



Code of **Conduct**

For Suppliers, Service providers and others

Dass

07/2020

Our Principles

1. PEOPLE: Basing the company in people with sense of urgency, proactive, focused, that think and act according to the objectives and be always positive in front of the growing needs of the organization.

4. SOCIAL VALUES: Comply with the laws with intelligence and ethics, abandoning objectives that affect the social and environmental values. Maintaining a responsible and respectful relation, but not dependent, with government, suppliers, banks, competitors, NGOs, unions, investors, partners and the community.

2. RESOURCES AND INVESTMENTS: Deep evaluate each investment, either in assets or in the search for market, in order to obtain in a low degree of indebtedness, not only technologically updated, modern and appropriate industrial plants, but also a greater market share.

5. HONESTY AND ETHICS: Act honestly and ethically towards everyone, especially public agents. There won't be tolerated any practice that violates the rules of ethical work or the applicable anti-corruption laws.

3. EXPERTISE: The knowledge and search for technologies and solutions are a responsibility of all of us, taking advantage of the partnerships and market, reducing time and cost.

6. CLIENTS: Always satisfy and surprise the clients with quality products and services in appropriate prices.

7. OWNERS AND SHAREHOLDERS: Being demanding with the business results. Besides legitimate, the business obligates the competences improvement and generate fund for new investments, the invested capital satisfaction and space for more and new competences.





1

DASS' CODE OF CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS

Dass conducts its business with the utmost ethical standards. Their (a) suppliers, (b) service providers, and (c) business partners, may they be individuals or legal entities, and subcontractors (jointly called in this code: "Third Parties") must ensure a performance based on respect and transparency, in absolute compliance with Dass' values, with this Code of Conduct ("Code"), and with the applicable laws and regulations.

Here it is listed, without limitation, the Third Parties that are subject to the rules of conduct: (a) freight forwarders, (b) agents, (c) consultants, (d) brokers, (e) facilitators, (f) lobbyists, (g) supply chain partners, (h) traders, (i) retailers, (j) commercial representatives and their representatives and other not mentioned service providers.

Therefore, it is a condition that all Third Parties know, understand, and adopt in their routine the recommendations foreseen in this Code, as well as the applicable laws and regulations to Dass' activities.

Third Parties must make this Code known to their employees.

We do not believe that the rules contained herein will cause any obstacle to the regular development of our commercial relations. However, once the entire qualification process is completed, Dass will carefully monitor the fulfillment of what is contained in this code and, in the case of an infraction, it will motivate the immediate and definitive breach of the contractual link for a just reason, regardless of any prior communication. If such an offense can be considered a criminal offense, we will promptly inform the competent authorities, if it is restricted to the field of civil reparation, we will resort to the necessary judicial measures to obtain a fair indemnity

Dass recognizes that no code of conduct is capable of covering all situations that Third Parties may face. Consequently, this code does not replace the Third Party's obligations and responsibilities to act prudently and obtain the necessary guidelines for conducting business. It is also encouraged to seek guidance from the Risk Management and Ethics team whenever needed.

The performance of Third Parties in the service of Dass must be based on:

- **Respect**
- **Transparency**
- **Law compliance**

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RELATIONSHIP WITH STAKEHOLDERS



Third Parties must act in line with the Company's ethical standards and with this Code, especially in the relationship with public organizations and agents, company customers and society in general, with whom they interact.

Third Parties may not subcontract the services for which they have been hired, in whole or in part, unless previously expressly authorized by Dass. In the event of express authorization, the subcontractor must understand and adopt, on a daily basis, the recommendations provided for in this Code, as well as the laws and regulations applicable to the company's activities.

2.1 WORK RELATIONS

Relationships in the work environment of Third Parties must be guided by safety, respect for the individual, dignity and respect for the laws.

Dass values diversity and does not accept any conduct that could characterize sexual or moral harassment, or any form of discrimination, whether due to color, origin, social class, political-party positioning, sex, religion, sexual orientation, age, physical appearance or special needs.

