

Code of Conduct





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.

Índice

Ideology	5
Message from the Presidency	6
Code Structure	7
Relationship with the Objectives of Sustainable Development - SDG	8
Environment	10
Social	12
Corporate governance	18
Code of Conduct Management	31
Violation of the Code of Conduct	31
Ethics Reporting Channel	32

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 for results

It's about getting it right the first time, always seeking the best, and reducing costs and expenses. It's a fixed idea, a constant pursuit of continuous improvement. Through results, Lunelli reinvests 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.



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 dissemination of Sustainability culture, the Lunelli Code of Conduct is structured in the ESG format:

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 www.pactoglobal.org.br/ods



Rede Brasil

Lunelli is a signatory company of the UN Global Compact.

By signing the Global Compact, Lunelli reinforces its commitment to these principles, aligning itself with a global community of companies seeking to make the world a better place for future generations.

With the aim of maximizing our positive impact and emphasizing the SDGs, we have defined 09 priority objectives to concentrate our efforts, which are:



During the Code of Conduct, we will identify the priority SDGs with a golden border. The other SDGs that are related to the theme but are not listed as priorities for the business will appear without any distinct identification.

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.

6 CLEAN WATER AND SANITATION



7 AFFORDABLE AND CLEAN ENERGY



12 RESPONSIBLE CONSUMPTION AND PRODUCTION



13 CLIMATE ACTION



14 LIFE BELOW WATER



15 LIFE ON LAND



CONSCIOUS CONSUMPTION

It is everyone's responsibility to use resources consciously at Lunelli. We continuously strive to reduce water, energy, chemical, raw material, and other resource consumption through innovation and continuous improvement of production, commercial, technological processes, and educational means that promote efficient and conscious use at Lunelli.



CONSCIENTIOUS DISPOSAL



All waste generated in the company must be properly disposed following the premises of Selective Collection. Liquid waste must be safely disposed and without posing a risk to the environment, following the guidelines and at the correct location.

We must always seek to reduce the generation of solid waste, effluents, and atmospheric emissions through preventive and integrated measures aiming at cleaner production in our operations.

It is everyone's commitment to identify deviations in the improper use of resources and incorrect disposal, which should be reported in assessments of the SOL Program (Safety, Organization, and Cleanliness) and to immediate leadership.

Jaqueline Pedroso Samagaia
Unidade Vestuário



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.

LABOR RELATIONSHIPS



We aim to provide a welcoming environment because we believe that respect transforms everything around us and connects us with the future. Diversity makes us unique.

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 value diversity without discrimination based on origin, nationality, race, gender, color, sexual orientation, age, religion, social status, disability, or political conviction.

Attention to the content and manner of verbal, visual, or physical expressions regarding colleagues and peers, refrain from using insults, negative stereotypes, and intimidating acts that may be interpreted as disrespectful and hostile.



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 allow family or personal relationships among employees, once they do not interfere with job performance or the workplace atmosphere, and do not result in personal favoritism or conflicts of interest. Employees who are in a personal relationship must behave like other professionals and avoid displaying intimacy in the workplace. Cases where these conditions are not met should be reported to the immediate supervisor and the HR department, where disciplinary measures may be applied.

We do not hire relatives or any person with whom we have a personal relationship as subordinates or service providers without prior notification to the immediate supervisor and authorization from the HR department.

We commit to immediately inform superiors of any commercial transaction under our responsibility involving companies where our relatives and friends work.

HEALTH AND SAFETY IN THE WORKPLACE

We promote a safe and healthy work environment, prioritizing the best safety practices and internal procedures to prevent work-related risks.

Employees are committed to keeping their work environment clean and organized and to attending the periodic assessments conducted by the SOL Program (Safety, Organization, and Cleanliness).



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.

Entry or presence of employees under the influence of alcoholic beverages on company premises is not permitted.

The consumption of alcoholic beverages on company premises is restricted to corporate events held outside working hours, previously authorized by the management, and conducted in moderation, respecting safety rules.

These rules also apply to employees participating in trips, events, training, and business meals on behalf of Lunelli.

CLOTHING AND USE OF UNIFORMS

We advise wearing appropriate clothing that suits the work environment and company events.

For industrial areas, we recommend wearing uniforms that comply with the company's safety rules.

COMMUNITY



We are aware that our decisions and actions influence the sustainable development of the communities where we operate.

VOLUNTEERING

We encourage our employees to participate in community life through volunteering.



DONATIONS, INCENTIVE PROJECTS, AND SPONSORSHIP

The use of resources from the area for financial support or the donation of gifts to institutions or individuals who do not represent professional and strategic relationships for the business is not allowed.

