



Triunfo
PARTICIPAÇÕES E INVESTIMENTOS

TRIUNFO CODE OF CONDUCT



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1. INTRODUCTION

The activities that guide the operations of Triunfo Participações e Investimentos S.A. and its subsidiaries, associates, wholly-owned subsidiaries or companies under shared control (“Triunfo Companies”) are based on ethics, transparency and good standing, mainly focused on complying with laws that guide business practices, such as Federal Law 12,846/2013.

In this regard, the Triunfo Code of Conduct seeks to promote the alignment of behavior and attitudes of its employees, and serves as an efficient means of ethical integration companies and society. It also seeks to drive the integration of Triunfo companies in a context that is compatible with the most modern corporate practices, and to ensure management of a healthy working environment that stimulates honesty, mutual respect and moral integrity.

All employees of Triunfo companies and third parties who use their resources, both at the company’s facilities or those of their clients, are equally responsible for ensuring that these principles are understood and put into practice.

Triunfo companies do not use, directly or indirectly, child labor, slave labor or labor in similar conditions, are not involved in prostitution and sexual exploration, and repudiate all such practices among their service providers.

The Code of Conduct is based on ethical and moral principles, and must be followed by everyone, including interns or third parties who are at the service of the company, always upholding the principles defined here.

2. THE DOCUMENT

This Code of Conduct is a declaration of the policies on personal and business conduct and establishes the basic principles and guidelines of conduct, for both the employees of Triunfo companies and third parties acting on behalf of them.

Reviews may be made at any time as required. Hence, each employee is responsible for complying with the policies and practices set forth in the Code of Conduct, performing to their full capacity in the pursuit of targets and results that enable the continuous growth of the company for the benefit of all.

The Code is available for consultation in the communication channels of the companies. The department responsible for the employee integration program will present the code of conduct during the recruitment process. Leaders and the TRIUNFO Integrity Committee are responsible for monitoring its application and compliance with it in the conduct of professional activities.

3. INTERNAL RELATIONS

4.1 OUR ENVIRONMENT

The Triunfo companies, through their managers and employees, undertake to carry out their activities and establish their relations without prejudice regarding race, color, religion, sexual orientation, political preferences, age, social status, physical or mental limitations, or any other forms of discrimination, respecting the conventions and agreements, while underlying the equality of all before law.

Moreover, Triunfo companies adopt the policy of not omitting or concealing mistakes but reporting them immediately so that due treatment is given.

Triunfo companies strive for a pleasant working environment and hence always encourage cooperation between employees and orient their managers to be accessible to all.

4.2 HARASSMENT AND ABUSE OF POWER

Respect and order must prevail in the working environment such that all acts of moral¹, sexual² harassment or situations that configure pressure, intimidation or threats in relations between employees, regardless of their hierarchical level.

¹ Exposing workers to humiliating, embarrassing, repetitive and protracted situations during the workday and in the exercise of their functions.

² To coerce someone with the intention of obtaining sexual advantage or favor using one's status as a superior in the job, position or function.

4. CONFLICT OF INTEREST

Conflict of interests arise when the personal interests of employees or third parties are in conflict with the interests of Triunfo companies, resulting in possible benefits for the persons and losses for the company.

As such, Triunfo companies encourage both their employees and third parties to perform their activities honestly and in a transparent manner in order to ensure that the interests of companies are always preserved.

5.1 RELATIVES OF EMPLOYEES

Triunfo companies allow hiring of employees through a normal and impartial selection process.

5.2 AFFECTIVE RELATIONSHIP BETWEEN EMPLOYEES

Affective relationship between employees is not prohibited in Triunfo companies. However, there cannot exist a relationship of direct subordination between those involved. Such relationships must be reported to the immediate superior for appropriate treatment.

5.3 GIFTS, PRESENTS, HOSPITALITY AND ENTERTAINMENT

Offering gifts and presents or paying for travel and entertainment could constitute conflict of interest. As such, offering gifts such as calendars, diaries, pens and other items with the logo of Triunfo companies is allowed for exclusively corporate use without any intention to influence decision-making.

