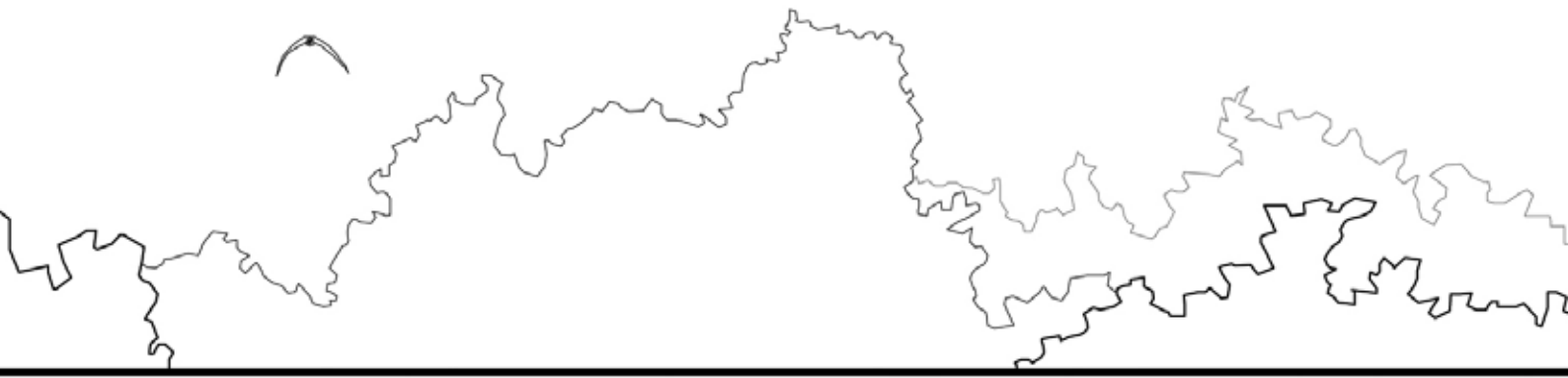


Code of Conduct

Standards of Business Principles

ATRIA



ATRIA

Dear Partner:

A pioneering spirit that stretches business ambitions and a drive for continuous improvements form the basis of Atria's DNA.

These actions must always be underpinned by a commitment to operate with integrity and transparency, a respect of human rights and a responsibility for the societies and environments in which we operate.

Only by integrating our values into the way we do business can we create truly sustainable growth.

We recognize that the international environment in which we operate, dealing with diplomatic clients and international firms, is often challenging. Competitive pressures are ever-present. But the greater the pressures, the greater the effort we have to make to ensure we uphold our values and our high standards of conduct.

Locally, today's business scenario in Brazil is volatile and uncertain. Protecting Atria through the fostering of business integrity is a non-negotiable for anyone who works for our business.

This expectation is embodied in our Code of Conduct, that regulates our Standards of Business Principles. This helps us create a consistent framework of simple 'musts' and 'must nots' – translating our standards into behaviours that protect Atria, our Clients, our Stakeholders, and each and every one of us.

Warm regards,

Gustavo Costa
Founding Principal



Act with integrity.

Be honest.

Follow the law.

**Comply with the
Code.**

Be accountable.



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Workplace Environment

How We Treat One Another

Atria makes recruiting decisions based solely on skills and job-related criteria and does not use forced labor. When employing our collaborators, managers must comply with all Atria-established or legally required limitations on minimum hiring age, and on hours and tasks performed by these partners to ensure any work performed does not hamper the partner's education, health, safety, and mental or physical development. Still, Atria's environment encourages discipline, compromise and continuous self improvement.

At Atria we treat each other with respect and dignity. This means that all partners are entitled to work in an environment that is free of harassment, bullying and discrimination.

Leadership

We estimate our leaders to make decentralized decisions that best address specific needs, while still reflecting our values.

“Leadership must be truthful and straight forward in the dealings with our stakeholders.”