If someone, acting on behalf of Dass, whether an employee or a third party, commits inappropriate attitudes towards this topic, does not hesitate to use the Ethics Channel as per item 9 of this code.

Dass does not accept the following practices by third parties:

- Anti-competitive practices;
- Corruption;
- Environment damaging practices;
- Child, compulsory, forced, slave labor or equivalent.

2.2 RELATIONSHIP WITH PUBLIC ADMINISTRATION

The relationship with representatives of the Public Administration must be maintained with ethics, integrity and transparency.

No offer, promise, payment or delivery of money, gifts, services, entertainment or any other benefit that characterizes an improper advantage, or has the appearance of impropriety, may be made, directly or indirectly, to any public agent.

Dass demands transparency in its relationship with public agents and adopts a zero-tolerance policy regarding corruption.

Examples of public administration organizations are:

- All government organizations linked to the executive, legislative and judicial powers, at the federal, state or municipal levels;
- Bodies or agencies responsible for regulating or supervising Dass' activities;
- Foundations, whether federal, state or municipal;
- State or mixed economy companies.

2.3 RELATIONSHIP WITH THE MARKET AND COMPETITION DEFENSE

It is absolutely forbidden for the Third Parties to share commercial or operational data and information with any third parties, in particular with competitors of Dass or their representatives.

Free competition and free enterprise must be basic elements in all operations and relationships involving Dass. Thus, Third Parties must also observe competition laws.

Third Parties must not participate in any form of agreement, combination, manipulation or adjustment with Dass competitors involving prices, costs, demand, sales commission, commercial strategy, division of markets and/or territories, whether in relation to products or customers, market share, participation in bids or any other form of action that may restrict the free supply of products or services to the market.

Competition laws provide for severe penalties for companies and individuals who engage in infringements.





3 CONFLICT OF INTERESTS

Third Parties must not have among their managers or key-employees people who are Relatives or Close Persons of Dass' employees and who exercise influence or effectively approve their hiring or transactions, to guarantee independence in the relationship and avoid conflicts of interests.

For this code, relatives are considered:

- spouse • partner • siblings • parents
- children • grandparents • grandchildren
- uncles • cousins • nephews • parents
- in-laws, daughter-in-law/son-in-law,
- stepmother/ stepfather, stepchildren).

FOR THIS CODE, CLOSE PERSONS ARE CONSIDERED:

Those with whom there is a corporate bond, affective relationship or habitual coexistence, whether through a loving bond or friendship, in which there may be an interest in benefiting the other.

Third Parties must act transparently and communicate to Dass' Risk Management and Ethics Department whenever there are Relatives or Close Persons of Dass employees in a situation of potential conflict of interest. The Dass employee must declare himself prevented from proceeding with the negotiation before the Company's formal acceptance in this regard.

Conflict of interests can be defined as any circumstance that may raise doubts about the ability to act objectively when conducting business with Dass, which may cause risks of fraud, commercial, relationship or reputational problems for the company.

Third Parties are prohibited from using their relationship with Dass to obtain any form of favoritism, for themselves or others. It is strictly forbidden for Third Parties to receive undue commissions, rebates and / or personal favors, taking advantage of their relationship with the company. The omission or attempt to conceal potential conflicts of interest may be interpreted as irregular favoring, subject to disciplinary measures against the employee (s) and compulsory termination of the contract/business relationship with the third party without prejudice to fines and other charges.



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ANTI-CORRUPTION PRACTICES AND MONEY LAUNDERING PREVENTION

4.2 MONEY LAUNDERING

Dass commits itself to prevent and combat the crime of money laundering and the financing of terrorism, complying with the legal requirements and those provided for in the regulations of the supervisory and regulatory authorities.

Third Parties must be diligent in monitoring and detecting operations with indications of money laundering and financing of terrorism and should report any suspicious situations to the Dass Risk Management and Ethics Department.

Money laundering is the transformation of resources originating from illegal activities to give an appearance of legality.

4.1 CORRUPTION

Dass does not accept corruption in any of its forms, whether through the action or inaction of its employees or third parties.

