



CODE OF ETHICS

PROSPECTA GLOBAL SOLUTIONS

Summary

Values.....	01
Considerations.....	02
Compliance with Laws and Regulations.....	03
Information	04
Communication, Social Media.....	05
Patrimony, Corruption.....	06
Employees and Work Environment	07
Performance and Training.....	07
Discrimination in the Work Environment.....	07
Violence	08
Kinship.....	08
Moral and Sexual Harassment.....	08
Use of Drugs and Alcoholics Beverages.....	09
Conflict of Interests.....	09
Exploitation of Adult or Child Labor.....	09
Political-Party Activities.....	10
Work Health and Safety.....	10
Compliance with Policies, Corporate Rules and Procedures, Abuse and Sexual Exploitation of Children and Adolescents..	10
Customers, Suppliers, Competitors.....	11
Shareholders, Public Authorities, Class Entities.....	12
Community, Environment.....	13
Violation of the Code of Ethics	14
Compromise term.....	15

Our Values

To ensure our continued and sustainable growth while keeping it simple, we base our management practices on the following values:

» Punctuality:

It is the central pillar of all Prospecta Global Solutions activities. We believe that the continuous search to comply with quality, within the deadline and in the established time are premises for a company that values the time of our customers, suppliers and collaborators.

» Transparency:

We cannot grow without the fullest and most complete transparency of our actions, whether operational or strategic, whether with our customers, employees or suppliers.

» Participative management:

A company is built with people. A group oriented and aligned with values reaches a strong foundation for all, together, achieve in a participatory way the growth and recognition needed to build a far-off company.

» Governance:

We promote, through a structured system of governance at all levels, transparency, integrity, ethics and security in everything we do, respecting the rights of all interested parties.

» Efficiency:

We prioritize simplicity in our relationships and pursue increased efficiency and competitiveness making our services, products and processes even better. We permanently seek to do more with less, with excellence in execution.

» Leadership and Culture:

We develop people to perform their role with excellence in the unfolding of the strategy and in maintaining and disseminating the company's culture. Leading is an art of two-way, where it is not enough to build great leaders, but we need people willing to leadership and continuous improvement.

Considerations

The sustainability of our growth depends, fundamentally, on an ethically correct conduct in the relationship between the interested parties. In addition to a formal document, which is the Code of Ethics, the Prospecta Global Solutions respects the local laws and cultures of each country where it is present.

Who is the Code of Ethics intended for?


The Prospecta Global Solutions' Code of Ethics presents the conduct expected of employees, managers and administrators in the exercise of activities, in all units of Prospecta Global Solutions. In this document, all businesses, products, verticals, partners, franchisees, branches or sales channels will be referred to as Prospect only.

Additionally, Prospecta Global Solutions encourages the application of its Code of Ethics, for the other interested parts:

- » Related Companies
- » Suppliers
- » Service Providers
- » Sales Representatives
- » Distributors
- » Resellers
- » Customers
- » Investors
- » Community
- » Govern



Kleyton Clemente
CEO - Founder



Carolina de Campos
CEO - Founder

Compliance with Laws and Regulations

We observe the applicable legislation to our activity, including treaties, rules, commercial agreements and others, in the places where we operate, as well as in the relationships we maintain with interested parties.

Expected Conduct:

• Know the legislation applicable to its activities and must comply with it so as not to harm the business of PROSPECTA Global Solutions.



Information

We respect confidentiality and guarantee the integrity and availability of information under our responsibility. The confidential and proprietary information may include services development, methods, products, projects, new business, price charts, profit margin, methods, materials, commercial proposals, contracts, acceptance terms and others.

Expected Conduct:

✎ Keep confidential and protected information confidential or restricted, owned by PROSPECTA Global Solutions.

✎ Keep private and protected the confidential or restrict information, owned by Prospecta Global Solutions or of other interested parties to which may have access, or which may be entrusted by reason of their responsibilities and functions, the same applies to employees' personal data.

✎ Do not reproduce or disseminate such information, whether total or partial, on any communication channel, unless authorized by the information owner, or required by law or by Juridical decision.

✎ Do not use such information to obtain self-advantages or for third parties.

✎ Only make information requested by interested parties available when given authority or receive superior authorization to do so.

✎ Provide authorized information in a complete, accurate, clear and timely manner.

✎ Avoid exposing confidential matters in public places.

✎ Not to create, disseminate, pass on false information and/or news related to Prospecta Global Solutions and Stakeholders.



Communication

We conduct the communication in transparent and trustworthy way, fulfilling the disclosure procedures specified by the Prospecta Global Solutions' Administration.