At Lunelli, all requests for donations, incentive projects, and sponsorship must comply with the donation policy and be submitted for analysis by the Corporate Governance and Sustainability department for subsequent presentation and approval by the Board of Directors.

CORPORATE GOVERNANCE

8 DECENT WORK AND ECONOMIC GROWTH




16 PEACE, JUSTICE AND STRONG INSTITUTIONS



17 PARTNERSHIPS FOR THE GOALS



 Lunell

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 CONDUCT

Lunelli manages its brands and business units professionally, guided by its ideology, organizational culture, and best practices of Corporate Governance.



INFORMATION INTEGRITY

We do not condone the presentation of forged data to approve projects, meet individual performance goals, or business unit targets.

Any employee who becomes aware of unregistered assets, asset misappropriation, or fraudulently recorded data and transactions must report such situations immediately to their supervisor and use the whistleblowing channel so that legal action can be taken.

We strongly oppose the leakage of information from any area to other companies, especially competitors.

HUMAN RIGHTS

We do not condone forced or child 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

USE OF COMPANY ASSETS

We use our assets responsibly, with care, and meeting the necessary workplace safety requirements for the performance of our activities.

Employees are responsible for the care, proper use, custody, and conservation of the physical spaces, assets, and property made available to them for the performance and development of their activities related to the company, which must be returned in case of termination of the employment contract.

USE OF COMPANY FINANCIAL RESOURCES

Employees must handle the financial resources provided for the performance of their activities with austerity, adhering to related policies and procedures that guide the use of Lunelli's financial resources.

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

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 gifts, even when specifically directed to an individual or department, must be directed to and stored in the Human Resources area, which will follow the internal procedure for distributing gifts.

Employees are not permitted to request gifts, presents, sponsorships, financial resources, and materials from business partners, suppliers, service providers, third parties, and partners in general on behalf of the company or coerce them into offering such items.

Employees are encouraged to avoid accepting invitations to lunches, dinners, or private events to preserve their impartiality in negotiations with suppliers, service providers, third parties, and partners in general.

CONFIDENTIALITY OF INFORMATION

The employee is responsible for the confidentiality of privileged and strategic information they have access to while performing their duties. It is their responsibility to take all necessary precautions to preserve confidentiality, and they are prohibited from disclosing such information under any circumstances or using it for their own or third-party advantage or benefit.

The employee must always avoid exposing confidential documents and information in their workplace. During conversations in public settings such as restaurants, airports, and transportation, the employee must exercise caution to avoid the risk of exposing confidential information. The employee should also be careful with the use of passwords and other access codes to internal systems, as these are individual and non-transferable.

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.



BUSINESS PARTNERS RELATIONSHIP



We aim to build a relationship of trust, partnership, and respect with our employees, customers, franchisees, suppliers, service providers, third parties, and partners in general.



We offer our customers products and services with quality, fair pricing, and added value, striving to achieve our strategic objectives.

We respect the confidentiality of strategic information about our business partners, suppliers, service providers, third parties, and partners in general.

SUPPLIERS AND SERVICE PROVIDERS

We do not engage in forced or child labor, and we demand the same conduct from our suppliers, service providers, third parties, and partners in general.

We treat our suppliers, service providers, third parties, and partners in general equally and impartially, respecting the principles of fair competition and considering Lunelli's purchasing policy and standards.

REPRESENTATIVES, MULTI-BRAND RETAILERS, AND FRANCHISEES

In line with our purpose of promoting the success of our customers, we adopt an ethical approach, acting in good faith, and respecting the commercial agreements and contracts established with our representatives, multi-brand retailers, and franchisees, aiming to strengthen and develop our business partners.

CONSUMERS

Our physical and online stores prioritize providing consumers with access to products at fair prices, quality, comfort, and unique style that comply with current socio-environmental regulations.

Our retail practices prioritize the best shopping experience and respect consumer rights, complying with the Consumer Protection Code*. Our Privacy Policy and Personal Data Protection ensure the confidentiality of our consumers' personal information.

*Access to the Consumer Protection Code: http://www.planalto.gov.br/ccivil_03/Leis/L8078.htm

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 requests for interviews or information about Lunelli and its brands should be directed to the Marketing Department Management. Providing information, interviews, and/or speaking on behalf of Lunelli will only be permitted with prior authorization or appointment from the Board of Directors.

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.

If incorrect information or news coverage is identified, or if a request for information about Lunelli and its brands is received from journalists or professionals working in media channels such as TV, radio, websites, newspapers, magazines, or social media, the employee should immediately inform the Marketing Department.

