



## **CODE OF ETHICS AND CONDUCT**

**Fazendas Klem Importação e Exportação de Café Ltda e  
filiais**

**INITIAL VERSION: 01/01/2022**

**UPDATED VERSION: 01/01/2024**



## **ABOUT THE COMPANY**

Fazendas Klem is a family. The essence of our company lies in our team, and we take pride in every member. Each individual brings unique knowledge and skills, but we all share the same mission and passion. We strive to change the way business is done by sustainably producing healthy foods and selling them through direct trade.

We began our operations in 2014, exporting coffee from the Matas de Minas region. By 2020, we were recognized in Brazil as a reference for producing some of the best specialty coffees. In 2022, we solidified our position with direct trade clients in more than 20 countries.

Fazendas Klem is committed to environmental awareness, cultivating our crops in an ecologically responsible manner, respecting native areas, enhancing biological control, and preserving springs, flora, and fauna.

The implementation of the Code of Ethics and Conduct is our way of managing the company with integrity, professionalism, and respect, always adhering to the principles, values, and practices of ethics and conduct outlined here. This Code applies to everyone associated with Fazendas Klem, including employees, suppliers, service providers, clients, and all others we interact with, including competitors, government entities, and the press.

We expect a commitment to practice and share the moral and ethical values inspired by this Code, fostering exemplary behavior with Fazendas Klem.

## **VISION, MISSION AND VALUE**

Mission:

The fundamental mission of the company is to produce high-quality sustainable foods and services by adopting regenerative agriculture practices that meet both national and international markets, while maintaining social integrity and environmental responsibility.



Vision:

To become a reference in producing sustainable foods and providing excellent services that inspire actions and promote harmony between humanity and the ecosystem, ensuring a balanced future for generations to come.

Core Value:

- Environmental Sustainability
- Social Well-being
- Quality of Products and Services
- Integrity
- Innovation
- Professionalism

## **OBJECTIVE**

The Fazendas Klem Code of Conduct reflects the highest standards of social, environmental, economic, and ethical responsibility, extending to all areas of the company and stakeholders, whether in Brazil, abroad, employees, suppliers, clients, media, or government agencies.

The primary purpose of the company is to provide understanding regarding the company's main objective:

- To establish the conduct that guides the business and relationships of Fazendas Klem through its corporate governance and its employees, including staff, interns, service providers, contractors, and temporary workers, regardless of their hierarchical position or area of activity, in an ethical, transparent, professional, and respectful manner. This includes declaring ethical values at all levels of responsibility and guiding personal and professional conduct both within and outside the workplace.

- This document does not intend to cover all the policies, procedures, and standards of Fazendas Klem. You may not find all the answers you are looking for here. If you have any questions, the company provides its employees, suppliers, and service providers with an exclusive channel for reporting situations deemed unethical, which violate this Code, internal policies, procedures, and/or current legislation. The contact information is:
  - Legal Department
  - Human Resources Department
  - Integrity Department

Other communication channels that, in your opinion, may assist you.

Anyone who is aware of any situations, actions, facts, or practices that violate the provisions of this Code, the policies, legislation, or regulations applicable to Fazendas Klem should report them through the Whistleblower Channel in accordance with Law 14,457/22.

- Email: [reclamacoes@fazendasklem.com.br](mailto:reclamacoes@fazendasklem.com.br)
- Suggestion, complaint, and praise boxes located on the properties.
- Integrity Committee, responsible for maintaining the confidentiality of all reports received.

All resources are handled with due confidentiality, maintaining social well-being and adhering to ethical principles as ensured by the Data Protection Law (LGPD). Compliance with local laws, as well as the values, policies, and procedures of Fazendas Klem, is mandatory. These standards exist to protect everyone involved with the company and the company itself from improper conduct.

It is the responsibility of employees to know, understand, and follow all Fazendas Klem policies and procedures, including but not limited to this Code, that apply to them.



## **CONSIDERATIONS**

The adoption of ethical and behavioral principles by Fazendas Klem reflects the type of organization we are part of. This Code of Conduct and Ethics should be updated annually or whenever necessary, along with the policies applied and approved by the board of directors.

This version is available to all employees, who are required to read, sign, and comply with it. Any violation will be considered a serious offense, which may lead to legal sanctions and disciplinary measures.

It will be provided to new hires, outsourced workers, service providers, clients, and employees, who must sign and receive a copy of it.