Expected Conduct:

Respect, in any relationship with the social communication bodies, the procedures for disclosure defined by PROSPECTA Global Solutions, forwarding requests from any communication vehicles to the press office of Prospecta Global Solutions.

Social Media

We respect freedom of speech, if it's done with respect, balance, common sense, and that it does not negatively expose the image of Prospecta Global Solutions, its employees and interested parties.

Expected Conduct:

Do not expose or disclosure information, facts, events and images related to Prospecta Global Solutions.

Do not use any Prospecta Global Solutions' identification, such as clothing, caps, etc., in any situations that harm the company's image.

Do not expose images, information or employees' opinions or interested parties without their consent, in environments of Prospecta Global Solutions or activities to it related.



Patrimony

We use our patrimony responsibly and efficiently, aiming to guarantee its preservation, reaching then the Prospecta Global Solutions purposes.

Expected Conduct:

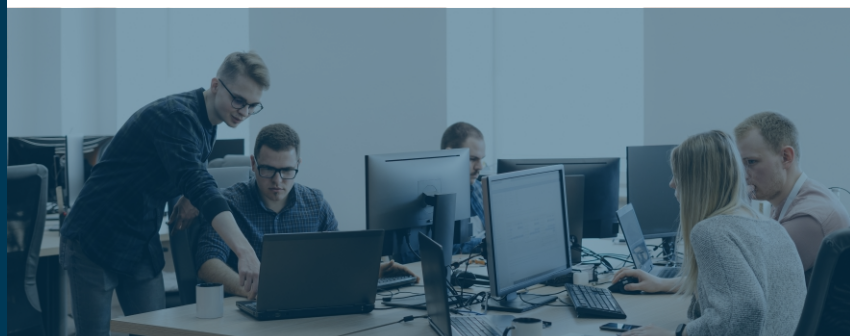
- ✎ Ensure the patrimony good use and conservation so that there are no losses, damage or waste.
- ✎ Respect intellectual property protected or not by copyright, patents or trademarks registered, such as: drawings, projects, spreadsheets, production methods, methods of services, systems, etc.
- ✎ Do not use Prospecta Global Solutions patrimony for private purposes or for the benefit of third parties.
- ✎ Communicate any case of theft, robbery, fraud or unauthorized removal of patrimony from the Prospecta Global Solutions.

Corruption

We condemn all and any form of corruption, as well as offer and receiving of undue advantage of any kind, in the business conduction.

Expected Conduct:

- ✎ Do not accept or request any undue advantage, for self-benefit or that of Prospecta Global Solutions such as gifts, benefits or financial gratuities. Can be accepted corporate gifts of compatible value.
- ✎ Do not promise, offer or give, directly or indirectly, an undue advantage to a public agent or private, or third party to it related.
- ✎ Do not tolerate money laundering, as well as not finance, fund, sponsor or in any way subsidize the practice of illicit acts.
- ✎ Do not harm or hinder any inspection or investigation by bodies, entities or public agents at any level of performance.



Employees and Work Environment

Valuing employees through participatory management, creating opportunities for personal and professional development, training, recognition of good performance, remuneration and benefits. We permanently invest in safe, healthy work environments with respectful internal relationships.

Performance and Training

We encourage the self-development of employees and ensure that the investments in capacity building are made fairly and strategically effectively through the assessment of essential and managerial skills of our employees.

Expected Conduct:

- ☛ The employee must apply the knowledge and necessary abilities for good performance.
- ☛ The employee must compromise to avail himself of the opportunities propitiated by Prospecta Global Solutions.
- ☛ The administrators and managers must evaluate, individually orientate and provide information that supports the personal and professional development of employees.

Discrimination in the Work Environment

We respect diversity, not admitting discrimination, prejudice or favoring of any nature, such as ethnics, skin color, religion, culture, age, gender, political conviction, nationality, regionality, marital status, sexual orientation, physical and intellectual condition, among others.

Expected Conduct:

- ☛ To relate within the highest standard of human and professional respect, regardless of the position he occupies, the function he performs and the time with the company.
- ☛ In the processes of recruitment, selection, performance evaluation, promotion, remuneration and dismissal, people must be evaluated impartially, free from favoritism and based on technical criteria, considering the job requirements.

Violence

We do not admit violence manifestations in any form, both in the work environment, and in other activities related to Prospecta Global Solutions.

Expected Conduct:

- Do not physically or morally attack, nor cause any situation that could lead to confrontation with anyone.

Regarding carrying weapons:

- Do not carry weapons of any kind on Prospecta Global Solutions premises unless inherent to the function or expressly authorized by the management of Prospecta Global Solutions.