USE OF SOCIAL MEDIA AND LUNELLI'S BRANDS EXPOSURE

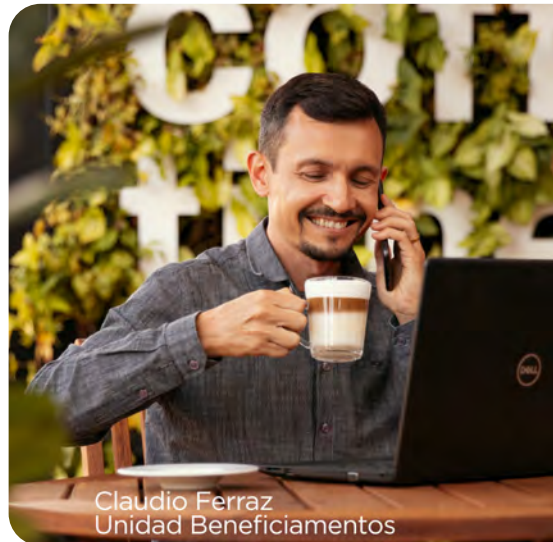
In addition to increasing visibility, social media has become an important channel for personal and professional relationship and communication. Lunelli uses social media to connect with its employees, customers, suppliers, service providers, third parties, and partners in general, providing relevant content and strengthening the positive image of the company and its brands.

We advise our employees and other stakeholders to adopt a respectful posture when making posts mentioning Lunelli and/or its brands on their social media platforms.

As a Lunelli employee, when online, one should take the precautions outlined in this code, including rules on information confidentiality, data protection/privacy, and intellectual property. When posting content on their social media, it is expected that they make it clear they are not speaking on behalf of Lunelli and/or its brands unless authorized to do so. We also encourage all employees and stakeholders to exercise good judgment on social media, interacting respectfully with others.

Employees, customers, suppliers, service providers, third parties, and partners in general may share content through their profiles that has previously been published by the Marketing Department on Lunelli's official profiles and its brands, avoiding the exposure of strategic information.

Posts containing content and photos of events, training sessions, conventions, and daily processes at Lunelli must not disclose strategic information or confidential content of Lunelli and its brands.



Claudio Ferraz
Unidad Beneficiamentos

Customer, consumer, supplier, or other partner inquiries should only be addressed through Lunelli's official social media profiles and its brands. Employees are not authorized to respond to customer inquiries on their personal profiles or create pages and profiles on social media platforms on behalf of Lunelli.

Socializing with friends and colleagues should be done privately, in closed groups, to prevent confidential Lunelli content from being exposed.

The use of Lunelli's image or its brands for any promotion that violates laws, political party affiliations, content that encourages prejudice, discrimination, violence, or offensive sexual content is not allowed.

Negatively exposing Lunelli, its brands, or colleagues due to the company's affiliation may result in legal action being taken, including termination of employment for just cause.

LUNELLI'S RELATIONSHIP CENTER - LRC

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

Email: crl@lunelli.com.br

Resell our brand:

[https://lunelli.com.br/site/
index.php/fale-conosco/](https://lunelli.com.br/site/index.php/fale-conosco/)



CONDUCT WITH STAKEHOLDERS

EMPLOYEES

To maintain a healthy environment and ensure compliance with internal and legal regulations, it is evident that Lunelli, upon becoming aware of any disagreement, may need to apply disciplinary measures.

Failure to comply with any guidelines in this Manual or other Company regulations may result in:

Verbal Warning: spoken notice, addressing the employee for improper behavior.

Written Warning: written notice for repeated misconduct or more serious offenses. It must be signed by the employee and two witnesses in case of refusal.

Suspension: may be applied for repeated or severe offenses. When suspended, the employee is prevented from working and, consequently, does not receive salary and does not rest for a determined period.

Just Cause: applied in any case provided for in Article 482 of the CLT. In addition to losing their job, the employee also faces limitations on severance pay.

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.

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.

IN CASE OF DOUBTS

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.

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.

You can also use this channel to seek help with personal matters such as domestic violence, various forms of abuse, financial difficulties, discrimination of any kind, race, gender, color, religion, sex, nationality, etc.

The ethics reporting channel is available 24 hours a day, and all information received is kept confidential, with no need for identification.

We want you to feel safe both within and outside Lunelli, so whenever necessary, communicate! The ethics reporting channel is available to assist you.

If you consider that the matter does not require confidentiality, please send an email to: ouvidoria@lunelli.com.br

Extension: 7488

External Calls: (47) 9090 3373-7488

Email: ouvidoria@lunelli.com.br

TERM OF COMMITMENT

Code of Conduct – 2^a edition

I hereby declare for the proper purposes and legal effects that I have received the ‘Lunelli Code of Conduct’.

I commit to uphold and respect this code, practicing it daily.

Full name: _____

Registration: _____

Place: _____

Date: __ / __ / ____

Signature: _____

Please sign and send this commitment agreement to the Human Resources department.