This practices is allowed in business relations with partner companies, suppliers or service providers, but should be done to strengthen partnerships and not influence decisions. Also, such practices should not create any need to return the favor, either in the form of favors, benefits or any other form of advantages. All such offerings of gifts or presents, or paying of hospitality or entertainment expenses, that is made must be in accordance with law and the internal rules of Triunfo companies, and must be duly recorded and documented.

In issues related to public employees and agents, there is a specific rule in the Anticorruption Policy.

5.4 PARALLEL ACTIVITIES

Parallel activities are those undertaken by employees outside their work day, and may or may not be remunerated.

Managers and executive officers of the Company cannot carry out parallel activities with relations governed by CLT rules. Other employees are free to carry out such activities, provided these do not negatively affect their performance or the image of the Company and also do not

constitute an act of competition with Triunfo companies. Moreover, other rules must be observed:

- a. Parallel activities, especially selling products or services, must not be carried out during work hours or at the Company's facilities;
- b. Using the assets of the Company for such activities is prohibited;
- c. Employees must not participate in the management or sit on the board of directors of competitors of Triunfo companies, and must not carry out parallel activities that could create any type of conflict of interest with the businesses of the Company;
- d. To ensure transparency in our businesses, we recommend that invitations for the position of director in any company are reported to and approved by the respective Chief Executive Officer/President;
- e. Use of internal information in seminars, workshops, projects in educational institutions or classes must be authorized by Management.

5.5 VOLUNTEER WORK

Triunfo companies recognize the importance of volunteer work and hence encourage their employees to participate in it.

Volunteer work during work hours is allowed provided it is organized by Triunfo companies. Outside work hours, employees are free to do volunteer work.

5. EXTERNAL RELATIONS

6.1 POLITICAL AND RELIGIOUS PARTICIPATION

Triunfo companies respect the religious and political freedom of their employees. However, they prohibit religious and political campaigns and/or campaigns for public office in their facilities or using any resource of the Company or on its behalf.

6.2 DONATIONS AND CONTRIBUTIONS

Donations and contributions must be for social or cultural purposes, made to or accompanied by the Triunfo Institute, and hence these must follow the rules set forth in the Bylaws of Triunfo and approved by the shareholders meeting, when required.

In addition, the following guidelines must be observed:

- a. In case of donations to other non-profit institutions, the existence of such institution must be proved, it must be solely for charitable purposes and must be duly authorized by Triunfo Institute after an evaluation process;
- b. There must be no conflict between Triunfo and the institution that will receive the donation or contribution;
- c. The analysis of charitable nature and the good reputation of the institution must be made carefully, because it cannot be linked to any public servant or his relatives,

political parties, government entities or even the source of financing for illegal acts and;

d. All donations and contributions will be duly recorded and documented at Triunfo Institute;

6.3 CONTRIBUTIONS TO POLITICAL PARTIES

Triunfo companies do not authorize donations to political parties.

6.4 PUBLIC SECTOR

Relations with the public sector must be ethical, based on respect, integrity and transparency.

For this, all employees must follow the provisions of the Triunfo Anticorruption Policy, prepared based on Law 12,846/13, which lays down specific guidelines on the conduct expected in relations with the public sector.

In this regard, it is prohibited to request or offer money, favors or any other forms of benefits, including the use of assets or resources from public authorities or agents to acquire or speed up the provision of services.

With regard to participating in public bids, Triunfo companies comply with laws through ethical and transparent conduct and by complying with the rules of the public bids.

Triunfo companies meet all the rules and legal obligations and hence any situation that could constitute a conflict of interest with these organs must be reported to the confidential channel.

6.5 COMPETITORS

Triunfo companies respect their competitors and do not tolerate illegal competition practices such as formation of cartels, industrial espionage or any other measure that contravenes Brazil's antitrust laws. It is also prohibited to adopt any approach that denigrates the image of competitors.

6.6. SOCIAL RESPONSIBILITY

Triunfo companies encourage social and environmental practices and volunteer work in order to promote the development of communities and improve the quality of life of society.

Social investments must be directed to projects implemented preferably by Triunfo Institute or other institutions that effectively promote the economic, social and environmental development of communities where the companies operate.