Dass complies with anti-corruption laws and supports efforts to promote integrity measures, working to ensure that business partners share this commitment.

Thus, any suspicious situation must be reported to the Risk Management and Ethics Department.

- Do not offer or accept bribes, commissions or any other type of improper advantage.
- Do not allow company resources to be used for illicit purposes, directly or indirectly. This includes facilitation payments ("urgency fee"), the offering or reimbursement of expenses or preferential treatment that can be interpreted as a bribe to or on behalf of the Dass.

5

RECEIVING AND OFFERING PRESENTS, PROMOTIONAL GIFTS AND EVENTS

Dass does not accept and does not offer presents. Such an offer constitutes a violation of this Code and the Third Parties' contracts with the company.

The offer of promotional Gifts by Third Parties to Dass employees does not constitute a violation of this Code and must be done without intention to exercise undue influence, whose object has an institutional nature, for use in the workplace representing cordial relations between the parties.

Dass' board of directors must previously and formally approve invitations to events or entertainment actions before acceptance.

Promotional Gifts are promotional items, which may contain a logo or institutional message, distributed in a general way, as a courtesy, advertisement or on the occasion of events or commemorative dates of a historical or cultural character.



6

ASSETS AND INFORMATION PROTECTION

6.1 ASSETS

The physical and intellectual assets of Dass, when expressly authorized, must be used by the Third Parties exclusively in activities related to it, and must not be used to obtain any advantage or for any use not expressly provided for in the contract or not authorized.

Misappropriation of Dass assets is illegal and will subject the violator to applicable legal sanctions.

Copying, selling or distributing Dass information, applications, software or other forms of intellectual property is strictly prohibited.

6.2 CONFIDENTIAL AND PRIVILEGED INFORMATION

In their activities, Third Parties may have access to various information owned by Dass and third parties that are not public knowledge.

It is the duty of the Third Parties and all of their employees to keep this information confidential, and its use is prohibited for any purpose other than the strict performance of their obligations, as provided for in their contract.

When a Third Party has access to privileged information (for example, financial data and forecasts, strategic plans, mergers and acquisitions, new products, etc.), it must not transmit them, whether paid or unpaid, to other entities, subject to penalties provided for in this code. If Dass has its shares in a public offering, when having access to privileged information, Third Parties shall not trade, share or request that others do so.

Third Parties are prohibited from disclosing information or data received or obtained, without the prior and express authorization.

6.3 PERSONAL DATA PROTECTION

Dass respects the legislation applicable to the protection of personal data, the Brazilian General Data Protection Law (LGPD) and any equivalent law from other countries. Our Information Technology policies seek to comply with good practices and international standards of excellence, in addition to ensuring the security, privacy and good use of the information collected. Dass does not authorize and does not allow the use of personal data that has been entrusted to it and which may be made available to the Third Party for purposes other than those for which it was contracted. In the event of failure to comply with this premise, Dass will take the appropriate civil and criminal legal measures so that those responsible are punished under the law and the damages caused are repaired.

The following are part of the physical and intellectual assets of Dass, among others:

- Product images, whether prototypes or collections under negotiation
- Brands, logos and industrial designs;
- Technologies, business and marketing strategies, information, research and data;
- Stocks, price lists, products; Equipment and tools;
- Buildings and vehicles, among others.

Confidential information is any information that is not known to the general public. Examples of classified information are:

- Data on products, customers, employees and other interested parties;
- Business and marketing strategies;
- Annual budgets and short and long term planning;
- Sales volume data, research results, financial data, policies and procedures; and
- Results not yet disclosed to the market.

7

DUE DILIGENCE, MONITORING AND ACCOUNTING RECORDS

Dass expects Third Parties to have processes and controls in place to comply with this code. When appropriate, Dass carries out due diligence and field auditing processes on Third Parties and expects them to use their best efforts to meet the full requests made, which aim to certify the application of the rules of this code. Dass may also require the Third Party to implement a remediation plan or, in some circumstances, suspend or close the relationship.

