
CODE OF CONDUCT

UNICASA INDÚSTRIA DE MÓVEIS S.A.

Approved at the Board of
Directors Meeting held on
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LETTER FROM THE CEO

Dear all,

Our company believes that aligning our core values with our strategic goals is key to our success.

Our business is based on fair, responsible and innovative actions from the perspective of all those involved.

People are the most important factor for strengthening Unicasa in both the market and society. As such, we believe that your attitudes must be guided by the core values of the Company, the alignment of which drives the growth of everyone.

Among the guiding values of Unicasa, ethics is one of the most important and the main characteristic of engaged, competent and creative professionals.

Our Code of Conduct and Ethics applies to everyone and is deemed a guide for regulating actions. Based on the mission and the defining values of the Company, it serves as a guide for the future and for the growth of the Company and its employees.

Read it carefully, follow it and monitor its practice on a daily basis.

We are counting on your collaboration!

Gustavo Dall Onder
CEO

INTRODUCTION

The Code of Conduct of Unicasa Indústria de Móveis S.A. (“Code of Conduct”, “Unicasa” or “Company”) regulates, in general terms, the ethical principles and standards of conduct that must guide the actions of Unicasa and must be preserved in its relationship with managers, employees, service providers and other persons and entities with whom Unicasa has a relationship (“Employees”).

Unicasa’s reputation and credibility are important assets of the Company. The ethical principles that guide Unicasa’s activities aim to preserve Unicasa’s image in the market and among clients, suppliers, consumers, investors, employees and other stakeholders¹.

The guidelines of this Code of Conduct must be observed by all Employees of Unicasa, including, but not limited to, managers and members of statutory and/or non-statutory Committees, as applicable, regardless of their functions and responsibilities.

The Code of Conduct is available to the public on the Company’s website: <https://ri.unicasamoveis.com.br/governanca-corporativa/estatuto-e-politicas>.

This code does not alter or replace the existing policies and procedures in force.

WHAT DOES UNICASA BELIEVE IN?

We believe that the foundation of a company’s strong reputation and credibility is its clearly stated Mission, Vision and Values so that everyone engaged in the Company’s purpose can contribute through actions that are aligned with the Company’s essence.

MISSION

To offer our clients of all lifestyles the best solutions in furniture for environments that offer well-being, through design and innovation.

VISION

To be the best Brazilian company in providing integrated and innovative solutions for environments, in a profitable and sustainable manner, to ensure the Company’s perpetuity.

¹ Stakeholders: Individuals and organizations impacted by the company’s actions.

VALUES

- 1) EFFICIENCY:** Focus on results in an ethical manner, creating value increasingly and in a sustainable manner.
- 2) MERITOCRACY:** Value people by developing, inspiring, motivating and compensating them for their commitment, efforts to achieve excellence and team work.
- 3) CLIENT:** Offer customer-oriented products and services.
- 4) INNOVATION:** Develop alternatives, through a creative process that combines form and function, that offer improvements and well-being.
- 5) ETHICS:** Act with transparency, integrity and respect.

RESPONSIBILITY OF MANAGERS AND LEADERS OF UNICASA AND THE ETHICS COMMITTEE

- Create a culture that encourages Employees to comply with this Code and express their doubts and concerns about its application;
- Apply this Code, identifying Employees whose conduct is not compatible with the guidelines in it, and discuss the applicable disciplinary measures with the relevant Department or, if necessary, with the Ethics Committee of Unicasa;
- Be a reference and role model for the teams with regard to compliance with this Code of Conduct;
- Disseminate this Code and its updates to their teams.

HOW TO USE THIS CODE?

- 1) Read it carefully;
- 2) Not sure if your action or decision violates the Code of Ethics? Contact your manager or the Ethics Committee;
- 3) Before taking any decision or action, ask yourself:

Does my attitude respect the values of Unicasa?

- 1) Is it allowed?
- 2) How will my action impact the Company, my coworkers, clients or partners?
- 3) If my attitude or decision is exposed, can I justify it comfortably?
- 4) How I feel after my action or decision?
- 5) Do I have all the information necessary to take my decision so that it benefits everyone involved?

If the answer to any of the questions above is negative or causes uncertainty, it is a sign you should contact your manager or the Ethics Committee to help you with your decision.

