

# ethics code



# SUMMARY

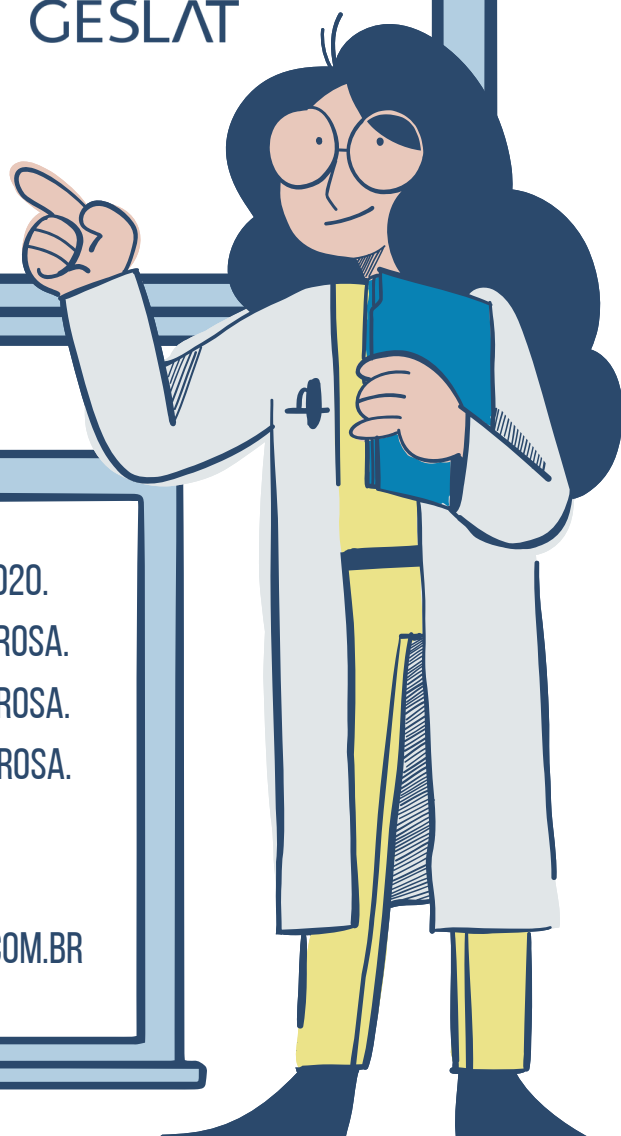


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# THE COMPANY

GESLAT WAS FOUNDED IN 2017 WITH THE AIM OF PROPERLY MANAGING THE VARIOUS DEPARTMENTS THAT DAIRY INDUSTRIES NEED TO DEVELOP. ALWAYS LOOKING FOR INNOVATION, IMPROVEMENT AND QUALITY THROUGH A PROACTIVE AND COURAGEOUS POSTURE, THE COMPANY HAS BEEN ACTING IN A RESPONSIBLE AND PROMISING WAY.

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GESLAT.COM.BR | @GESLAT.OFICIAL



ELABORADO POR VIVIANE LEMES DA ROSA EM 01/10/2020.  
REVISÃO Nº 01 EM 18/07/2022, POR VIVIANE LEMES DA ROSA.  
REVISÃO Nº 02 EM 17/08/2023, POR VIVIANE LEMES DA ROSA.  
REVISÃO Nº 03 EM 27/03/2024, POR VIVIANE LEMES DA ROSA.

REFERÊNCIA PARA CITAÇÃO:  
GESLAT. CÓDIGO DE ÉTICA. 4 ED. DISPONÍVEL EM: GESLAT.COM.BR

# MISSION

# VISION

Contribute to the organization and development of clients through responsible management

Act with excellence in dairy management

Honesty  
Humanity  
Proactivity  
Dedication  
Union

# VALUES



# OBJECTIVES OF ETHICS CODE

The purpose of Ethics Code is to establish and clarify the guidelines, rules and values that guide the company's activities.

By bringing the rules of coexistence and the values that justify them, the Ethics Code presents the organization's culture, assists employees in decision-making and clarifies all subjects who interact with the company - public bodies, suppliers, employees, customers and society - what are the organization's practices and values.

Therefore, the following can be listed as specific objectives of this Code:

- a) Present and insert the organizational culture;
- b) Guide the assessment of employees;
- c) Clarify to the community, public bodies, suppliers, customers and employees what are the values and practices accepted and prohibited by the company and demonstrate what are the expected standards of conduct.



