

**RUMO CERTO** ➤  
**ÉTICA E COMPLIANCE**

# **Conduct Guidelines for Third Parties in Relation to GOL**



These Guidelines of Conduct for Third Parties in their relationship with GOL ("guidelines") complement GOL's Code of Ethics with the purpose of regulating the ethical conduct of Third Parties in their relationship with GOL.

These guidelines are also intended to formalize GOL's firm commitment to act ethically and make public its repudiation of corruption of any kind. The commitment to ethical conduct and to compliance mechanisms to inhibit and punish deviations is an essential factor for the Third Parties to maintain partnerships with GOL.

For the purposes of this document, Third Parties are the representatives, suppliers of goods and services, business partners, outsourced or subcontracted workers, any other natural or legal persons and other entities or individuals with whom GOL relates in its activities or uses the Company's name.

GOL's Members are understood as all Employees, at any hierarchical level, the Statutory Committees, the Fiscal Council, the Board of Directors and its Shareholders, in the exercise of their functions or attributions.



## SUMMARY

<b>1. INTRODUCTION .....</b>	<b>4</b>
<b>2. APPLICATION AND RESPONSABILITIES .....</b>	<b>4</b>
<b>3. ETHICS IN OUR RELATIONSHIPS.....</b>	<b>5</b>
3.1 CONFLICTS OF INTEREST .....	5
3.2 COMBAT CORRUPTION .....	5
3.3 GIFTS, PRESENTS AND HOSPITALITIES .....	7
3.4 DONATIONS AND SPONSORSHIPS.....	8
3.5 REGISTERS TRANSPARENT.....	9
3.6 ANTITRUST AND FAIR COMPETITION .....	9
3.7 INCLUSION AND DIVERSITY.....	9
3.8 HUMAN RIGHTS AND LABOR .....	9
3.9 HEALTH AND SAFETY .....	10
3.10 ENVIRONMENT AND COMMUNITY .....	10
3.11 RELATIONSHIP WITH COMPETITORS .....	11
3.12 TRANSACTION WITH RELATED PARTIES .....	11
<b>4. COMPANY INFORMATION AND ASSETS .....</b>	<b>12</b>
4.1 CORPORATE RESOURCES .....	12
4.2 INFORMATION SECURITY AND INTELLECTUAL PROPERTY .....	12
4.3 PRIVILEGED INFORMATION.....	13
4.4 RELEVANT INFORMATION PROVISION .....	13
4.4 PERSONAL DATA PROCESSING .....	13
<b>5. COMMUNICATION AND ENGAGEMENT CHANNELS. ERROR! BOOKMARK NOT DEFINED.</b>	
5.1 ETHICS CHANNEL.....	14
5.2 GOL INSTITUTE AND VOLUNTEER PROGRAM.....	14
<b>6. FINAL DISCLOSURES .....</b>	<b>15</b>

# 1. Introduction

**Dear Third Party,**

GOL's relations are based on principles that sustain a culture focused on valuing people, compliance with guidelines and regulations and the permanent search for development.

For this reason, we invest in education and actions that strengthen the principles of our Culture, as well as adopting policies and practices to prevent and combat corruption, discrimination, harassment, and unworthy working conditions, such as child or forced labor.

GOL Linhas Aéreas, committed to accessible, human, simple and intelligent communication, recognizes the importance of establishing constructive and continuous engagement with all our suppliers and third parties, as well as other stakeholders. We understand that strengthening ethical and transparent relationships is not just a choice, but an imperative for responsible and effective ESG (Environmental, Social and Governance) management. For this reason, this document serves as a guide to our strategic approach to engaging with stakeholders, reflecting our constant quest for excellence in sustainability and corporate governance.

## 2. Application and Responsibilities

GOL prefers to relate to Third Parties that conduct their activities according to ethical principles similar to its own.

This document applies directly to all representatives, suppliers of goods and services, business partners, outsourced or subcontracted workers, any other natural or legal persons and other entities or individuals with whom GOL relates in its activities or uses the Company's name, which together are called "Third Parties. The Third Party is not allowed to subcontract services without GOL's prior written authorization.

In their relationship with GOL, Third Parties are responsible for complying with these guidelines as well as with the legislation applicable to their area of activity, other Company rules that are applicable to them and the contractual terms that have been entered.

## 3. Ethics in our Relationships

The GOL Way of Being and Doing (O Jeito de Ser e de Fazer) is supported by behavior with integrity and ethical conduct. These attitudes or behaviors connect us to the purpose of being the First for All.