Everyone has the duty to care for the Company and so contact your immediate leader for guidance if you become aware of any misconduct or have any concerns about certain behavior.

If you do not feel comfortable about contacting your leader, you can report the situation to Unicasa's Hotline anonymously (optional), in a clear, truthful and detailed manner.

In both cases, we guarantee that investigations will be based on ethics and justice, and focus on improving processes and conduct.

Finally, the hotline is a secure, confidential, fair and reliable option for you to report the facts anonymously.

If any defamatory or malafide conduct is proven, the Company can impose disciplinary sanctions after consulting the Ethics Committee.

GENERAL GUIDELINES

CONDUCT IN WORKPLACE RELATIONS

Work relations at Unicasa are based on transparency, trust, integrity and respect for the individuality, privacy and dignity of each human being.

Important:

- Safety is everyone's responsibility; strictly comply with the occupational safety guidelines, use personal protective equipment (PPE) and report inappropriate situations;
- Treat your coworkers, partners, suppliers and clients respectfully;
- Constantly read the Company's policies and procedures and comply with them;

In this regard, employees must not:

- Use their job, function or hierarchical position for any personal advantage;
- Engage in political, ideological or religious actions on the Company's premises;
- Circulate subscription lists or raffles and/or play games of chance or indulge in loan-sharking on the Company's premises;
- Consume alcoholic beverages during working hours, including during rest breaks, and in the means of transport used for commute to work;
- Use or carry drugs;
- Use or carry guns, except for performing authorized security services and in compliance with the laws in force;
- Smoke in non-smoking areas of the Company;
- Wear Unicasa's uniform for purposes other than the activities of the Company;
- Photograph/film any of the Company facilities, as well as products or product designs without authorization from the manager of the area;
- Provide strategic or confidential information to third parties, including, but not limited to, competitors;

- Adopt any attitude that discriminates, embarrasses or intimidates any Employee in terms of race, color, religion, political beliefs, nationality, origin, age, marital status, gender, sexual orientation, or physical and mental disabilities or limitations;
- Indulge in harassment, i.e., expose people to humiliating and embarrassing situations;
- Engage in acts that may cause damage to the dignity and integrity of people;
- Practice sexual harassment or abuse, which consists of any sexual advance that is not acceptable or requested and causes embarrassment, humiliation or fear;
- Commit physical assault.

We reiterate that at the workplace, relations between employees must be based on cordiality, trust, respect, as well as dignified, honest and ethical conduct, irrespective of hierarchical position or function, as well on compliance with labor laws.

BUSINESS CONDUCT

Business relations involving the Company and its Employees must comply with this Code of Conduct and the policies of Unicasa, as well as:

Compliance with laws

One basic principle in Unicasa is compliance with the laws and regulations in force, including, but not limited to, Law 12,846/2013 – Anticorruption Law, Law 8,429/1992 – Administrative Improbity Law, Law 13,709/2018 – Brazilian General Data Protection Law, and the respective amendments, and Employees are responsible for complying with such laws.

Compliance

All and any operation involving Unicasa must be supported by applicable documents, pursuant to the laws in force.

Avoid conflict of interests

All Employees are dutybound to act with integrity, ethics and responsibility so that their actions do not conflict directly or indirectly with the interests of Unicasa or directly and/or indirectly damage the image and/or reputation of the Company in the market or among its investors and other stakeholders.

As such, Employees must ensure the following, without limitation:

- Not act in direct subordination with 1st degree blood or affinity relatives (spouse, father, mother, children, siblings, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law) or with people with whom they have any type of affective or loving relationship;
- Not use Confidential Information (as defined below) or specific techniques of the Company that may bring personal benefits and/or losses (financial or otherwise) to Unicasa;
- Not request coworkers from other areas, clients, suppliers, service providers and other stakeholders to hire family members without considering the principles of competence and potential;
- Not use the position held to obtain benefits for themselves or others;
- Not engage in professional activities that directly compete with Unicasa's business and may cause losses (financial or otherwise) to the Company;
- Not engage in any other professional activities that are not related to the Company during their working hours.

