



POLO FILMS

CODE OF ETHICS AND CONDUCT



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Welcome,

You are receiving the Code of Ethics and Conduct of Polo Films Indústria e Comércio S.A. This document reinforces the Company's commitments towards its many different stakeholders: clients, shareholders, collaborators, suppliers and local communities. It also presents, in a clear and transparent way, the conducts expected from all members of the organization, in line with the best business practices and aimed at preserving the common good.

This Code establishes the ethical principles and norms of conduct that must orientate both the internal and external relations of all POLO FILMS community members. Our ethics is a result of the following combined attitudes: honesty in any situation, justice, transparency, coherence, and integrity. Behaviors we have been putting into practice and institutionalized.

We would like to ask you all to carefully read it and put it into practice in your daily activities.

You can count on our help and on the support of your leaders in this journey.

PURPOSE

The current Code of Ethics' purpose is to establish the basic principles of Polo Films' Values, of the ethical standards in business and internal relations we expect from our Collaborators, Suppliers, Clients and Third Parties that have any relationship with the company.

SCOPE

All Collaborators, Suppliers, Clients and Third Parties of company POLO FILMS.

RESPONSIBILITIES

Elaborated by: Human Resources Area

Approved by: Office of the CEO

Layout: Marketing

Applicable to: Collaborators, Suppliers, Clients and Third Parties that have any relationship with Polo Films.





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1. CODE OF ETHICS AND CONDUCT

Ethics in relationships has been one of the most debated issues in human history, since the very first steps in our civilization process. It is based on the freedom of every human being, and grounded on respect to the rights and freedom of our fellow men and women. Ethics in this company must reflect “the promotion and defense of the common good”, and has been an integral part of staff members’ attitudes and behaviors, and become a part of their personal and collective beliefs.

The postures and forms of relationship mentioned in the current document describe the behaviors and attitudes that must be observed by every collaborator at POLO FILMS. They are the fundamental principles and values of our business ethics:

- RESPECT TO HUMAN RIGHTS;
- SOCIALLY AND ENVIRONMENTALLY RESPONSIBLE OPERATIONS;
- SUPPORT TO THE ERADICATION OF FORCED AND CHILD LABOR;
- A PREVENTIVE APPROACH TOWARDS ENVIRONMENTAL AND LABOR SAFETY ISSUES;
- FIGHTING CORRUPTION;
- RESPECT TO DIVERSITY.
- REDUCTION OF SOCIAL INEQUALITIES.

These values, in which we mirror ourselves and hereby assume the commitment to individually and collectively uphold, reflect our adhesion to global ethical conventions.

2. PREJUDICES AND PRESSURES

Respect to personal differences is indispensable for any humane and dignified relationship. For us discrimination involves any differentiation, exclusion, restriction or reference based on race, color, social class, nationality, religion, sex/gender, sexual orientation, affiliation to workers’ unions or any political affiliation, and whose purpose or effect is to negate or impair the recognition, enjoyment or equal exercise of one’s rights or freedom, during hiring processes, and in regard to remuneration, access to training, promotion, contract termination, or upon retirement.

In such a context, at POLO FILMS no type of discrimination will be accepted that might promote unequal opportunities, except for those derived from affirmative actions. Jokes and pranks involving such matters must be avoided, so as to create a healthy, orderly, and productive work environment, with mutual respect.

If any of you believe you are being discriminated or have been subject to any prejudice, pressure or tactics intending to establish and spread fear, disrespect or domination in labor relations, you must raise this issue to your higher hierarchical levels. All parties that directly or indirectly have any relationship with POLO FILMS must receive that same treatment, whether they are temporary collaborators, third parties or product and/or service providers.



3. CRITICAL REMARKS AND SUGGESTIONS

At POLO FILMS an environment of openness and freedom must prevail, in order to stimulate its collaborators to take the initiative, develop their creativity and adopt non-conformist stances, as a way of avoiding stagnation and lack of interest. Whenever anyone disagrees with the policies or practices adopted by the Company, that collaborator must expose his/her ideas, so they can be discussed, through the available channels, such as in direct contact with your local Managers, at evaluation meetings, in internal identified mails, etc.