Our Principles

- Respect
- Integrity
- Ethics
- Humility
- Gender equality
- Making a difference
- Clients' service

How We Treat Our Clients

We strive to make every client's experience pleasant and fulfilling, and we treat our clients as we treat one another, with respect and dignity. This means, for example, that we never harass or discriminate against our clients.

“We treat our clients as we treat one another, with respect and dignity.”

Workplace Environment

What is Expected of Everyone

Comply with the Code and the Law

Understand the Code. Comply with the Code and the law wherever you are. Use good judgment and avoid even the appearance of improper behavior.

Consider Your Actions, and Ask for Guidance

If ever in doubt about a course of conduct, ask yourself:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and the Company?
- Would I want to read about it in the newspaper?

If the answer is “No” to any of these questions, don’t do it.

If you are still uncertain, ask for guidance. The Code tries to capture many of the situations that employees will encounter, but cannot address every circumstance.

You can seek help from any of the following:

- Your management
- Company legal counsel or senior finance personnel supporting your business
- The Compliance Committee

Workplace Environment

What Is Expected of Managers

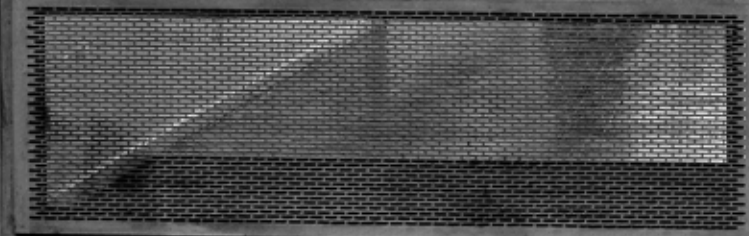
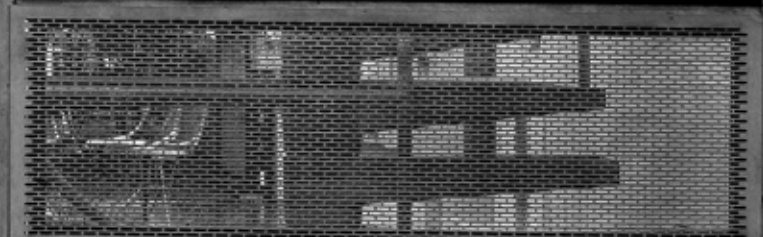
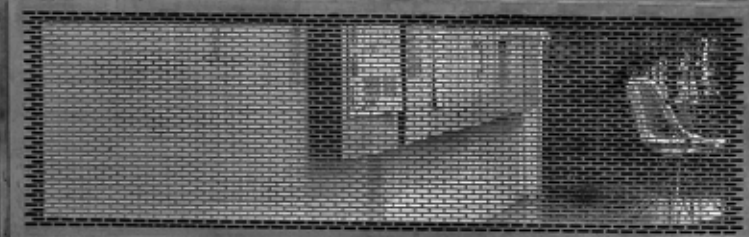
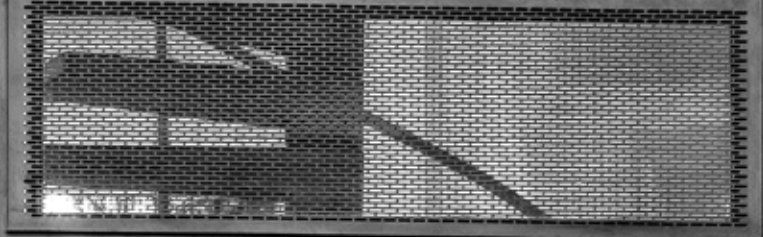
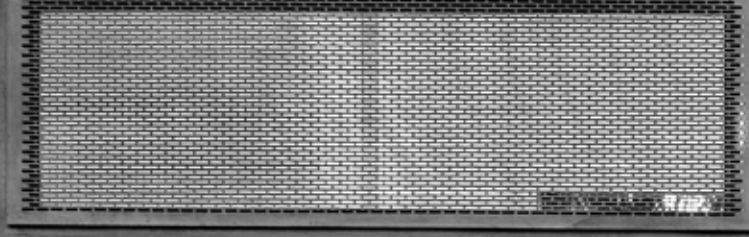
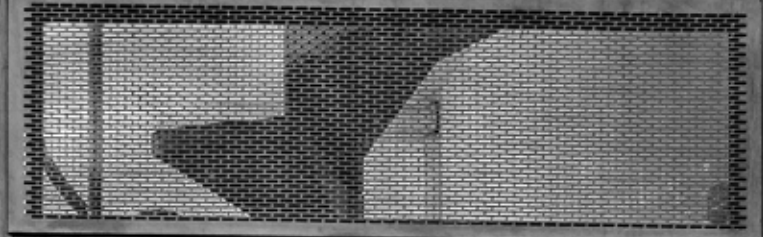
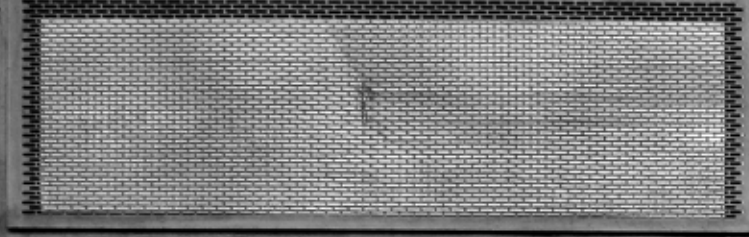
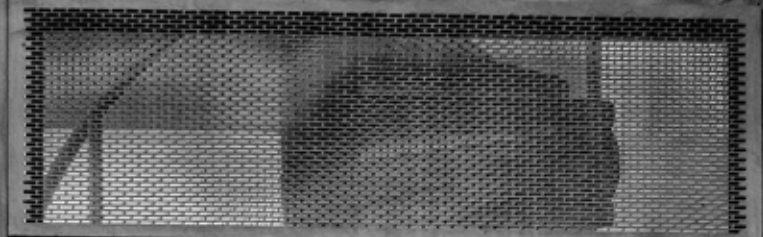
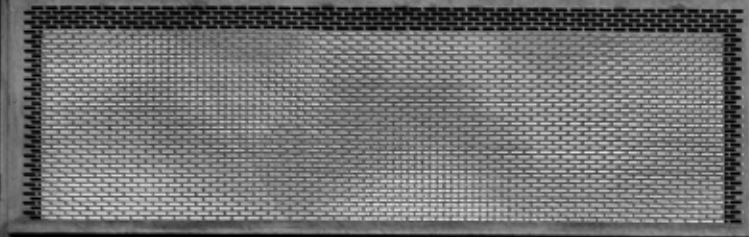
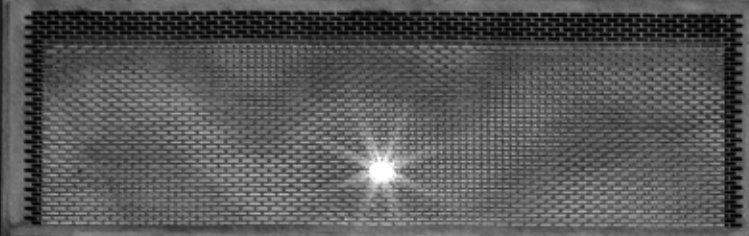
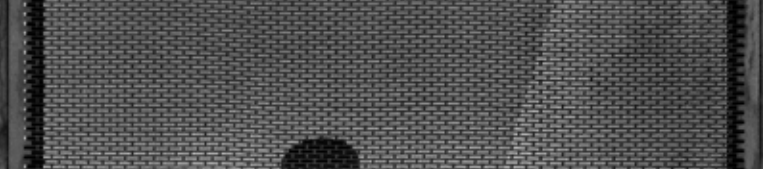
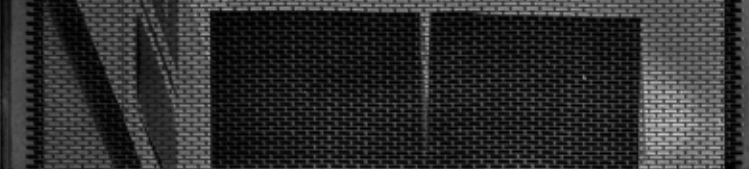
Promote a Culture of Ethics and Compliance

