



Code of Ethics and Conduct

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General Considerations

The Company's adoption of ethical and behavioral principles reflects the type of organization it is. Its respect for individual differences and the growing concern for social responsibility, where social and environmental and safety and health issues are embedded in the day-to-day business management, reflect its relationships with its partners and with society.

Each organization has its own standard of values. Therefore, it is fundamental that each partner reflects, so as to make their values compatible with the Company's cultural values. Everyone shall act in accordance with the Code of Ethics and Conduct in their relationship with customers, suppliers, government and society. It is important to mention that this Code does not replace the current legislation.

Whenever you are faced with what you think is a delicate ethical decision, ask yourself the following questions:

- ***Is it legal?***
- ***Is it ethical?***
- ***Do you agree with Corporative Culture?***
- ***Will it reflect well for me and my business?***

If the answer is "No" to any of these questions, do not adopt such behavior.

Letter of Administration

Dear Partner,

The credibility of our Company is a relevant and non-negotiable asset. It is based on our culture, ethical principles and the relationship between the Company and its various audiences. This relationship establishes expectations regarding our performance, quality and diversity. It also includes our commitment to always act with honesty, integrity, responsibility and respect. Therefore, we also believe that this is an essential asset for the growth of our Partners with B2W and society as a whole.

This Code of Ethics and Conduct is here to help all of us to follow the rules that we believe are paramount both within and outside the Company. The Code presents values and commitments that shall be shared by all stakeholders along our value chain. It is important that you read, understand, and refer to it frequently.

We count on your efforts to maintain the highest quality standards and ensure the best results.

Management.

Corporate Culture

B2W Digital Corporate Culture is present in each of our actions: it is our “way” of being and doing things. Among the main characteristics of our Culture are results orientation, meritocracy and customer appreciation. Our Corporate Culture is expressed through the Company’s Mission, Vision and Values and Principles, as follows:

Mission

Make dreams come true and meet people’s consumption needs, saving time and money and exceeding their expectations.

View

“To be closer to our customers, becoming the largest and dearest digital company in Latin America.”

Our Values

- Have the best people;
- Be a good “Business Owner”;
- Seek excellence in operation;
- Focus on the customer;
- Delta - Do more and better every day;
- Being obsessed with results;
- Breathing innovation all the time.

Our Principles

PEOPLE

- A big and challenging dream makes everyone go to the same direction;
- Good people, working as a team, growing according to their talent and being rewarded for it, is the company’s biggest asset;
- Choosing people better than themselves, training them, satiating and maintaining them is the main task of managers;
- Personal leadership, for example, is vital, both in heroic attitudes and in the small gestures of everyday life.

METHOD

- Focus is essential. You cannot be great in everything, you have to focus on the essentials;
- Everything has to have an owner with responsibility and authority. The debate is good, but in the end someone has to decide;
- Good judgement is as good as great knowledge. Simple is better than complicated.

RESULT

- Being obsessive with costs and expenses, which are the only variables under our control, helps maintain long-term survival;
- Understand speed, urgency and zero complacency as enduring competitive advantage factors;
- Ethics, hard work and consistency are the foundation for the Company's growth.

Clients Code of Ethics and

Conduct

1. Communication

The Company provides communication channels for its clients to express their opinions. In addition, there is a commitment that all requests, complaints and orders for information are answered within pre-established deadlines and with the appropriate quality.

Right to Information

The Company is committed to providing clear and correct information about its products and services and the same commitment shall be made by its partners.

Responsible Marketing

The communication, marketing or publicity actions developed by the Company and its subsidiaries are based on our values and principles and respect the legislation and self-regulation codes of the sector, guaranteeing the alignment with ethical principles and respect for the consumer, the citizen and the environment, which shall also be strictly observed by the partners with whom the Company maintains a relationship.

2. Service

The client shall obtain answers, even if negative, to its requests, in an appropriate way and in the expected term. In the customer service, the following shall be considered as basic premises:

- Treat the client with respect and appropriate language;
- Listen carefully to the doubts of the clients and address them adequately;
- Transmit security and credibility to the client;
- Do not use informal words, diminutives or offensive words;
- Do not end the contact with the client without the doubts are clarified;
- Do not use, delete, copy or provide any confidential customer data that it may have access.

