

Code of Conduct for suppliers and partners





WELCOME TO
LUNELLI



OUR CARE COMES FROM
inside out

A seed, no matter how small, already carries within its DNA the full potential of the plant it will become.

It is from that tiny grain that, once nurtured and cared for, sprouts the main raw material of our business.

In these 40 years of Lunelli, the seed that sprouted and sustained our development has always been the people who have been and are by our side, who bring incredible potential for creation, collaboration, dedication, care, and results in their DNA.

We have only reached where we are because we have always had the best seeds. By valuing our roots and solid values, we can transform the world around us.

Today we are a family that has grown, valuing simplicity, enthusiasm, and seeking the growth and development of all.

Together, with every gesture, every action, we are sure that we are sowing a better future.

We are Lunelli, with great pleasure.

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MISSION

To improve people's lives through opportunities, products, and services.

Essentially, this means that Lunelli aims to positively impact individuals and their relationships by generating development opportunities in various areas, including financial, educational, commercial, personal, and intellectual, considering that individuals who engage with the company will be better every day.

VISION

To become the most respected fashion textile group in the country.

Lunelli seeks, through its actions such as service provision, meeting established deadlines, offering quality products at fair prices, to strengthen relationships and earn the respect of our customers through Meaningful Fashion.

VALUES

Enthusiasm

It means having God within oneself. An enthusiastic person faces obstacles and challenges with confidence, positively influencing those around them. Having positive energy and empathy for others, treating them as you would like to be treated.

Simplicity

This value is deeply rooted in the Lunelli family. It emphasizes the need to simplify life, tasks, work, relationships, and to appreciate the simple things in life.

Obsession by results

It's about getting it right the first time, always seeking the best, and reducing cost and expenses. It's a fixed idea, a constant pursuit of continuous improvement. Through results, Lunelli reinvest in technology updates, training, and development of its units, and in providing the best customer service.

PURPOSE

To promote the success of our customers through the happiness and satisfaction of our employees.

Viviane Cecilia Lunelli
CEO



MESSAGE FROM THE CEO

The Lunelli's Code of Conduct has been developed based on our ideology, values, and principles. It guides our professional conduct, establishes standards and attitudes considered appropriate for promoting an excellent workplace. We are all responsible for maintaining standards and improving processes, striving for a more sustainable and ethical business for people and the planet.

This document serves as guidance and contributes to supporting our organizational culture, which should be observed and incorporated into our daily lives and relationships with shareholders, employees, leadership, customers, franchisees, suppliers, service providers, partners, the community, government, society at large, and other stakeholders.

We rely on you to continue generating positive changes in the world and creating fashion that brings meaning to the lives of those who choose to wear it.

“By valuing our roots and solid principles, we can transform the world around us.”



CODE STRUCTURE

Aiming at supporting the disseminations of sustainability culture, the Lunelli Code of Conduct is structured in the ESG form at:

Ecosystem: care for the Environment;

Social: care for people and community;

Governance: care for ethics, transparency, equity, accountability, and corporate responsibility.

RELATIONSHIP WITH THE SUSTAINABLE DEVELOPMENT GOALS – SDGs

The 17 Sustainable Development Goals (SDGs) were established by the United Nations (UN) in 2015 and form a global agenda for the construction and implementation of public policies aimed at guiding humanity until 2030.

The Lunelli Code of Conduct is related to the Sustainable Development Goals (SDGs), aiming for integration of our internal and external actions with the promotion of sustainable development. We believe that it is our actions that have the power to change the world and promote more conscious fashion.

The 17 SDGs aim to identify the targets to be achieved by 2030 for the creation of a sustainable world.



Learn more at: sdgs.un.org

ENVIRONMENT

In Sustainability, the ENVIRONMENTAL aspect deals with environmental care and dictates how the company, employees, and third parties should proceed regarding the use and disposal of resources.

We are committed to promoting efficient and responsible operations, minimizing, and offsetting negative impacts, and maximizing positive impacts on the environment. We encourage everyone to share the same commitment.





GOOD PRACTICES

All Lunelli's suppliers and service providers must:

Abide by the environmental legislation, codes and regulations in place and applicable to its facilities, industrial methods and processes, workplace, manufactured and/or resold products and services provided; When requested, all Lunelli's suppliers and service providers must show evidence of the above items compliance, as a qualification criteria.

In case of incidents and accidents, the emergency response procedure must be followed, as well as control, mitigate and repair any eventual damage, immediately informing the contractor.

We encourage all suppliers and service providers to carry out awareness campaigns for conscious consumption and disposal, as well as programs to reduce resource consumption and develop products and services with a lower environmental impact.

ENVIRONMENTAL MANAGEMENT



All Lunelli's suppliers and service providers must:

For effluents, all activities with a potential negative impact, carried out in Lunelli's service, must be managed, measured, and controlled before any effluent is released into the environment.

For solid waste, the supplier or service provider must have adequate facilities for collecting and storing solid waste (hazardous or not), including appropriate signage and coverage. All waste transported for disposal or temporary storage must be registered in compliance with the documents required by the competent authorities, as well as having the current environmental licenses of the companies hired to transport the waste.

For chemical products, the supplier or service provider must fulfill the conditions set out in the law regarding the structure of the storage place, such as lighting, ventilation, containment, signage and safety equipment, among other requirements. It must also follow the guidelines of the Material Safety Data Sheet (MSDS) and have an In case of Emergency Form (ICE). Preferably, do not use chemical products classified as hazardous to the environment. If they are used, keep control and management of them.

IMPORTED PRODUCTS AND SUPPLIES

In the case of imported products and supplies, the supplier must ensure that they are in compliance with the country of origin's environmental laws and regulations, as well as guarantee that the origin of the product is not the result of illegal exploitation of natural resources.



Jaqueline Pedroso Samagaia
LUNELLI CLOTHING



SOCIAL

The SOCIAL pillar of Sustainability deals with caring for and valuing people, diversity and inclusion, development and working conditions, and support for the community.

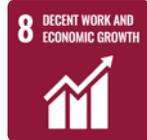


EMPLOYEES

We believe that Lunelli's success is built on the happiness and satisfaction of our employees. Therefore, we strive to provide a suitable work environment where Respect is the foundation of interpersonal relationships, thus enabling opportunities for development and professional recognition. Therefore, we believe that our suppliers, service providers, third parties and partners in general must be aligned with our commitments.

LABOR RELATIONSHIPS

Our suppliers, service providers, third parties and partners in general must provide a suitable environment and establish employment contracts that respect local laws, valuing and respecting human rights.



We do not tolerate any form of harassment, intimidation, prejudice, or discrimination, characterized by differential treatment, segregation, confrontation, or disregard, such as verbal, physical, or psychological violence.



DIVERSITY

We recognize differences not as a means of distinction, but as a transformative force that generates growth and connection. We respect everyone equally because we believe that respect is synonymous with empathy and that **respect inspires respect.**

We encourage our suppliers, service providers, third parties and partners in general to value diversity, without origin, nationality, race, gender, color, sexual orientation, age, religion, social status, disability, and political conviction discrimination.



HARASSMENT

We do not tolerate any form of harassment. We must avoid any form of abusive behavior and/or moral, sexual, or otherwise harassment, always ensuring a professional environment of mutual respect, based on technical and professional guidelines.

Workplace moral harassment is characterized by abusive conduct, manifested through behaviors, words, acts, gestures, or writings that may harm the dignity and integrity of the individual, jeopardizing health and impairing the work environment.

Sexual harassment is characterized by the harassment of someone with the intention of obtaining sexual advantage or favoritism.

FAMILY OR PERSONAL RELATIONSHIPS



We do not recommend family or personal relationships between employees and suppliers and partners in general. Suppliers, service providers, third parties and partners in general, who have an emotional relationship with an employee, must adopt the same behavior as the other workers, and may not

behave intimately in the work environment, they also must not jeopardize the performance of activities or result in personal favoritism or a conflict of interests.