Managers should at all times model appropriate conduct. As a manager, you should:

- Ensure that the people you supervise understand their responsibilities under the Code and other Company policies.
- Make opportunities to discuss the Code and reinforce the importance of ethics and compliance with employees.
- Create an environment where employees feel comfortable raising concerns without fear of retaliation.
- Consider conduct in relation to the Code and other Company policies when evaluating employees.
- Never encourage or direct employees to achieve business results at the expense of ethical conduct or compliance with the Code or the law.
- Always act to stop violations of the Code or the law by those you supervise.

Responding to Questions and Concerns

If approached with a question or concern related to the Code, listen carefully and give the employee your complete attention. Ask for clarification and additional information. Answer any questions if you can, but do not feel that you must give an immediate response. Seek help if you need it. If an employee raises a concern that may require investigation under the Code, contact your senior finance personnel or the Compliance Committee.



Communication Channel

Raising Concerns

We all have an obligation to uphold the ethical standards of Atria. If you observe behavior that concerns you, or that may represent a violation of our Code, raise the issue promptly. Doing so will allow the Company an opportunity to deal with the issue and correct it, ideally before it becomes a violation of law or a risk to health, security or the Company's reputation.

Resources

You have several options for raising issues and concerns. You can contact any of the following:

- Your management
- Company legal counsel or senior finance personnel supporting your business
- The Compliance Committee

Communication Channel

Anonymity and Confidentiality

When you make a report to the Compliance Committee, directly on our website, you may choose to remain anonymous, although you are encouraged to identify yourself to facilitate communication. If you make your identity known, the Committee will take every reasonable precaution to keep your identity confidential, consistent with conducting a thorough and fair investigation. To help maintain confidentiality, avoid discussing these issues, or any investigation, with other employees. Because we strive to maintain strict confidentiality in all investigations, we may not be able to inform you of the outcome of an investigation.

Investigations

The Company takes all reports of possible misconduct seriously. We will investigate the matter confidentially, make a determination whether the Code or the law has been violated, and take appropriate corrective action. If you become involved in a Code investigation, cooperate fully and answer all questions completely and honestly.

No Retaliation

The Company values the help of employees who identify potential problems that the Company needs to address. Any retaliation against an employee who raises an issue honestly is a violation of the Code. That an employee has raised a concern honestly, or participated in an investigation, cannot be the basis for any adverse employment action, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.

If you work with someone who has raised a concern or provided information in an investigation, you should continue to treat the person with courtesy and respect. If you believe someone has retaliated against you, report the matter to the Compliance Committee.

Making False Accusations

The Company will protect any employee who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.



Business Practices

Compliance with Laws and Regulations

Our team works in accordance with relevant Brazilian and International compliance standards allowing us to focus and increase the efficiency of procedures and to provide a safer environment to our clients and partners.

Atria's compliance program seeks to promote a culture within our organization that encourages ethical conduct, and a company-wide commitment to adhere to the law. We understand that working in this way we can help protect our reputation, brand, relationship with investors, assets, and help in the detection and prevention of misconduct and violations.

International Business

Atria is committed to the highest ethical standards in all business transactions. Partners must follow all applicable laws, rules and regulations when conducting their activities.