The success of Fazendas Klem depends on its reputation and relies on its employees, clients, partners, service providers, and business partners to do what is right in all aspects every day, practicing corporate values, policies, and procedures, and complying with laws in all locations and countries where we operate.

## **ETHICAL VALUES**

The ethical values of Fazendas Klem represent the fundamental principles that guide the behaviors, decisions, and practices of the organization in its interactions with employees, clients, suppliers, communities, and other stakeholders. These values form the foundation of the corporate culture and reflect the company's commitment to integrity, social responsibility, and ethical conduct.

### **1- INTEGRITY**

Act with honesty, transparency, and fairness in all business interactions, maintaining trust.

### **2- RESPECT**

Treat all individuals with dignity, promoting an inclusive and respectful work environment.



### **3- SOCIAL RESPONSIBILITY**

Contribute to the well-being of society by adopting sustainable practices and participating in social responsibility initiatives.

### **4- QUALITY**

Strive for excellence in products and services, ensuring high quality to meet the expectations of clients and partners.

### **5- EQUITY AND JUSTICE**

Treat all team members fairly and equitably, promoting equal opportunities.

### **6- ENVIRONMENT:**

Fazendas Klem's mission is to lead by example, committing to operate sustainably, actively respecting and preserving the environment in all aspects of our business while minimizing environmental impacts.

Fazendas Klem invests in renewable energy, prioritizes ecological preservation, and ensures the provision of potable water in compliance with current legislation, performing annual water and soil analyses.

The use of pesticides and agrochemicals is strictly prohibited by suppliers, employees, residents, and others associated with the property. Additionally, the company encourages suppliers, clients, and employees to promote social development and contribute to the sustainability of the communities where we operate.

### **7- CONFIDENTIALITY**

Respect the confidentiality of the company's information and demonstrate loyalty to the organization's interests.

Confidential information includes all data that is not publicly available, as such information can impact the outcome and dynamics of the business.

Public information includes data disclosed by the company on its website and/or social media.



All communication involving Fazendas Klem should be conducted by authorized individuals, preserving the company's image.

## **8- COMPLIANCE AND RISK MANAGEMENT**

Comply with all applicable laws and regulations in all operations and business transactions, and maintain a disciplined and risk-averse attitude as part of an intelligent management framework.

All relationships must adhere to labor laws, respecting working hours and weekly rest periods. Overtime must be voluntary, and salaries, benefits, and deductions must comply with the law and collective agreements.

All employees, clients, partners, outsourced workers, service providers, and others must adhere to applicable legal provisions and international anti-corruption conventions. Engaging in corruption, extortion, embezzlement, or bribery to gain unfair or improper advantage is unacceptable. Corruption is not tolerated within the company, whether by employees, suppliers, or service providers.

In full compliance with Law 12,846/2013, we do not tolerate unethical practices. Bribery, acceptance of gifts, awards, or other offers, whether monetary or otherwise, is prohibited, including in the purchasing sector or with any employee of the company.

Business decisions should be based on unbiased opinions, free from personal interest or gain. A conflict of interest may arise when personal objectives interfere with an employee's evaluation and objectivity or loyalty to Fazendas Klem. Avoid situations that create or appear to create conflicts.

## **9- SOCIAL**

Work should be conducted in a fair and ethical work environment, with treatment of employees following principles of dignity and respect.

Harassment can take various forms, such as sexual harassment, moral harassment, racial harassment, and religious harassment, all of which are unacceptable at Fazendas Klem. Examples include:



- Jokes, insults, threats, and other undesirable behaviors that reference race, color, sex, age, religion, nationality, ancestry, citizenship, physical disability, veteran status, social or economic status, or education level.
- Sexual behaviors or insinuations, requests for sexual favors, verbal or physical sexual conduct, display of objects or images with sexual connotations, unsolicited advances, inappropriate touching, or sexual coercion.
- Verbal or physical conduct that disrupts another employee's performance or creates fear or hostility in the workplace.
- Harassment through the internet and social media, involving aggressive behaviors, defamation, threats, or online stalking.

The importance of balancing work and personal life is recognized, supporting practices that promote employee well-being. Work performed must be voluntary; any form of slave, forced, or involuntary labor is not tolerated.

Fazendas Klem does not use child labor or forced labor and respects each employee's freedom to join or not join legally established associations or organizations. The possession, consumption, or being under the influence of alcoholic beverages or illegal drugs is not allowed on company premises, nor is the carrying and storage of weapons.

All employees, outsourced workers, service providers, and interns must participate in company-provided training and follow the CAT procedure in case of an accident, adhering to the stipulated requirements.

Partners must follow all safety practices and rules, including the use of personal protective equipment (PPE), cooperate with those responsible for enforcing these practices and rules, and take necessary measures to protect themselves and their colleagues. They must adhere to the PGRTR and PCMSO, respecting safety and health policies and norms specific to each area and function.

These ethical values not only shape the internal culture of the company but also influence the brand's perception by clients and the organization's relationship with society at large. Consistency in practicing these values is essential to building and maintaining the company's ethical reputation.





## **10- COPYRIGHT**

Various materials used throughout our work are protected by copyright laws, including our name and brand. It is not permitted to reproduce, distribute, or alter third-party materials whose copyrights are protected by law, except with prior authorization.

Our relationship with the press is based on trust, mutual respect, ethics, and professionalism. If you identify any information that has been incorrectly disclosed or with media outlets that could potentially generate negative repercussions in society and, consequently, damage the image and reputation of Fazendas Klem, immediately notify the legal department so that appropriate measures can be taken. In case of an approach by the press, the employee should not disclose the company's names/brands.

## **COMMERCIAL VALUES**

### **1- INTENTION**

We place our customers' needs and satisfaction at the center of our operations and business strategies.

### **2- QUALITY**

Commitment to high standards of quality in products and services, aiming to meet and/or exceed customer expectations.

### **3- PARTNERSHIPS**

We build and maintain business partnerships based on trust, transparency, and mutual benefits.

### **4- INTEGRITY**

We act with honesty and transparency in all business transactions, maintaining the trust of our customers and partners.

### **5- INNOVATION**

We are open to changes in the business environment and agile in adapting to new circumstances.



## ETHICAL CONDUCT RULES

**1- Compliance with Contractual Terms:** All employees must honor contracts, ensure safe and dignified working conditions, and adhere to labor laws and environmental regulations.

**2-Confidentiality of Information:** All information obtained from clients, whether personal or contractual, is considered confidential and must be handled with care, in compliance with data protection laws (LGPD). Sensitive information should be securely stored and protected.

**3-Non-Disclosure of Information:** Employees are not authorized to disclose company information, client details, or any other confidential data to family, friends, or colleagues, and should avoid sharing it on any media platforms.

**4- Access and Authorization:** Unauthorized access to company sectors is prohibited. Employees are not allowed to represent the company in agreements that benefit themselves or third parties.

**5- Sustainability and Environmental Preservation:** Everyone is responsible for preserving and conserving the environment, and it is forbidden to pollute natural resources or protected areas.

**6- Conflict of Interest:** Employees must avoid any situation that could create a conflict of interest and report any potential conflicts to the legal department.

**7- Data Protection:** Confidential information, including know-how, techniques, business plans, and other corporate data, is protected by law and must be treated accordingly. Violations of these rules can result in severe penalties.

## LEGAL COMPLIANCE

Fazendas Klem does not tolerate misconduct or unethical behavior. The Legal, Human Resources, Commercial, and Certification departments are responsible for ensuring that applicable obligations and responsibilities are observed within their respective areas.

If anyone is unclear about their obligations, they should consult the relevant department to ensure full understanding of the applicable laws and regulations.



Any violations of this Code will jeopardize the business relationship with the supplier.

This Code of Conduct applies to all suppliers of Fazendas Klem Importação e Exportação de Cafés Ltda, including its subsidiaries and subcontractors.

### COMMITMENT TERM

I declare that I have received, read, and am aware of and agree with the provisions set forth in the CODE OF ETHICS AND CONDUCT of Fazendas Klem Importação e Exportação de Cafés Ltda.

I undertake the obligation to fully comply with it in my activities related to Fazendas Klem, including not disclosing any information, whether during or after the indefinite term of my employment, labor, or any other relationship.

I also agree to follow the guidelines and regulations adopted by Fazendas Klem, comply with current legislation, and maintain the good faith of my actions before public and/or private bodies and/or agents.

Is there any conflict of interest situation that should be declared to you for information and/or validation by the Committee?

No

Yes, Which one?

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I \_\_\_\_\_  
TAX ID \_\_\_\_\_ I

declare that I have read, am aware of, understand, and agree with the Code of Ethics and Conduct of Fazendas Klem Importação e Exportação de Café Ltda, and I commit to adhering to the standards established above.

\_\_\_\_\_, \_\_\_\_/\_\_\_\_/\_\_\_\_.

Fazendas  
**Klem**



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