If the social responsibility action to be implemented by Triunfo companies is not carried out by Triunfo Institute, the institution or entity selected by the Institute must first be analyzed to prove its existence and good standing, as established in the item "donations and contributions".

6.7 MEDIA / PRESS

Contacts with the press will be handled exclusively by the spokesman indicated by the executive board, the CEO or the Communication and Sustainability Department of Triunfo. If any employee is contacted by the press and is not duly authorized to speak, he should not do so but must immediately inform the Communication and Sustainability Department of the fact.

In all cases, employees must follow the guidelines established in this code of conduct together with the information disclosure policy of the Company.

6.8 SOCIAL MEDIA

Participation in social media and other forms of social interaction has increasingly pervaded the lives of both employees and companies. Publication of photos and videos related to the company, clients or partners on social media (Facebook, Twitter, LinkedIn and YouTube, among others) will be permitted only when such material is already available on the official website of Triunfo or the official social media of the company. Internal and confidential information cannot be published on these media.

Creation and updates of social media content on behalf of Triunfo companies is not allowed. Moreover, it is important that employees remain respectful even in the virtual environment and act without prejudice and discrimination.

6. RELATIONS WITH USERS

Providing excellent services is a commitment undertaken by all Triunfo companies. Respect for users and clients, characterized by attention to their needs, is an essential practice for building fruitful and lasting relationships with them. The Company is also committed to continuously improving its processes to ensure the quality and reliability of its services.

7. RELATIONSHIP WITH SUPPLIERS

All suppliers must be evaluated based on criteria that take into consideration the technical, economic and reputation aspects, and no type of favoritism or discrimination is allowed. Moreover, Triunfo companies recommend their suppliers to run ethical businesses free of corruption or any violation of any law.

Strategic information received from Triunfo companies through e-mail, telephone, orally or in writing must be kept confidential and must be disclosed only after authorization from the executive board.

In case of noncompliance with the laws on the environment, labor, tax, health and occupational safety, or if other interests are harmed, the supplier will be replaced.

Moreover, suppliers must respect this Code of Conduct, the Anticorruption Policy and the Sustainability Policy adopted by Triunfo companies, given that there exists a contractual clause stipulating this formality in the agreement signed between the parties.

In this regard, Triunfo companies do not tolerate child labor, slave labor and any other violation of human rights in their value chain, and reserve the right to break off relations with institutions and/or companies that violate this guideline directly or indirectly.

8.1 CONTRACTING THIRD PARTIES

Contracting third parties to work with Triunfo companies is allowed only if there is effective need and must be according to internal practices that assure the company's interests. Moreover, third parties must be contracted only after an analysis of technical, legal and ethical criteria, such as, for example, the production/delivery capacity, compliance with applicable laws and ethical and transparent business conduct.

When third parties act on behalf of Triunfo companies, they must do so within the scope of the contract and must, under no circumstances, offer or promise, on behalf of the company, presents, gifts, travels, payment of hospitality expenses, invitations for events, cash, favors or benefits of any kind to public servants or agents, their aides and relatives.

8.2 PAYMENTS TO THIRD PARTIES

Payments to third parties acting on behalf of Triunfo companies will be made as agreed at the time of contracting, taking into consideration the following points:

- a. Triunfo companies do not make payments to suppliers, service providers or other third parties in cash or through bearer instruments;
- b. Triunfo companies do not make payments in banking accounts in a country different from where the service was provided or where the company does not have a registered office or branch;
- c. Triunfo companies make payments only in the bank account in the name of the legal entity contracted or the individual who owns the legal entity contracted; and
- d. A proof of payment will be requested with the actual value of the service provided and other information needed to record the transaction according to law.

8.3 CONTRACTS WITH RELATED PARTIES

Such contracts must be according to good practices and be aligned with the Bylaws of Triunfo companies.

8.4 SUBCONTRACTING

The contract signed between Triunfo companies and suppliers must specify whether subcontracting is permitted or not. If subcontracting is allowed, the respective guidelines must be included in the contract.

Any subcontracting made by the supplier, service provider or partner must be forwarded to the contract manager for his information and authorization.