# SCOPE AND ADHERENCE

The Ethics Code covers all employees, interns and apprentices, in all structures and hierarchical levels of the company, guiding their personal and professional behavior towards all colleagues, hierarchical superiors and subordinates, suppliers, customers, community and public bodies.

It is the duty of all those who form part of the company's staff - partners and employees - to carry out legal transactions or interact with the organization by any means or reason, to observe the principles and rules that make up this Ethics Code. In this sense, everyone involved with the company for whatever reason must respect this Code, ensuring its values and standards.

To this end, the company has set up numerous channels for hearing interested parties and receiving complaints related to violations of the Brazilian legal system, international standards ratified by Brazil and this Ethics Code, enabling anyone to gain access to the board of directors to raise matters that are of interest of the community and the company itself, such as respect for the rules contained in the Code of Ethics.

The hotline was established with the aim of providing a direct channel between the community in general and the Ethics Committee. While this is the business body responsible for receiving, investigating and processing complaints and issues related to violations of the Code of Ethics, the hotline serves so that employees, suppliers and customers can make suggestions and complaints regarding behavior and conduct they consider inappropriate and harmful to employees, consumers and the company.

As for suggestions, the company is always available to hear them, as we believe that the growth process requires everyone's participation.



# ETHICS COMMITTEE AND HOTLINE

The Ethics Committee is the business body responsible for assisting in the receipt, verification and processing of complaints and questions related to violations of Ethics Code. Formed by an Advisory Board, the Committee ensures compliance with ethics in the corporate environment and ensures that the company's values are respected and observed in the day-to-day of the organization.

The Committee is made up of company's two directors. It is up to the Committee to assess matters relating to the Code, investigate with impartiality, search solutions for incidents that are brought to them and respond to complaints. Members ensure compliance with the principles used.

The Ethics Committee and the hotline are available to everyone, through numerous channels, to make suggestions and complaints. Just access the available means of communication - identification is optional:



**WHATSAPP (49) 99935-0404**



**GESLAT.COM.BR**



**QR CODE**

# ETHICS IN THE ORGANIZATIONAL ENVIRONMENT

Everyone who is related in some way with the organization has rights and duties related to organizational ethics.

The company fulfills, among other responsibilities:

- a) Prevent any type of discrimination, prejudice or disrespect, notably those related to color, race, gender, sexual orientation, sex, religion, among others;
- b) Act to ensure respect among all people who participate in some way in the corporate environment;
- c) Present a healthy and safe environment, in compliance with the norms of hygiene and safety at work to guarantee the health and physical integrity of all who pass through the company;
- d) Reject any violation of labor and human rights, preventing and combating degrading forms of work, such as child and slave labor, among others;
- e) Treat everyone with equality and transparency, rejecting favoritism;
- f) Always act with good faith, probity and loyalty in all areas;
- g) Respect the political-partisan opinions of employees and refrain from attending to electoral or political-partisan interests;
- h) Respect and observe the principle of employee freedom of association;
- i) Form leaders who act with honor, responsibility, discipline, vocation, commitment and honesty, and who lead their teams based on typical principles of responsible people management, always treating everyone with cordiality, respect and politeness;
- j) Encourage suppliers and customers to institute sustainability practices;
- k) Maintain an efficient compliance and independent ombudsman process e. proactive;
- l) Maintain an inclusive, responsible, respectful and confidential people management process;
- m) Respect the General Personal Data Protection Law (LGPD - Law nº 13709/18).





# EMPLOYEES, INTERNS AND APPRENTICES



Employees, interns and apprentices are responsible for:

- a) Respect the norms of the organization, among them discipline and respect for the hierarchy;
- b) Present an unblemished image and fulfill civic duties;
- c) Respect equally all people who are part of the organization in some way, such as other employees, customers, suppliers, public servants and the community in general;
- d) Never act with disrespect or prejudice for any reason;
- e) Work as a team and cooperate with everyone;
- f) Not operate or provide assistance to competitors of the organization or engage in activities of competition;
- g) Lead with honor, responsibility, discipline, vocation, commitment and honesty, based on principles of responsible people management and always treating everyone with courtesy, respect and politeness;
- h) Never act with violence of any kind;
- i) Never use or enter the company's property under the influence of alcoholic beverages or any kind of psychotropic/narcotic;
- j) Care for the organization's physical and intellectual assets, rejecting and reporting crimes such as theft, robbery or misappropriation;
- k) Never use your position within the organization to commit crimes, illicit acts and/or obtain benefits;
- l) Never carry out disposals, donations and assignments of use of company assets without prior written authorization from the board of directors;
- m) Care for the organization's image, refraining from disclosing its data and information and from taking a stand on its behalf without prior written authorization from the board of directors, and contacts with the press must be carried out exclusively by the board of directors;
- n) Cooperate in complying with the regulatory standards in force in relation to health and safety at work, as well as in the internal procedures for carrying out their professional activities, ensuring the health and safety of other employees and all third parties who enter the organization, communicating immediately the situations of insecurity, risk or danger;
- o) Communicate the board or management regarding any evidence of slave and/or child labor, sexual or moral harassment or any other forms of violations of human rights;
- p) Collaborators who handle food have a duty to observe the rules presented in the mandatory course on "Good Food Handling Practices";
- q) Communicate any breaches of Ethics Code immediately.