For the purposes of this Code of Conduct, confidential information refers to any and all information of the Company that: (i) if unduly disclosed, may be useful for competitors or detrimental to Unicasa and all stakeholders (e.g. clients, business partners, service providers, etc.); and (ii) may be deemed important for an investor to decide on buying, selling or holding the securities of the Company or its business partners.

Employees who, during their employment at the Company, have knowledge of or access to Confidential Information, must not: (i) negotiate or trade securities of Unicasa or its business partners based on such information; (ii) disclose information to others, who could, based on such information, negotiate or trade securities of the Company or its business partners; or (iii) disclose Confidential Information while interacting with relatives or friends.

Furthermore, we MUST NOT, without previous notification to and written authorization from the Executive Board of Unicasa:

- Carry out business on behalf of Unicasa with Companies or people that: (i) have family ties or personal relationship with the managers; (ii) hold a position that could directly influence the decision-making process of the business; and (ii) are shareholders holding material interest.

Family members are spouse, parents, siblings, children, uncles, nephews and cousins up to 2nd degree, including those of the spouse.

Fair competition

Unicasa operates in the market honestly and transparently and is guided by innovation and valuing people.

Hence, the Company WILL NOT tolerate corruption, dishonesty, bribery or any other conduct that damages its reputation.

Prevention of money laundering

Unicasa complies with its legal obligations related to the prevention of money laundering. Suspected or confirmed acts of money laundering, corruption, fraud, illegal acts or bribes to business partners are PROHIBITED and must be immediately reported to a manager and/or the Ethics Committee.

Gifts and Amenities

Unicasa employees and their family members must not give, request or accept gifts or favors to/from clients, suppliers, service providers or competitors, whose value is more than one hundred U.S. dollars (USD100.00), and these cannot be accepted or offered to influence business decisions.

Travel and invitations to events that are of interest to Unicasa's business must be reported to the executive officer of the area or the Ethics Committee for prior assessment.

Exceptions must be analyzed and approved by the Executive Board or the Ethics Committee of Unicasa.

CONDUCT TOWARDS THE MARKET, CLIENTS, SUPPLIERS, SERVICE PROVIDERS, PARTNERS AND COMPETITORS

Unicasa's relationship with the market is the foundation of its success.

Clients

Clients must be served promptly and quickly, and provided with clear, accurate and transparent information. Their requests must always be responded to properly and within the defined period. Unicasa strives to make the value perceived by clients with regard to the quality of its products and service transform into trust and long-term relationship with the Company.

Expenses with clients related to meals, transportation, lodging or entertainment are acceptable, provided these are incurred for work reasons, within reasonable limits, authorized by a manager and do not imply embarrassment or need for compensation.

Suppliers, Service Providers and Partners

Business partners (suppliers, service providers, stores, financial institutions and other business partners) play an important role in the Company's business.

As such, relations with these partners and the business carried out by the Company must be conducted with transparency, trust and commitment of both parties in order to achieve the best technical conditions, costs, quality and reputation.

Unicasa strives to establish long-lasting relations based on mutual trust with its suppliers, without prejudice to the principles of free enterprise and fair competition.

Supplier selection criteria must consider their ethical and socially responsible conduct, in addition to technical and financial aspects.

Expenses with suppliers related to meals, transportation, lodging or entertainment are acceptable, provided these are incurred for work reasons, within reasonable limits, authorized by a manager and do not imply embarrassment or need for compensation.

Competitors

The competitiveness of the products manufactured and/or sold by Unicasa must be exercised based on fair competition. No comments should be made that could affect the image of competitors or contribute to disclosing unfounded information that is harmful to them. Competitors should be treated with the same respect that Unicasa expects to be treated.

Unicasa is a member of industry associations to contribute to the development of its sector and complies with the principles of free competition.

CONDUCT TOWARDS THE GOVERNMENT

All and any interaction or communication with government officials or bodies must be made in an ethical, professional and transparent manner, in compliance with the ethical principles in this Code and the laws and regulations applicable to Unicasa.

Unicasa Employees are expressly prohibited from offering gifts or benefits to government officials, their family members or similar persons, directly or via third parties.