We do not hire relatives or anyone with whom we have a personal bond for a subordinate or service provider position, without first involving and informing their immediate superior and the Human Resource area, in order to analyze and authorize it.

Suppliers and partners in general commit themselves to promptly inform contractors of any act or commercial transaction, as a subordinate or service provider, about employees with a degree of family or personal relationships.

WEAPONS, LEGAL AND ILLEGAL DRUGS

We prohibit the carrying and use of illicit drugs and weapons (bladed or firearms) on company premises.

We do not tolerate the consumption, offering, or presence of employees under the influence of any illicit substance during working hours.

Smoking is prohibited on company premises, except in designated and reserved areas.

Suppliers and partners in general are not allowed to enter or remain in the company grounds under the influence of alcoholic beverages.

HEALTH AND SAFETY IN THE WORKPLACE

We promote a safe and healthy work environment, prioritizing the best practices and internal safety procedures to prevent work-related risks and our suppliers, service providers, third parties and partners in general must be aligned with our commitments.



Suppliers and partners in general must guarantee and provide an environment that meets the legal requirements for health and safety at work. They must also adopt measures to prevent accidents and health damage, including access to drinking water, hygienic toilets, ergonomic conditions and personal protective equipment suitable for the job.

Suppliers must keep all the health and safety documents required for operation and service provision up to date and inform the contracting area immediately in case of updates or renewals.

Suppliers and partners in general must respect the rules of access to the units, follow the procedures of the Health and Safety at Work area and commit to provide the documentation, the safety equipment and adopt the necessary conducts to provide internal services.

CLOTHING, PPE AND USE OF UNIFORMS

We orientate on the proper use of clothing and PPE (Personal Protective Equipment) and that they are suited to the work environment and service provided.

CORPORATE GOVERNANCE

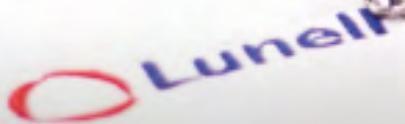
8 DECENT WORK AND ECONOMIC GROWTH



16 PEACE, JUSTICE AND STRONG INSTITUTIONS



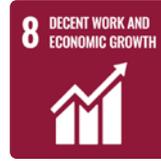
17 PARTNERSHIPS FOR THE GOALS

The Lunell logo, featuring a red circle with a white outline to the left of the word "Lunell" in a blue, sans-serif font.

Corporate Governance principles include Integrity, Transparency, Equity, Accountability, and Sustainability, which are essential for sustainable development, trust, and respect, both internally and in relationships with third parties.

INTERNAL CONDUCTS

Lunelli manages its brands and business units in a professional way, guided by its ideology, organizational culture and the best Corporate Governance practices.



INFORMATION INTEGRITY

We do not accept the submission of falsified data in order to approve projects or services, meeting performance targets or any other information provided to Lunelli.

We do not allow misappropriation of assets, data and transactions registered in fraudulent manners by any party. All suppliers, service providers, third parties and partners in general must immediately report such situations to the contractor so that legal actions can be taken.

We repudiate the leaking of information from any area, to other companies, especially competitors.

HUMAN RIGHTS

We do not allow forced or child labor, or labor conditions analogous to slavery labor and we require the same conduct from our suppliers, service providers, third parties, and partners in general.

ANTI-CORRUPTION PRACTICES

Lunelli prohibits any act or practice that may constitute corruption, whether directly or indirectly, in accordance with Anti-Corruption Law No. 12.846/2013*. All employees, when conducting business and routine activities, must comply with or enforce this legal provision.

We do not tolerate attitudes and actions involving the payment and/or receipt of undue benefits (gifts, favors, loans, contributions, special services) or that constitute bribery, corruption, kickbacks, or the exchange of favors with public officials to obtain any favor or privilege from government agents.

