

DANIEL			
Type	Code	Date / Issue	Issuer

CODE OF CONDUCT

CONTENTS

- 1. PURPOSE.....2**
- 2. APPLICATION2**
- 3. DEFINITIONS2**
- 4. ETHICAL PRINCIPLES3**
- 5. RESPECT FOR DIVERSITY AND INCLUSION3**
- 6. CONFLICTS OF INTEREST4**
- 7. GIFTS AND ENTERTAINMENT4**
- 8. EXTERNAL RELATIONSHIPS5**
- 9. COMMUNICATION AND REPORTING CHANNELS7**
- 10. RESPONSIBILITIES7**
- 11. REFERENCES.....7**
- 12. REVIEW HISTORY8**
- 13. APPROVAL8**

DANIEL			
Type	Code	Date / Issue	Issuer

1. PURPOSE

The purpose of this Code of Conduct is to establish an individual and collective commitment to respect the values of Daniel Law (“Firm”), in the way that all Employees relate to each other, to their teams, clients, service providers and their communities, whether inside or outside their work environment.

Daniel Law believes that following the principles contained herein contribute to reduce subjectivity to a minimum in the interpretation of the rules of conduct expected from all those who relate internally or externally with Daniel, hoping to ensure the perpetuity and credibility of the Firm in the national and international Legal Market for Intellectual Property.

2. APPLICATION

This code of conduct covers all Daniel Law’s Employees, regardless of their hierarchical level or area of operation. It also guides the conduct to be adopted with and by clients, suppliers and other business partners.

3. DEFINITIONS

Employees: all partners, staff, service providers, outsourced workers, young apprentices and trainees at Daniel Law.

Diversity: diversity, in the work environment and relationships, is deemed to be the social and cultural characteristics of our Employees, such as characteristics related to sex/gender, race, ethnicity, age, disabilities, social class, sexual orientation, gender identity, marital status, religion, place of birth, nationality, accent, physical characteristics, among other peculiarities that recognize the differences between individuals, treating them with dignity, equality and equity.

Prejudice: for Daniel Law, the prejudging of individuals or groups of individuals, according to preconceived ideas that attribute negative qualities to them is deemed to be prejudice.

Discrimination: situations that distinguish between individuals that compromise equal treatment, favor exclusion and degrade the dignity and rights of the individual are deemed to be to discrimination.

Public Official: as expressed in Law no. 8,429/1992, “*anyone who exercises, even temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or connection, mandate, position, job or function*” in entities subsidized with public funds is deemed to be a public official.

4. ETHICAL PRINCIPLES

DANIEL			
Type	Code	Date / Issue	Issuer

The ethical principles of Daniel Law are in line with the precepts of the Code of Ethics and Discipline of the Brazilian Bar Association, and of the different professional classes that make up our staff, as detailed below:

- I. **Transparency** - commitment to ensure that all those involved in the activities of Daniel Law have fast and secure access to relevant information about facts, acts and business carried out by the Firm.
- II. **Lawfulness** - respect for national legislation and in the countries where we operate, as well as the internal rules that regulate the activities of each client, in accordance with the Brazilian constitutional principles and the international treaties to which Brazil is a signatory.
- III. **Fairness/Loyalty** - full respect for our clients, business partners, and employees, striving for honest and lasting relationships.
- IV. **Professionalism** – acting as technical references in the Intellectual Property segment, committed to finding the best solutions for our clients.
- V. **Respect for people** - we value life, the assertion of citizenship, we respect individual differences and the Diversity of social groups with equity.
- VI. **Commercial integrity** - honesty and consistency between what is said and what is done are fundamental for Daniel Law. We repudiate all forms of fraud and corruption, and we demand equal commitment and performance from our Employees and suppliers.

The relationships and conduct of Daniel Law’s employees must always be guided by transparency, lawfulness, fairness/loyalty, professionalism, respect for people and commercial integrity. These are the ethical principles that guide us in all daily activities, and make Daniel a respectful, respected and well recognized company in the Intellectual Property market, both nationally and internationally.