# SUPPLIERS

The company values its suppliers considerably, as it knows that its existence is impossible without them. Good suppliers influence the quality of the company's production and, therefore, the satisfaction of its customers. As they are extremely important, the relationships established with suppliers will observe the following values and rules:

- a) Confidence;
- b) Transparency;
- c) Loyalty, honor and good faith;
- d) Occupational health and safety;
- e) Hiring based on legislation and objective criteria;
- f) Human rights;
- g) Repudiation of slave and child labor, the crime of homophobia and all forms of harassment;
- h) General Data Protection Law;
- i) Anti-Corruption Law (Law n° 12,846/13);

According to the values and principles that guide the organization's activities, it is important to mention that the company will not tolerate violations of labor, health and environmental legislation, personal favoritism, corruption, degrading work or any other criminal acts in its supply chain.



# CLIENTS

Just like suppliers, customers are also extremely important for the organization, configuring one of the reasons for the very existence of the company. Bearing in mind that meeting the needs of customers is a priority for the company and considering that its mission is to act with excellence, the relationship with its customers will observe the following precepts:

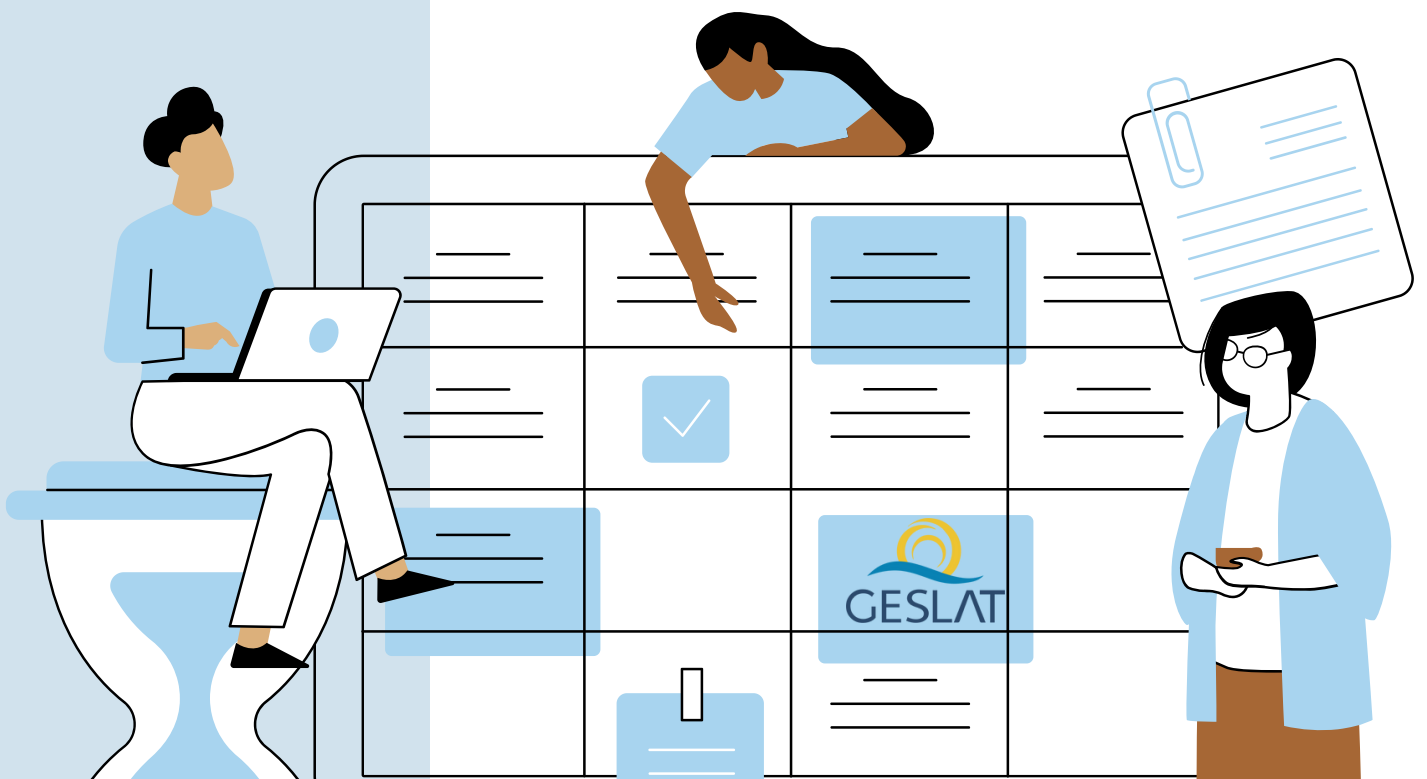
- a) Provide services with responsibility and compliance with Brazilian legislation and international treaties to which Brazil is a signatory;
- b) Respect the confidentiality rules of clients, ensuring the safekeeping of information and data concerning them;
- c) Meet the needs of customers without neglecting respect for consumer, tax, competition, civil, criminal, labor, health, social security, among others;
- d) Comply with the delivery conditions and individual commercial policies of each customer;
- e) Act with good faith, loyalty, honor, respect, efficiency and transparency;
- f) Work for the continuous improvement of the services provided and the products produced and for the maintenance of commercial relations, always acting in accordance with the principles of reasonableness and proportionality;
- g) Fully repair any damage caused to customers with honesty, promptness and agility;
- h) Respond to requests and requests from customers within reasonable timeframes and seeking to satisfy their needs satisfactorily.