Thus, GOL undertakes to conduct its activities in a respectful, transparent, safe, responsible, inclusive and equal manner, free from conflicts of interest and consistent with our Values and expects its partners to do the same.

### 3.1 Conflicts of Interest

Conflicts of interest are situations in which the private interests of the individual or of someone related to him/her may override the Company's interests. In other words, they are situations in which, by acting or not acting, the individual can benefit himself, his family members, or others of his relationship.

GOL considers that individuals have personal ties when there are family or intimate ties between them that may have, or appear to have, influence in decisions of a professional nature, such as marriage, stable union, engagement, sponsorship, or dating.

The simple appearance of a conflict of interest can be negative to GOL's image or to that of the Third Party. For this reason, GOL's Third Parties are expected to disclose the personal connections that their employees have with Company Members to mitigate possible situations of conflict of interest.

### 3.2 Combat Corruption

GOL is against corruption in all its forms and seeks to ensure the highest level of integrity and ethics in its activities. In this sense, the Company is committed to the applicable Anti-Corruption Legislation<sup>1</sup> and has adopted the Rumo Certo (Right Way) - Ethics and Compliance program, which aims to foster, among others aspects, a culture of integrity, as well as preventing and mitigating risks of non-compliance with this Legislation and being accountable for them.

GOL expects that Third Parties will also adopt the necessary mechanisms and controls, adapted to their own risks, to ensure compliance with applicable anti-corruption regulations.

Thus, no Third Party is allowed to practice any type of bribery, promising, offering, requesting or accepting, directly or indirectly, advantages that have or appear to have the intention of influencing a decision, or that aim only at the facilitation of services, even if it is to favor GOL.

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<sup>1</sup> The concept of Anti-Corruption Legislation includes Law 12.946/13 and the legislation that regulates it, as well as the US Foreign Corrupt Practices Act (FCPA) and other applicable legislation on the subject.

In addition to bribery, GOL also condemns the practice of other acts prohibited by the Anti-Corruption Law, such as causing damage to the competitive nature of any bidding procedure, defrauding public contracts, obstructing or hindering investigations or inspections by Public Agencies, using Third Parties to conceal their true interests or identity or in any way supporting any of these acts.

### 3.2.1 Joining the Global Compact

GOL's integration into the United Nations Global Compact represents a significant milestone in our commitment to the (Environmental, Social and Governance) agenda. Being a signatory to this cause reinforces the company's determination to contribute to a fairer and more sustainable world by engaging with international standards of corporate governance and the universal principles of the United Nations (UN): Human rights, decent work, the environment, and the fight against corruption.




Aligning the principles of the Global Compact with the Sustainable Development Goals allows GOL to identify the key areas where the best ESG solutions can be implemented. By adhering to the agenda and focusing on issues such as gender equality, carbon offsetting and diversity, equity and inclusion actions, based on the educational pillar, GOL stands out and defines what it believes to be the guiding line for all actions that impact its stakeholders.

The engagement of the entire Eagle Team with GOL's values and principles, as well as those of the Global Compact, is essential for consolidating a corporate culture focused on its entire production chain. By understanding and embracing social and environmental responsibility initiatives, Employees strengthen the Company's positive impact and create a more ethical and collaborative work environment.


The alignment of the Team of Eagles with GOL's ESG goals, including knowledge of the Code of Ethics and the Manual of Conduct, is a vital element for the Company's success and sustainability. Let's get on board!

See below the ten principles of the United Nations Global Compact:

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01 Companies must support and respect the protection of internationally recognized human rights.

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**DIREITOS HUMANOS**
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02 Ensure that they do not participate in violations of these rights.

03 Companies must support freedom of association and the effective recognition of the right to collective bargaining.

04 The elimination of all forms of forced or compulsory labor.

05 The effective abolition of child labor.


06 Eliminate discrimination in employment.

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07 Companies should support a preventive approach to environmental challenges.

08 Develop initiatives to promote greater environmental responsibility.

09 Encourage the development and dissemination of environmentally friendly technologies.

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10 Companies must combat corruption in all its forms, including extortion and bribery.

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**ANTICORRUPÇÃO**

### **3.3 Gifts, Presents and Hospitalities**

GOL values its Third Parties and establishes cordial and trusting relationships with them, and it is common in its business relationships to exchange courtesies such as gifts, presents and hospitalities. These are offered or received as a simple cordiality and with no intention of influencing business decisions.

