



VIVARA	Policy: Suppliers Code of Conduct		Code: POL.87.001
	Department: Sustainability	Manager: Sustainability	Version: 1.0
	Prepared by: Fernanda Ormonde	Approved by: Marina Kaufman	Date of creation: 10.26.2020
	Subject: Suppliers Code of Conduct		Last Updated:

Version	Date	Owner	Alteration



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VIVARA PARTICIPAÇÕES S.A.

Suppliers Code of Conduct



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MESSAGE FROM THE CEO

This Supplier Code of Conduct is a corporate guide that establishes the general requirements and principles that should govern the ethical, social and environmental conduct of Vivara's suppliers.

For the Vivara group, business perpetuity is achieved through integrity and trustful relations, care for people and preservation of the environment in our daily activities and decisions.

We understand that looking at the challenges across the value chain is also our responsibility. Hence, the manufacture of our products, the purchase of supplies and the services we engage must integrate ethical, social and environmental parameters - from the purchase of raw materials until they reach the customer.

Compliance with the rules of conduct established in this Code is essential for the Vivara group and its suppliers of products and/or services to ensure integrity and coherence in their relations and, consequently, strengthen their businesses.

The Vivara group is certain that it can count on your indispensable support and effective participation in ensuring strict compliance with these requirements and principles, and expects to receive, as soon as possible, the completed and signed Attestation of Knowledge and Compliance, which is available at the end of this document.

Marcio Monteiro Kaufman
CEO



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This Suppliers Code of Conduct complements the provisions in the Vivara Code of Conduct, available at <https://ri.vivara.com.br/governanca-corporativa/codigo-de-etica/>

1. VISION, MISSION, VALUES AND PRINCIPLES

1.1. Vision

Be the most desired brand in Latin America to celebrate special moments.

1.2. Mission

We exist to fascinate our customers by offering the best experience when choosing the perfect gift.

1.3. Values

- Sense of Ownership

We are passionate about the company. We think, act and lead with the commitment to results and our code of conduct.

- Fascinate the client

We have an incessant desire to win over and retain the loyalty of our customers. We work with the determination to surprise them in special moments, through quality products and experiences.

- Creativity

We make creativity our biggest brand, seeking innovative and effective solutions.

- We are strong together

We value, develop and recognize our team in a collaborative, meritocratic and high performance environment.

- Resilience

We are capable of adapting to changes and have the persistence to overcome the obstacles.

1.4. Principles

- Diversity

We respect gender, age, ethnic, cultural, sexual, political and religious diversity, as well as any type of disability.

- Ethics

All our decisions and actions are fair, legal, coherent, transparent, ethical and honest. We respect the laws in force and combat all types of fraud, corruption and acts that are harmful to the public administration in Brazil and abroad.



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2. TO WHOM IT APPLIES;

This Suppliers Code of Conduct applies to the suppliers and service providers of the Vivara group, including subsidiaries.

3. COMPLIANCE WITH LAWS AND REGULATIONS

Vivara's suppliers must conduct their business in compliance with the laws and regulations in the countries where they operate. They must also repudiate any act that characterizes corruption, bribery, fraud, antitrust practices and other illegal acts.

4. BUSINESS INTEGRITY

The highest standards of integrity must be observed in all business interactions. Suppliers must conduct their business in an ethical manner and all business transactions must be transparent and reflected accurately in their business records and books.

5. PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING

Trading in jewelry and precious stones is considered a sensitive activity for preventing money laundering and terrorism financing, and Vivara is responsible for establishing policies, procedures and internal controls that are compatible with its size and volume of operations, and which ensure compliance with the obligations established in laws on the subject..

As such, Vivara's suppliers must always respect and ensure that their employees respect the laws on the prevention of money laundering and terrorism financing, and must have internal procedures and controls in place to combat practices that violate said laws.

6. RESPECT FOR LABOR RELATIONS

Child Labor

Vivara suppliers must comply with the law on the minimum age of workers in accordance with the guidelines of the International Labour Organization. They must comply with all legal requirements for programs involving “young apprentices”, especially those related to working hours, working conditions, wages, health and safety.