# COMMUNITY AND PUBLIC SECTOR

The relationships maintained between the company, the community and the public sector will observe the following standards:

- a) Always have open doors to receive requests, criticisms and suggestions, acting with respect and courtesy;
- b) Comply with environmental legislation to ensure sustainable growth;
- c) Observe competition legislation so that everyone operates in a fair and equal market, encouraging the growth of the national economy;
- d) Allow and encourage volunteering and charitable initiatives;
- e) Encourage environmental awareness and respect for diversity;
- f) Respect the precepts of law and act in accordance with the principles that govern public administration;
- g) Respect the freedom of the press;
- h) Comply with the General Data Protection Law and the Anti-Corruption Law;
- i) Report to government competent bodies any illicit conduct discovered.



# CONFLICTS OF INTEREST AND PROHIBITION OF FAVORITISM

The company rejects any type of favoritism in the treatment of its employees. Everyone must be treated with impartiality, respect and ethics, always focusing on sustainability and legality to the detriment of individual opinions or personal interests.

Therefore, it is prohibited:

- a) Provide information to third parties regarding the company's selection processes and purchases and sales;
- b) Violate secrecy and confidentiality rules of the organization and its customers, suppliers and collaborators, both in relation to its services and processes as well as its objectives, methods, etc.;
- c) Generate expectations or perform personal favors to the detriment of legality and efficiency;
- d) Acting in conflict of interest or omitting potential conflicts of interest;
- e) Receive gifts/giveaways/perks due to the position held within the organization;
- f) Offer/donate presents/gifts/advantages and/or suggest/offer exchanges of favors to employees of the organization;
- g) Negatively influence the organization's negotiations for personal interests;
- h) Carry out any conduct that puts other interests above the interests of the organization, compromising or generating the appearance of compromising the professional decision;
- i) Form companies, carry out external activities and/or run for public office without previously informing the board;

Employees are prohibited from accepting or receiving gifts, incentives, values or any kind of advantage to act, influence, compensate or refrain from any conduct in favor of third parties, even if this attitude generates some benefit to the company.

Employees who eventually receive proposals of the kind are advised to immediately seek the organization's official communication channels to report the situation, as no employee will be penalized for reporting and immediately rejecting such proposals.



# DATA PROTECTION



All company data and information to which employees have access due to their duties are confidential and must not be shared. In this sense, the following information is considered confidential, for example: balance sheets, invoices, reports, payrolls, contracts, judicial and administrative proceedings, financial results, minutes of meetings, data from suppliers, customers, consumers and employees, personal data to which the company has access, among others.

Employees are responsible for keeping and protecting such data and information and preventing third parties or employees from other departments from having access to them, unless prior written authorization from the board of directors. All employees have a duty to observe the General Data Protection Law.