*Access to the Anti-Corruption Law: www.planalto.gov.br/CCivil_03/_Ato2011-2014/2013/Lei/L12846.htm

APPROPRIATION OF ASSETS

We do not tolerate fraud, theft, robbery, or any form of diversion, which is why we do not accept employees misappropriating the company's or any other person's assets and financial resources.

GIFTS AND PRESENTS

All suppliers, service providers, third parties and partners in general must follow the criteria defined by Lunelli for gifts and presents.

Only gifts, presents, and bonuses that align with the supplier and/or service provider's relationship strategy, are appropriate for the professional relationship, and comply with our internal policy will be accepted.

All suppliers, service providers, third parties and partners in general commit to not receiving or offering gifts, entertainment or travels, securities or any other undue advantage to any public agent or person related to them, when acting on behalf of or for the benefit of Lunelli.

The supplier is prohibited from carrying out any act in this regard.

USE OF THE COMPANY'S ASSETS

We use our assets responsibly, with care, and meeting the necessary workplace safety requirements for the performance of our activities, and we demand the same care from suppliers, service providers, third parties and partners in general.



CONFIDENTIALITY OF INFORMATION

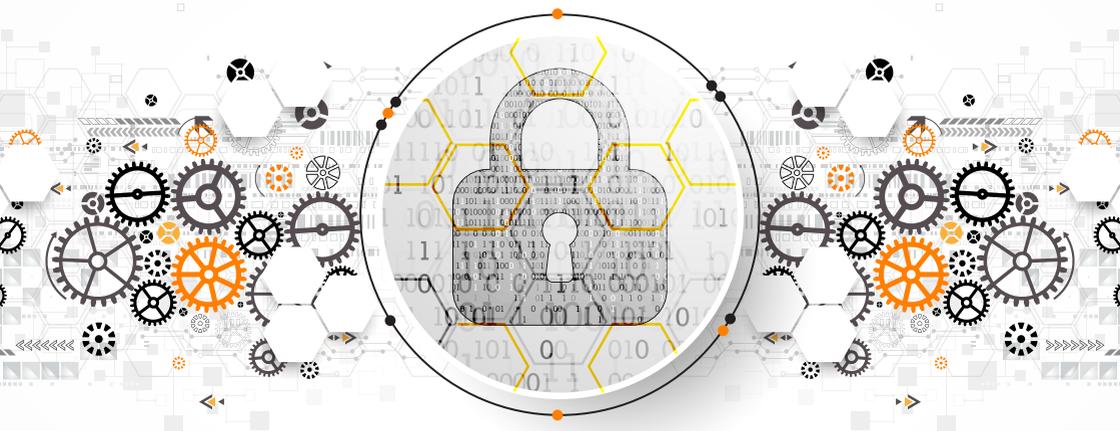
All suppliers, service providers, third parties and partners in general must ensure compliance with the provisions of the Brazilian General Data Protection Law (Law 13.709/2018), guaranteeing the privacy of the information of their customer groups, such as clients, shareholders, employees, suppliers and business partners.

It is forbidden to disclose, intentionally or unintentionally, confidential, or strategic data that are not in the public domain, such as:

- Technical and commercial product data;
- Business and commercial goals, initiatives and strategies;
- Budget and short, medium or long-term planning;
- Volume and purchase conditions;
- Research results;
- Accounting, statistical, financial and operational data, among others.

Privileged access to this type of information may not be used for one's own benefit or for the benefit of third parties.

We repudiate the leaking of information from any area, to other companies, especially competitors.



PRIVACY AND PERSONAL DATA PROTECTION

We, as employees, shareholders, customers, franchisees, suppliers, service providers, third parties, and other business partners of Lunelli, are all responsible for protecting the personal data to which we have access.

We must safeguard personal data by always applying the necessary security measures to ensure its integrity. We protect the personal information of third parties that we may access during and after the established relationship between the third party and Lunelli.