We consider gifts or presents to be those items that we offer in the context of our activities, as cordiality of only symbolic commercial value and with no intention of influencing decisions.

Hospitalities are also offers, but related to entertainment or technical events, meals, airfare, lodging, or tickets.

Thus, GOL Members can offer or receive courtesies, as long as they observe the following rules:

- whether in the scope of business relationships.
- do not appear to have or aim to influence those who receive the courtesy, therefore they should not be offered in a period close to or immediately after the award or renewal of the contract with GOL;
- are not of excessive value, being considered of excessive value any courtesy received or offered to private entities of a value above 1/3 of the national minimum wage;
- are not offered in excessive frequency, being considered excessive frequency the receipt/offering of courtesy when the sum of the value of the different items, considering a period of six months, is higher than the established limit value;
- are not in cash or any other medium readily convertible into kind/ in specie;
- are not inappropriate.
- Courtesies offered by Third Parties to Company Members that do not comply with the above rules will be returned or forwarded to GOL's Compliance area so that their destinations can be defined. <sup>2</sup>.

#### **3.3.1 Offering/receiving courtesies involving Public Agents**

The offering or receiving of courtesies from Public Agents is allowed on GOL, provided that:

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<sup>2</sup> Except for exceptions previously analyzed by GOL's Compliance area.

- comply with the Company's requirements and guidelines, presented on the previous page;
- are limited to the value of R\$ 100.00 (one hundred reais);
- do not have, nor appear to have, the objective of influencing a decision that impacts GOL;
- are not offered at a time that is known to be close to the decision making by the Public Agent;
- are in accordance with the norms applicable to that Public Agent.
- Institutional models of up to 20cm are allowed;
- The offering of tickets or invitations to entertainment or technical events to Public Agents is subject to prior recommendation by the Compliance area

### **3.3.2 Tehcnical Events**

GOL Members may participate in technical events at the invitation of Third Parties when these are in the scope of normal business development and whenever such invitation is, cumulatively:

- justifiable by reason of the position or function occupied by the guest;
- performed and offered with transparency and formality;
- addressed to the Member, without participation of family members;
- offered only for the duration of the event.

Third Parties are not allowed to promise or offer any courtesy to other entities, on behalf or in the interest of GOL, with the exception of cases authorized in writing by the Director of the contracting area, provided that GOL's rules related to the offering of gifts, presents and hospitalities are followed.

Courtesies that the Third Party receives from other entities with which it relates in the scope of the execution of the contract with GOL are subject to the rules defined above or any other rules to which the Third Party is subject, if these are more restrictive.

If a GOL Member requests any type of gift, present or hospitality, or any other personal benefit, consult the Company's Compliance area beforehand by e-mail at [compliance@voegol.com.br](mailto:compliance@voegol.com.br).

### **3.4 Donations and Sponsorships**

Donations and sponsorships are those granted by the Company to initiatives with which GOL identifies and that meet internal criteria.



GOL does not make political donations and does not allow any Third Party to make donations on behalf and/or in the interest of GOL.

Donations and sponsorships are not offered with the intention of influencing decisions or if they are in disagreement with the Values and guidelines of GOL's Code of Ethics.

### **3.5 Registers Transparent**

To ensure the transparency and legitimacy of transactions, any operational, financial and economic records arising from the relationship with GOL must be made and kept accurately, completely, reflecting the veracity of the transactions performed and made available upon request.

### **3.6 Antitrust and Fair Competition**

GOL respects and expects its Third Parties to also respect all antitrust and fair competition laws and regulations and to refrain from entering into agreements with competitors, implicit or explicit, to fix prices, allocate markets, limit capacity or weaken any competitor in the competition process.

### **3.7 Inclusion and Diversity**

Diversity & Inclusion are part of the Company's commitment and positioning and are reflected in our Culture, strategy, Code of Ethics and Team.

GOL works so that differences, more than being respected, are valued, free of explicit or veiled barriers, and thus boost our creative processes, team integration, the results generated, and the Company's positioning.

Thus, GOL expects its Third Parties to commit to non-discrimination of any nature in the workplace and to collaborate in building a more diverse and inclusive environment, where everyone feels respected, regardless of any characteristic, such as social condition, gender, ethnicity or color, religion, age, sexual orientation, region of origin, permanent or temporary physical or intellectual characteristics, philosophical or political convictions, diverse opinion, among others.