It is prohibited to enter company spaces to make abusive use of electronic means of communication, understanding as abusive the use that violates human rights, the General Data Protection Law, the Federal Constitution and Brazilian legislation in general, containing, among others, discriminatory, prejudiced, racist, homophobic, sexist, violent, obscene and/or pornographic content.

The company clarifies that all electronic systems are monitored and must be used exclusively to carry out work functions, ensuring compliance with the General Data Protection Law.

The company reserves the right to monitor the organization's access to the internet and professional e-mails, controlling the use of equipment that is interconnected to its information technology system. Therefore, it is up to everyone who makes use of such resources:

- a) Use the resources only for work purposes and within the limits of its function;
- b) Protect data, information, reports, files and other intangible assets of the company;
- c) Use the internet and professional e-mail in a respectful manner with third parties and employees;
- d) Not transmit data, information and files found on the company's server to third parties or collaborators, even if culpably, without prior written authorization from a Director;
- e) Not to use and/or disclose the company's know-how;
- f) Do not install applications and make changes to the organization's computers and cell phones without prior authorization from the Information Technology Department.
- g) Prevent the leakage of data and information;
- h) Observe the General Data Protection Law (LGPD - Law nº 13.709/2018).

The company is committed to respecting the precepts of the LGPD and safeguarding the privacy of all its suppliers, employees and customers, relying on ethics and their duty to also respect others.

Access to personal data of other employees due to their function requires that the respective employee has the necessary responsibility to maintain the confidentiality of such data and use them solely for professional purposes, within the organization itself, in the performance of their regulated functions and observing the LGPD.

# INDUSTRIAL AND INTELLECTUAL PROPERTY

The company and its employees undertake to respect the provisions of Law n° 9,279/1996, safeguarding intellectual and industrial property rights, notably with regard to patents, trademarks and inventions.

In this sense, it is forbidden to pass on any information, data, production processes, industrial secrets and confidential information of intellectual or industrial property of the organization to any third party. The organization's industrial and intellectual properties are considered secret and confidential and include the company's documents, products and processes.

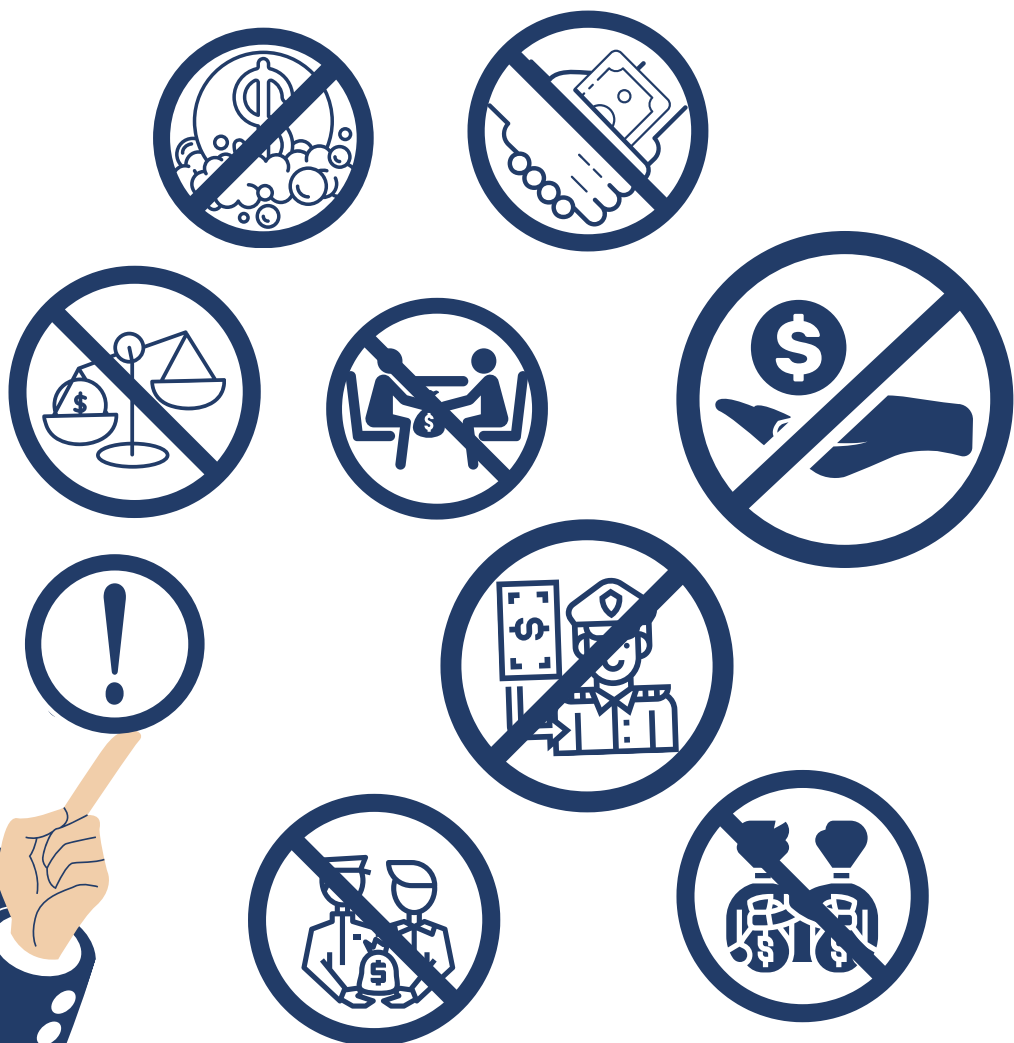
To this end, employees undertake to maintain secrecy, preserve and respect the confidentiality of the company's data to which they have access, unless prior written authorization from the Board of Directors, as well as to respect the copyrights of the organization, suppliers, employees, customers and others.