When accessing computers, hardware, software, mobile devices, including email and the internet, we must all adhere to the information security guidelines. It is not permitted to share any documents, spreadsheets, contracts, or contacts of Lunelli's employees, customers, franchisees, suppliers, service providers, third parties, and other business partners that contain personal data outside the specific context of work and Lunelli's internal policies, under penalty of violating this Code of Conduct and the current personal data protection laws.

Lunelli is committed to the legitimate and lawful treatment of personal data of all individuals (data subjects) who interact with us: employees, dependents, shareholders, customers, franchisees, suppliers, service providers, and representatives of business partners. We respect privacy as a personal right, always placing it at the center of our priorities and ensuring, especially, the following principles: non-discrimination, transparency, security, quality, and minimization.

We are a Brazilian and transnational company. We treat and use personal data while always respecting applicable laws and regulations. We consider privacy and the protection of personal data throughout the data lifecycle, from collection to disposal or storage, including sharing and lawful use.

Our employees, shareholders, customers, franchisees, suppliers, service providers, and other business partners have the right to know how their personal data is treated. Therefore, we act with transparency regarding the treatment and purpose for which we use personal data.

For more information on how we handle your personal data, please contact the Privacy and Personal Data Protection department via email at dpo@lunelli.com.br



INTELLECTUAL PROPERTY

Intellectual property refers to the legal protection and recognition of authorship of intellectual works such as inventions, patents, trademarks, industrial designs, creations, collections, etc. It is the duty of employees and all partners to respect and protect Lunelli's intellectual property and that of third parties, thereby avoiding misuse, diversion, or improper use.



COMMUNICATION WITH STAKEHOLDERS

We aim to maintain a relationship of respect and transparency with our stakeholders, striving to uphold the image of Lunelli and its brands.



CORPORATE COMMUNICATION

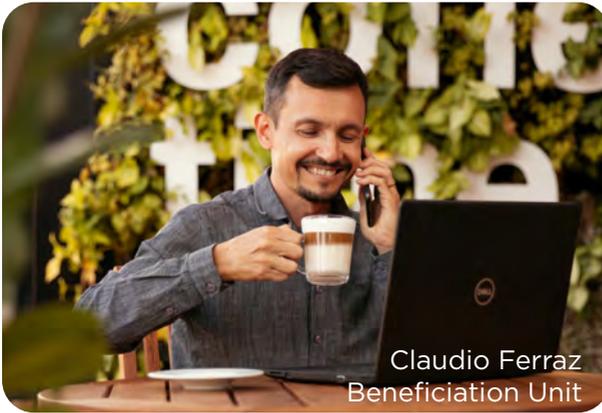
All suppliers, service providers, third parties and partners in general must guarantee that they will not use Lunelli's brand and/or logo, for any reason whatsoever, without the prior, formal and specific authorization from the Marketing area or Board of Directors of the contracting area.

Our suppliers, service providers, third parties, and partners in general should not disclose any completed or ongoing projects without prior authorization from the Marketing Department or the Board of the contracting area.

USE OF SOCIAL MEDIA AND LUNELLI'S BRANDS EXPOSURE

In addition to increasing visibility, social media have become an important channel for personal and professional relationships and communication. We advise all suppliers, service providers, third parties and partners in general, to adopt a respectful approach when making posts mentioning Lunelli or its brands on their social media.

Suppliers, service providers, third parties and partners in general can only share through their profiles content that has already been previously published by the Marketing area on Lunelli and its brands' official profiles, avoiding the exposure of strategic information.



Claudio Ferraz
Beneficiation Unit

Posts with content and photos from events, trainings, conventions and daily processes at Lunelli must not disclose strategic information or confidential content about Lunelli and its brands.

Attending the demands of customers, consumers, suppliers or other partners should only be carried out through Lunelli and its brands' official social media, with authorization from the Marketing department.

It is not permitted to use Lunelli or its brands' image for any purpose that violates the law, for political party manifestations, with content that encourages prejudice, discrimination, violence or content with sexual offenses.