- Comply with the conditions defined by the third party when representing the Prospecta Global Solutions.

Kinship

It is desirable not to directly subordinate blood relatives up to the 3rd degree and the like: parents, children, spouses, grandchildren, great-grandchildren, brothers, brothers-in-law, uncles, nephews, in-laws, stepchildren, sons-in-law and daughters-in-law, if there are cases, it must be known and

Expected Conduct:

- Communicate with your superior if you are in a situation of direct subordination.

Moral and Sexual Harassment

We do not admit any form of moral or sexual harassment, such as insinuations, jokes, proposals of offensive physical acts, subtle or explicit pressure to obtain favors, threats, intimidation, teasing and subjecting individuals to ridicule or unreasonable exclusion is also prohibited.

Expected Conduct:

- Do not use your position, function of influence to harass, obtain personal benefits or any other form of favoring you or others.

- Refrain from any disrespectful conduct that could offend, denigrate, intimidate or embarrass co-workers.

- Administrators, managers and bosses must be attentive to curb any situations of moral or sexual embarrassment involving its collaborators.

Use of Drugs and Alcoholic Beverages

We prohibit the possession and use of illegal drugs and alcoholic beverages that may impair the work ability, putting health and safety at risk in the work environment and compromising the results of Prospecta Global Solutions.

Expected Conduct:

Do not distribute, carry or consume alcohol or any illegal drugs in the Prospecta Global Solutions premises during period in which it is at its service or in any way that may compromise your conduct and professional performance.

We prohibit the access or permanence, on the PROSPECTA Global Solutions premises, of people whose conduct or performance is altered using illegal drugs or alcoholic drinks.

Conflict of Interests

We do not admit that employees, managers and administrators participate in any activity or exercise functions that conflict with Prospecta Global Solutions' interests or damage their performance.

Expected Conduct:

Not to carry out external activities, remunerated or not, and that may compete with the interests of Prospecta Global Solutions or cause physical or emotional distress that harms their professional conduct or performance. In case of doubt, the employee should consult the immediate manager.

Refrain from influencing or interfering in operational, technical or commercial decisions with suppliers, customers or any other interested party in which the employee, manager or administrator, his/her spouse, first and second degree relative or anyone close to you may influence impartiality in decision-making.

Do not sell products or services on Prospecta Global Solutions premises, inside or outside your working hours.

If any situation of conflict of interest is identified by an employee, manager, administrator or shareholder, he must immediately manifest his conflict of interests, professional or private. If you do not, any other person who is aware of the fact may do it instead. As soon as such a conflict of interest is identified, the person involved must withdraw, even physically, from discussions and deliberations in relation to the specific topic.

Exploitation of Adult or Child Labor

We affirm our commitment to the eradication of all forms of child labor, forced and slave, under any circumstances, nor do we maintain relationships with companies and people that disrespect this conduct.

Expected Conduct:

Report on the existence of child labor practices, forced and slave.

Political-Party Activities

We respect the freedom to participate in the party-political process, in the exercise of its citizenship in accordance with current legislation.

Expected Conduct:

✦ Any party-political initiative must take place outside working hours and without using the resources, dependencies or name of Prospecta Global Solutions.

Work Health and Safety

We value a safe and healthy work environment.

- ✦ Provide a safe environment for employees to carry out activities.
- ✦ Carry out your activities and processes safely.
- ✦ Identify, correct or report activities outside health and safety standards.
- ✦ Comply with policies, standards and procedures for health and safety at work.

Compliance with Policies, Corporate Rules and Procedures

We consider important the knowledge and application of the policies, corporate rules and procedures that regulate the activities and processes of Prospecta Global Solutions.

Expected Conduct:

- ✦ Know and apply the corporate policies, rules and procedures that regulate their activities and processes.
- ✦ Administrators and managers are responsible for guiding the employee and stakeholders about the corporate policies, rules and procedures involving their area of acting.

Abuse and Sexual Exploitation of Children and Adolescents

We repudiate any form of abuse or sexual exploitation of children and adolescents, nor do we tolerate the omission of these practices by anyone.

Expected Conduct:

- ✦ Report on the existence of child or adolescent abuse or sexual exploitation.

Clients

We add value to our clients by providing quality products and services that are internationally competitive.

Expected Conduct:

☛ Treat the customers equally, with respect, attention, proactivity and agility while providing for their needs.

Suppliers and Service Providers

We consider our suppliers and service providers as business partners for the pursuit of sustainable development, treating them equally, free of favors and respecting the principles of free competition.