### **3.8 Human Rights and Labor**

GOL respects and expects its Third Parties to also respect all antitrust and fair competition laws and regulations and to refrain from entering into agreements with competitors, implicit or explicit, to fix prices, allocate markets, limit capacity or weaken any competitor in the competitive process.

GOL is committed to fostering human rights and supporting the communities in which we live.

Therefore, GOL expects its Third Parties to condemn and combat all forms of human trafficking and sexual exploitation, including prostitution and child pornography. Additionally, GOL requires its Third Parties to:

- Repress and monitor child labor or forced and compulsory labor;
- Commit to applicable labor laws, respecting standards related to minimum wages, working hours and other obligations provided for by law;
- maintain a working environment free of hostility, abuse and discrimination;
- do not participate in networks of human trafficking and sexual exploitation;
- Respect the right to freedom of expression and association;
- Commit to the practices and values of diversity, equity and inclusion in all its spheres;

### **3.9 Health and Safety**

Suppliers must provide and maintain a safe and healthy work environment, being forbidden to carry hazardous materials, explosives or weapons inside GOL's facilities.

The possession or use of illegal substances, alcohol and other intoxicating substances is also not permitted on GOL's premises or while conducting Company-related business.

### **3.10 Environment and Community**

GOL is a company that seeks to integrate itself into the societies in which it operates and work to mitigate the impacts on communities that may be affected by the Company's activities, products, services, decisions or performance.

The Company expects its suppliers to have guidelines that do not degrade the environment, and that comment on environmental crime among others and their activities and properties that are not in compliance with environmental legislation.

Thus, the Company expects its Third Parties to conduct their activities with the same premises (or similar premises in line with those proposed by GOL) always trying to minimize and/or eliminate negative impacts on the environment, society and the economy and acting in a respectful manner with all its partners.

Any social actions that the Third Party intends to support on behalf of the Company will only be recognized with formal authorization from GOL.

If, in their relationship with GOL, the Third Party causes accidents, incidents and/or conduct that may cause risks or environmental damage to the communities in which

they operate, they must promptly inform their focal point at GOL so that we can act to reduce the damage and mitigate the impacts.

Check item 5 to participate in GOL's engagement actions!

### **3.11 Relationship with Competitors**

GOL considers competition healthy, provided it is fair. Accordingly, the Company treats its competitors with respect, and predatory or dishonest behavior and non-compliance with the antitrust laws is not permitted.

Practices such as insider trading, omission of relevant facts, manipulation of good faith, economic espionage or obtaining or delivering plans and actions of our competitors are not part of GOL's policy.

### **3.12 Transaction with Related Parties**

Related Parties are the people or entities with which the Company has a relationship that makes it possible to negotiate under conditions other than those of independence that characterize transactions with Third Parties unrelated to GOL, for example, by having a corporate relationship with the Company.

Every Third Party that intends to relate to GOL must promptly inform us if it is a Related Party<sup>3</sup>.

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<sup>3</sup> The concept of Related Party must be understood as established in the legislation in force and includes the entity or person who:

- a) is a member of the same economic group as GOL;
- b) is under the joint control of the same third entity that controls GOL;
- c) is an affiliate of, or jointly controlled by, an entity that is a member of the same economic group as GOL;
- d) is under the joint control of a third entity and GOL is an affiliate of this third entity;
- e) provides, by itself or by any member of the group of which it is part, Key Management Personnel services to GOL or to GOL's parent company;
- f) is controlled, either individually or under joint control, by an individual or a family member or close relative of that individual, who:
  - g) has individual or shared control of GOL; or
  - h) has significant influence over GOL; or
  - i) is a member of the Key Management Personnel of GOL or its parent company.

The concept of Key Management Personnel should be understood as individuals who have authority and responsibility for planning, directing, and controlling the Company's activities, either directly or indirectly.

## 4. Company Information and Assets

The Company's information and assets are considered to be all of GOL's resources, tangible and intangible, which are directly or indirectly used for Company-related activities.

### 4.1 Corporate Resources

In their relationship with GOL, Third Parties are responsible for the use, maintenance and protection of the Company's assets or of the bodies with which they relate.

GOL's resources are facilities, vehicles, equipment, values, documents, brand, machinery, technology, concepts, methodology, know-how, materials, furniture, information, business strategies, plans, research, systems, inventions, technical and intellectual assets, among others.

GOL's resources to which a Third Party has access, for whatever reason, cannot be used for any purpose that has not been previously approved in writing by the Company.

