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Regulations		January/2022	Internal Audit and Compliance

CODE OF CONDUCT

			
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1. GOAL

At Daniel Global IP LP (“Company”) we are committed to our code of conduct, in the way that each Collaborator relates to each other, to their teams, customers, service providers and their communities, whether inside or outside their work environment.

Daniel Global IP LP believes that following the principles contained herein contributes to reducing, to a minimum, subjectivity in the interpretation of the standards of conduct expected from all those who relate internally or externally to Daniel Global IP LP, hoping to ensure the perpetuity and credibility of the Company in the legal market for Intellectual Property.

Everyone should be familiar with this Code and the supplementary procedures. You can consult it on the Company’s website (<https://www.danielhub.com>).

2. APPLICATION

This code of conduct covers all Daniel Global IP LP’ Collaborators, regardless of their hierarchical level or area of expertise. It also guides the conduct to be adopted with and by customers, suppliers, and other commercial partners, in this code designated as “Third-parties”.


3. DEFINITIONS

When mentioned in this Code of Conduct, the terms described below have the following meanings:

Public Agent: it is considered a public agent, anyone who practices, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, employment, or function in subsidized entities with public resources.

Gifts: any object, without commercial value or that is distributed as a courtesy, advertisement, usual dissemination or on the occasion of special events or commemorative dates (e.g.: pen, agenda, a mug with the logo of the Company or the Third-party involved).

Ethics Channel (Safe Contact): communication channel for reports and complaints via e-mail: compliance@danielhub.com, available to Collaborators, Third-parties and to any society that directly or indirectly relates to Daniel Global IP LP.

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Collaborators: all partners, Collaborators, service providers, contractors, young apprentices, and interns at Daniel Global IP LP.

Ethics Committee: Commission formed by members of Daniel Global IP LP with deliberative powers, designated to receive notifications of reports and/or complaints.

Conflict of interests: situations involving people or organizations to which Collaborators or family members have a financial or residual interest, and which may compromise the interests of the Company, or inappropriately influence the performance of Collaborators.

Corruption: the act of obtaining, in an improper manner, direct or indirect benefits to the detriment of self-interest, of Third-parties and other related parties, where the hierarchical position or professional activity may also be used for this purpose.


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

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

Due Diligence: due diligence refers to the process of study, investigation, analysis and the detailed evaluation of information about a company, the subject of a possible negotiation, aiming at the identification of any relevant distortions and risks, resulting from business practices.

Entertainment: is a way to please or amuse people or a group of them when they are diverted from their daily concerns.

Money laundry: process by which resources originating from illegal activities are transformed into assets of apparently legal origin. Those responsible for these operations cause the values obtained through illegal activities, such as drug trafficking, arms trade, terrorism, extortion, tax fraud, among others, to be concealed or hidden, appearing as a result of legal commercial operations.

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Facilitation Payments: consist of offering or promising undue advantages to a Public Agent, usually of a low hierarchical level, in order to expedite administrative procedures. They are not to be confused with bribery, since facilitation aims to speed up a certain official act.

Business partners: are those who represent or act on behalf of the company that hires them (for example: intermediaries, resellers, distributors, dispatchers, lawyers, consortium members, among other entities, can be considered in this class).


Prejudice: for Daniel Global IP LP, prejudice is considered to prejudge individuals or groups of individuals, according to preconceived ideas that attribute negative qualities to them.

4. ETHICAL PRINCIPLES

The ethical principles of Daniel Global IP LP are in line with the precepts of the Code of Ethics and Discipline of the different professional classes that make up our workforce, as detailed below:

- a. **Transparency** – commitment to ensure that all those involved in the activities of Daniel Global IP LP have quick and safe access to relevant information about facts, acts and business carried out by the Company;
- b. **Legality** – respect for national legislation and from the countries where we operate, as well as the internal rules that regulate the activities of each customer, in accordance with the local constitutional;
- c. **Loyalty** – full respect for our customers, Business Partners, and Collaborators, striving for honest and lasting relationships;
- d. **Professionalism** – act as technical references in the Intellectual Property segment, committed to tailoring the best solutions for our customers;
- e. **Respect for people** – we value life, the affirmation of citizenship, we respect individual differences and the diversity of social groups with equity;
- f. **Business Integrity** – honesty and consistency between speech and practice are fundamental for Daniel Global IP LP. We reject all forms of fraud and corruption, and we demand from our Collaborators, Business Partners and suppliers equal commitment and performance.