3. Quality of products and services

The Company is committed to the permanent improvement of the quality of products and services that are marketed through it. Should any product be required to be exchanged, the Company undertakes to do so by following, in addition to the aspects already contained in the Consumer Defense Code, an internal procedure established and previously informed to the customer, a circumstance that shall be observed by its partners in products and services they market in B2W's marketplace.

Partners

1. Equality

Honesty towards partners is an essential requirement for healthy and lasting relationships. For this reason, the Company gives all its potential partners fair and uniform treatment. Their decisions are based on objective criteria such as price, quality, reliability and honesty of the partner, thus promoting a fair and equal selection.

2. Compliance with Laws and Business Agreements

Every partner is required to comply with current environmental, fiscal/tax and labor laws and to comply with the agreements entered into in the commercial agreements. The Company reserves the right not to contract services, or to interrupt the business relationship with those that do not meet these criteria.

Business with doubtful reputable partners shall not be tolerated. All associates are expressly prohibited from making any improper, dubious or illegal payments, or favoring customers, partners, suppliers, service providers or competitors for the granting of undue benefits.

The Company emphasizes that all commercial agreements shall be approved by the Legal Department.

3. Quality of products and services

The Company supports and guides its partners to constantly improve their processes, products supplied and services provided, always in accordance with the highest quality and ethical standards.

Marketplace partners may only explore the activities for which their establishment/company are legally authorized by their Articles of Association/Bylaws and current registration.

It is not allowed to advertise products expressly prohibited by current legislation that do not have the specific authorization of competent regulatory bodies that violate the rights of third parties, for which the Partner is not authorized by their tax registers, or even that are in disagreement with the B2W Policies.

Therefore, we provide below a list with some products that can not be advertised or sold in B2W Marketplace:

<p>Illegal/irregular products</p>	<ul style="list-style-type: none"> • Products that encourage or allow illegal activities; • Products that violate applicable laws; • Products that contain viruses, trojan horses, spyware or malicious code; • Stolen, counterfeit or forged products; • Products that are not homologated or certified, when applicable, by regulatory bodies (e.g. ANATEL, INMETRO, ANVISA); • Products that violate or infringe any intellectual property right or third party right.
<p>Offensive Products</p>	<ul style="list-style-type: none"> • Products that exhibit explicit nudity or vulgar language; • Products containing obscene or pornographic material; • Products that portray, glorify, promote or instigate: <ul style="list-style-type: none"> - The racism; practice of Nazism; - Animal cruelty; - Criminal or illegal activity; - Depreciative stereotypes based on ethnicity, gender, sexual orientation, religion, political and ideological position or nationality; - Hate; - Intolerance; - Violence; • Products marketed or directed to children or adolescents that are inappropriate or prohibited for the age, according to prevailing legislation.
<p>Restricted Products</p>	<ul style="list-style-type: none"> • Products that have age restriction by law; • Products that at B2W's discretion are not suitable for sale, including, but not limited to: <ul style="list-style-type: none"> - Products for adults (erotic); - Gambling and its accessories (including lotteries and raffles); - Products originally manufactured and made available by the Government (e.g.: military uniforms); - Police or military items; - Refurbished products that do not meet the criteria defined by B2W; - Surveillance equipment and devices, decoders for subscription services (including pay-TV), unless homologated by regulatory agencies; • Products that cannot be sold in Brazil under applicable laws.

In the event that the announcement of these products or any other prohibited by current legislation and/or that are incompatible with the Company's Policies is verified, B2W may, in its sole discretion, suspend the Partner, terminate the partnership without prior notification and/or remove all inappropriate, irregular or illegal content, without prejudice to the penalties that may be applied in case of non-compliance.

4. Intellectual Property Right

The products developed exclusively for the Company and its subsidiaries, based on their orientation and support, are owned by the Company, and its commercialization to third parties is forbidden, without the duly and express authorization of the Executive Board of B2W Digital.

Partners are only allowed to market in B2W's marketplace environments products that have a legitimate origin and respect the intellectual property rights of their holder, and the commercialization of products that are forged, counterfeited or that in any way intellectual property rights of third parties shall be prohibited.

5. Information Security

B2W Digital's confidential data shall be treated by the partners in a responsible and respectful manner, ensuring its exclusive use for the development of the products, the activities carried out in B2W's environments and services rendered to the Company.

