

# **CONFLICT OF INTERESTS POLICY**

**GLOBAL FOREST BOND** 



# Global Forest Bond – Conflict os Interests Policy

Date	Staff	Sections reach	ed
May 20, 2019	Elaborated by:	Initial issue	
	Artur Ferreira		
	Verified by:		
	Eduardo Ferreira		
	Released for issuance:		
	Partners		
Released for issu	ance:		
Eduardo Mai	son Ferreira	Wilson Tomanik	Artur Villela Ferreira



#### **GOAL**

Actual or apparent Conflicts of Interest situations may impair the integrity and reputation of Global Forest Bond, as well as bring a situation of risk of judicial or administrative questioning to the Company or to the employee.

The purpose of this policy is to avoid situations of risks related to conflicts of interest and lack of transparency. This policy is in line with the current Code of Conduct.

## **SCOPE OF APPLICATION**

This policy is mandatory for all Global Forest Bond employees in their professional activities or in direct or indirect relationships with related parties. This includes directors, officers, managers and employees. All those who work in the Company's activities must be free from conflicts of interest that may influence their objective decision-making capacity.

#### **DEFINITIONS**

**Personal Interests -** may include financial gain or other benefits using their professional activity.

**Conflict of Interest** - Conflict of interest occurs when personal interests interfere, or seem to interfere, with their ability to perform their duties in an impartial manner, to the detriment of the Company's interests.

Conflict of Interest can occur in many ways and appear unintentionally.

#### GENERAL RESPONSIBILITIES

Every Global Forest Bond employee should keep in line with the Code of Conduct to avoid any conflict of interest.

Any conflict of interest should be avoided. The contracting of partners and suppliers must be based exclusively on objective competencies, aiming at the best hiring for the Company.

Any situation of potential conflict of interest, real or apparent, must be reported to the immediate manager or to the Compliance Officer.

The manager and the Compliance Officer will analyze if there is a real conflict of interest, offer guidance to the employee and inform the necessary managers and directors (in total transparency with the employee).

The manager involved and the Compliance Officer must resolve the situation together, aiming to end the conflict of interest and ensuring that the employee involved does not influence or participate in the decision-making process of the contracting of the third party or supplier.

Global Forest Bond Al. Franca, 1050, cj 82, São Paulo (SP) - Brasil +55 11 3062-1049 / www.gfbond.com.b



The disclosure of the conflict of interest and the way of managing it shall be recorded by the Compliance Officer. Cases of conflicts of interest within the Board of Directors must be filed in the Company's book under the responsibility of the Chairman of the Board.

## CASES OF VIOLATION

Global Forest Bond will investigate any violation of this policy and, if there is no disclosure of a conflict of interest, penalties will be applied, in accordance with current labor legislation.

In case of application of sanction, the Department of Human Resources will be consulted previously.

If Global Forest Bond experiences any financial loss arising from an undisclosed Conflict of Interest situation, the Company may claim these amounts from the benefited employee. The use of professional activity for its own benefit may lead the employee to be questioned judicially.





# **ANNEX 1-REGISTRATION TERM**

This term is intended for Employees who have any situation that may suggest conflicts of interest, as well as situations that require validation.

Indicate Public / Privat	e Employees who have a dire	ect relationship:		
Full Name	Management level	Company / Department Public Entity/ UF		
Situation (s) requiring	validation:			
Description of the situation	tion			
I declare that the information provided by me in this document is true, and there is no omission of any information that may influence Global Forest Bond's decisions, regarding this Agreement.				
Full Name:				
Department: Signature:				

This Statement of Awareness and Commitment is an integral document of the Employee's Work Contract with Global Forest Bond and consists of two counterparts. One counterpart remains with the Contributor and the other with Global Forest Bond.