Constructive critical remarks, clearly made and through the appropriate means, are welcome and considered demonstrations of respect and of the fulfillment of the current Code of Ethics and Conduct.

4. TRUTH AS A COMMITMENT

Truth and honesty are fundamental to build and perpetuate POLO FILMS.

4.1 Dialogue as a daily practice

Always practicing an open dialogue is an important path to harmonize collaborators' interests and POLO FILMS' objectives.

Statements about matters a collaborator is not familiar with and does not know in depth should be avoided. Any and every misunderstanding must be immediately clarified or corrected, thus avoiding any distortion of truth and the emergence of embarrassing situations.

4.2 Rumors

The dissemination of rumors is an attitude that compromises the image of a collaborator, of his/her Company, and of POLO FILMS as a whole. Before any news or information is disseminated, its veracity must be verified, as well as its source. In case you have any doubt, the correct attitude to follow is to ask for clarification from your local Managers or contact the Human Resources Area for official information from the Company.

4.3. Relevant Information

Relevant information about POLO FILMS should only be disclosed to outside persons or institutions by those who are formally designated to perform such a task. Journalists and other parties interested in receiving information about the Company must be forwarded to the Human Resources Area. Providing false or incorrect information, either inside or outside the Company, is an infringement of this Code of Ethics and Conduct and might lead to disciplinary sanctions, as established by Law. This also applies to any misrepresentation that might induce others to error or confusion. One commendable attitude is to verify how external parties might use any requested information.



5. ETHICS CHANNEL

The Ethics Channel is a tool to report any improper conduct or that is not in conformity with POLO FILMS' principles. Through this channel, called "Canal Aberto/Open Channel", all collaborators, clients and suppliers can submit their denunciations, suggestions and complaints. It's available 24 (twenty-four) hours a day, 7 (seven) days a week through the 0800-601-5699 toll-free telephone number, from any fixed or mobile telephone. You may also contact us at <http://www.contatoseguro.com.br/polofilms> or through our app in your tablets and smartphones. Any and every conduct deemed improper for a healthy work environment will be immediately investigated. You may also forward any denunciation/complaint through Polo Films' website at www.polofilms.com.br by accessing Canal de Ética/Contato Seguro (Ethics Channel/Safe Contact).

6. COLABORATORS' PERFORMANCE EVALUATIONS

At Polo Films, we undertake performance evaluations based on either collective or individual goals. All collaborators have the right to know how they are being evaluated and how they have been performing at Polo. Leaders are responsible for individual evaluations, and they must orientate and provide information on matters that might directly or indirectly affect the work and evaluation of every collaborator.

7. TOLERANCE WITH ERRORS

Everybody can make mistakes. In the case of any error, it is necessary to analyze its causes. The repetition of errors due to neglect, negligence or indifference requires special attention and strict measures to correct it, and the involved parties will be subject to disciplinary sanctions.

8. PRAISES AND WARNINGS

Praising is a way of driving the performance of a collaborator and recognizing his/her effort, dedication and ability to work. A praise may be formal, by recording it in a collaborator's dossier, or informal, verbally announced, and it may extend to the whole work team.

Warnings may be given either orally or in written form, they must be issued privately and in a constructive manner. In addition to warnings, a defaulting collaborator is also liable to suspension or dismissal for a just cause, according to the applicable legislation.

It is a good practice to publicly praise and privately warn collaborators. However, a respectful treatment between leaders and collaborators must always prevail, in an atmosphere that promotes education, professionalism and impartiality. Humiliations, insults and disrespect under the guise of a warning must be communicated to superior officers and their perpetrators will be subject to disciplinary sanctions.

9. PRIVACY

POLO FILMS keeps files with personal and functional information pertaining its collaborators, including medical information and data on benefits. Access to that information is internally restricted on a need-to-know basis as the formal part of collaborators' responsibilities and in order to exercise their attributions.

Personal information is only conveyed to external parties if approved by the concerned collaborator or his/her legal representative, or in the case of a judicial order. Those responsible for safeguarding and keeping such information have the obligation of making sure it is not improperly disclosed or used. Collaborators must always keep their personal data up to date while they are engaged with POLO FILMS.

10. CONFIDENTIALITY

Any confidential information POLO FILMS might disclose to a collaborator, or to which he/she may have access to, will be disseminated in the company's exclusive interest and as deemed necessary or useful in order to conduct its business. No collaborator is allowed to utilize, reproduce and/or disclose any confidential information he/she may have access to, under the penalty of disciplinary sanctions and criminal actions.

11. CONFLICT OF INTEREST

One's private life is a personal matter in any and every way. There might be a conflict of interest whenever a collaborator is involved with any activity that goes against POLO FILMS' interests, and it will apply to a collaborator to avoid any situation that may imply his/her loyalty might be questioned.

In the case of any doubt on the existence or not of a conflict of interest, a collaborator must consult his/her immediate superior or the company's Human Resources Area. Only to exemplify it, below you will find some situations that characterize a conflict of interest:

- Having a personal interest that might affect one's ability to evaluate a business/job transaction of interest to POLO FILMS;
- Holding any confidential information that, if utilized, might generate personal advantages;
- Accepting direct or indirect benefits that might be interpreted as retribution, or to obtain a favorable position from POLO FILMS in a business deal of interest to third parties;
- Utilizing POLO FILMS' resources to promote private interests;
- Keeping private commercial relations in which one may benefit from privileges due to his/her position at POLO FILMS, with client companies, suppliers, service providers or competitors;

Any person that may eventually face any situation involving a conflict of interest must promptly communicate it to his/her area manager, who must then solve this problem by consulting a superior officer.

11.1. Family Relations

The hiring of family members is restricted, and the existing blood relations must always be communicated to one's immediate supervisor and to the HR area. Collaborators bearing any blood relation are not allowed to work in a same area or under direct subordination to each other.

11.2. Parallel activities

POLO FILMS' collaborators cannot exercise any activity or be engaged with any other organization that might compromise their dedication to POLO FILMS, or adopt any behavior that might generate a conflict of interest in regard to their responsibilities and duties, especially those activities performed in another work shift outside the company, and that may lead to fatigue or lack of attention. Collaborators are not allowed to provide services to contractors, or to companies that may produce or commercialize goods or services that compete with POLO FILMS' currently available or potential products, nor to hold any share or partnership in a company that provides services or goods to POLO FILMS' controlled companies.



The establishment of any commercial relation by POLO FILMS with companies in which a collaborator's family member or close acquaintance may be an owner or partner must be evaluated. At the company's premises, a collaborator must not exercise any commercial and/or financial activity to his/her own advantage, nor to raise resources under any pretext whatsoever, except when it involves an institutional program supported by the Company.

11.3. Reservation and secrecy

The use of POLO FILMS' restricted and privileged information, to one's own advantage, or to benefit third parties, will be considered an illegal act, and will subject the offender to the sanctions forecasted by law.

11.4. Respect to property

The utilization of machines, equipment, materials, resources, or information owned by the company, in one's own interest or in the interest of any third party, is not allowed.

Collaborators, third parties, or visitors are not allowed to use photographic or mobile phone cameras to capture images of the premises, equipment, processes or personnel working at POLO FILMS without the express authorization of a competent authority.

Any and every brand or patent developed, created, improved or utilized by POLO FILMS during the execution of works or using materials provided by the company or to the company will be POLO FILMS' exclusive property, and any recording or utilization thereof for personal gain is forbidden.

12. COMPUTER RESOURCES

Any information generated and digitally stored in the Company's Information Systems will belong to the same, and any person who might need to use it must care for the safety of such information (data integrity and secrecy). Access to computer resources (Intranet network, Internet connection, and e-mails) is enabled through a personal password created by the involved collaborator, which password is non-transferable and cannot be disclosed to any third party. Access to this resource must be restricted to those contents linked to the company's business, and must aggregate knowledge for the development of its works.

Access to websites with pornographic content is not allowed, nor the dissemination of images and other content of such nature while using POLO FILMS' electronic means. The company reserves itself the right to monitor all transactions (accesses and received materials) undertaken using its information systems and the worldwide network (Internet). POLO FILMS keeps control over the utilization of any software, and only the use of properly licensed and/or acquired systems will be allowed. The company will not allow the use of pirated software and/or of copies thereof in its systems.

Such resources must always be responsibly accessed, disclosed, and utilized, in line with POLO FILMS' business operations, and in order to acquire knowledge aimed at facilitating the execution of the company's works.

13. WASTAGE

The elimination of wastage is a social duty of all. From the Company’s point of view, the more we are able to reduce energy, fuel, water, and food consumption, and of raw materials and other materials, more resources will be available to POLO FILMS to be used in its production processes and to improve work conditions. All Collaborators must encourage a permanent attitude of concern with reducing costs and eliminating unnecessary expenses and wastage.

14. RELATIONSHIP WITH THIRD PARTIES

14.1. Conduct

Service provider companies are asked to require that their collaborators respect the ethical principles and conduct commitments defined in the current Code, during the validity of their contracts with POLO FILMS.

14.2. Courtesy

Each collaborator is a company ambassador and, as such, his/her acts while building a relationship with third parties will so be judged. Courtesy, attention and patience, under any circumstance, are fundamental when dealing with internal and external stakeholders, with the purpose of always conveying the best possible personal and corporate image.

14.3. Use of the company’s name

Nobody may use POLO FILMS’ name with the purpose of intimidating or threatening people or organizations and/or obtaining any personal advantage.

14.4. Gifts and presents

The receipt of gifts and presents must be carefully evaluated, often times, an offered courtesy conceals a tactics to implicate someone and obtain special favors. Gifts offered as advertising articles, broadly distributed as having just a symbolic value, such as pens, notebooks and personal agendas, may be given or received by POLO FILMS’ collaborators.

High-value gifts must be reported to area Managers and immediately returned. In case the refusal to accept a gift may hinder a business relation, a collaborator may accept it on behalf of the company, and such gift will then become a company property, which will forward a received gift for donation to a charity entity to be identified by the Human Resources Area and/or raffle it to employees as a part of SIPAT’S activities.

Any bribery attempt must be repealed and immediately communicated to your superior officers.



15. WORK ENVIRONMENT

The Company shall constantly strive to improve the quality of its work environments, and ensure the safety, hygiene, health, and wellbeing of its collaborators. Collaborators must help maintain and care for their work environments.

There is no opposition to personal initiatives seeking to adapt a work environment to individual characteristics, but any adaptation and change must respect the rights of coworkers and the standards established by the Company for furnishings, use of walls, circulation areas, etc.

15.1. Harassment

No sexual, moral, or racial harassment, or of any other nature, is allowed within Polo Films' premises under any circumstance. Polo Films will not accept any such conduct. Such conducts must be informed to senior managers and to the Human Resources area, and offenders will be subject to disciplinary sanctions, and when applicable to criminal actions as forecasted by law.

15.2. Professional Growth

Professional growth is exclusively based on collaborators' merit, performance and skills, and no other criterion to favor or discriminate any individual will be allowed.

15.3. Professional Look

In many workplaces, collaborators are required to use a uniform due to its adequacy to labor safety norms. A collaborator must care for the cleanliness and tidiness of his/her uniform, and always bear an identification badge.

At places where collaborators are not required to wear a uniform, they are free to choose their manner of dress and personal appearance, however collaborators are asked to use good judgment; considering the type of activity he/she is involved with, local habits and the public one is working with must be respected.

15.4. Smoking

As a bad habit that affects your health, smoking must be avoided in public places and is forbidden in enclosed places such as auditoria, meeting rooms, and collective means of transportation. In some regions, smoking is regulated by legal norms. All smokers must respect those norms

15.5. Alcohol consumption

The consumption of alcoholic beverages at the workplace is forbidden and might make a collaborator temporarily unable to perform any activity at POLO FILMS. It is forbidden to stay in the company's premises when under the effect of any such substance, since in addition to health risks, the habit of consuming alcoholic beverages places the life of coworkers and organization's assets at risk.