6. Health and safety

The Company is committed to the procedures and instructions that regulate and preserve safety and health at work, and strictly complies with the laws and regulations relating to Occupational Health and Safety. Therefore, the Company reserves the right not to engage in services or to enter into business relationships with partners that put at risk the health of its own employees or that tolerate such practices in their value chains, including:

- Forms of compulsory work, contrary to human dignity or that violate the rights of the worker, provided by law;
- Use of child labor;
- Any form of sexual abuse or exploitation, as provided by law, including of children and adolescents;

- The practice of actions that constitute moral harassment.

7. Valuing Diversity

The Company does not tolerate discriminatory practices by its partners, as we believe that diversity contributes to different views of the world and enriches work.

8. Conflict of interests

The Conflict of Interest occurs when a partner is able to influence a decision of the Company or associates that may result in some personal gain, direct or indirect, for himself/herself, his/her family members or friends.

Business transactions shall be conducted in accordance with the exclusive interests of the partner and the Company, based on the principle of good faith, without any privileges of any nature resulting from their personal relationships. No person, whether a natural person or a legal entity, who maintains relationships with any associate, may obtain any benefit due to the position of such associate in the Company.

What is not allowed:

- Associate, even if outside working hours, or family, having business relations with B2W as a partner, employee of a partner, supplier and/or service provider;
- Companies with family members of associated of B2W in their corporate bodies shall not participate in bids, provide services or be a partner of B2W, even if the person is not directly linked to the performance of the work;
- Use commercial, operational, strategic and/or confidential information of B2W, disclosed by reason of the existing business relationship, in lectures, courses and/or in any material or public manifestation or for any purpose other than that necessary for the performance of the resulting activities of the relationship maintained with the Company.

9. Presents or gifts

No member may accept gifts, favors, participate in events, receive loans or special benefits from persons or companies with which the Company has or aims to have business relations. For this reason, partners shall avoid sending gifts to members of the Company and if they intend to do so, they shall send them directly to the

Company and/or the Business Officer or the Officer of the area with which it maintains its relationship.

Government and Society

1. Social and Environmental Responsibility

Many of the activities inherent in the marketing of products and services have impacts on the environment and on the communities where the Company and its partners operate. It is the responsibility of the Company and of those with whom it has commercial relations to reduce these impacts and contribute to:

- Disseminate environmental awareness;
- Adopt initiatives to reduce the consumption of energy, water and supplies and to increase the selective collection of waste generated;
- Have ecologically correct attitudes, which includes having thousands of suppliers, partners, service providers and millions of customers as multipliers of this environmental policy;
- Preserve the environment and generate a better quality of life for the next generations.

2. Public Power and Legislation

The Company obeys all the laws that regulate its activities. Consultation with your department or legal adviser shall be a habit whenever there are doubts surrounding the legislation. The Company's Legal Department acts and interferes in the Company's relations with its partners and shall recommend, whenever it identifies situations of violation of the laws that subject the activities of its partners, the termination of existing commercial relations, in privileges of the values and culture that it defends.

3. Fight Against Corruption

Corruption is unacceptable in the Company, be it practiced by our associates, partners, suppliers and service providers, or by any participant in our value chain. This behavior is not appropriate to the Corporative Culture, does not benefit the communities and represents a burden to the Company. Bribery is a form of corruption and is illegal.

Bribery is the act of giving money, property, or other benefits to a third party to obtain an illicit or immoral advantage or thing.

Corruption shall be punished to associates, partners, suppliers and service providers, whenever proven, with the termination of employment agreement, partnership, supply or service provision, as the case may be.

Doubts and Violations of the Code of Ethics and Conduct

If there is doubt about how to behave or what to do in a particular situation, the marketplace partner shall ask for guidance through the Portal Parceiro.

When faced with an incorrect conduct, the partner can report it through Disk Alerta, through the email: disk_alerta@b2wdigital.com.

All complaints shall be carefully investigated and communications shall be kept in absolute secrecy and any forms of coercion or reprisal shall be unacceptable.

The participation of all partners is essential to building the Company's reputation and the reputation of its own operations. Therefore, its commitment to the values, principles and rules of conduct, expressed in this Code, are indispensable.

Violations of the Code of Ethics and Conduct shall result in penalties for those who commit them, which may lead to, including, termination of agreement.

Term

This Code of Ethics shall be reviewed annually, being updated whenever there are changes in legislation or when the Company deems necessary to maintain the proper functioning and credibility of relations with its partners.