Corporate Internet access, corporate e-mail or GOL's computers and other equipment may not be used for activities that are not related to the work to be performed with

the Company, including activities that are unethical, contrary to the Company's Values, inappropriate to the work environment, or prohibited practices, such as gambling or committing crimes.

It is not allowed to use work tools, corporate e-mail, brands or other symbols of GOL to obtain personal advantage, whether financial or otherwise.

### 4.2 Information Security and Intellectual Property

It is everyone's duty to make sure that the information belonging to GOL, its Members and Customers is duly protected and can only be accessed by formally authorized persons.

GOL expects its Third Parties to have Information Security programs in place to ensure the Security, confidentiality, integrity and availability of the information necessary to achieve business success.

GOL's documents may not be used outside the Company or disclosed without written authorization by the responsible directors.

Except as permitted by contract, the Third Party is forbidden to use GOL's intellectual property. The use of the name, brand or other information owned by GOL requires the Company's prior authorization.

GOL's intellectual property includes any material, non-public information, information subject to copyrights, its patentable innovations and inventions, trade secrets, and its business and service marks, including respective logos.

#### **4.3 Privileged Information**

In situations where the Third Party has access to privileged information, it is essential that confidentiality be maintained. It is not permitted to obtain benefit or benefit others by virtue of access to privileged information about the purchase or sale of GOL shares.

#### **4.4 Relevant Information Provision**

Whenever requested, GOL's Third Parties must make available the information related to their contracts with GOL. This information is critical to the safety of our passengers and clients, financial results and the transparency of our records. Because of this criticality, this information may be requested.

#### **4.5 Processing of Personal Data**

GOL expects all third parties to understand and comply with the Privacy Laws applicable to their activities, providing mature data protection and communication processes regarding the legitimacy of activities that process personal data, security incidents and reporting to regulators and data subjects.

GOL's personal data may only be processed in accordance with the provisions of a contract or formal authorization from the GOL Administration. If the third party, in an unexpected way, processes GOL's personal data without having a contractual provision or formal authorization from GOL Management, they must immediately inform GOL's Privacy department via e-mail [dpo@voegol.com.br](mailto:dpo@voegol.com.br).

The conduct of third parties in GOL environments must always preserve the privacy and intimacy of all customers, employees and suppliers involved in the relationship.

# 5. Communication and Engagement Channels

## 5.1 Ethics Channel

If you are in doubt about any of the guidelines or concepts contained in this document, do not hesitate to access GOL's Ethics Channel through the following means:

- Hotline: 0800 800 11 01, dedicated to receiving confidential reports and inquiries;
- Internet, on [www.eticanagol.com.br](http://www.eticanagol.com.br);
- Your report will be received by an external and independent company, which guarantees its integrity and absolute confidentiality.

GOL also encourages its Third Parties to report to the Ethics Channel their concerns, questions, and suggestions, as well as any situations of which they are aware that seem to be or are in disagreement with the rules contained in this document or in GOL's Code of Ethics.

Using the Ethics Channel to communicate information that the user knows is untrue is a violation of these guidelines.

## 5.2 GOL Institute and Volunteer Program

At GOL, we strive to establish and guide the Company's indispensable principles and values through initiative-taking and innovative attitudes, guided by ethics and transparency, in pursuit of equity in economic, social and environmental rights and duties. Our purpose is to raise awareness, encourage and promote the exercise of social responsibility with all our stakeholders. By developing social management with our stakeholders, we create an organizational culture conducive to internal and external social transformation.

Through the GOL Institute and the Volunteer Program, we have managed to broaden the company's role with the stakeholders in our business. We hope that our suppliers are aligned with this objective and we suggest that they share common premises, collaborating with those described above. To take part in some of the actions, our suppliers can follow GOL's social networks, the ESG tab on our website ([www.voegol.com.br](http://www.voegol.com.br)) or by e-mail at [institutogol@voegol.com.br](mailto:institutogol@voegol.com.br)

## 6. Final Disclosures

These guidelines aim to provide guidance on matters related to Ethics and Values that govern our activity. If there are other related issues that are not covered here, please contact the Compliance area or GOL's Ethics Channel.

Any crime committed by the Third Party in the scope of its relationship with GOL, even if not expressly provided for in these guidelines, will be considered a violation of them.

Further information about Rumor Certo - Ethics and Compliance is available at [www.voegol.com.br/pt/a-gol/compliance](http://www.voegol.com.br/pt/a-gol/compliance).

GOOL