5. RESPECT FOR DIVERSITY AND INCLUSION

Daniel Law ensures equal opportunities for access to work and professional advancement through selection, admission and promotion processes, aiming to identify the most appropriate and qualified people for the profile and needs of the position.

In addition, guided by respect for international human rights norms, we do not agree with behaviors that characterize sexual or moral harassment, Prejudice or any type of Discrimination. Examples of unacceptable conduct are:

- a. preferences, favors or undue advantages, whatever they may be, resulting from social position or seniority;

DANIEL			
Type	Code	Date / Issue	Issuer

- b. intimidation, humiliation, threats or abusive attitudes, whether through gestures, derogatory language or behavior against the moral, psychological and physical integrity of any person;
- c. behaviors or words that can be characterized as sexual harassment; and/or
- d. Discrimination based on sex/gender, race/ethnicity, age, marital status, religion, sexual orientation, gender identity, social class, disabilities, physical characteristics, nationality, place of birth, accent, political opinion or any other form of Prejudice and Discrimination.

6 CONFLICTS OF INTEREST

The use of position or influence by employees at Daniel Law to promote private interests may generate conflict through their inappropriate conduct. Examples of situations that cannot happen:

- a. any type of favor, material or financial advantages that an employee receives from a supplier or a commercial partner of Daniel Law.
- b. misuse of privileged information obtained within Daniel Law.
- c. a family relationship between an employee, supplier and/or business partners that compromises business impartiality.
- d. performance by an employee of other professional activities that may interfere with Daniel Law's business, even if performed outside working hours.
- e. any unjustifiable favoritism directed by an employee to a particular client and/or business partner, to the detriment of others or the interests of Daniel Law itself.
- f. parallel activities that are performed by the employee during working hours or with Daniel Law's resources.

7. GIFTS AND ENTERTAINMENT

Daniel Law has its own rules about courtesies, such as gifts and entertainment opportunities, possibly being offered by clients, suppliers and partners. Such rules make it clear that these offers should not affect internal and external decision-making processes, as well as the carrying out of business and the conducting of contracts.

In general, Daniel Law allows its Employees to receive courtesies, but there is a maximum amount established for this and under no circumstances whatsoever should the receipt of such gifts influence the choice of a supplier and/or business partner.

DANIEL			
Type	Code	Date / Issue	Issuer

Inappropriate gifts and entertainment opportunities can harm Daniel Law and lead to improper business decisions. If a courtesy is offered above the stipulated amount, the Employee at Daniel must thank and decline the offer cordially, explaining Daniel Law's rule of conduct. The same principles must be applied when Daniel Law offers gifts and invitations to its suppliers and business partners.

8. EXTERNAL RELATIONSHIPS

Daniel Law does not operate in isolation in the Brazilian market and abroad. We understand that our businesses are related to a constant interaction with other entities, public bodies, individuals and companies from the most diverse segments. Examples of these external relationships are contacts with clients, the media, public entities and government bodies, unions, competitors and suppliers, among others.

Our communication, both internally and with our clients and external partners, must be simple, avoiding the use of overly technical terms, to ensure the understanding and alignment of all audiences.

In these interactions, Daniel Law's Employees are expected to:

I. WITH CLIENTS

Customer satisfaction is the measure of our success. Therefore, our commitment is to build solid and reliable relationships, improve our service and the quality of the services we offer.

We seek to serve clients with professionalism, transparency, respect and by providing open relationship channels.

Our Employees are responsible for acting ethically, prioritizing the client's needs, not passing on unreliable information or promising anything that is in conflict with Daniel Law's internal procedures.

II. WITH THE MEDIA

Daniel Law seeks to build its good image and reputation by establishing a dialogue with its clients and other audiences through the media, which represent an important tool for the dissemination of our work and our professional commitments.

Daniel Law's relationship with the media is based on trust, mutual respect, ethics and professionalism. The dissemination of information to the external public is the entire responsibility of the marketing area, through the press office hired to represent us.

II. AT CONGRESSES, LECTURES, SEMINARS AND OTHER EVENTS REPRESENTING DANIEL LAW

DANIEL			
Type	Code	Date / Issue	Issuer

The participation of Employees at congresses, lectures, seminars and any other events, has the sole and exclusive purpose of fulfilling Daniel Law's institutional mission, contributing to the institutional growth of the Intellectual Property area, as well as developing Daniel's client portfolio.