Expected Conduct:

☛ Select suppliers and service providers based on technical, commercial and impartial criteria, which optimize the cost X benefit ratio, in their ethical and socio-environmental responsible posture and compliance with legislation.

Competitors

We believe in free, loyal and fair competition as the basis for a competitive environment that gives priority to meeting the needs of customers.

Expected Conduct:

☛ Respect the competition, not denigrating it by using false, misleading or illegal information.

☛ Not obtain any information from competitors illegally, such as ideological falsehood, industrial espionage, blackmail, hacking of computer and smartphones.

☛ Not to frustrate, defraud, prevent or try to prevent the competitive nature of bidding or to remove bidder, illegally in the bidding process.

☛ Not to manipulate or defraud the economic-financial balance of contracts entered by public or private administration or any other intervening.



Shareholders and Capital Market

We are constantly improving our Corporate Governance practices, preserving confidential information and operating in a transparent, reliable and equal manner, in the relationship with interest parties, respecting legal provisions.

Expected Conduct:

➤ Attended the internal control's structure and registered all transactions in a way to reflect the reality of operations.

➤ Maintain secrecy, including in relationships with colleagues and family, regarding financial information, sales, profitability, new products or others that have or may have influence on decision to trade with the securities issued by Prospecta Global Solutions. Do not trade in these securities until this information is released publicly.

➤ Cooperate with auditors, providing the requested information in a transparent and trustworthy way.

Public Authorities

We relate to public authorities respecting the good practices of corporate governance.

Expected Conduct:

➤ Maintain ethical, transparent and cooperative relations with the public authorities, in accordance with the applicable legislation.

Class Entities

We maintain a relationship with class representative entities to discuss legitimate topics of collective interest that may, directly or indirectly, affect the operations of the Prospecta Global Solutions.

Expected Conduct:

➤ Obtain prior authorization from Prospecta Global Solutions to represent it in class entities, such as chambers of commerce, unions, professional and sectorial entities.

➤ The information exchanged must be limited to topics of collective interest and must not expose sensitive data from Prospecta Global Solutions, whether in meetings or formal interactions, events or informal conversations.

Community

In our decisions, we consider the analysis of potential impacts on community life, strengthening economic, environmental and social development.

Expected Conduct:

- Seek participation in community life through volunteering, including in the management of non-profit entities, in order to contribute to their development.

- Be aware of the potential impacts arising from carrying out their tasks and act according to the procedures established by Prospecta Global Solutions.

Environment

We seek to avoid or minimize the environmental impact of our products and production processes, exercising sustainable economic activity.

Expected Conduct:

- At least comply with the applicable environmental legislation.

- Apply materials whose proper use does not harm health or the environment.



Violation of the Code of Ethics

The conduct described in this Code must be practiced by all employees, managers and administrators during the performance of their activities, and Prospecta Global Solutions undertakes to provide the necessary conditions for this to happen.

Employees, managers or administrators who fail to comply with the Code of Ethics or who have information during an investigation are subject to disciplinary action.

Anyone who still has doubts about the meaning, intent or application of the Code of Ethics must clarify their queries promptly.

We expect that any violation of the Code that you become aware of will be reported immediately. Don't be conniving!

In case of any doubt, call:

Brazil: 55 (11) 4130-7444

There will be situations in everyday life not addressed by the expected conduct described in this Code, which will raise doubts as to what should be done.

1. Just this once...
2. No one will know...
3. Everyone does this...
4. You can hide...
5. This conversation never took place...
6. This conversation never took place...

In these situations, to guide you, reread the first paragraph of the relevant item of the Code and check if there are any conflicts. If necessary, answer the following questions:

- ☞ Is it nice what you're thinking of doing?
- ☞ Is this attitude impartial and honest?
- ☞ Will this action be questioned after a while?
- ☞ How will I feel afterwards?
- ☞ How would this look on the front page of newspapers?
- ☞ What would I advise my children to do?
- ☞ How would I feel if family, friends and neighbors knew?

We must not omit ourselves when faced with these situations of doubt. Answering these questions will help you choose the best course of action in these cases or help you recognize that there is a violation of the Code that needs to be reported.

Commitment Term – Code of Ethics

I declare that I have received the Code of Ethics from PROSPECTA Global Solutions and I undertake to comply with it in the exercise of my activities in the company, to ensure its compliance and for all who must respect it, and in case I have subordinates or third parties under my responsibility, it is up to me to communicate with them about the requirements of this code.

FULL NAME: _____

DATE AND LOCATION: _____

REGISTER: _____

SIGNATURE:



PROSPECTA 
GLOBAL SOLUTIONS