All transactions carried out by the Third Parties must be supported by skilled documentation and be immediately and properly recorded in books and their accounts, under the law. No payment or receipt made by Third Parties may be made in disregard with the purpose of its authorization, nor to a person other than the one for whom the payment is intended.

Third Parties' financial statements must be prepared following accounting laws and principles to adequately represent their transactions related to Dass.



Third parties in their relationship with Dass:

- They must maintain accurate, complete and easy-to-analyze records for any and all expenses or revenues related to the company, independently of value;
- They may not, under any circumstances, alter or hide accounting data, nor provide or record false or incorrect information in their books; and
- They must protect and retain all documents related to their contract with Dass, for the term defined by law.

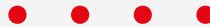


COMMITMENT TO THE ENVIRONMENT AND SOCIAL RESPONSIBILITY

Dass adopts and supports, within its sphere of activity and influence, a set of values, related to the defense of human rights, working conditions and the environment, which follow the 10 principles of the United Nations Global Compact.

THE 10 PRINCIPLES OF THE GLOBAL COMPACT ARE THE FOLLOWING:

- Human Rights Protection;
- Freedom of association and right to collective bargaining;
- Elimination of forced or compulsory labor;
- Abolition of child labor;
- Fighting sexual exploitation of children and teenagers;
- Elimination of discrimination with respect to employee and job title;
- Preventive approach to environmental challenges;
- Promote environmental responsibility;
- Development and diffusion of clean technology ; and
- Fighting corruption in all its forms.



Dass is firmly committed to protecting the environment and requires third parties to comply with all relevant environmental laws and regulations.

DASS SUPPORTS AND ENCOURAGES ITS THIRD PARTIES TO:

- Prevent potential risks that the activity may generate to the environment;
- Implement sustainable practices that minimize environmental degradation as a result of its activities;
- Conserve natural resources and reduce waste.

9 TALK TO US, IT'S SAFE!

Dass provides communication channels that can be used by Third Parties, either to indicate suspicions related to standards of conduct and ethical principles set out in this Code or the law, or to clarify doubts related to Compliance.

The content of the complaints should be as complete as possible to enable an eventual investigation process.

Whenever it is aware of or experiencing a situation that could characterize a violation of this code, or when it suspects or knows facts that could harm Dass, the Third Party must immediately report it to the Risk Management and Ethics Departments, through the communication lines made available or directly by phones **+55 51 3563 8269** or **+55 51 3563 8200**.

Contact with our Ethics Channel can be done:

By e-mail: compliance@grupodass.com.br.
website: www.contatoseguro.com.br/grupodass.

When using communication lines, Third Parties may remain anonymous, if they so choose.

No one who, in good faith, reports a suspected violation of laws, regulations or Dass' internal rules will be subject to retaliation.

THE USE OF THE COMMUNICATION LINE GUARANTEES THE USER:

- Option for anonymity;
- Ensuring confidentiality;
- Guarantee of no retaliation.

www.contatoseguro.com.br/grupodass



10 SOCIAL MEDIA

Dass is committed to using social media platforms in a responsible manner and to being courteous and respectful in its public online communications.

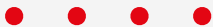
The company expects Third Parties to avoid disrespectful, non-professional, uncomfortable, defamatory, discriminatory and/or prohibited activities on social networks. Third Parties must not act or speak on behalf of Dass, present themselves as Dass or express any opinion attributable to Dass, except when expressly authorized by the company to do so.



11 SCIENCE AND RESPONSABILITY

All Third Parties must receive and know this Code of Conduct, at the time of hiring or whenever Dass chooses to update it.

Third Parties that, for other person's reasons, choose not to adhere to the rules of this Code will be automatically prevented from supplying Dass and their registration will be blocked.



If you consider it necessary to clarify more about this or other matters related to Compliance and Business Ethics, feel free to contact the channels mentioned in item 9, as well as the Dass's Risk and Ethics Management team.

We count on your partnership to build a world of more ethical and lasting relationships.



Dass

IMPLEMENTING SPORTSWEAR BRANDS