CONDUCT TOWARDS SHAREHOLDERS

Communications with shareholders on any aspect of the Company's performance will be made via the Investor Relations Department. Relations with shareholders and investors must be based on accurate, transparent and timely disclosure of information, enabling them

to follow Unicasa's operations and performance, while bringing a positive impact on the Company's market value.

The treatment given to shareholders will not depend on the number of shares held by them, subject to legal restrictions. Information will be provided to all shareholders in an egalitarian manner.

CONDUCT WITH REGARD TO CONFIDENTIALITY AND INFORMATION

Pursuant to the Brazilian Corporations Law and CVM regulations, a person is required to maintain confidential any material information that has not yet been disclosed to the market and which was obtained by virtue of their function and which is capable of considerably influencing the price of securities and investors' decision to trade securities or exercise any rights inherent to their status as holders of securities.

The obligation to protect confidential and privileged information is not limited to protecting it from misuse but also to using it only for the performance of their professional duties.

No information can be used to obtain, for oneself or others, undue advantage in the capital markets. The use of material information not yet disclosed to the market, by any person who becomes aware of it and who is bound by the duty of confidentiality, when such use may bring them or others undue advantage in trading securities on their behalf or on behalf of others, is a CRIME against the capital markets.

CONDUCT WITH REGARD TO POLITICAL ACTIVITIES

As an institution, Unicasa does not make any restrictions on the political activities of its Employees. Employees participating in any political activity do so as citizens and not as a representative of Unicasa.

If an Employee chooses to participate actively in politics, they must always do so in their personal capacity and in a way that does not interfere with their professional responsibilities.

Employees are expressly prohibited from carrying out political activities at the work environment that in any way involve the resources of Unicasa. Also, employees must not wear Company uniforms while carrying out political activities.

Broadcasting any kind of political propaganda on the premises and in vehicles that use the parking spaces on the Company's premises is prohibited.

CONDUCT REGARDING THE PRESERVATION OF THE ASSETS OF UNICASA

Employees must endeavor to conserve the assets of Unicasa, which include facilities, machinery, equipment, furniture, vehicles, amounts, brands, patents and technologies, among others.

Equipment and other assets of Unicasa must not be used for personal use.

Internet access and use of telephone must be solely for exercising work-related activities.

Means of communication and Internet

Avoid using emails, software, equipment and any other Company resource for personal purposes. Such abusive use for personal purposes will attract disciplinary sanctions.

Use of Unicasa's Internet, emails and social media to transmit aggressive, pornographic, political or religious content or other information and/or to disseminate conduct that contravenes the values of this Code is prohibited.

Inventions, Trademarks and Patents

All and any innovation developed by professionals in the performance of their job and strategic information about trademarks must be protected during and after the end of the employment contract with the employee since as they are the assets of Unicasa.

Work documents and personal data

All and any electronic or printed document used to perform the task or which the Employee will have access to through Unicasa must not be copied or taken at the time of leaving.

Personal and sensitive data

Unicasa uses and processes personal and sensitive data of natural persons only for the purpose of conducting its business.

Personal data refers to all information related to the identified or identifiable natural person and sensitive personal data includes ethnic origin, religion, political beliefs, health, sexual orientation and others related to the natural person. As such, all matters of the Company, without exception, must be addressed with due care according to the level of sensitivity of the information, following the provisions described in the Corporate Information Security Policy (PCSI), which is available internally on the Intranet, and in the Privacy Policy available on Unicasa's corporate website.

Unicasa is committed to preserving the privacy of all its Shareholders, Clients, Suppliers, Managers and Employees. It is the duty of all to take all efforts to ensure that the processing of personal data in the exercise of our activities complies with the laws in force and the best information security practices, especially the following guidelines:

- Use personal data only for specific legitimate purposes that are informed to the data subject, in accordance with current laws
- Follow all technical, physical and organizational measures described in the Information Security Policy to avoid accidental or unlawful destruction, loss, alteration, unauthorized access, leakage or any other form of inappropriate or unlawful treatment of personal data;