# COMPLIANCE POLICIES

Law n° 12,846/2013 was enacted to hold individuals and legal entities responsible for carrying out acts against the public administration. The company is aware of the content of said law and applies it daily in its business, commercial and labor relations, observing the principle of morality when relating to public administration in all instances and spheres of power.

In this sense, the company is responsible for observing and complying with all the precepts contained in such law, ensuring compliance by its suppliers, customers, employees and any person who has any relationship with the organization.





# RESPECT FOR FUNDAMENTAL AND HUMAN RIGHTS

minority  
protection

cooperation  
with  
government

respect  
for  
freedom

progressive  
posture



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# REJECTION OF SLAVE AND CHILD LABOR

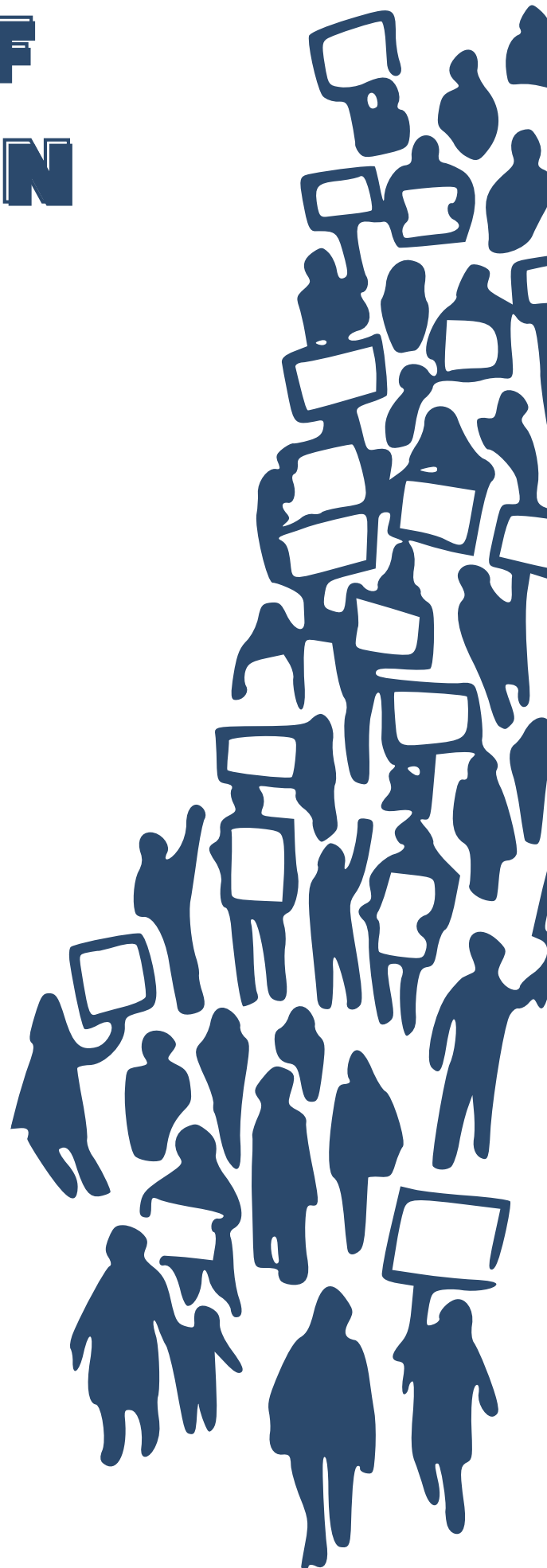
The company absolutely rejects child and slave labor and other violations of human rights. In this sense, it is fully responsible for avoiding such degrading forms of treatment of human beings, denouncing them and punishing them with the support of the law.

Each and every employee or third party who has contact with the organization has a duty to denounce child and slave labor. The company makes itself available through all its forms of contact to receive complaints, investigate and resolve them, immediately terminating any business relationships with suppliers, customers, employees and other third parties who carry out or support practices of the kind, communicating them the public bodies responsible for investigating the offenses should be immediately notified.



# FREEDOM OF ASSOCIATION

The company recognizes and praises the effects of freedom of association for the protection of workers' rights, which is why it is committed to guaranteeing the full exercise of these fundamental rights. Every employee is free to join trade unions and fully exercise these rights, with the company being a space for protection and respect for workers' achievements.



# WORKING ENVIRONMENT



In addition to the norms that guide the personal relationship between employees and between them and the other people involved in the organizational environment, it is necessary to emphasize that the work environment is extremely important for the organization.

In order for everyone to act in a responsible, polite and respectful manner, it is essential that the particularities, individualities and differences between human beings are recognized, observed and respected by everyone, without any kind of mockery or lack of education.

Every human being is different from one another and deserves equal respect and consideration, with the observance and guarantee of their fundamental right to the dignity of human person. Therefore, the private life, intimacy and individuality of every human being must be respected by others.

Any type of disrespect for the individual freedom of others is considered a violation of ethics and the principles of freedom and human dignity. The observance of such principles requires that everyone involved with the organization refrain from any form of prejudice, discrimination and harassment.

It is clarified that threats, blackmail and humiliating or degrading treatment characterize moral harassment. For example, it constitutes moral harassment to force the employee to perform a humiliating or degrading act under penalty of dismissal or other labor sanction.

In turn, sexual harassment is characterized by sexual intercourse, requests for sexual favors, among other physical or verbal conduct with a sexual connotation that involves the physical or psychological harm of another without their express consent. For example, kissing an employee or inducing/performing a lascivious act against her will constitutes sexual harassment, under penalty of dismissal or other labor sanction.

The following behaviors constitute discrimination or prejudice and are absolutely rejected and forbidden in this organization: making jokes and mean comments, instituting nicknames, disrespecting, failing to relate, among others, due to gender, sex, sexual orientation, color, race, age, marital status, place of birth, religion, physical/psychological handicaps of other people.

The crime of homophobia is imprescriptible and the company absolutely rejects it, committing itself to immediately report to the competent bodies any conduct that it becomes aware of that could constitute an indication of this crime, in compliance with the precedent of the Federal Supreme Court handed down in 2019 in the Action Direct of Unconstitutionality by Omission nº 26 and in the Writ of Injunction nº 4733.



# INCLUSION AND PLURALITY



Did you know that gender, sex and sexual orientation are different things? And did you know that prejudice based on gender, sex and sexual orientation is a crime? The Brazilian legal system is guided by the principles of human dignity, freedom and equality, all provided for in art. 5 of the Federal Constitution of 1988. By virtue of these principles, people are free to relate to people of the same gender, sex or sexual orientation. It's not up to anyone to dictate how people should conduct their love and sex lives. Each one knows in his heart how he feels and what brings happiness. Happiness is also everyone's right. Therefore, we have a duty to respect the choices, characteristics and culture of other human beings.

In this sense, on 06/13/2019, when judging the Direct Action of Unconstitutionality by Omission No. 26 and the Injunction No. 4733, the Federal Supreme Court equated the crime of homophobia/transphobia with the crime of racism.

This organization respects and observes this precedent and Law nº 7716/89, welcoming all people regardless of gender or sexual orientation. In addition, there are also several forms of families and the Federal Constitution protects all these family modalities, and it is up to every human being to respect them. This organization equally welcomes, respects and protects all forms of family.



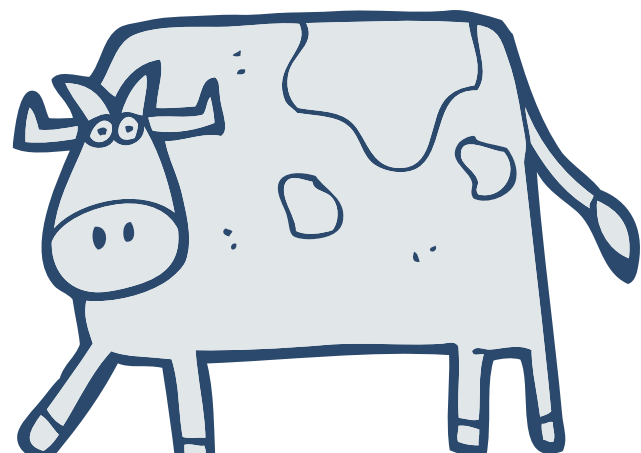
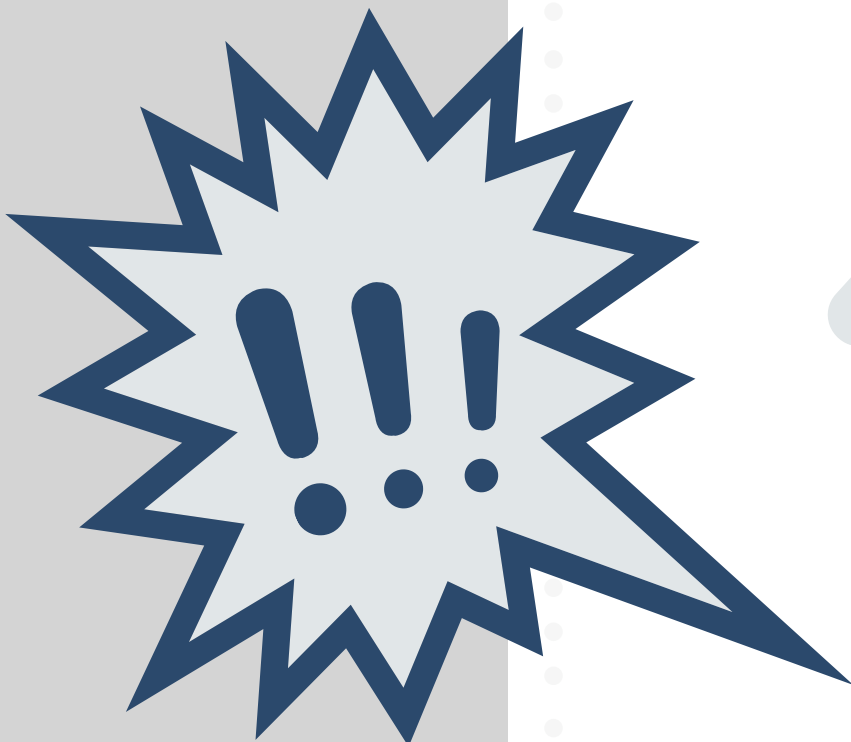
# DISCIPLINARY PRACTICES



This Ethics Code is mandatory for all suppliers, customers and employees of the organization and its non-compliance will result in the following sanctions:

- a) Termination of the employment or commercial relationship;
- b) Verbal or written warning;
- c) Suspension without pay;
- d) Prohibition of removal or promotion;
- e) Notification to public supervisory entities and bodies;
- f) Loss of premiums and benefits by the employee.

It should be noted that the applicability of labor sanctions by the company is guided by labor legislation and observes the principles of reasonableness, proportionality and human dignity.





# REFERENCES

- Brazilian Constitution  
([http://www.planalto.gov.br/ccivil\\_03/constituicao/constituicao.htm](http://www.planalto.gov.br/ccivil_03/constituicao/constituicao.htm))
- Consumers Code  
([http://www.planalto.gov.br/ccivil\\_03/leis/l8078compilado.htm](http://www.planalto.gov.br/ccivil_03/leis/l8078compilado.htm))
- Civil Code  
([http://www.planalto.gov.br/ccivil\\_03/leis/2002/l10406compilada.htm](http://www.planalto.gov.br/ccivil_03/leis/2002/l10406compilada.htm))
- Criminal Code  
([http://www.planalto.gov.br/ccivil\\_03/decreto-lei/del2848compilado.htm](http://www.planalto.gov.br/ccivil_03/decreto-lei/del2848compilado.htm))
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- Law n. 12.846/2013  
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- Law n. 12.529/2011  
([http://www.planalto.gov.br/ccivil\\_03/\\_ato2011-2014/2011/lei/l12529.htm](http://www.planalto.gov.br/ccivil_03/_ato2011-2014/2011/lei/l12529.htm))
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- Decree n. 9.013/2017  
([http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2017/decreto/d9013.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2017/decreto/d9013.htm))
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- Law n. 13.146/2015  
([http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2015/lei/l13146.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2015/lei/l13146.htm))