

CODE OF ETHICS



THE RIGHT PATH ✈️
ETHICS AND COMPLIANCE

GOL

Message from Management

Team of Eagles,

Best practices, in attitudes and relationships, consistent with our Values, should guide our daily activities and are essential to ensure the perpetuity of our business and the integrity and reputation of our brands.

By acting ethically, we reflect our individual principles, but also show our collective Values and how we relate to colleagues, Customers, shareholders, suppliers and to the communities we serve.

We want to be the First for Everyone and so we must be the First in acting in a consistently ethical way towards everybody.

For GOL, integrity is the way it does business and conducts its relationships, and is an inseparable part of what we are.

As the world around us and the way we relate to it change, we must, too, adapt and respond. That is why we are launching a new version of the Code of Ethics, which strengthens our Culture and our *Way of Being and Doing*, reaffirming GOL's unconditional commitment to ethics and integrity.

The Code sets forth the principles that should guide our behavior. It is part of THE RIGHT PATH - Ethics and Compliance Program, that has as its overarching objective to ensure that integrity characterizes our relationships and our behavior. Remember: the decisions we make every day show what our ethical standards are.

Our reputation depends on all of us being engaged in applying and sharing the ethical guidelines of the Code. Each of us is responsible for its dissemination, application and effectiveness. We should read the Code and understand it, strictly follow its principles, and be willing to raise the alarm if something seems to be going off track.

And we will go beyond GOL, by seeking from our business partners adherence to the principles of the Code or encourage them to adopt their own policies strictly in line with ours.

The Code of Ethics does not have answers to all situations that we will encounter. It does, however, serve to show us how to deal with ethical challenges. The consistent application of the principles reaffirmed here is key to continuing our success. Only together, oriented by the same ideals, will we be able to achieve our purpose to be First for Everyone.

We count on the involvement, the commitment and the engagement of all.



Constantino de Oliveira Júnior

Chairman of the Board of Directors

Paulo Sérgio Kakinoff

President

July 24, 2018.

TABLE OF CONTENTS

1. OUR PURPOSE, VISION AND VALUES	8
2. APPLICATION AND RESPONSIBILITIES	10
3. ETHICS IN OUR RELATIONSHIPS	13
3.1 Conflict of Interests	13
3.2 Fighting Corruption	15
3.2.1 Say “No” to Bribery	15
3.2.2 Gifts, Entertainment, Sponsorships and Donations	16
3.2.3 We do not Accept any Form of Corruption	19
3.2.4 Our Partners and Suppliers	20
3.2.5 Our Books and Records must be Accurate	21
4. OPERATIONAL SAFETY	23
5. OUR RELATIONSHIPS	25
5.1 Inclusion and Diversity	26
5.2 Relations with Customers	26
5.3 Relations with Shareholders	27

5.4	Relations with Employees	29
5.5	Relations between Employees	30
5.6	Relations with Suppliers and Partners	32
5.7	Relations with Competitors	33
5.8	Relations with the Media	34
5.9	Relations with Social Media	35
5.10	Relations with the Community and the Environment	36
5.11	Relations with Public Agencies	37
6.	OUR INFORMATION AND PROPERTY	41
6.1	Advertising and Publicity	41
6.2	Corporate Resources	42
6.3	Data Security	44
7.	THE RIGHT PATH - ETHICS AND COMPLIANCE PROGRAM	46
8.	THE ETHICS CHANNEL	50
9.	RELATED POLICIES	54
10.	MISCELLANEOUS	55



CODE OF ETHICS



1.

OUR PURPOSE, VISION AND VALUES

Purpose

Be the First for Everyone.

Vision

Be the best airline to travel, work and invest.

Values

Safety — It is our number 1 Value: it guides all our actions.

Low Cost — We have the lowest cost in the industry.

Team of Eagles — We are an opportunity company, with the best brazilian aviation Team.

Intelligence — We maximize our results with intelligent solutions and technologies.

Serve — GOL's *Way of Being and Doing* makes us the best option for the Customer.

GOL is guided by principles that sustain an Organizational Culture focused on valuing those who work here and those we work for, complying with legal and ethical standards and the permanent search for improvement. Social issues, such as human rights, diversity, and sexual exploitation are of extreme concern to the Company. Therefore, we invest in education and initiatives that strengthen our Culture, and adopt policies and practices to prevent and combat all forms of discrimination, harassment, prejudice and hostile working conditions.





CODE OF ETHICS

GOL



2.

APPLICATION AND RESPONSIBILITIES

Our Principles

This Code of Ethics applies to all Employees, regardless of rank, to all executives and to the Board of Directors (together, our “members”).

In addition, GOL expects the Code’s principles to be followed by all its business partners.

What is your role in building a more ethical work environment?

Leadership

- Encourage ethical behavior by setting the right example.
- Read, understand and ensure compliance with the principles of our Code of Ethics.
- Encourage the reading of the Code of Ethics and create opportunities for discussion of its principles, to broaden understanding of the Code and show how to face possible ethical challenges.
- Contact the Ethics Channel for clarification and guidance regarding troublesome situations. You are guaranteed confidentiality.
- Never retaliate or threaten to do so, for the use of the Ethical Channel or for any other reason.
- Help to resolve doubts as to Code-related issues and show your willingness to address related management issues.



Employees

- Be an example of ethical conduct for your colleagues and others.
- Practice the Company's Values with empathy, helping to strengthen the bonds of our Team.
- Comply with the Code's principles and other Company policies, and seek to have discussions that help compliance by others.
- Talk to your supervisor about any ethical issues.
- Use the Ethics Channel responsibly and in good faith. Never use the Channel to threaten others.
- Use the Ethics Channel to communicate all cases of non-compliance with the Code of Ethics.

All members are responsible for complying with applicable legislation, this Code and GOL's other internal policies and standards.

This Code should be applied consistently and coherently with other GOL policies.

In case of doubt about the interpretation and application of this Code, consult your supervisor, or contact the Ethics Channel at www.eticanagol.com.br.





CODE OF ETHICS

GOL



3.

ETHICS IN OUR RELATIONSHIPS

Our *Way of Being and Doing* is based on doing the right and ethical thing. These attitudes or behaviors connect us to our purpose of being the First for Everyone.

GOL pledges to conduct its activities in a transparent, safe and responsible manner, free from conflict of interests and consistent with our Values.

3.1 Conflict of Interests

Our Principles

Conflicts of interest are situations in which the personal interests of the member or a person close to the members may not be consistent with GOL's interests. In other words, situations where a member may benefit himself or herself or others close to the member, at the expense of GOL.

Members may not be involved in decisions that favor or appear to favor their interests.

How to Act

- Inform your supervisor, as soon as possible, by email, about potentially relevant **personal ties** with (I) suppliers, (II) business partners, (III) major Clients, (IV) competitors, (V) candidates for job opportunities, (VI) public officials with whom GOL relates, and (VII) recipients of donation and sponsorships. Your supervisor should advise Compliance as to how the matter is proposed to be handled. Compliance will take the matter to the Ethics Committee, which, in turn, may recommend that additional or different steps be taken.



If you come upon a conflict of interest situation, be proactive and use the Ethics Channel www.eticanagol.com.br.

Be alert to and speak up in situations where you:

- Can influence the choice or evaluation of a supplier, where someone close to you works.
- Can influence the negotiation with a business partner of which you or someone close to you is a shareholder.
- Can influence the choice of a job candidate, if that candidate is someone close to you.
- Are personally involved with an Employee about whom you can influence evaluation, promotion or other work decisions.

Remember: the Ethics Channel is always at your disposal for situations that you do not feel comfortable sharing with your supervisor
www.eticanagol.com.br.

For more information, see the Conflict of Interests Policy.



3.2 Fighting Corruption

GOL is against corruption in all its forms and insists on the highest standards of integrity and ethics in its activities. The Company carries out its activities strictly complying with applicable law, including Brazilian and foreign anti-corruption legislation.

In support of this commitment, GOL has created THE RIGHT PATH - Ethics and Compliance Program, which has as one of its main objectives the prevention, detection, and response to acts of bribery and corruption.

3.2.1 Say “No” to Bribery

Our Principles

GOL does not tolerate any form of corruption including to influence a favorable outcome by promising, offering or giving any kind of improper advantage, directly or indirectly, to those who can decide in GOL's favor, whether or not public officials, or to someone close to the decision-maker.

An **improper advantage** is a benefit promised, offered or given, directly or indirectly, to a public official or other third party, and which, by virtue of its value or the context of the situation, **may influence or be seen as potentially influencing**, a favorable outcome for GOL.

This benefit can be money, air tickets, discounts and upgrades, gifts, hospitality, donations or sponsorships, among others.

Even if the benefit is not directly for the decision-maker, but to someone close to him or her, it may be an improper advantage and thus illegal.



Some examples:

- Giving an upgrade or bonus miles to a public official with decision-making power over GOL, if offered only to the public official or persons close to him or her without adequate justification, is improper.
- **It will NOT be considered improper** if in giving bonus miles to all passengers on a canceled flight, there are public officials among the passengers.

How to Act

Never offer, promise to give or give, directly or indirectly, whether to public officials or others, advantages that may influence, or seem to influence, a decision in favor of GOL. Likewise do not solicit or accept, directly or indirectly any improper advantage which may influence, or seem to influence, your decision in respect of GOL matters.

Violations of this policy are subject to disciplinary measures and possible legal action.

For more information, see the Anti-Corruption Policy, Sponsorships and Donations Policy and the Gifts and Entertainment Policy.

3.2.2 Gifts, Entertainment, Sponsorships and Donations

Our Principles

GOL does not allow the offering of gifts, entertainment, sponsorships or donations as an improper advantage.

We permit **gifts** given in the context of our activities, for marketing or branding purposes, or as a courtesy, if only of symbolic value and without intention to influence decisions. See the Gifts and Entertainment Policy.

Examples are pens, items offered to children on board, key rings, calendars and mugs, which preferably contain the GOL logo.



Entertainment is the offering of hospitalities related to entertainment or technical events, meals, air tickets, lodgings or tickets.

Sponsorship and donations are the support granted by the Company to initiatives with which GOL identifies itself. Such supports can be cash, travel, discounts or other types of benefits.

GOL does not make political donations, nor does it allow any member to make donations in the name of or in the interest of GOL.

Sponsorships and donations may be offered, provided they are within the scope of our business relations, in line with GOL's policies, and not influencing, or seeming to influence an outcome in favor of GOL.

How to Act

Only offer sponsorships or donations in accordance with GOL's policies and be aware of the context and the identity of the beneficiaries of the sponsorship or donation.

Do not offer or receive a gift:

- That may influence or appear to influence a decision regarding GOL.
- That is of excessive value.

Gifts are of excessive value:

- In the case of a gift to a public official, if its value is greater than permitted by the government regulations applicable to the official. For example, public officials of the city of São Paulo may not accept a gift worth more than R\$ 100 (about US\$ 25).
- A gift to a private legal entity or a private person, may not exceed one-third of the minimum wage in Brazil, or R\$ 318 (approximately US\$ 80 in 2019).



- That violates the rules to which the recipient is subject, such as a gift worth more than what the recipient's employer allows.
- That is given very frequently, even if of low value, such as, a bimonthly gift.
- In cash or cash equivalents, such as gift cards.
- That is otherwise inappropriate because it is intended for a purpose that is not in accordance with GOL's Values.

A gift or other courtesy received in violation of the Code must be returned.¹

If return is not possible, its receipt must be communicated to Compliance, so that the Ethics Committee may decide as to the disposition of the gift.

Members must document gifts offered or received. If you have any questions about the above guidelines, talk to your supervisor or contact the Ethics Channel.

Never accept gratuities for services rendered to our Clients or the public.

Before you decide to offer or receive gifts, check the Gifts and Entertainment Policy. With respect to the granting of any sponsorship or donation, see the Sponsorships and Donations Policy.

¹The return of courtesies must be accompanied by a letter in the form of PO - SAODD 001.



3.2.3 We do not Accept any Form of Corruption

Our Principles

In addition to bribery, GOL also prohibits other acts prohibited by anti-corruption laws applicable to GOL, such as:

- Interfering with or influencing a bidding or competitive auction process.
- Entering into or amending a public contract in an illegal or illegitimate manner.
- Obstructing or hindering investigations or inspections by public agencies.

Violations of these laws will be subject to internal sanctions, in addition to any fines or penalties.

How to Act

Do not commit or help to commit any act of corruption or any other act prohibited by applicable legislation.

If you have any questions about whether an action may be illegal, or become aware of any action that violates the principles and conduct of this Code, **do not hesitate to talk to your supervisor or access the Ethics Channel.**

Remember that GOL's liability for acts of corruption will not exclude the responsibility of the involved individuals.



3.2.4 Our Partners and Suppliers

Our Principles

GOL prefers to do business with those who share our ethical principles.

Consequently, we have procedures for the prior vetting of suppliers and partners of greater risk.

Members must make clear to the business partners, public officials and others with whom they interact that the policies in this Code are expected to be followed.

These third parties should be made aware of the availability of the Ethics Channel (www.eticanagol.com.br) for reporting possible noncompliance.

How to Act

- Members that are active in (I) the acquisition of goods and services, (II) mergers, acquisitions and corporate restructurings, (III) the establishment of partnerships, or (IV) the granting of sponsorships and donations, must be diligent in verifying the non-existence of irregularities or unlawful acts on the part of third parties, so that GOL's reputation and legal responsibility are not negatively affected. If you become aware of such a situation, immediately inform your supervisor or Compliance.

For more information, see the Supply Policy and the Sponsorships and Donations Policy.

See more information in the Anti-Corruption Policy.

The full text of Federal Law No. 12,846, dated August 1, 2013, known as the "Anti-Corruption Law" of Brazil, is available at www.planalto.gov.br/ccivil_03/_ato2011-2014/2013/lei/l12846.htm, and the Foreign Corrupt Practices Act ("FCPA") is available at <https://www.justice.gov/criminal-fraud/statutes-regulations>.



3.2.5 Our Books and Records must be Accurate

Our Principles

Our operational, financial, and accounting records must precisely, completely and faithfully reflect the transactions being registered.

Assuring accurate and complete operational, financial and accounting records is the **responsibility of all members**.

How to Act

- Insist on the accuracy of all operational, financial and accounting records of the Company. This is to be interpreted broadly, and includes expense reports, punctuality records, schedules of hours worked and the like.
- Ensure that all reports to tax and regulatory authorities are clear, accurate and timely delivered.
- Never falsify any documents.
- Do not tolerate attempts to evade tax or currency laws or regulations.
- Ensure that all contracts under your management are up-to-date, reflect the reality of the underlying transaction and are properly filed with all evidence of their performance.
- Deal with auditors in a helpful and forthright manner, ensuring access by them to all relevant records, documents and other information.





CODE OF ETHICS

GOL



4.

OPERATIONAL SAFETY

Safety is our number one Value and guides all our actions. Members must pay close attention to our safety principles and strictly comply with all applicable safety norms.

Our Premises

- The Safety of our members, Customers, and assets is our highest priority.
- Every member must follow the policies that assure our operational, personnel and asset Safety.

How to Act

- Pay attention. If you see anything that compromises Safety, speak up.
- If supervisors are alerted to a problem, they must deal with it immediately by using our Safety tools.

- In case of a Safety event, incident or error, immediately inform your superior or operational Security (by the AQD Portal).

For specific information about Information Security, see section 6.3 Data Security.





CODE OF ETHICS

GOL



5.

OUR RELATIONSHIPS

GOL interacts with a wide range of the population: Customers, shareholders, Employees, suppliers, public agencies and communities. All our decisions and actions affect these various segments.

We must treat everyone with respect, honesty and transparency, and preserve the dignity and privacy of all we affect.

Ask yourself:

- Am I following GOL's Values?
- If reported in the media, would my conduct hurt GOL's reputation?

Before acting, stop and reflect for a moment about whether those with whom you are dealing may feel disrespected in some way. If so, try another way. Pretend you are a spectator observing the situation: what would your reaction be?



5.1 Inclusion and Diversity

Our Principles

We are the same because we are all different.

Diversity is at the core of our *Way of Being and Doing* and we constantly seek to be respectful in our relationships.

Our *Way of Being and Doing* is intended to promote an inclusive environment where people can do what they enjoy and be recognized and compensated for the different ways they contribute.

How to Act

- Help build an environment of inclusion and partnership, where everyone feels respected, regardless of social condition, ethnicity, religion, age, gender or sexual orientation, region of origin, physical or intellectual limitations, marital status, physical characteristics, philosophical or political convictions, etc.
- If you know of any situation involving our members that violates the principles of inclusion and diversity, you should report it to the Ethics Channel: www.eticanagol.com.br.

5.2 Relations with Customers

Customers are our reason for being.

Excellent relations with Customers is something we constantly strive for and do so with enthusiasm and care.

This is our *Way of Being and Doing*: serving effectively and pleasantly is how we become the Customer's top choice.



Our Principles

- Courtesy, empathy, and respect: these behaviors are essential to provide our Customers a positive experience.
- We do not trick or mislead Customers into buying our products or services.
- We are constantly striving to improve the quality of our services and our Customer relations.
- All interactions with the consuming public must follow our Customer-service guidelines, rules and regulations.

How to Act

- Serve the Customer quickly and effectively. Seek information that will lead to solutions. Provide speedy, clear, precise and transparent service.
- Identify the Customers' needs and then meet them. Commit to offering helpful, innovative and quality services, always with the highest attention to the Safety of our Customers.
- Do not allow your particular circumstances or opinion to affect your service to the Customer.
- Do not accept a gratuity for any reason.
- Do not use or disclose any Customer-related data (telephone number, email address, credit-card information, etc.) for any non-GOL purpose.
- Promote, in your relations with Customers, an inclusive, respectful, tolerant and non-discriminatory environment.

5.3 Relations with Shareholders

Shareholders are those who invest their capital in GOL.

We must relate responsibly with, and be accountable to, our shareholders and by extension, also to market analysts and regulatory agencies, domestic and foreign.



Our Principles

- Relations with the shareholders must be based on our corporate governance policies. We should provide consistent, clear, precise, and complete information about our Company.
- Any market-sensitive information (for example, financial projections or strategic plans) may be disclosed only by the Investor Relations area.
- All our financial statements must present fairly our Company's financial condition and should be disclosed in a timely manner.
- We protect the confidentiality of our shareholders' information.
- Our Board of Directors monitors the Company's management, sets GOL's strategic direction and continuously evaluates business risk management.

Applicable laws clearly state that we may not benefit or benefit others by using privileged non-public information in the purchase or sale of shares. It is thus essential that we maintain the confidentiality of all privileged information we have access to.

How to Act

- Do not transmit to third parties any non-public information that might affect our share price.
- Do not use material non-public information in the purchase or sale of the Company's shares.
- Do not trade GOL's shares in the periods when doing so is forbidden by the Company. In case of doubt, contact the Investor Relations area.



5.4 Relations with Employees

We are the best Brazilian aviation Team.

We are the Team of Eagles, and transparency in relations with other members is the starting point for the creation of an environment of credibility, trust and integrity.

We promote an inclusive environment of mutual respect and discriminatory or intolerant attitudes will not be tolerated.

Our Principles

- All information related to the Company's decisions and business intended for our Employees must be conveyed via GOL's channels of communication.
- We do not allow hiring or contracting that could affect supervisor/subordinate relationship or generate a conflict of interest.

How to Act

- Comply with labor laws, collective-bargaining agreements and the relevant regulations of the Company.
- Do not use or allow your workplace to be used for non-GOL commercial purposes.
- Use email and communications systems responsibly and thoughtfully. Avoid offensive, disturbing, obscene or discriminatory language or images, and do not use our systems for personal business interests or to engage in any illegal act.



- Promote an inclusive environment, avoiding any attitude that discriminates on the basis of sex, ethnic origin, religion, social class, age, sexual orientation, physical disability or any other factor. Be aware of what you say and do and the impact on others.
- Accept, respect and treat everyone equally. Be courteous, cooperative and considerate, regardless of the nature of the other's job (i.e., seniority or area).
- GOL guarantees the right to join a labor union and the right to collective bargaining, recognizes the representatives of your labor union as your legitimate representatives, maintains a constructive and respectful dialogue with these representatives and gives priority to collective bargaining as the preferred mechanism for dealing with labor issues.

5.5 Relations between Employees

We spend a good part of our day in the work environment involved in work-related routines and so have repeated and numerous interactions with many others in the Company.

These relations are often close and can become personal. We consider this to be natural and healthy. But in any type of relationship, it is important to keep our personal interests from negatively affecting the interests of the Company or interfering with the work we are all expected to perform.

Our Principles

- **There can be no direct supervisor/subordinate between Employees who have marital, romantic or familiar ties or are otherwise in a long term relationships.** This principle is vital to the appearance of impartiality and to our image. An Employee who is or might come to be in such a situation must report it to his or her supervisor, who will evaluate the matter and inform the Ethics Channel on how it is to be handled.



It should be noted that, as Employees, we must maintain a correct and respectful attitude in our interactions with those we deal with (Employees, Customers, suppliers, partners, etc.), even when personal ties exist.

- The rule does not apply to cases in which there are ties between Employees with no direct supervisor/subordinate relationship, provided there is no conflict of interest. Nevertheless, Employees must inform their supervisors of any such ties. The supervisor must then evaluate the matter and report it to the Ethics Committee.
- The Ethics Committee will evaluate cases of potential conflict of interest that might have an adverse effect on the Company.
- GOL cultivates a constructive environment, and there is no room at GOL for aggressive, intimidating or offensive behavior. GOL does not tolerate any abusive behavior, such as pressuring Employees to render services of a personal nature, harassment, sexual or otherwise, public humiliation, veiled or explicit insults and threats, or any type of retaliation.

How to Act

- Preserve transparency by reporting a covered relationship to your supervisor, who will evaluate the matter and report it to the Ethics Committee.
- Always keep your professional responsibilities above all personal interests or any relationship with other Employees.

Remember: the Ethics Channel is always at your disposal in situations that you may feel uncomfortable discussing with your supervisor.

For further information, consult the Conflict of Interest Policy.



5.6 Relations with Suppliers and Partners

Suppliers and partners are important to our business; all our contacts with them must be conducted ethically and respecting applicable laws and GOL's policies.

Our Principles

- Suppliers are the companies from whom we acquire goods or services. Partners are other companies, such as, for example, those we enter joint ventures with or that we may acquire.
- The selection and contracting of suppliers and partners must be based on technical, professional and ethical criteria.
- In relation to suppliers, we must always consider the best offers, taking into account the cost, delivery time and quality.
- We have a commitment to our suppliers to be transparent in contracting and purchasing, to treat them with respect, without favoritism or discrimination of any kind, regardless of the volume of business they may have with us.
- We must check the backgrounds of potential partners and be on watch for any conflict of interest, as contemplated by GOL's internal policies.
- Any gift or courtesies received from suppliers or partners must conform to the applicable policies previously described.
- Contracting with suppliers or negotiating with partners in situations involving conflict of interest is expressly prohibited. Please see the Conflict of Interest section.



How to Act

- You may only deal with suppliers or partners who conduct their business properly and comply with all the legal labor, environmental, health and safety requirements, who have a good reputation in the market, respect and protect human rights, fight child and slave labor, criminal prostitution and sexual exploitation of minors, and do not use child — or forced — labor. Please remember that GOL may be held liable for the actions of its suppliers and partners.
- You may not accept any payments, gifts or other courtesies of any kind or value from suppliers in exchange for commercial advantages or benefits.
- Always maintain a respectful relationship with suppliers and partners, and refrain from attitudes or conduct that may offend or be reputationally damaging to them.

Should you identify a conflict of interest between Employees, suppliers and partners, report it to the Ethics Channel.

For further information, see the Conflict of Interest Policy.

5.7 Relations with Competitors

Competition is healthy, so long as it is fair.

Our Principles

- Our interaction with our competitors is based on fair competition practices. Predatory or dishonest behavior and practices and other violations of anti-trust laws are not permitted.
- The Company does not allow its Employees to be employed by or



provide services to our competitors or to any other company whose objectives conflict with ours.

- Members must always respect the work of our competitors, and refrain from making misleading statements about their products and services.
- We do not tolerate bad faith business practices, economic espionage or misappropriation of competitors' confidential information.

How to Act

- Treat all information relating to competition with discretion, refrain from discussing topics that reveal our strategic differences, such as pricing policy, contract terms, costs, marketing, market research and new services or products.
- Do not disclose personal and banking information of our Customers and members to other companies. Members who access the personal information of Customers may only use that information in-house and only as expressly permitted by our policies.

5.8 Relations with the Media

The media performs an extremely important role in the formation of public opinion and our relationship with the media must be ethical and professional.

Our Principles

- We are transparent with the media, making available to them all the information relevant to our business and our activities.
- We respond candidly to media inquiries, but always keeping in mind the importance of safeguarding confidential information.



- Our relations with the media are based on a constant dialogue marked by honesty and fairness.

How to Act

- Members may not grant interviews or give any information to the media without the prior approval of the Corporate Communication area.
- Assure that suppliers do not disclose, without prior approval of the Corporate Communication area, any Company project they might be involved with.

5.9 Relations with Social Media

Social media plays an extremely important role in our business and in the shaping of public opinion.

A member using social media must remember the social media environment is public, and the message content may adversely affect GOL's reputation or its dealings with the public, even if the member does not purport to be a company spokesperson.

Bear in mind that messages on social media can harm GOL's reputation or affect its dealings with the public. **Therefore, use social media and networks prudently, ethically and respectfully.**

Our Principles

- Avoid expressing your opinion on social media, if you might in some way be seen to embarrass, offend, criticize or otherwise denigrate GOL, its members or any group of the public at large.



How to Act

- Do not disclose any information or document unless expressly authorized to do so.
- Respect the opinions of other users, even when they are different from yours.
- Do not respond on behalf of the Company to comments, provocations or questioning by other users.
- Interact in a respectful and cordial manner.

5.10 Relations with the Community and the Environment

GOL prides itself on being part of the communities where it is present and on being an active and concerned participant.

To meet the expectations of the other members of these communities, GOL seeks to proactively and creatively contribute by its commitment to sustainability, social and economic fairness and environmental responsibility.

Our Principles

- We support social projects designed to improve and develop the community we are a part of.
- Our members, as the creators of GOL's history, are encouraged to exercise their citizenship through volunteering and being proactive in their communities.

How to Act

- Always conduct your activities so as to minimize any negative impacts to the environment, society and the economy.



- Act respectfully towards the communities we are a part of.
- Do not act in the name of the Company without the formal authorization of the Sustainability area.
- Immediately report to your supervisor accidents, incidents, practices or behavior that might cause environmental risks or damage, so that appropriate action may be taken.
- Verify how sponsorships or donations may be offered in line with GOL's internal policies.
- Actively participate in activities that meet the Company's social objectives, such as volunteering, always in accordance with GOL's policies and with the approval of your supervisor.

5.11 Relations with Public Agencies

We insist on the highest level of integrity in our relations with public officials.

Our Principles

- Public officials are those individuals connected, directly or indirectly, to a public agency, due to their employment or the position they occupy therein, even if not remunerated or only temporary. We also consider candidates to public office and officers of political parties to be public officials.
- A public agency is any department, agency or office of the legislative, executive and judicial branches of government, as well as the military forces in Brazil and abroad, whether federal, state or municipal. Also included are companies owned or controlled by the government, companies that are public-service concessionaires or authorized to provide public services, international public organizations, and other politically-exposed entities, such as labor unions.



- Public agencies, such as ANAC, Infraero, the Internal Revenue Service and ANVISA must be treated professionally and respectfully. Whenever requested, we will provide relevant information, data and records, as required by law.
- Contracts and arrangements entered into with the government must be in strict compliance with all applicable laws and regulations.
- No member may, under any circumstances whatsoever, offer anything of value in exchange for facilitating or expediting the services of government authorities.
- No member may promise, offer or give gifts or courtesies to public officials who are in a position to make a decision in favor of GOL, even if otherwise permitted by GOL's internal policies. Examples include negotiation of a public contract, an inspection, or when applying for a license.

Be alert to situations of risk that might require analysis by Compliance, such as, for example:

- Public officials scheduling meetings at locations not commonly utilized for business, requesting "commissions", donations to institutions indicated by them, favors or gifts which could influence the making of a decision relevant to GOL, or offer of "help" during inspections and controls or in expediting requests.

More details about the relationship with public officials can be found in the **Anti-Corruption Policy** and in the **Gifts and Entertainment Policy**.



How to Act

- Follow strictly all applicable laws and regulations.
- Establish an ethical, transparent and truthful relationship with the public agencies we deal with.
- Do not embarrass, offend, criticize and/or otherwise denigrate the public agencies we deal with.
- Inform Compliance of any improper requests, either direct or indirect, made by public officials.





CODE OF ETHICS

GOL



6.

OUR INFORMATION AND PROPERTY

All of GOL's tangible and intangible resources as well as those directly and indirectly utilized in activities are considered Company information and property.

Among these resources are the following:

- Our image, reputation and intellectual property.
- Equipment.
- Communication devices, technology resources, smartphones, tablets, etc. and software.
- Real estate, facilities and vehicles.
- Office material and equipment.
- The Company's financial resources.
- GOL's non-public information, including financial, operating and business information, internal reports and documents.
- Products, advertising and publicity material, etc.

6.1 Advertising and Publicity

Our Principles

- All our publicity must reflect the honesty and integrity of our policies and practices.



- All marketing must comply with the principles established in this Code and must not, under any circumstances, convey any defamatory, discriminatory, false or incorrect information.

How to Act

- Report to your supervisor publicity of the Company that violates the principles established in this Code.

6.2 Corporate Resources

All members and service providers are responsible for the use, maintenance and protection of the resources we use, whether we or others own them.

Our Principles

- All of GOL's installations, vehicles, equipment, documents, trademarks, machinery, technology, concepts, methodologies, know-how, materials, furniture, information, business strategies, plans, research products, systems, inventions and technical and intellectual material are considered GOL's corporate resources.
- The use of GOL's corporate resources, such as corporate computers and cell phones, must be in a responsible and conscientious manner, preferably for professional purposes and never in violation of GOL's objectives and Values or the provisions of this Code.
- Internet websites, as well as GOL's email messages, sent or received, are also the property of the Company. Their use may be constantly monitored, and their contents are not personal or private.



- Allowing access to electronic websites and addresses is at the discretion of the Company, according to the business needs of each department. Therefore, the utilization of tools that enable access to sites not made available by the Company is prohibited.
- Our buildings and structures must provide a safe and healthy work environment in compliance with our workplace policies.

How to Act

- Protect the Company's resources as well as those of the agencies we deal with (Infraero, ANAC, and others), from loss, theft and or vandalism.
- Guarantee the confidentiality of the members' personal records.
- Do not use corporate access to the internet for outside business or unethical or prohibited activities.
- Use email properly. The dissemination of offensive or incendiary messages, chain messages and the disclosure of strategic or financial Company information, is a very serious offense.

The utilization of GOL's work tools, corporate email, trademarks or other GOL symbols **to obtain a personal advantage**, financial or otherwise, **is prohibited**.

- Protect the "GOL" brand, evaluating whether or not its use in a particular way can affect the Company's image, and take special care in situations in which you are identified with GOL as, for example, when wearing a GOL uniform or GOL ID card, as well as in your postings or comments on social media.



6.3 Data Security

It is essential that we all do our part to ensure that the Company's information is duly protected and cannot be improperly accessed.

Our Principles

- All work-related data and documents are confidential, unless previously made public by GOL.
- Our information is an asset that requires the special protection specified in GOL's Information Security Policy.
- The use or disclosure of our Customers' personal (including banking) information and that of our members, is prohibited. Members who access the personal information of Customers and other members may only do so for business reasons.
- Computer and system passwords are personal and confidential.

How to Act

- Use of non-strategic information about GOL for academic purposes is permitted, but only if **previously authorized by vice-president responsible for the area such information would come from**.
- Documents may not be disclosed, unless duly and formally authorized by the executive responsible for the affected area.
- Avoid discussion of work-related matters in public areas, such as on planes, at gate check-ins, elevator etc.
- Do not share your passwords with other members or third parties, as their access and use are your responsibility. If access by another Employee is necessary, consult your supervisor or the IT area.
- Do not make copies of software or any confidential documents on Company computers.





CODE OF ETHICS

GOL



7.

THE RIGHT PATH – ETHICS AND COMPLIANCE PROGRAM

THE RIGHT PATH – Ethics and Compliance Program are the actions the Company takes to foster and encompass an Ethical Culture among Employees and others.

Its purpose is to detect, prevent and respond to the risk of corruption, bribery and other behavior contrary to our Values.

The elements of this initiative are:

1. Top Management's commitment.
2. Ongoing evaluation and management of the Company's risks.
3. A structure that is independent and exclusively dedicated to ensuring THE RIGHT PATH.
4. Structuring of appropriate internal policies, procedures and controls.
5. Developing and carrying out training and engaging in constant communication around ethics and compliance. Our goal is to reinforce our Ethical Culture and the effectiveness of our controls.
6. Monitoring and auditing tools to identify weak points and deviations.
7. Independent communication channels and investigation processes to discover and evaluate violations.
8. Continuous updating and improvement of initiatives.



THE RIGHT PATH – Ethics and Compliance Program is coordinated by the Executive Director of Corporate Risk and Compliance, who reports directly to the President and has independent access to the Audit Committee and Board of Directors.

Compliance is mainly responsible for the execution of THE RIGHT PATH – Ethics and Compliance Program. It also refers issues related to ethics and conduct to the Ethics Committee.

The structure and functioning of the Ethics Committee are regulated by its Internal Regulation, which was approved by the President and the Audit Committee, to whom the Committee reports.

The Ethics Committee members are:

- Chief Internal Audit;
- Chief Legal Officer;
- Chief Corporate Legal Officer;
- Chief People and Culture (Human Resources) Officer;
- Chief Corporate Risk and Compliance Officer;
- Other members of the Directorate level who can be appointed.

The Ethics Committee's main responsibilities are:

- To promote, directly or indirectly, by raising awareness through dialogue and event, the dissemination of the principles of the Code.
- To ensure that the communications channels are working well, that reports received are kept confidential, and that the good faith reporting persons, are protected.



- To evaluate violations of the Ethics Code and resolve ethics-related issues.
- To interpret the Code of Ethics.

THE RIGHT PATH – Ethics and Compliance Program applies to all of us and its success depends on **all of us being engaged**, following our Values and contributing to the effectiveness of the Program.





CODE OF ETHICS

GOL



8.

THE ETHICS CHANNEL

We encourage all to report concerns, doubts and suggestions, without fear of retaliation for good-faith complaints.

We are all responsible for having successful interpersonal relations and following the Company's rules and procedures.

We are the best brazilian aviation Team, intensely engaged and fully aware of the processes and tools available to us for our work and for our Customers.

Therefore, should you become aware of (I) an act that violates our principles or standards of behavior, **or (II)** a weak point, failing or error, regardless of the area, **please report it to your superior.**

If you feel uncomfortable doing so or have already done so but the issue has not gone away, please contact the Ethics Channel.

Our official channel of communication is:

By the internet: www.eticanagol.com.br. Your report will be received by an outside, independent company, guaranteeing absolute integrity and confidentiality.



After receiving the report, the Ethics Channel will:

- 1.** evaluate the report and forward to management those that are not related to Code violations;
- 2.** determine how to deal with the report;
- 3.** investigate the reported facts;
- 4.** submit a report of the investigation's results and recommendations to the Ethics Committee.

The reporting person, **may monitor** the processing of the report via www.eticanagol.com.br using the protocol number.

The Committee will communicate to the reporting person as soon as possible, the Committee's solution.

In all cases, the confidentiality of the reporting person shall be maintained by the Ethics Channel.

GOL encourages good faith reporting, even if based merely on suspicion or uncertainty. The reporting person will be anonymous. GOL prohibits and punishes any type of retaliation against a good faith reporting person.

Complaints of fraud involving management shall be forwarded to the Audit Committee.

It should be noted that matters outside the scope of the Channel, such as facilities, procedures, hiring, benefits, work schedules and other management-related topics must be referred to your supervisor. If these matters are raised in the Ethics Channel, they will be forwarded to the relevant management personnel, but maintaining confidentiality as to the reporting person.



Reports must be truthful, respectful, and free of offensive or abusive language. Inappropriate use of the channel is grounds for disciplinary measures.

Remember, knowingly using the Ethics Channel to communicate false information is a violation of this Code.

Bad faith use of the communication channel will result in disciplinary action. A report that is clearly intended to unfairly benefit or harm another member is in bad faith.





CODE OF ETHICS

GOL



9.

RELATED POLICIES

This Code is not meant to address all issues or to cover all of the Company's internal procedures, but rather, to provide guidance on our Ethics and Values.

For further information regarding the topics dealt with in this Code, see the following, all of which are on our website:

Conduct Manual

Anti-Corruption Policy

Conflict of Interest Policy

Transactions with Related Parties Policy

Gifts and Entertainment Policy

Sponsorships and Donations Policy

Policy for the Contracting of Employees

Purchasing Policy

If you have any questions, please contact the **Ethics Channel**.



10.

MISCELLANEOUS

This Code is effective as of its publication and shall remain in effect indefinitely, subject to periodic updating.

Any crime committed by a member in the context of his/her relationship with GOL, even if not expressly addressed in this Code, shall be considered a violation of this Code.

This Code and other information about THE RIGHT PATH – Ethics and Compliance Program are available on:

www.eticanagol.com.br.





CODE OF ETHICS **GOL**



CODE OF ETHICS

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THE RIGHT PATH 
ETHICS AND COMPLIANCE

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