- Do not use personal data excessively or unnecessarily (ask: what is the purpose of this information?);
- Do not use personal data for purposes other than those informed to the data subject;
- Do not share personal data with third parties without the knowledge and authorization from the data subject or any other legal grounds;
- Avoid talking about Company issues in public and/or private places in the presence of third parties, keeping confidential information, which includes personal data and/or sensitive personal data that you have access to by virtue of their professional activities;
- Ensure that physical and digital documents containing personal data are kept securely so that such information cannot be accessed by unauthorized persons;
- Take extra care while handling sensitive personal data or data related to children and teens, observing the criteria established by law;
- Immediately inform the immediate manager or the Data Protection Officer of Unicasa by sending an email to privacidade@unicasamoveis.com.br, reporting any theft or leakage of personal data;

CONDUCT TOWARDS THE PRESS AND DISCLOSURE OF INFORMATION

Only professionals authorized by the Management of the Company can speak on behalf of Unicasa and provide information about it to the press or external groups.

ACCOUNTING RECORDS

Transparency is essential for market players to correctly evaluate Unicasa.

The accounting standards and practices of Unicasa must be strictly observed and consistent records and reports must be prepared, which ensure a uniform foundation for evaluating and disclosing the Company's operations and results.

Hence, all the assets, rights and obligations held by Unicasa or those that it must record in the accounting books, must be accounted.

CONDUCT TOWARDS SOCIETY AND THE ENVIRONMENT

Social Responsibility

Unicasa values social responsibility through harmonious coexistence with the community where it operates. Employees must apply the values established in this code in their relations with people and the environment, and respect the local culture.

Environment

An environment in equilibrium and preservation of nature are of fundamental importance for Unicasa's business activities and the company actively participates in preventing the wastage of natural resources through zealous and diligent measures in the manufacture, handling and transport of its products. Each Employee is responsible for contributing to the conservation and improvement of the environment.

Child and slave labor

The hiring of child labor, as well as forced and/or slave labor is PROHIBITED.

Union Activities

We maintain respectful relations with diverse entities representing Employees, including unions. These relations are based on dialogue and respect for diverse points of view in the pursuit of the best and balanced solution to diverse situations.

VIOLATIONS

Employees must always comply with this Code and the policies of Unicasa, as well as laws and regulations applicable to the Company.

Employees who become aware of or notice violations of any aspect of this Code or the policies of Unicasa, or of laws and regulations applicable to the Company, must immediately report the same to the manager or the Hotline or the Ethics Committee. The Hotline can be used by both internal and external stakeholders and complaints can be made anonymously. To contact Unicasa, use one of these channels:

- Website: www.contatoseguro.com.br/unicasa
- Telephone: 0800-5152204

The Hotline is operated by a third party specializing in this segment.

The Hotline guarantees confidentiality of information and the identity of the Employees involved.

Unicasa will not permit any type of reprisal or retaliation against the person who reports, in good faith, any incident that potentially violates this Code or the policies of Unicasa, or laws and regulations applicable to the Company, through the Ethics Channel.

In case of doubts, seek guidance from your manager or from the Unicasa Ethics Committee.

TRAINING

Unicasa will periodically hold training sessions and other initiatives to raise awareness among Employees about the conduct, concepts and values established in this Code. The training, which will be conducted by the Human Resources area, will be mandatory for all Employees.

ETHICS COMMITTEE OF UNICASA

We have an Ethics Committee, which is responsible for managing and ensuring compliance with this Code, analyzing all doubts and complaints received by the Hotline and deciding on cases of proven violation.

Employees who violate any practice, policy or expected conduct by Unicasa, or any law or regulation applicable to the Company, or who allow a subordinate to do so, will be subject to disciplinary action, which could be a warning, suspension, termination or rescission of agreement with Unicasa.

GENERAL PROVISIONS

The Unicasa Code of Conduct was implemented and approved at the Board of Directors Meeting held on December 13, 2021.

The Company and its managers undertake to inform all Employees, as well as the market, investors, business representatives, suppliers, service providers and other stakeholders, of the guidelines of conduct contained in this Code.

As such, no Employee can claim ignorance of the guidelines contained in this Code under any circumstances or under any argument.

Bento Gonçalves, December 13, 2021.

Gustavo Dall Onder
CEO

AGREEMENT

I declare that I am aware that all professionals and service providers must guide their behavior by the values and standards described in the Code of Conduct that I am receiving hereby and that I undertake to read and observe it.

____/ ____/ ____

Name:

CPF/ME: