

CODE OF CONDUCT

PRINCIPLES FOR
A RESPONSIBLE
AGRICULTURE



RADAR

A Westchester Group Company

WORDS FROM THE PRESIDENT





DEAR PRODUCERS,

We are glad to present our Code of Conduct. It brings our expectations regarding all operations performed in our properties and the criteria for us to check them.

But what "expectations" are these?

In general terms, we expect all of you to preserve the land and the people involved, as described in the booklet of the **"5 Principles for Responsible Agriculture"**, designed by the Global Compact, a UN-connected institution. These Principles inspired our Code of Conduct and should guide all management and operations decisions on farms managed by you, deepening on the following issues: environmental sustainability, labor practices, relationship with surrounding communities, ethics and business transparency.

In our Code of Conduct, the verification criteria are divided into two groups: "minimum requirements" and "best practices". The first group refers to legal requirements while the second to good practices that go beyond the law.

We are all aware that there are certain factors within agriculture that are beyond our control, but inseparable from this business, such as climate and commodity prices. Agriculture presents inherent risks and, in addition to effective compliance with the law, requires experience and competence.

In this context, our Code of Conduct should apply as a tool for support, continuous improvement and risk management. We are looking forward to improving our relationships by promoting the **“5 Principles for a Responsible Agriculture”** within our industry.

THANK YOU,
**Henrique Americano
Carvalho de Freitas**



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INTRODUCTION



Investment in land in Brazil is becoming increasingly attractive with constant improvements in the country's institutional environment and infrastructure. Such investments occur in the midst of important discussions about the impacts arising from the use of natural resources. Responsible agriculture is a way to anticipate and mitigate these impacts, ensuring greater confidence for all parts in the agribusiness chain.

Radar is a land manager that, since the beginning, values the long-term vision. Our work, in short, is to prospect, buy, manage, lease and sell land. So, the company's focus is not producing. In our properties, the tenants are responsible for that, therefore, we are counting on you to hire rural labor, transport and sell your products in the national market and abroad.

Since we are part of the agribusiness chain and are aware of the challenges and limits of this sector, we strive for the best practices and assist our operators in the search for a socially and environmentally responsible model for the use of the land.

This **Code of Conduct** aims to present values and principles towards the way we evaluate our value chain.

THE PRINCIPLES ARE:

- 1** PROMOTING ENVIRONMENTAL SUSTAINABILITY
- 2** RESPECT FOR HUMAN RIGHTS AND LABOR PRACTICES
- 3** RESPECT FOR NATURAL RESOURCES AND LAND OWNERSHIP
- 4** PROMOTING HIGH STANDARDS OF BUSINESS ETHICS
- 5** REPORT ACTIVITIES AND PROGRESS IN IMPLEMENTING THE PRINCIPLES



PRINCIPLE 1: PROMOTING ENVIRONMENTAL SUSTAINABILITY

PROMOTE MEASURES GUIDED BY THE PROTECTION AND PRESERVATION OF THE ENVIRONMENT

The operators* of our lands should consider sustainability in their decision-making processes. In this sense, it is essential to implement actions to protect biodiversity, use and conservation of soil and water, as well as fostering the rational use of chemicals in order to minimize their environmental impacts.

It is also vital to monitor the operation and develop management measures, which are both relevant and appropriate to the business' nature and scale.

** We name "operators" any company or legal entity that leases and produces in our lands; on the other hand, "manager" means the company responsible for the management of the land as regards legal adequacy, in order to enable its lease to the operators.*

PRINCIPLE 2: RESPECT FOR HUMAN RIGHTS AND LABOR PRACTICES

RESPECT FOR LABOR & HUMAN RIGHTS

Both managers and operators should comply with labor laws and not allow violations of human rights. Emphasis should be placed upon preventing forced labor, child labor, excessive working hours, inadequate remuneration, discrimination and lack of health & safety management within the direct operation and supply chain.

All risks related to activities performed within the work environment should be monitored. Where appropriate, control measures should be implemented in line with legal requirements and appropriate for the size of the business.



PRINCIPLE 3: RESPECT FOR NATURAL RESOURCES AND LAND OWNERSHIP

RESPECT FOR THE RIGHT TO USE, OWNERSHIP OF LAND AND ITS RESOURCES

For operations with significant potential to impact local communities, operators should implement procedures that ensure early consultation of stakeholders. After that, the operator should consider mitigation actions.

PRINCIPLE 4: PROMOTING HIGH STANDARDS OF BUSINESS ETHICS

Operators should comply with the local legislation, even when not effectively monitored by relevant authorities. Operators are expected to implement measures against any form of corruption, including extortion, kickbacks and bribes.

Offering personal advantages for business facilitation or any other form of illegality involving private or public agents are practices incompatible with our business standards.

PRINCIPLE 5: REPORT ACTIVITIES AND PROGRESS IN IMPLEMENTING THE PRINCIPLES

Our operators are expected to be transparent with inspections Radar may carry out during field visits.

In addition, operators should report their activities, progress and challenges in public reports compatible with the size of their respective companies.

Compliance with the Code of Conduct is a joint responsibility between Radar and its tenant partners. Both are challenged to follow the highest standards of socio-environmental governance.

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APPLICATION



To facilitate the application of the five principles, Radar aligned this code with other codes applied in the rural sector, such as the Fair Labor Association (FLA), Better Cotton Initiative (BCI), Brazilian Responsible Cotton (ABR), Bonsucro and the Round Table for Responsible Soy (RTRS).

This allows the application of existing audit practices, making our checks more efficient. For non-certified companies, this Code of Conduct may be used as an unofficial, non-specific guide on requirements of certifiers for their approval.

Below are the checkable criteria for each of the principles:

PRINCIPLE 1: PROMOTING ENVIRONMENTAL SUSTAINABILITY

1.1 Water

1.2 Soil

1.3 Chemicals

1.4 Protection of
biodiversity and the
environment

1.5 GHG (Greenhouse
Gas)
Emissions

PRINCIPLE 2: RESPECT FOR HUMAN RIGHTS AND LABOR PRACTICES

- 2.1** Work relations
- 2.2** Basic labor rights
- 2.3** Health & safety
- 2.4** Infrastructure

PRINCIPLE 3: RESPECT FOR NATURAL RESOURCES AND LAND OWNERSHIP

- 3.1** Impact
- 3.2** Communication
- 3.3** Engagement

PRINCIPLE 4: PROMOTING HIGH STANDARDS OF BUSINESS ETHICS

- 4.1** Compliance
- 4.2** Ethical behavior in
labor relations

PRINCIPLE 5: REPORT ACTIVITIES AND PROGRESS IN IMPLEMENTING THE PRINCIPLES

- 5.1** Transparency,
cooperation,
reporting and
continuous
improvement

In order to facilitate the verification of the criteria during Radar's periodic visits, two categories of compliance have been established. The first one relates to Brazilian legal requirements and the second one is connected with international rules and good practices on responsible agriculture.

MINIMUM REQUIREMENT

Indicates what Radar expects from the tenants, regardless of their size. Represent primary requirements from a responsible tenant, understood as compliance with the legislation in force. Most of the terms are linked to laws* or related to basic commitment with our principles.

In the event of any non-compliance in this category, an action plan should be developed jointly with the tenant.

PRINCIPLE 1: PROMOTING ENVIRONMENTAL SUSTAINABILITY

Protection of the environment and sustainable use of natural resources are key to the sustainability of the land. Impacts arising from the application of chemicals to the environment or people should be minimized.

*A legal reference is mentioned in the Code of Conduct, but the tenant should be aware of the laws relevant to their business

1.1 Water

Water quality: the tenant meets all requirements for discharge of effluents determined by the environmental agency in the receiving water bodies.

- Resolution CONAMA No. 430/2011

External reference: ABR / RTRS / Bonsucro

Water use: the tenant should maintain a water collection monitoring system in order to ensure that the volume used does not exceed the allowed.

- Act No. 9.433/1997

External reference: BCI / ABR / RTRS / Bonsucro

Wastewater treatment system: all water used in industrial processes (cooling water, boilers, car wash etc.) should be properly treated before returning to the environment.

- Resolution CONAMA No. 430/2011

External reference: BCI / ABR / RTRS / Bonsucro

1.2 Soil

Sustainable agriculture practices: the tenant should apply good conservation practices of soil management, in order to minimize the erosion process (grooves, ravines and gullies).

External reference: BCI / ABR / RTRS / Bonsucro

Waste management system: the tenant should regularly collect, dispose and eliminate solid waste in an appropriate manner.

- NR 25 - Industrial Waste

External reference: BCI / ABR / RTRS / Bonsucro

1.3 Chemicals (fuel and agrochemicals)

Agrochemical application: the tenant should maintain a registration system for use of agrochemicals, including a list of newly treated areas (re-entry interval).

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

Prohibited agrochemicals policy: the tenant should not use prohibited agrochemicals in national territory.

- Act No. 7.802/1989

External reference: RTRS / Bonsucro

Chemicals storage management: all chemicals should be stored in the correct manner. This means correct segregation of materials, appropriate signage, displaying of product labels, secondary restraining, lighting and ventilation.

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: BCI / ABR / RTRS / Bonsucro

PRINCIPLE 2: RESPECT FOR HUMAN RIGHTS AND LABOR PRACTICES

Basic rights of employees should be respected, as well as safe and appropriate conditions provided for the performance of their duties, regardless of whether they engage in such activities on leased or private land. Radar expects the tenant to meet the following requirements:

2.1 Work relations

Social contributions: The tenant must keep up-to-date records of payments related to social security and guarantee fund (INSS and FGTS).

- Act No. 8.036/1990; Act No. 8213/1991

External reference: Bonsucro / RTRS

Recruitment: Workers (local and/or migrants) should be recruited directly by the company or via an agency. This should be conducted within the legal rules and exempt from paying any amount to the agency by the workers.

- Normative Instruction of the Ministry of Labor No. 76/09

External reference: Bonsucro / RTRS

Employment contracts: all workers either permanent or temporary should be provided with a valid signed contract.

- Act No. 5.452/1943 - CLT - Art. 29

External reference: BCI / ABR / RTRS / Bonsucro

2.2 Basic labor rights

Non-discrimination: the tenant should not tolerate any form of discrimination based on race, gender, color, origin, political conviction or sexual preference.

- Act No. 7.716/1989 - Crimes from race or color prejudice

External reference: ABR / RTRS / Bonsucro

Harassment: the tenant shall not tolerate any form of harassment or abuse.

- ACt No. 12.250/2006 - Law Against Moral Harassment

External reference: BCI / ABR / RTRS / Bonsucro

Labor analogous to slavery: the tenant should not practice acts such as the retention of personal documents belonging to workers; restriction of access to toilets, water fountains, medical care and religious services; prohibition of leaving the property or terminating the employment contract.

- Decree-Law No. 2.848/1940 - Penal Code Art. 149

External reference: BCI / ABR / RTRS / Bonsucro

Child labor: the tenant should not use labor from people below the legal age of 16 in the farm's operations.

- Act No. 10.097/2000 – Apprentice Law
- Act No. 5.452/1943 - CLT Art. 415 through 441

External reference: ABR / RTRS / Bonsucro

2.2 ►

Young Apprentices: the company shall meet all requirements of the learning programs where applicable.

- Act No. 10.097/2000 – Apprentice Law
- Act No. 5.452/1943 - CLT Art. 415 through 441

External reference: ABR / RTRS / Bonsucro

Freedom of association: the tenant's employees must be allowed to contact the union or its representatives/members.

- Act No. 5.452/1943 - CLT Art. 511 through 514

External reference: ABR / RTRS / Bonsucro

Convention/collective agreement: the tenant should maintain the applicable convention or collective agreement in the site. In the absence of unions, the rules adopted should be in line with existing conventions or agreements in other regions with a similar scope.

- Act No. 5.452/1943 - CLT - Art. 611

External reference: ABR / RTRS / Bonsucro

Working hours: regular working hours and overtime should be within the limit determined by the collective agreement, or at least meet the requirements stated by the law

- Act No. 5.452 - CLT - Art. 58
- Federal Constitution, 1988 - Art. 7, §XVI

External reference: BCI / ABR / RTRS / Bonsucro

Breaks: all workers must be allowed to take breaks (lunch break and inter-day) as provided for in the legislation, convention or collective agreement.

- Act No. 5.452/1943 - CLT Art. 66 through 72

External reference: RTRS / Bonsucro

Weekly rest day: workers shall be provided with weekly rest according to law and the provisions of the convention/collective agreement.

- Act No. 5.452/1943 - CLT Art. 66 through 72

External reference: RTRS / Bonsucro

Hour record: every hired worker is required to properly record their daily workday.

- Act No. 5.452/1943 - CLT - Art. 74

External reference: RTRS / Bonsucro

Remuneration: values should be aligned with the minimum wage provided for in the law or convention/collective agreements.

- Act No. 5.452/1943 - CLT Art. 76 through 128

External reference: RTRS / Bonsucro

2.3 Health & Safety

Health and Safety Teams: the site maintains duly qualified technical experts in occupational health and safety.

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture
- Act No. 5.452/1943 - CLT Art. 166 and 167

External reference: ABR / RTRS / Bonsucro

Health and Safety Teams: the tenant should promote the voting process and ensure full operation of the Internal Commission for Accident Prevention in Rural Occupation (CIPATR).

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

Documentation: when applicable, the site should have valid documents for health and safety management, with the definition of the risks involved in the employees activities.

- NR 7 - Occupational Health Control Program (PCMSO).
- NR 9 - Environmental Risk Prevention Program

External reference: ABR / RTRS / Bonsucro

Extreme weather conditions: in case of fires or storms, the employees should be free to leave the workplace and seek protection.

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: ABR / RTRS / Bonsucro

Health and safety trainings: health and safety trainings should be periodically carried out with all employees and during the working hours, such as: mandatory trainings on agricultural machinery operation (NR 12 or NR 13) and trainings on using and handling agrochemicals (NR 31).

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture
- NR 6 – Personal protective equipment - PPE

External reference: BCI / ABR / RTRS / Bonsucro

Evacuation and firefighting: the tenant should maintain a qualified team with adequate resources for firefighting actions and emergency services.

- Technical Instructions for Fire Departments (from each State)

External reference: RTRS / Bonsucro

Safety equipment: the tenant must provide appropriate Collective Protection Equipment (CPE) and Personal Protection Equipment (PPE) free of charge to workers, according to the risk assessments performed.

- NR 6 - Personal protective equipment - PPE
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture.
- NR 9 - Environmental Risk Prevention Program

External reference: ABR / RTRS / Bonsucro

2.3 ►

Machinery safety: machinery and equipment within the tenant's working profile should not present defects, improvisations or absence of mandatory protection and safety systems, which may pose a risk to the employees.

- NR 11 Transport, Moving, Storage and Handling of Materials.
- NR 12 - Safety at work in machinery and equipment

External reference: ABR / RTRS / Bonsucro

Vehicle safety: the tenant should perform and document regular operation and safety inspections for all agricultural vehicles.

- NR 11 Transport, Moving, Storage and Handling of Materials

External reference: ABR / RTRS / Bonsucro

Workers transportation: the company responsible for the transportation of workers must possess and supply an updated permit to drive.

- Resolution No. 4.777/2015

External reference: RTRS / Bonsucro

Medical: regular occupational medical tests should be provided for all workers as needed.

- Act No. 5.452/1943 - CLT - Art. 168

External reference: ABR / Bonsucro / RTRS

2.3 ►

First-aid kits: these must be made available in all relevant places of work, their contents should be regularly verified and workers should be made aware of their locations.

- NR 7 - Occupational Health Control Program
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: BCI / RTRS / Bonsucro

First-aid Training: the site must keep an appropriate number of qualified workers to provide first-aid services.

- NR 7 - Occupational Health Control Program
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: BCI / RTRS / Bonsucro

2.4 Infrastructure

Living area: the living areas (permanent and movable) are to be provided in all working front areas and should also contain adequate toilet facilities and fresh water storage.

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

Water availability: the site must provide either a suitable source of drinking water or, in the event this is not practicable, a sufficient vessel to allow the employee to conduct his/her activities.

2.4 ►

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture
- NR 24 - Sanitary and Comfort Conditions in the Workplace

External reference: BCI / Bonsucro / RTRS

Feeding: the site must provide meals for the workers during working hours. In addition to this, monthly meal provisions can also be supplied to employees, provided that these benefits have been established by a prior collective agreement.

- Variable benefits established in convention/collective agreements.

External reference: BCI / Bonsucro / RTRS

Food preparation areas: where appropriate, food preparation areas, must be properly authorized by a Sanitary Surveillance body.

- NR 24 - Sanitary and Comfort Conditions in the Workplace

External reference: RTRS / Bonsucro

Accommodation, housing and other infrastructures: the conditions of all relevant areas should be compliant with the health, safety and hygiene regulation.

- NR 24 - Sanitary and Comfort Conditions in the Workplace
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

PRINCIPLE 3: RESPECT FOR NATURAL RESOURCES AND LAND OWNERSHIP

Responsible land investment prescribes a detailed analysis of the property chain to ensure respect for all stakeholders. In addition, this analysis ensures benefits for our reputation and credibility to communities around the property. A win-win relationship with key stakeholders is essential for any institution that strives for sustainable development.

3.1 Impact

Neighboring lands: the tenant should prevent the release of agrochemicals to areas adjacent to the site.

- Resolution CONAMA No. 460/2013
- Act No. 10.406/2002 Art. 1.228, § 1st

External reference: RTRS / Bonsucro

Security: the security of the property (if any) should respect the integrity and freedom of transit of people.

- Decree-Law No. 2.848/1940 - Penal Code Art. 149

External reference: Bonsucro / RTRS



PRINCIPLE 4: PROMOTING HIGH STANDARDS OF BUSINESS ETHICS

In addition to compliance with Brazilian legislation, the fourth principle addresses ethical behavior in the company's daily relations. Institutions that value ethics and convert their concerns into effective practices are often more competitive and able to obtain higher levels of satisfaction and motivation from their professionals.

4.1 Compliance

Law: the tenant should operate in accordance with all applicable laws and maintain all required and valid permits.

- Act No. 6.938/1981
- Resolution CONAMA No. 237/1997
- Act No. 9.433/1997

External reference: RTRS / Bonsucro

GOOD PRACTICE

Radar understands this practice as an opportunity to improve the level of management of the tenant and a greater performance of operational sustainability. Compliance within good practice improves the relationship with the tenant by evidencing complementary initiatives in development aligned with the five principles.

PRINCIPLE 1: PROMOTING ENVIRONMENTAL SUSTAINABILITY

Protection of the environment and sustainable use of natural resources are key to sustainability of the land. Impacts from the application of chemicals to the environment or people should be minimized.

1.1 Water

Water use: the tenant should implement progressive measures to reduce water consumption and increase efficiency gains in its collection and use.

External reference: Bonsucro / RTRS

1.2 Soil

Soil quality management system: the tenant should implement a chemical analysis program for the soil accompanied by a sampling plan, with proposed recommendations for application of corrective agents and fertilizers.

External reference: BCI / ABR / RTRS / Bonsucro

Selective Collection: the tenant should implement selective collection of solid waste.

- Resolution CONAMA No. 275/2001
-

1.3 Chemicals (fuel and agrochemicals)

Prohibited Agrochemicals: the tenant should not use agrochemicals prohibited by international regulations.

- Rotterdam and Stockholm Convention

External reference: RTRS / Bonsucro



1.4 Protection of Biodiversity and the Environment

Environmental management: the tenant must ensure an individual or department is responsible for environmental management of the site.

PPA and Legal Reserve: where applicable, the tenant agrees to monitor PPAs (Permanent Preservation Areas) and LRs (Legal Reserves) in order to prevent invasions and misuse by illegally trespassing persons.

- Act No. 12.651/2012 - Brazilian Forest Code

External reference: RTRS / Bonsucro

Hunting and fishing: the tenant should maintain a policy or procedure to prevent illegal hunting or fishing by its employees.

- Act No. 6.938/1981 - National Biodiversity Policy

External reference: RTRS / Bonsucro

Environmental management plan:

The tenant should maintain a map of operational impacts on the environment and promote actions to mitigate them.

- Resolution CONAMA No. 01/1986

External reference: RTRS / Bonsucro



1.5 GHG (Greenhouse Gas) Emissions

Management & control of atmospheric emissions: the tenant should monitor and maintain a control system for atmospheric emissions and correct any flaw when detected.

- Act No. 12.187/2009 - National Policy on Climate Change
- Resolution CONAMA No. 432/2011

External reference: RTRS / Bonsucro

PRINCIPLE 2: RESPECT FOR HUMAN RIGHTS AND LABOR PRACTICES

Basic rights of employees should be respected, as well as safe and appropriate conditions provided for the performance of their duties, regardless of whether they engage in such activities on leased or private land. Radar expects the tenant to meet the following requirements.

2.1 Work relations

Documentation: the tenant should maintain written instructions explaining working conditions, disciplinary practices and hiring at the farm.

External reference: Bonsucro / RTRS

2.1 ►

Communication: a communication channel for complaints, denunciations or clarification of doubts should be available to all workers.

External reference: Bonsucro / RTRS

2.3 Health & Safety

Health and Safety Management: the tenant should ensure an individual or department is responsible for health and safety management of the site.

- NR 5 - Internal Commission for Prevention of Accidents (CIPA)
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture
- NR 6 - Specialized Service in Safety Engineering and Occupational Medicine (SESMT)

External reference: RTRS / Bonsucro

Accident prevention: the tenant should maintain accident records, and analysis of causes should be carried out in order to implement corrective actions for preventing other accidents (if applicable).

- NR 5 - Internal Commission for Prevention of Accidents (CIPA)
- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

Ergonomics: the tenant must have an Ergonomics study of all performed operations.

- NR 17 - Ergonomics

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

2.4 Infrastructure

Internal access routes conditions: monitoring of access routes and their conditions, for example, back roads and side roads, must be implemented to avoid accidents.

- NR 31 - Health and Safety at Work in Agriculture, Livestock, Forestry and Aquaculture

External reference: RTRS / Bonsucro

Leisure: the company shall provide areas for leisure and sport practice for employees living at the farm, at their own homes or accommodations.

External reference: RTRS / Bonsucro

Historical Heritage: assets of historical value should be preserved.

External reference: RTRS / Bonsucro



PRINCIPLE 3: RESPECT FOR NATURAL RESOURCES AND LAND OWNERSHIP

Responsible land investment prescribes a detailed analysis of the property chain to ensure respect for all stakeholders. In addition, this analysis ensures benefits for our reputation and credibility, mainly in regards to communities around the property. A win-win relationship with key stakeholders is essential for any institution that strives for sustainable development.

3.1 Impact

Impact Mapping: the tenant should maintain records and mapping of its social impact operations for external stakeholders (communities, government, quilombo population, indigenous groups etc.)

External reference: Bonsucro

3.2 Communication

Complaints and claims systems: the tenant should implement complaints and claims systems available for external stakeholders, in conjunction with an internal management department to deal with their demands (e.g.: neighboring communities, indigenous villages etc).

External reference: RTRS / Bonsucro

3.3 Engagement

Engagement: the tenant should implement forms of engagement with external stakeholders (meetings, assemblies, social media, website, social projects etc.) whenever an aspect critical to a given public is identified.

External reference: RTRS / Bonsucro

PRINCIPLE 4: PROMOTING HIGH STANDARDS OF BUSINESS ETHICS

In addition to compliance with the Brazilian legislation, the fourth principle addresses ethical behavior in the company's daily relations. Institutions that value ethics and convert their concerns into effective practices are often more competitive and obtain higher levels of satisfaction and motivation from their professionals.

4.1 Compliance

Legislation: the tenant should keep a system to follow the applicable legislation.

External reference: RTRS / Bonsucro

Subcontractors: the tenant should monitor subcontractors, to ensure their practices comply with the basic labor rights established by law.

- CPC - Art. 509

External reference: RTRS / Bonsucro

4.2 Ethical behavior in labor relations

Corruption: the tenant should implement policies, processes and practices to protect the operation against acts of corruption and provide training to all employees.

Subcontractors: the tenant has implemented procedures to monitor the working relationships of subcontractors.

- CPC - Art. 509

External reference: RTRS / Bonsucro

PRINCIPLE 5: REPORT ACTIVITIES AND PROGRESS IN IMPLEMENTING THE PRINCIPLES

Reporting on operations of the company is a good source of information for stakeholders. In order to properly apply the terms of this Code of Conduct, Radar needs cooperation of tenants in both visiting on properties and spreading of information. In addition to this cooperation, the tenant should also consider a plan for their continuous improvement based upon the terms outlined by this Code of Conduct.

5.1 Transparency, cooperation, reporting and continuous improvement

Visits & inspections: the tenant should allow and provide support to visits for analysis of this Code of Conduct.

Report: the tenant should provide information on compliance with all subjects under the Code of Conduct whenever requested.

Continuous improvement: the tenant should evidence commitment with continuous improvement as regards the requirements of the Code of Conduct.

The principles and their respective criteria will orient Radar's visits.

*This code is subject to regular revisions, which may occur by consulting different stakeholders.



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Risks and other important considerations

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