Payments made to any foreign agent or government official must be lawful under the laws of the Brazil and the foreign country. Payments by or on behalf of Atria to foreign agents or government officials should always be strictly for services rendered and should be reasonable in amount given the nature of those services. Under no circumstances may a partner make payments in violation of the law or to induce government officials to do business with Atria.

Partners must comply with all local and foreign laws regarding customs and trade. Atria will be accurate and truthful in representing business transactions to government agencies. All information that a partner furnishes to any customs official or to any agent hired by Atria to facilitate imports and exports must be accurate and truthful. If you conduct business internationally on behalf of Atria, please make sure you have a thorough understanding of these laws and know enough about any third parties doing business in Atria's name to ensure they are making appropriate decisions on our behalf. Atria's partners at no time are permitted to influence the outcome of any business decision by exchanging bribes or kickbacks of any kind.

Software Licensing

Atria's digital environment has as a core premise the use of original and licensed software. All internal working stations make use of licensed softwares in accordance with relevant Brazilian and International regulation.

“Clear values and controlling practices are key standards to achieve legal safety.”

Business Practices



Standards

Contractual Standards

Our contracts adhere to guidelines, policies or best practices developed by trade associations or industry groups. In addition, subcontractors, suppliers, and vendors are often contractually required to comply with the code of conduct or compliance program of their respective principal.

Legal and Regulatory Standards

Our standards are derived from the laws and regulations applicable to the organization based on the industry, country, and region in which it operates. These legal and regulatory standards set the floor for acceptable conduct within our firm.

Commitment from Leadership

Leadership engagement, also referred to as the “tone at the top”, requires key leaders to champion the roll-out of the compliance program, emphasize its importance, and underscore the organization’s zero tolerance policy for improper business conduct.

Code of Conduct

We have codified our values and principles in a Code of Conduct. By promoting values-based standards of conduct, our leadership seeks to serve a greater good and position Atria as a responsible member of the community.

Intellectual Property and Proprietary Information

Confidential Information

During the course of employment at Atria, all partners gain some knowledge and information that is non-public and belongs to Atria. Partners are trusted with maintaining the confidentiality of this valuable information.

Confidential information includes things such as supplier information, Atria technologies, projects, documents, business and marketing plans, internal company communications, and existing and future product information. Atria information should be used only for company purposes and should not be disclosed to anyone outside of Atria. Even within the company, only those individuals who truly need to know the information to conduct their business should have access to confidential information. If you leave Atria, you must return all company materials and property, and any copies.

Confidential materials should:

- Be stored in a secure place and should not be left out where others can see them
- Be clearly marked as confidential
- Not be sent to unattended fax machines or printers
- Not be discussed where others may hear

“There are strict rules relating to the processing and handling of private and secret information.”

Due Dilligence

Pre qualification program for sub consultants and vendors

Atria established a due diligence system to support its ongoing commitment to meet all of its legal and compliance obligations. Among other purposes, this program is designed based on Brazilian “Empresa Pró Ética” for the “CGU - Controladoria Geral da União”, and the Foreign Corrupt Practices Act, as well as the United Kingdom Anti-Bribery Act.

Atria requires that subcontractors and vendors be prequalified to be eligible to work with our company. We seek quality partners in our subcontractors and vendors that share with us the desire to exceed our clients' expectations.

We select subcontractors that are financially healthy, have the necessary resources to complete the project and have a proven track record.



Contact Information

Compliance Comitee

The Compliance Comitee is available to answer any questions about the Code or Company compliance policies, or to discuss any concerns you may have about potential Code violations through confidential and safe channel on www.atria.arq.br. Visit "Compliance" menu.

General Contact

+55 61 3443-8654

info@atria.arq.br

Address:
SCLS 208 BLOCO C LOJA 34
Asa Sul, Brasília - DF, Brazil
70.254-530



**Atria reserves the right to amend,
alter or terminate this Code at any
time and for any reason.**