The relations and conduct of Daniel Global IP LP' Collaborators must always be guided by transparency, legality, loyalty, professionalism, respect for people and commercial integrity.

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These are the ethical principles that guide us in all daily activities, and make the Company a respectful, respected and a well-recognized Company in the Intellectual Property market.

5. RESPECT FOR DIVERSITY AND INCLUSION

Daniel Global IP LP ensures equal opportunities for access to work and professional development through the selection, admission and promotion processes, aiming to identify the most suitable and qualified people to the profile and needs of the position.


In addition, guided by respect for international human rights standards, we do not agree with behaviors that characterize sexual, moral harassment, prejudice or any type of discrimination. Examples of unacceptable conducts are:

- a. preferences, favors or undue advantages, whatever they may be, resulting from social, hierarchical position or working time;
- b. intimidation, humiliation, threats or abusive attitudes, whether through gestures, derogatory languages or behaviors 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 of sex/gender, race/ethnicity, age, marital status, disabilities, religion, sexual orientation, gender identity, social class, disabilities, physical characteristics, nationality, naturalness, accent, political opinion or any other form of prejudice and discrimination.

6. CONFLICTS OF INTEREST

The use of a position or influence by a Collaborator of Daniel Global IP LP to promote private interests may generate a conflict through his/her inappropriate conduct. Examples of situations that must not happen:

- a. any type of favoritism, material or financial advantages that a Collaborator receives from a supplier or Commercial Partner of Daniel Global IP LP;
- b. misuse of privileged information obtained within Daniel Global IP LP.
- c. kinship relationship between the Collaborator, supplier and/or Business Partners, which compromises business impartiality;
- d. performance, by the Collaborator, of other professional activities that may interfere with Daniel Global IP LP' business, even if performed outside working hours;

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- e. any unjustifiable favoring directed by the Collaborator to a specific customer and/or Business Partner, to the detriment of the others or the interests of Daniel Global IP LP;
- f. parallel activities that are performed by the Collaborator during working hours or with the resources of Daniel Global IP LP.

7. GIFTS AND ENTERTAINMENT

Daniel Global IP LP has its own rules for offering and receiving courtesies, such as gifts and entertainment opportunities, which may be offered to and by Third-parties. These rules make it clear that such offers must not affect internal and external decision-making processes, as well as the conduct of business and the conduct of agreements.

In general, Daniel Global IP LP allows its Collaborators to receive Free Gifts, and, under no circumstances, the receipt of such courtesy will influence the choice of a supplier and/or Business Partner. In case of doubts, consult the specific procedure or the person responsible for the Internal Audit and Compliance area at Daniel Global IP LP.

Inappropriate gifts and entertainment opportunities can harm Daniel Global IP LP and lead to improper business decisions. If a Gift is offered above the specified amount, Daniel's Collaborator must cordially thank and decline the offer, explaining the Daniel Global IP LP' standard of conduct. The same principles must be applied when Daniel Global IP LP offers gifts and invitations to its suppliers and business partners.


8. DONATIONS, CONTRIBUTIONS AND SPONSORSHIPS

A donation will only be allowed if it is transparent, and at any time, it would be possible to justify its reason and its destiny, always considering the possibility of the donation being tax-deductible.

Donations are prohibited:

- a. to individuals, organizations that represent a risk to the Company's reputation, political parties, candidates for public Company, religious institutions and any institution that poses a risk of misapplication of the donated resource;
- b. through deposits in private accounts.