8. USE OF RESOURCES

9.1 PHYSICAL PROPERTY OF COMPANIES

All the assets, equipment and facilities of the companies must be preserved by employees and third parties who use the services of Triunfo companies.

Triunfo companies value the conscientious use of available resources and the adoption of meticulous and hygienic practices (e.g.: furniture, computers, office supplies, etc.).

9.2 ELECTRONIC RESOURCES

Triunfo companies allow the use, within reasonable limits, of electronic systems for personal purposes provided such use does not interfere with their work or violate internal rules and guidelines. Both emails and computers of Triunfo companies may be monitored and so employees are prohibited from accessing websites with improper content, such as porn sites.

The IT resources must not be used to spread messages or files containing chain letters, rumors, pornography or defamatory content. Use of unauthorized programs and pirated software is also prohibited.

Access to the IT systems of companies is allowed only to employees and persons authorized by managers and executive officers.

9.3. MONITORING OF COMPANY COMPUTERS AND EMAILS

Employees hereby declare they are aware that their computer and company email can be inspected at any time and that the monitoring will cover all files, folders and emails, and will not be characterized as violation of any rights since the equipment belongs to Triunfo companies and its use should be strictly professional.

9. ENVIRONMENT, SAFETY AND OCCUPATIONAL HEALTH

Promoting the appropriate use of natural resources and preserving the environment is a commitment undertaken by Triunfo companies. To ensure this commitment is honored, employees must read the policies, procedures and practices relating to health, safety and environment, and ensure these are complied with.



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Hiring professionals to work at Triunfo Companies is carried out when there is actual need and only those with technical skills necessary to perform the tasks related to the position will be hired.

Everyone who uses the infrastructure or materials of Triunfo companies, whether employee or visitor, plays an important role in preventing workplace accidents or incidents, or environmental disasters. We encourage a high level of quality through an active approach and the adoption of good health and safety practices that are appropriate to the tasks performed.

Triunfo companies encourage their employees to:

- a. Report to their immediate superior all workplace accidents and incidents that occur at on the company premises or in their work, involving employees, outsourced workers, partners or service providers;
- b. Preserve cleanliness, organization and safety at the workplace;
- c. Use personal protective equipment (PPE) and collective protective equipment (CPE) required to perform the tasks and ensure that coworkers too do the same;
- d. Always inform the manager of any risk situations at the workplace;
- e. Inform the manager of any medical treatment that involves using medicines that interfere in the performance of their tasks or which may compromise their or their co-workers' safety.

It is prohibited to consume alcoholic beverages or illegal drugs during working hours or to enter the company premises under the influence of narcotic substances.

It is prohibited to enter the company carrying weapons or any other device (explosives, flammable material or fireworks) that endangers people's lives, except by people legally so authorized for performing their function.

Smoking is not recommended and is not allowed indoors or in areas identified as "no smoking" areas.

Employees working at Triunfo companies or on behalf of Triunfo companies must respect the health and safety standards established in the code and in other policies of the company.

10. INTELLECTUAL PROPERTY

Intellectual property related to programs, projects and plans developed at Triumph companies belong to the company even after the exit of the employee who developed them.

Employees are aware that all the files relating to their activities should remain in the possession of Triunfo companies and cannot be deleted or copied, under penalty of being liable for damages caused by such violations.

11. ACCOUNTING RECORDS AND FINANCIAL RESULTS

All transactions carried out by Triunfo companies will be recorded and certified according to law and the guidelines of the Securities and Exchange Commission of Brazil (CVM), including the prohibition of insider trading³ and observance of quiet period⁴.

Triunfo companies prohibit their employees from altering any accounting record, posting false or fraudulent entries, or tampering with proof of such transactions. Original documents are receipts, invoices and expense reports.

All the documents must be maintained for audit purposes during the period required and for other legal requirements.

12. MONEY LAUNDERING

Money laundering refers to the practice of disguising the illegal origin of funds by using them in legal operations in an attempt to make them appear that the origin is lawful.