Only authorized spokespersons can speak on behalf of Daniel Law. The same goes for recordings and interviews, which can only take place with Daniel's awareness and approval.

Employees invited to deliver a speech or lecture, or publish an article or academic paper containing a topic related to Daniel Law, must first consult the Marketing area for the material to be analyzed and approved. Such expressions of opinion must only address technical and legal aspects, and the Employee should refrain from adopting any ideological or political stance or one that is contrary to the interests of our clients and/or the Firm.

An Employee that identifies any situation of risk or noncompliance that could apparently generate negative repercussions for the company and consequent damage to the image and reputation of Daniel Law's brand, must immediately inform the Marketing area so that it can take appropriate measures.

I. WITH PUBLIC ENTITIES AND GOVERNMENT BODIES

We do not tolerate favors or payments of any amounts or material possessions to any Public Official in order to obtain advantages in decisions or the use influence to maintain and/or establish business.

An unlawful or improper payment can cause irreparable damage to our Firm's reputation, in addition to generating civil and even criminal liability for both Daniel Law and the Employees involved, as set forth in the **Brazilian Anticorruption Law (No. 12,846/2013)**.

Individuals can be prosecuted for carrying out an act that they did not know constituted a violation of the law. Therefore, Employees must be particularly cautious in their approach and relationship with public entities and government bodies.

II. WITH UNIONS

Daniel Law values its relationship with the unions and their importance in its relationship with Employees. We respect Employees freely joining unions and collective bargaining, recognizing its legitimacy and complying with collective agreements.

III. WITH COMPETITORS

Daniel Law is committed to fair competition, and it seeks to maintain a professional relationship of transparency, respect and cordiality with its competitors.

DANIEL			
Type	Code	Date / Issue	Issuer

Thus, we condemn attitudes of corruption, the formation of cartels or acts that could defraud the mechanisms that scrutinize the sector and, in particular, the regulations and the Code of Ethics of the Brazilian Bar Association (OAB).

IV. SUPPLIERS

Daniel Law does not tolerate suppliers and partner companies adopting inadequate working conditions, making use of work analogous to slave or child labor, and/or being negligent with the national legislation to combat and prevent the sexual exploitation of children and adolescents.

We are committed to supporting Diversity and are guided by ethical and Human Rights principles, respect for the Dignity of the Human Person, and impartiality and equality with our stakeholders. Therefore, we value all our suppliers having the same commitment.

9. COMMUNICATION AND REPORTING CHANNELS

Failure to comply with the rules contained in this Code of Conduct cannot be justified by being unaware of them or by merely following a superior's orders. Use the available communication channels to report actual or supposed violations of which you become aware, always in as much detail as possible.

External public: we ask you to access our website: <https://www.daniel-ip.com/pt/contato/>, in the option "Contact", and register your report in the field "Send a message".

Employees: contact the Human Resources Department in person or via the e-mail rh@daniel-ip.com.

We emphasize that people who report or those involved will be treated in a confidential and respectful manner, with no Discrimination or prejudgment, preserving the dignity of all those involved. At all times, the principles of neutrality, impersonality and impartiality will be observed during the handling of the events.

10. RESPONSIBILITIES

It is the responsibility of the Human Resources area to update this Code of Conduct whenever necessary and keep it available to everyone.

11. REFERENCES

Brazilian Bar Association (OAB) Code of Ethics and Discipline

Law no. 12,846/2013 – Brazilian Anticorruption Law

Company Bylaws

12. REVIEW HISTORY

Internal Use	DANIEL LAW	Page 7 of 8
--------------	------------	-------------

DANIEL			
Type	Code	Date / Issue	Issuer

Review	Date	Reason	Responsible Person
00	19/09/2018	Update	Bruna Souza
01	19/06/2019	Update	Fernanda Faria
02	13/11/2019	Update	Fernanda Faria
03	10/12/2019	Review	Hannah Fernandes

13. APPROVAL

Validation	Responsible Person	Area	Signature
00	Alicia Daniel-Shores	Presidency	