Forced Labor / Slave Labor

Vivara's suppliers must not use forced labor of any kind, whether by way of debt, or by withholding the documents or personal objects of the worker, or by way of work performed in a geographically isolated place or under surveillance in order to detain



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the worker. Suppliers must only hire workers who have legal work permits. All workers must be free to leave employment by giving prior notice.

Description

Vivara's suppliers must ensure that employment - including the hiring process, salary, benefits, career growth, termination and retirement - is based on competence and not on beliefs or any other personal characteristics such as race, color, religion, gender, ethnic and social origin, age, marital status, pregnancy, political beliefs, union membership, disability, sexual preferences or any other parameter prohibited by law.

Harassment

Vivara's suppliers must treat all workers with respect and dignity. For this, the work environment must be free from any form of harassment such as corporal punishment, fines, as well as physical, sexual, psychological or verbal abuse or harassment.

Workday

Vivara's suppliers must respect the working hours and other conditions established by applicable laws and the minimum conditions established by the International Labour Organization (ILO).

Compensation (salaries and benefits)

Vivara's suppliers must pay workers a salary compatible with the minimum for their category set by applicable laws and provide all the benefits determined by law and by the supplier.

Freedom of Association

Vivara's suppliers must recognize and respect the rights of workers regarding the freedom of association, to join workers unions or commissions to be represented in accordance with applicable laws. They must also respect the legal right of workers to collective bargaining agreements.

Healthy and Safety at the Workplace

Vivara's suppliers must maintain a risk-free environment in order to ensure compliance with all applicable laws on working conditions, including, but not limited to, the safety and health of workers, sanitation, fire safety, protection against risks and electrical, mechanical and structural safety, emergency preparedness, occupational injuries and disease, industrial safety and hygiene, work that requires physical effort, machinery protection, as well as the safety and hygiene of dormitories and canteens.



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7. RESPECT FOR THE ENVIRONMENT

Vivara's suppliers must comply with all environmental laws and regulations and meet the standards established in the international environmental treaties and best practices applicable to the sector, manufactured goods and production methods.

Hazardous Substances

Suppliers must not produce, sell and/or use chemicals and hazardous substances prohibited by applicable local laws due to their high toxicity to living organisms, environmental persistence or bioaccumulation potential, irreversible ecological impacts or damage to the ozone layer. Chemicals, toxic substances and hazardous waste that are harmful to the environment must be disposed of in accordance with applicable laws and regulations.

Additional requirements for suppliers of metals, precious stones and finished products

Suppliers must ensure that the raw materials and/or finished goods supplied to Vivara were acquired from legitimate sources and not from a conflict zone or involved the financing of terrorism. These must also have been extracted, processed and manufactured without infringing any human or labor rights and without causing environmental damage, in accordance with the laws in force.

8. CONFIDENTIALITY OF INFORMATION

Confidential information about the Vivara group, including subsidiaries, must be treated by all suppliers of products and/or services in a responsible manner, ensuring that it is used exclusively in performing the activities and obligations established in the commercial agreement entered into between the parties.

9. RECEIPT OF GIFTS AND PARTICIPATION IN EVENTS

Vivara's suppliers of products and/or services must not offer gifts, benefits, favors or participation in private social events to Vivara's employees in order to avoid any conflict of interest in the business relationship.

10. APPLICABILITY AND COMPLIANCE

Suppliers are responsible for ensuring that this Code of Conduct is understood and followed throughout their operations and for monitoring compliance with it. As such, they must share this Code of Conduct with all their employees in their local language. Suppliers must also ensure that any subcontractors approved for providing goods or services to Vivara understand and comply with this Code of Conduct. With regard to the obligations established in this Code, Vivara's suppliers must also:

- Take the necessary corrective measures to promptly remedy any noncompliance;
- Keep all the documents necessary to prove compliance with legal requirements; and



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- Permit inspections and audits, both announced and unannounced, to be conducted by Vivara and/or its representatives.

Vivara seeks to work together with its suppliers to continuously streamline the responsible business practices. However, we reserve the right to cancel, suspend or terminate our business relationship with any supplier that is not willing to comply with this Code.

11. COMMUNICATION CHANNELS

Any person who notices any breach of these obligations may contact Vivara through the communication channels: <https://canalconfidencial.com.br/canalabertovivara>, canalaberto.vivara@vivara.com.br or 0800 377 8024.