All contributions in the form of sponsorship must be transparent, be based on a written contract, have a legal business purpose and be suitable for the compensation offered. Promising, offering or making contributions for the purpose of guaranteeing unjustified competitive benefits is not permitted and contributions may not be made to events organized by people or organizations with

			
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objectives that are incompatible with our business principles and/or that may harm our company's reputation.

9. USE OF COMPANY GOODS AND INFORMATION

Daniel Global IP LP' property, resources, tools and information must be used for the Company's business purposes. In view of this, the following duties apply to all Collaborators:


- a. Use the Company's goods (assets, properties, equipment, software, hardware, and any other business assets) exclusively for professional purposes and interest of the Company;
- b. Do not generate or transmit information that incites racial prejudice, the glorification of violence or other criminal acts or sexually offensive content;
- c. Do not make video or audio recordings, which relate in any way to the Company, without the consent of the superior;
- d. Ensure the security of information and the conscious use of the data at your disposal, so as not to harm the individual and business rights;
- e. Handle personal data only when necessary and only for legitimate, clear and predetermined purposes;
- f. Maintain confidentiality concerning internal matters, which have not become public knowledge. This obligation will continue to apply even after the end of the employment relationship;
- g. Do not use privileged confidential information for personal purposes, or make recommendations to Third-parties for that purpose;
- h. Generate accurate and true records and reports, whether for external or internal purposes.

10. ACCOUNTING RECORDS

Daniel Global IP LP is committed to ensuring that all data, information, documents and accounting records of the Company, created by itself or under its responsibility, are complete, accurate, honestly reflect each transaction, and are generated in due time and in accordance with the applicable accounting rules and standards.

11. ANTI-BRIBERY AND ANTICORRUPTION

The Company prohibits the practice of any and all acts harmful to the public administration, as provided for in the applicable national anti-corruption laws and regulations. Prohibited practices include, but are not limited to, all forms of bribery, corruption, extortion and fraud.

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Therefore, Collaborators are prohibited, directly or indirectly, from promising, offering, sponsoring, authorizing or giving undue advantage to the Public Agent or Third-party related to him/her, as well as financing, funding, sponsoring or, in any way, subsidizing the practice of illegal acts.

As internally required, the Company understands that Third-parties must also have adequate systems to ensure compliance with applicable national anti-corruption laws and regulations.

The Collaborator who needs any clarification regarding the provisions of this item or faces a situation that raises doubts or suspicions regarding the legality of payment or expense should request the appropriate advice from the Ethics Committee of the Company.

12. ENVIRONMENTAL PROTECTION, HEALTH AND SAFETY AT WORK

Despite being part of the service segment, Daniel Global IP LP encourages its Collaborators to adopt sustainable practices and respect for the environment.


Daniel Global IP LP is unconditionally committed to the protection of the health and safety of its Collaborators, being constantly attentive to work safety and occupational health. We emphasize that each Collaborator shares the responsibility of protecting his/her partner at his/her workplace.

13. INTEGRITY MECHANISM AND COMPLIANCE SYSTEM

Our Compliance System is established with the purpose of contributing to compliance with the guidelines of this Code of Conduct. Therefore, it is the duty of all Collaborators to support and engage in the activities, processes and controls of this system, in order to keep it constantly effective. If you are invited to contribute, you must agree to do so, with an emphasis on investigations and internal audits.

In particular, it is prohibited to grant or offer bribes, kickbacks, Facilitation Payments and any other benefit that constitutes an undue advantage, either directly or through Third-parties. Any type of fraud, disclosure of false information, forming a cartel and engaging in illegal activities, such as Money Laundering, unfair competition and non-compliance with current laws and codes are also prohibited acts.

Sensitive cases are treated with confidentiality and retaliation of any kind is prohibited. Only people who, necessarily, need to know the information should access it. For complaints, the principle that it is always the content and not the source that is important, is adopted.

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14. PRIVACY AND DATA PROTECTION

All Collaborators and Third-parties shall comply with privacy and data protection rules and policies and, in particular, actively contribute to ensuring that Daniel Global IP LP data as well as personal data are protected from unauthorized access and accidental or illicit situations of destruction, loss, alteration, communication or any form of inappropriate or illicit treatment.

Therefore, Collaborators and Third-parties of Daniel Global IP LP must take the appropriate measures to ensure that personal data are accessed and/or processed only by people who need such information, in the performance of their tasks, and that only data that is strictly necessary and adequate to carry out the activities should be collected, especially in relation to data classified as critical by the Information Security Policy.

In case of doubts or a possible infraction: email: compliance@danielhub.com.

15. EXTERNAL RELATIONSHIPS

We understand that our businesses are related to a constant interaction with other entities, public agencies, individuals and companies from the most diverse segments. Examples of these external relationships are contacts with customers, the media, public entities and government agencies, unions, competitors, suppliers, among others. In these interactions, Daniel Global IP LP' Collaborators 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 customers with professionalism, transparency, respect and providing open channels of relationship.

Our Collaborators are responsible for acting ethically, prioritizing the customer's needs, not passing on unreliable information or promising anything that is at odds with Daniel Global IP LP' internal processes.

II. WITH THE MEDIA

			
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Daniel Global IP LP seeks to build its good image and reputation by establishing a dialogue with its customers and other audiences through the media, which represent an important tool for disseminating our performance and our professional commitments.

Daniel Global IP LP' relationship with the media is based on trust, mutual respect, ethics and professionalism. The disclosure of information to the external public is the sole responsibility of the marketing area, through the press Company hired for representing us.

III. IN CONGRESSES, LECTURES, SEMINARS AND OTHER EVENTS REPRESENTING DANIEL GLOBAL IP LP

The participation of Collaborators in congresses, lectures, seminars and any other events, has the sole and exclusive purpose of fulfilling the institutional mission of Daniel Global IP LP, contributing to the institutional growth of the Intellectual Property area, as well as developing the Company's customer portfolio.

Only authorized spokespersons can speak on behalf of Daniel Global IP LP. Recordings and interviews are only permitted after prior knowledge and evaluation.


The Collaborator invited to give a speech, lecture, publish an article or academic work that contains a topic related to Daniel Global IP LP, should consult the Internal Audit and Compliance area in advance for analysis and approval of the material. Such statements should only address technical and legal aspects, and the Collaborator should refrain from adopting any ideological, political stance or contrary to the interests of our customers and/or the Company.

The Collaborator who identifies any risk or non-conformity situation that apparently can generate negative repercussions in society and consequent damage to the image and reputation of the Daniel Global IP LP trademark, shall immediately inform the Internal Audit and Compliance area so that it can take the appropriate measures.

IV. WITH PUBLIC ENTITIES, GOVERNMENTAL BODIES AND POLITICAL PARTIES

The duties of the management team and Collaborators are:

- a. Respect the applicable legislation and the ethical principles of this code in the relations established with public bodies in general;

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- b. Establish relationships with authorities, politicians and public agents guided by ethics, professionalism and transparency, immediately reporting to the Company any form of pressure, offer or request by a public agent contrary to these principles;
- c. Do not offer gifts, presents or any kind of financial advantage or not, to any Public Agent or politician, to people related to them, in return for private benefits or for the Company;
- d. Do not use any natural or legal person to conceal or disguise interests or the identity of those who may benefit from any illegal acts practiced.

The Collaborators of the Company are expressly prohibited in contracts and biddings with the Government:

- a. Previous agreements or combinations with competitors, which aim to defraud the competitive character and other applicable rules;
- b. Defrauding any bidding or agreement, including practices that aim to illegally remove competitors, including by offering any kind of advantage;
- c. Hinder the investigation or inspection activity of agencies, entities or Public Agents, or intervene in their performance.

The Company does not tolerate favors or payments of any amount or goods to any Public Agent with the purpose of obtaining advantages in decisions or using influence for maintaining and/or establishing business.


An illegal or improper payment can cause irreparable damage to the reputation of our Company, in addition to generating civil, administrative and even criminal liability for both Daniel Global IP LP and the Collaborators involved.

V. WITH UNIONS

Daniel Global IP LP values the relationship with the union entities and its importance in the relationship with the Collaborators. We respect the free association of Collaborators and collective negotiation, acknowledging their legitimacy and complying with collective agreements.

VI. WITH COMPETITORS

Fair competition is a commitment of Daniel Global IP LP, which seeks to maintain a professional relationship of transparency, respect and cordiality with its competitors.

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In this sense, we condemn attitudes of Corruption, cartel formation or acts that could defraud the mechanisms inspecting the sector.

VII. WITH SUPPLIERS

Daniel Global IP LP does not tolerate suppliers adopting inadequate working conditions, making use of work similar to slavery or child labor, and/or being negligent with national legislation to combat and prevent the sexual exploitation of children and adolescents.

We are committed to supporting Diversity and we are guided by ethical and human rights principles, respect for the dignity of the human person, impartiality and equality with all public we have a relationship with. Therefore, we value that all our suppliers have this same practice.

VIII. WITH COMMERCIAL PARTNERS

In addition to the requirements relating to suppliers, it is essential to:


- a. Assess the qualifications and reputation of these Third-parties before hiring (through Due Diligence);
- b. Ensure that partners understand the principles of our Company and align with them;
- c. Monitor the activities of partners, in order to ensure that they comply with the principles of ethics and integrity;
- d. Do not use the partners, under any circumstances, to carry out any illegal activity or that contravenes the requirements of this Code of Conduct;
- e. Do not fix or influence resale prices and do not impose illegal restrictions on commercial counterparties.

IX. IN EXTERNAL EVENTS – PRIVATE

It is strictly forbidden to use cases of customers and/or potential customers in external exhibitions, congresses, lectures, classes, courses or any other similar events, of a private nature.

When conducting a private paid event and/or external activity, all Collaborators are prohibited from performing activities that may conflict with Daniel Global IP LP' business.

16. COMMUNICATION AND COMPLAINT CHANNELS

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All Collaborators and Third-parties must immediately express their concerns and immediately report any behavior or situation that may be in conflict with this Code of Conduct or that violates Daniel Global IP LP’ policies, applicable laws or regulations. If they become aware of a potential or actual violation, Collaborators must inform their superior and/or use the Daniel Global IP LP Ethics Channel by reporting the violations as follows: compliance@danielhub.com.

We emphasize that the people assisted/involved will be treated in a confidential, respectful manner, without discrimination or pre-trial, preserving the dignity of all those involved. At all times, the principles of neutrality, impersonality and impartiality will be observed during the processing of the complaint that will be carried out by the Ethics Committee.

If any Collaborator or Third-party prefers not to identify himself/herself, Daniel Global IP LP will guarantee anonymity. In all cases, the identity of the person making the complaint will be kept confidential and the complainant will be informed of the progress of the complaint. More information and specific guidelines can be obtained from the Compliance area or in specific regulations.

No sanction will be imposed on a Collaborator as a result of a report of violation of this Code of Conduct. This also applies if the complaint is unfounded, as long as the information is provided in good faith.

17. RESPONSIBILITIES AND DISCIPLINARY MEASURES


It is the responsibility of the Internal Audit and Compliance area to update this Code of Conduct whenever necessary and keep it available to all.

Violations of this Code of Conduct may result in the application of disciplinary measures. Collaborators must be aware that they will be responsible for consequences arising from such violations.

Third-parties that are involved in violations of this Code of Conduct, Daniel Global IP LP policies or applicable laws and regulations, will be subject to the measures provided for in the respective contract, including the possibility of terminating the business relationship.


18. HISTORY OF REVISIONS

Review	Date	Reason	Responsible
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00	January 03, 2022	initial release	Internal Audit and Compliance
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19. APPROVALS

Validation	Responsible	Area	Signature
00	Alicia Daniel-Shores	Partner	<small>DocuSigned by:</small>  <small>93C584D6CF65459...</small>