Money laundering is a crime according to Brazilian laws and a practice prohibited in the businesses of Triunfo Companies. Hence, employees who have proof of or suspect the existence of such practices must immediately contact the Triunfo Integrity Committee, which, after discussions with the Board of Directors, will inform the Board of Control of Financial Activities (COAF) of the Ministry of Finance, if any such practice is confirmed.

13. CONFIDENTIALITY OF INFORMATION

Strategic information relating to Triunfo companies must be maintained confidential and must be disclosed only after authorization from the Executive Board and in accordance with the Information Disclosure Policy of the company and other guidelines of Triunfo companies.

When improperly disclosed, confidential information may cause immeasurable damages. Hence, we draw your attention to the following precautions:

- a. Do not disclose or share information with employees who do not need it to perform their tasks; and
- b. Inform your immediate superior of any leakage of information that you are aware of.

If linked to Triunfo companies, activities such as photographing, filming, giving lectures, interviews, participating in surveys, seminars, blogs and discussion lists will be allowed only with prior knowledge of the supervisor and after authorization from the corporate communication department of Triunfo companies.

After the authorization is granted, the contents of any presentation, interview, article or public statement, whether in a lecture, seminar or external meeting, must first be authorized by the

³ Insider trading is the trading of securities based on the knowledge of material information that is not yet public knowledge to obtain profit or advantage in the market. Insider trading is a crime in Brazil.

⁴ Period of restriction on the disclosure of information by the issuing company during the period of public offering of securities.

executive board and the CEOs of the companies. In view of these rules, employees must restrict their comments to the technical aspects, precisely and directly, avoiding value judgment and respecting the confidentiality of information relating to the company, as well as its customers and suppliers.

It is very important that all precautions are taken for information security with respect to the sharing of system users/passwords, exposure of printed material and exposure of important information at the workstation of each employee.

Employees who have access to information about Triumph companies that has not yet been publicly disclosed, or to privileged information due to the position held or function performed, cannot trade on securities or stocks of these companies or forward them to third parties, pursuant to the information disclosure policy of the company.

14. TRIUNFO INTEGRITY COMMITTEE

The Triunfo Integrity Committee consists of employees selected by Triunfo companies, whose key responsibilities are:

- a. Evaluating and decision on breaches of the Code of Conduct and other company policies;
- b. Analyzing and advising on cases not envisaged in the Code of Conduct and the Anticorruption Policy;
- c. Recommending updates to the Code of Conduct and the Anticorruption Policy;
- d. Ensuring adaptation of procedures related to the above-mentioned documents; and
- e. Organizing actions to strengthen the culture of ethics and compliance.

The method of functioning, responsibilities and membership of the Triunfo Integrity Committee are laid down in its Charter.

15. LAW

Compliance with laws and rules at all levels of public administration (federal, state and municipal) applicable to the companies is mandatory.

16. GUIDELINES FOR CONDUCT

17.1 PERSONAL APPEARANCE

Wearing uniforms outside the working environment is not allowed, except in case of commuting between residence and office and between office and educational institution.

Those who do not wear uniforms must wear clothes that are appropriate for the environment and must avoid very tight, short or transparent clothes, which could cause embarrassment to themselves and to their peers.

When uniforms are provided by the company, they must compulsorily be worn.



17.2 PERSONAL CONDUCT

It is the duty of each employee to maintain a working environment based on respect, ethics, justice, transparency and professionalism. As such, the following behavior is considered inappropriate at the workplace:

- a. Jokes, insults, threats, physical, verbal or written actions that may affect employee performance or create internal conflict;
- a. Helping persons in their misconduct;
- b. Entering the company premises with another employee's badge or lending one's badge;
- c. Being absent from the workplace during office hours without prior authorization from the immediate superior;
- d. Taking part in and encouraging gambling and betting activities;
- e. Selling raffles, products or services;
- f. Request or grant loan or carry on loan sharking at the workplace;
- g. Spread or encourage rumors, false or alarmist news about matters concerning the company and its employees.

17. VIOLATIONS OF THE CODE OF CONDUCT

Everyone is responsible for following the Code of Conduct and Triunfo companies require that the provisions of the Code are known to and complied with by all.