The use or possession of alcoholic beverages in the work environment is not tolerated and will subject the responsible person to disciplinary measures.



15.6. Drug use

The use, distribution, sale or possession of illegal drugs at the workplace is forbidden and might make a collaborator temporarily unable to perform any activity at POLO FILMS. It is forbidden to stay in the Company's premises when under the effect of any such substance. In addition to health risks, the habit of using drugs places the life of coworkers and organization's assets at risk.

The use or possession of certain medicinal drugs is forbidden by law and liable to penal sanctions, and so it will not be tolerated in any work environment. Some controlled medications may place a collaborator at risk when executing his/her activities at the company and, in case anyone has to use any controlled drug under medical supervision, it will be necessary to contact the company's medical area so it may analyze any eventual risk associated to a collaborator's activities. The company's medical personnel will ensure absolute secrecy.

15.7. Gambling

Gambling (or any kind of betting) is forbidden inside POLO FILMS' premises, in its vehicles, or in the facilities of contractors and other service providers.

15.8. Health, Safety and the Environment

Caring for Safety, Health and the Environment is a responsibility of all of us. All accidents, occupational diseases, and environmental impacts can be avoided through individual, collective and managerial actions.

The correct use of the safety equipment provided by POLO FILMS is mandatory. In case you have any doubt on the correct use of any safety equipment, please contact the Labor Safety area, an attitude of constant attention and care in order to avoid accidents reduces risks and helps preserving everyone's health and life. Under no circumstance may any work be executed if the related risks have not been evaluated and controlled. We must all know the protection measures and put them systematically into practice during working hours. In case you do not feel safe to execute any task, please contact your local manager and the areas responsible for labor safety.

The rational use of natural resources, and the prevention of accidents, unsafe acts, and environmental impacts, both inside and outside the workplace, are excellent practices and must be stimulated.

POLO FILMS is committed to promoting sustainable development practices, that is, to produce and commercialize products while contributing to the wellbeing of its collaborators and the local communities where it operates, to the country's economic growth, making sure shareholders have a proper return on their investment, and acting as an environmentally friendly company. We believe we can achieve all that by complying with the laws, norms, practices and habits in each region where the company operates.

POLO FILMS has adopted preventive measures and implemented initiatives to promote greater environmental responsibility, while assuring development and the dissemination of environmentally friendly technologies. In any and every case, we must respect the norms in force and the practices and habits of each region where the company operates and reporting and remedying any unsafe act and condition are an obligation all of us.

We must care so that our activities do not affect the safety and health of our collaborators, subcontracted parties, local communities, and the users of our products.

15.9. Employment of forced and/or child labor

POLO FILMS does not tolerate, allow, nor compromise in any way whatsoever with the employment of forced and/or child labor in any process related to the Company's activities.

15.10. Property Security

At POLO FILMS, safety, personal wellbeing, property protection and operational continuity are closely linked. We are all responsible for it, especially those who look after any corporate property.

We must all be aware of any situation or incident that might lead to any loss, misuse or theft of POLO FILMS' assets, as well as any suspected attitude at workplaces.

Any occurrence of such a nature must be immediately reported to the Property Security Area through the proper channel.

15.11. Property Degradation

It is a duty of all of us to care for the conservation of the public goods used at POLO FILMS. Any damaging act that may lead to the degradation of common goods, premises and equipment, such as graffiti, improper use, and vandalism must be immediately communicated to the Property Security Area or to the Company's Senior Management.

16. RESPONSIBILITY WHEN DOING BUSINESS

We must all execute our activities and conduct POLO FILMS' business with transparency and strict compliance with the law, respect to human rights and the environment, and to the principles and guidance provided by the Company. At POLO FILMS we are all responsible for adopting the applicable measures in case any collaborator becomes aware of any irregularity practiced by a third party and that might compromise company's name and interests.

17. SOCIAL RESPONSIBILITY

POLO FILMS is concerned with the impacts of its actions on surrounding communities, and feels as a company it is an integral part of them, it sees its involvement with the problems of those communities as something that must always be sought after, in order to contribute to the development and wellbeing of society at large, and always strives to operate in a socially responsible manner.

POLO FILMS believes any volunteer work developed by its collaborators and involving social programs or community projects in its area of influence is important, and must be recognized and supported

18. LABOR RELATIONS

18.1. Workers' Unions

POLO FILMS acknowledges the right of workers to join unions as a free and democratic franchise, and does not allow any kind of discrimination against collaborators affiliated to workers' unions. Sometimes workers' unions and the company can be at odds, but we will always strive to reach an agreement through dialogue, in an atmosphere of respect and dignity.

A healthy and productive relationship with workers' unions ensures harmony at work and benefits collaborators and the company. Union activities inside POLO FILMS' premises will only be allowed if previously communicated and authorized by the Company.

18.2. Strikes

POLO FILMS' willingness to dialogue means strikes, if possible, should be avoided at all times, and started only after all attempts to find a solution have been exhausted. However, any act deemed incompatible with respect for individual freedom and the principles of a properly organized society will be absolutely restrained, and thoroughly investigated and punished by POLO FILMS, as established by Law, and in deference to the safety of its collaborators and its corporate property.

19. RELATIONS WITH LOCAL COMMUNITIES

POLO FILMS' activities must be developed in full harmony with the communities where it operates. Environmental conditions must always be monitored in order to promote a healthy environment and strictly in conformity with the environmental legislation.

20. COMMERCIAL RELATIONS

POLO FILMS expects its members build commercial relations in compliance with the applicable laws, legal market practices, and especially the national and international norms related to economic order and competition defense.

All POLO FILMS' collaborators are expressly forbidden to make, either directly or through third parties, any improper, dubious or illegal payment, or to favor its clients and suppliers by granting improper benefits or at odds with usual trade practices, in detriment to the remaining stakeholders.

21. CLIENT RELATIONS

At POLO FILMS our purpose is to offer innovative and intelligent solutions to our clients, by providing the necessary orientation and information, while protecting the image of our partners, our common interests, and our agreed commitments.

We offer quality products and services, with advanced technology, and a transparent, efficient, effective, gentle and respectful standard of customer care, with the purpose of ensuring full satisfaction to our clients and consumers, and establishing long-lasting relationships.

22. RELATIONSHIP WITH SUPPLIERS

POLO FILMS will always ensure the highest ethical practices and standards when selecting, negotiating and managing all of its commercial activities, by treating all suppliers with respect, without any privilege or discrimination of any nature, regardless of the volume of business they may hold with the company.

Material suppliers and service providers must be selected and contracted in conformity with the criteria established in the specific norms. Our suppliers must also fulfill the requirements related to socially responsible practices in their production chain.

POLO FILMS commits itself to contract suppliers that do not employ child or slave labor, and that comply with the applicable labor and environmental legislations in their countries.

POLO FILMS' collaborators must abstain from using their posts, functions, activities, facilities, positions or influence to obtain any favor for themselves or for third parties due to their relationship with suppliers. The disclosure of any privileged information to suppliers is absolutely forbidden, everybody should have access to the same information. The content of a proposal submitted to a supplier cannot be informed to another one.

23. RELATIONSHIP WITH SHAREHOLDERS

POLO FILMS actively promotes compliance with all municipal, state, federal, and international laws in place and applicable to its business activities. Any breach of any law, norm or regulation that might damage the reputation of involved company, and consequently the interests of their shareholders, will subject the responsible parties to severe sanctions.

24. RELATIONSHIP WITH COMPETITORS

POLO FILMS competes in the market based on our capacity to negotiate with suppliers and clients, and on the ethical management of our business.

No collaborator is authorized to provide information to competitors about our plans to commercialize, promote and advertise our products and services.

POLO FILMS will not accept that its collaborators make any defamatory comment about our competitors, which deserve the same decent and respectful treatment we expect from them.

25. RELATIONSHIP WITH GOVERNMENT ENTITIES

At POLO FILMS we do not accept or condone any practice involving favoritism or the offer or concession of any personal advantage of any nature to public authorities in a country. Must refuse any practice involving corruption and bribery, and we have established formal procedures to control and punish any eventual transgression. No form of payment or any other benefit may be offered to a public authority or government officer from a direct or indirect public administration body, whether at the federal, state or municipal levels, in exchange for any advantage.

It is also forbidden to offer support and contributions to political parties or to the political campaigns of those running for a public office. Corporate leaders, collaborators or intermediary parties must not make any direct or indirect contribution to political parties, party officers, candidates, and organizations or individuals involved with party politics, as a subterfuge to bribery. All political contributions must be transparent and only made in conformity with the applicable legislation.

Those subject to the current Code of Ethics are well aware that POLO FILMS forbids, at any title and under any circumstance whatsoever, any delivery, receipt, or offer of money, or any valuable item, from or to any person linked to a state-owned company, semi-public corporation, autarchy, or any other government entity, or to private companies connected to any government, and their managers, collaborators and service providers, whether at the federal, state, municipal, or district levels, with the purpose of directly or indirectly granting or obtaining any advantage for the company, or for themselves, their relatives, friends, and close acquaintances.



26. DOUBTS AND BREACHES OF THE CODE OF ETHICS

Any breach of the current code must be communicated to the Ethics Channel so the proper measures can be adopted. POLO FILMS will promptly and thoroughly investigate any fact involving a suspected fraud, theft, robbery, damage to property, misappropriation, manipulation of information, or any other crime, criminal offense or illegal act, and any other act that may go against the corporate guidelines and procedures, of which the current code is an integral part.

In case you have any doubt in regard to the current code's application, the HR Area must be consulted. In case this latter is not able to clear your doubt, please submit it to the Ethics Committee through the Open Channel/Canal Aberto.

27. ETHICS COMMITTEE

POLO FILMS' Ethics Committee is comprised of 4 (four) members:

The Chair of the Management Board, the CEO, the Legal Director, and the HR Manager.

The Ethics Committee is responsible for managing the Code of Ethics, together with the Human Resources Area, and is responsible as well for revising it in conformity with its predefined lifecycle. The Ethics Committee will discuss and deliberate about any and every breach of the current code.

Sanctions for any noncompliance with the current code will be applied by the company's Human Resources Area, through a verbal or written warning, suspension from work, or rescission of the employment agreement, regardless of any eventual job opening.

To report any practice noncompliant with the conducts established in the current code, collaborators must contact the Open Channel/Canal Aberto through the following channels:

Telephone: 0800-601-5699, a toll-free number from any fixed or mobile phone.

Website: www.contatoseguro.com.br/polofilms

Or through our app in any tablet and smartphone.



TERM OF COMMITMENT

I, _____, a I,
_____, a collaborator
working at Polo Films Indústria e Comércio S.A., enrollment nº _____,
declare to have received POLO FILMS' Code of Ethics and Conduct and to be aware of
its content, and hereby assume the commitment to fully comply with all the therein
established norms of conduct.

_____.

Collaborator's Signature

ADDRESSES AND CONTACT INFO

SAO PAULO

**POLO FILMS INDÚSTRIA E COMÉRCIO S.A. - Commercial
Taxpayers' Registry (CNPJ) # 26.051.817/0001-82
Rua Dr. Renato Paes de Barros, 750 - 16th floor.
Itaim Bibi - Sao Paulo - SP - Zip Code: 04530-001
Tel.: (11) 3478-5950**

RIO GRANDE DO SUL

**POLO FILMS INDÚSTRIA E COMÉRCIO S.A. -
Manufacturing Plant.
Taxpayers' Registry (CNPJ) # 26.051.817/0002-63
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Tel.: (51) 3883-6700**



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