LUNELLI'S RELATIONSHIP CENTER - CRL

Lunelli's Relationship Center (LRC) is a specialized communication channel aimed at meeting the relationship needs of our multi-brand customers and consumers of Lunelli and its brands, products, and services.

Phone/WhatsApp:
0800 721 1414

E-mail:
crl@lunelli.com.br

Resell our brand:
<https://lunelli.com.br>



CONDUCT WITH STAKEHOLDERS



SHAREHOLDERS

We protect the interests of our shareholders and investors through the transparency, reliability, ethics, and honesty we adopt in maintaining and presenting our financial statements.

GOVERNMENT

We respect the current legislation in Brazil and countries where we have operational and commercial activities.

ENTITIES AND TRADE ASSOCIATIONS

We maintain relationships with entities and trade associations relevant to our interests to discuss proposals and issues that affect the activities carried out by Lunelli.

We strive to maintain a respectful relationship with trade unions and do not adopt any discriminatory practices against unionized employees.

COMPETITORS

We adhere to the principles of fair competition and condemn actions that may publicly discredit the image of our competitors.

CONFLICTS OF INTEREST



A conflict of interest, whether real or potential, occurs when an employee uses their influence or commits acts with the aim of advancing personal interests or those of individuals to whom they are linked, which oppose the interests and may cause harm or damage to the company. Therefore, it is the duty of the employee to be vigilant of situations that may lead to conflicts of interest in their activities.

We must always inform our superiors of any shareholdings held by us or by our relatives and friends, as well as any commercial, financial, or economic interests that may lead to conflicts of interest.

Employees must not engage in external activities, whether paid or unpaid, that compete with the interests of Lunelli.

The use of assets, facilities, and other resources of Lunelli for personal purposes is prohibited.

TRANSPARENCY

Transparency is paramount in the partnership between Lunelli and its suppliers, service providers, third parties, and partners. We expect everyone involved in our product and service supply chain to uphold principles of objectivity, honesty, dignity, respect, loyalty, courtesy, mutual respect, and collaboration.



In addition to maintaining quality and clarity during contract negotiations and amendments, and throughout contract administration, it's crucial to avoid practices that could disrupt these processes. We also emphasize the importance of providing accurate information, particularly regarding legal, fiscal, economic-financial, health and safety, environmental, quality, and professional training aspects of our service providers.

THE MULTIPLIER EFFECT

We recommend that our suppliers, service providers, third parties and partners in general use their own supply network to disseminate and consolidate the requirements, parameters and good practices described in this Code of Conduct to extend its reach.

Lunelli encourages its suppliers to promote the adoption of a code of conduct within their own supply network.

CODE OF CONDUCT'S MANAGEMENT

It is the responsibility of the Corporate Governance and Sustainability area to manage and update Lunelli's Code of Conduct, submitting it to Lunelli's Board of Directors and Board of Trustees for approval.

The Board of Directors and Leaderships are committed to:

1. Become multiplier agents of the Code of Conduct for Suppliers and Partners, ensuring that they understand our values and ethical principles.
2. Disseminate this document to all suppliers, service providers, third parties and partners in general.
3. Deal appropriately with any conflicts and misconduct cases.

VIOLATION OF THE CODE OF CONDUCT

Any violation of the Code of Conduct needs to be immediately reported through the ethics reporting channel for proper investigation.

Disregard for the Code of Conduct will result in disciplinary measures, which do not exempt or replace any legal penalties for violations of current legislation and/or rules and regulations of bodies with which Lunelli maintains relationships.

ETHICS REPORTING CHANNEL

In case of doubts and/or conflicting situations not covered by the Code of Conduct, talk to your leader, and use the ethics reporting channel.

The Ethics reporting channel is a communication channel through which you can report lost or found items, deviations of materials, or any type of misconduct that may be occurring in the company, as well as suggest improvements.

If you consider that the matters require confidentiality, call:

External calls: **+55 47 9090 3373-7488**

If you consider that the matter does not require confidentiality, send an e-mail to:

E-mail:

ouvidoria@lunelli.com.br