Any violation of this Code of Conduct will entail penalties according to the seriousness of the fact, which could be warning, suspension or termination of the contract, in addition to other applicable legal measures.

Any employee who discovers any practice or act that violates the provisions of this Code of Conduct must inform the manager of the area, the Triumph Integrity Committee or, if he wants to remain anonymous, the confidential channel. All complaints or violations will be treated confidentially.

18. MEANS OF COMMUNICATION

Communications and clarifications of doubts may be addressed to direct superiors.

Violations of the Code of Conduct and the Anticorruption Policy must be reported through the following channels:

- a. Online confidential channel: www.canalconfidencialtriunfo.com.br



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b. Voice confidential channel: 0800 721-0756

These communication channels are managed by a specialist firm, which ensures confidentiality of information and the possibility of employees remaining anonymous. Regardless of this, Triunfo Companies do not tolerate any form of retaliation against whistleblowers.



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APPENDIX I – ACKNOWLEDGEMENT AND UNDERTAKING

I hereby declare that I received, read and understood the Triunfo Code of Conduct and fully agree with the criteria and guidelines established in it and their relevance for me and the company.

I undertake to follow it thoroughly, under penalty of being subject to measures including administrative proceedings, termination of employment agreement and other legal measures.

Is there any situation regarding conflicts of interests that must be reported to the Triunfo Integrity Committee and/or validated by it?

() Yes. Complete the Clarification and Validation Statement.

() No.

Full Name: _____

Area: _____

Signature: _____

Date: __/__/____

This Acknowledgement and Undertaking is part of the Employment Agreement of Triunfo companies and their Associates and is signed in duplicate. One copy remains with the employee and the other copy with Triunfo companies and their associates.

APPENDIX I – ACKNOWLEDGEMENT AND UNDERTAKING

I hereby declare that I received, read and understood the Triunfo Code of Conduct and fully agree with the criteria and guidelines established in it and their relevance for me and the company.

I undertake to follow it thoroughly, under penalty of being subject to measures including administrative proceedings, termination of employment agreement and other legal measures.

Is there any situation regarding conflicts of interests that must be reported to Triunfo Integrity Committee, so that it can be informed of it and/or validate it?

() Yes. Complete the Clarification and Validation Form.

() No.

Full Name: _____

Area: _____

Signature: _____

Date: __/__/____

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APPENDIX III – CLARIFICATION AND VALIDATION

This declaration is targeted at employees involved in any situation that could suggest conflict of interests with the businesses of Triunfo companies and situations requiring validation, according to the rules in this Code of Conduct.

Indicate the suppliers, service providers or partners of Triumph company(ies) in which you are partner, manager, executive, negotiator, sales representative or occupy positions with decision-making power:

Company/Department	Link with Triunfo companies	Position

Indicate the persons with whom you have close relationship who are partners, managers, executives, negotiators, sales representatives or who occupy positions with decision-making power in a company that is a supplier, service provider, partners or competitor of Triunfo companies:

Full name	Level of relationship	Company/Department

Situation(s) requiring validation:

Description of situation

I hereby declare that the information provided by me in this document is true and that I have not omitted any information that may influence the decisions that Triunfo Companies may need to take about this Declaration.

Full Name: _____

Area: _____

Signature: _____

Date: _____

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APPENDIX II – CLARIFICATION AND VALIDATION

This declaration is targeted at employees involved in any situation that could suggest conflict of interests with the businesses of Triunfo companies and situations requiring validation, according to the rules in this Code of Conduct.

Indicate the suppliers, service providers or partners of Triumph company(ies) in which you are partner, manager, executive, negotiator, sales representative or occupy positions with decision-making power:

Company/Department	Link with Triunfo companies	Position

Indicate the persons with whom you have close relationship who are partners, managers, executives, negotiators, sales representatives or who occupy positions with decision-making power in a company that is a supplier, service provider, partners or competitor of Triunfo companies:

Full name	Level of relationship	Company/Department

Situation(s) requiring validation:

Description of situation

I hereby declare that the information provided by me in this document is true and that I have not omitted any information that may influence the decisions that Triunfo Companies may need to take about this Declaration.

Full Name: _____

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Signature: _____

Date: _____

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