order to guarantee independence and impartiality, areas dealing with compliance at mrv report directly to the board of directors through governance, risk and compliance committees, as well as the auditing committee.

MRV&CO also maintains an ethics committee made up of members from senior management aiming to comply with and adhere to the code of conduct, assess and deliberate on any ethical issues that may involve the company, in addition to defining the consequences and correct of actions.

According to governance best practices, the board of directors and the ethics committee support the compliance department so that it may achieve effective results in upholding the MRV&CO integrity program.

**LEARN MORE ABOUT OUR
INTEGRITY PROGRAM**

**Please visit
www.mrv.com.br/integridade**



8. APPROVAL, COMMUNICATION AND TRAINING

When we build together,
dreams come true.

In 2007, our board of directors approved the first version of the MRV&CO code of conduct.

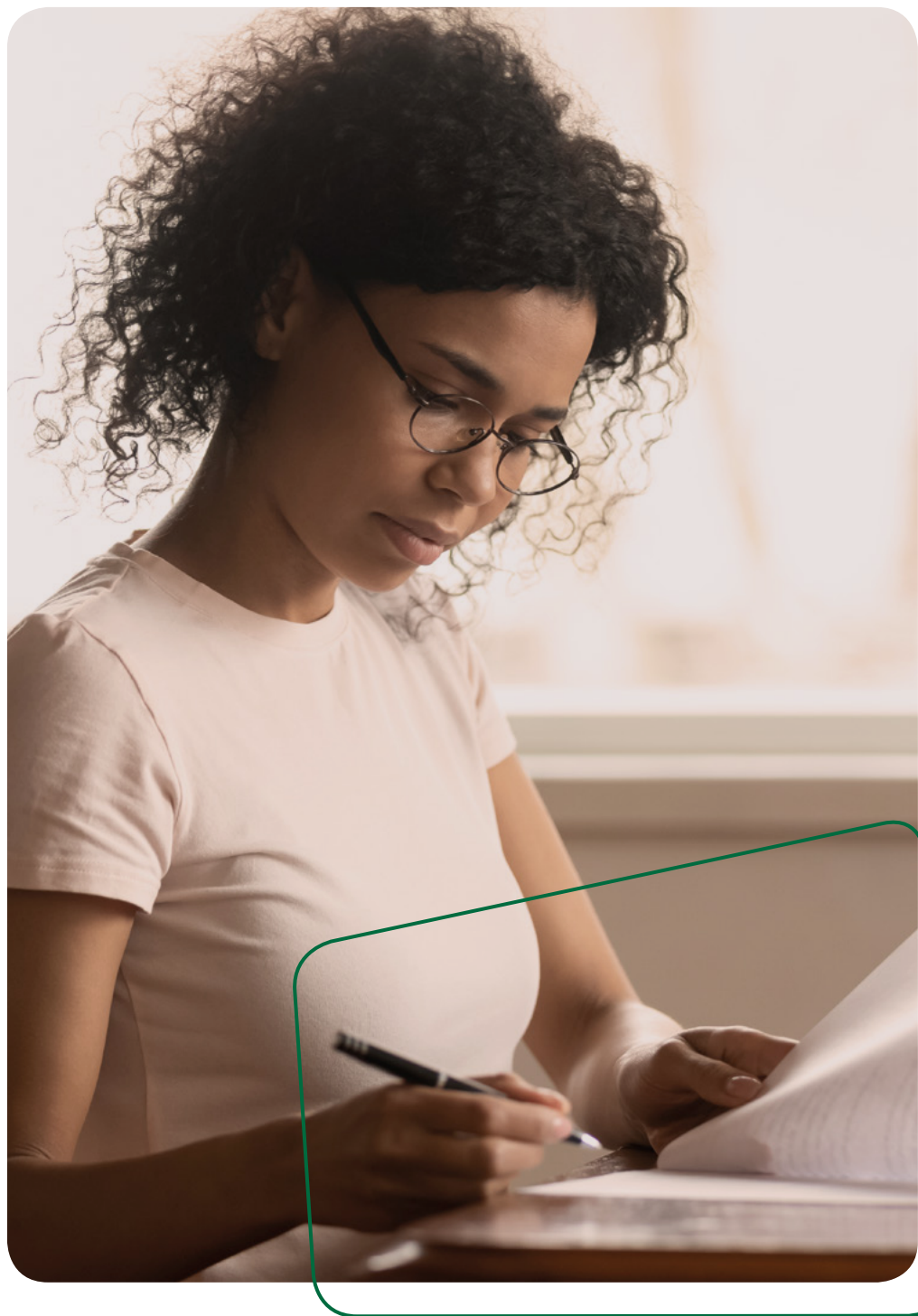
Since then, it has been periodically updated aiming to keep pace with the changes in the world and the development of our corporate environment and our staff.

This is the fourth edition of this document. It was **approved by our board of directors in september 2020**. This was also the date on which the MRV&CO code of conduct went indefinitely into effect, until the next draft is approved.



CODE OF CONDUCT COMMUNICATION AND TRAINING

MRV&CO also maintains routine communication and training plan for staff, in order to disclose and engage staff with the rules of the code of conduct, its policies and its values, in addition to stressing the importance of compliance with the code.



9. MRV&CO CODE OF CONDUCT TERMS AND CONDITIONS

I declare that i am aware of the MRV&CO code of conduct, and i have read the full extent of the content, therefore i am aware of the rules and directives contained within.

I assume the commitment to follow these directives during my professional activities whether it be as staff member, business partner (supplier, third-party service provider, developer, real estate agent, broker, etc.), Under the penalty of disciplinary measures, rescission of contract and any criminal or civil lawsuit that may result according to the law.

Signing of the code of conduct should be preferentially carried out and confirmed electronically.

Complete name/company name: _____

CPF/CNPJ: _____

Department: _____

Signature: _____

Date: _____

MRV & CO

Check the digital version of the
CodeConduct by scanning the QR Code:

