

# Code of **Conduct**





# *Introduction*

Omni Táxi Aéreo S/A presents its Code of Conduct to all its employees and stakeholders.



# Message from the CEO

Dear Employees,

This Code of Conduct is designed to express our fundamental principles, as well as our behavioral standards and expectations.

It contains the best practices to keep Omni compliant with regulations and an example of excellence in our industry.

The company's pillars are present in our values and in the Code of Conduct so as to convey to employees, partners, suppliers, and clients what Omni expects from each one of them.

Therefore, we expect everyone to read, understand and comply with the rules in the Code, its associated policies, and other documents, as well as laws and regulations, while maintaining the highest ethical standards.

Remember that we all have the responsibility to promote a culture of integrity within the company.

Do your part and keep helping Omni become an outstanding organization.

Together, we will fly higher!

Enjoy your reading!








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# 1 | Presentation

This is a compilation of standards and rules governing internal and external relationships, showing employees what Omni expects from them, aiming for more harmonious and respectful relationships, focused on the growth and development of the company and its people.





The aim of this Code is to clearly define the ethical principles that guide the conduct of the company and, consequently, of its employees, trainees and third parties who represent it, establishing recommended practices in internal and interpersonal relationships, in dealings with clients, suppliers, contractors and society.

As important as the Code is its essence, due to the amplitude of the subject. So, when a situation of apparent conflict with this document arises, it must serve as a parameter for the solution of the question.

In the relentless pursuit of excellence in quality and well-being for employees and clients, Omni understands that the principles set forth herein are a day-to-day aid.

Next, learn about the mission, vision, and values that guides Omni:

## Mission

Transporting people safely and punctually, satisfying our clients with excellent service and maintaining the sustainability of the business.

## Vision

To be the best offshore air transport company, recognized by all as a reference in excellence and work environment.

## Values

### ***Safety***

Respect for life above all.

### ***Ethics***

Ethical conduct in the direction and execution of business.

### ***Business Excellence***

Continuous business improvement.

### ***Teamwork***

The team is bigger than the individuals.

### ***Transparency***

Cherish the truth with frank and open dialogue.



## 2 | Scope

Omni employees at all levels and interns are subject to this Code. The rules compiled here extend to third parties and suppliers that represent the company in any sphere.



## 3 | General Principles

**3.1.** All people are free and have the right to individuality, privacy, and respectful, dignified, and fair treatment without prejudice of any kind.

**3.2.** Omni and its employees guide their activities based on respect, legality, equality, loyalty, trust, transparency, dignity, commitment, quality, impersonality, and fairness.

**3.3.** The company's activities are developed strictly in compliance with the legislation in force in the country, and legal infractions and/or non-compliance with Brazilian standards are not allowed, for any reason or purpose.

**3.4.** Omni is committed to developing fair labor relations through a healthy mutual trust, cooperation, and solidarity environment, making clear to employees what is expected of them in accordance with the corporate mission, vision, and values.

**3.5.** Omni's essential principle is to act proactively in pursuit of excellence in air transport, performing it with high levels of safety, quality, profitability, social responsibility, ethical leadership, fair competitiveness, and respect for the environment, health, and human resources, promoting the training and development of individuals, respecting, above all, the cultural, regional, and social particularities of the various environments in which it operates and those of its employees and suppliers.

## 4 | Corporate Governance

**4.1.** Omni is committed to conducting its activities with integrity and transparency, working to maintain credibility before its employees, suppliers, and clients.

**4.2.** The company operates seeking growth, but based on ethics, good principles, honesty, respect, commercial loyalty, and social and environmental responsibility.

**4.3.** All Omni's relations with its competitors are based on ethics, respect, and honesty, adopting explicit rules about its competition procedures and business practices.

**4.4.** Omni faithfully complies with and encourages its employees, interns, third parties, service providers and partners to strictly comply with the determinations of this Code, encouraging them to transmit and disseminate its essence.

**4.5.** Omni keeps an open communication channel with its clients and suppliers, through a client service center - herein considered any and all individuals or legal entities who keep in contact with the company - available on its website at [www.omnibrasil.com.br](http://www.omnibrasil.com.br) and phone 0800 701 7995, available to all who intend to contact the company, presenting suggestions, criticism or compliments.



## 5 | Accounting Records

Omni ensures that its accounting documents and records, created by it or under its responsibility, are complete, accurate, honestly reflect each transaction or expense, and are generated in due time and in accordance with applicable accounting rules and standards, as well as with the legislation in force.





## RELATIONSHIP



## 6 | Relationship with Employees

**6.1.** It is the duty of all employees, interns, third parties, and service providers to strive to build and preserve Omni's image every day as its most important asset.

**6.2.** The relationship with employees is consolidated in the practices and actions of administration and people management, such as recruitment, selection, hiring, promotion, performance management, training, compensation, recognition, and any other inherent to the professional activity. Omni adopts effective practices to comply with this Code.

**6.3.** The differences in position, function, or hierarchical level do not prevent an employee from dealing with or exposing matters, whether of a professional or personal nature, as long as they respect the principles of conduct contained in this Code, thus ensuring equality and impersonality in the relations between the company and the employee.

**6.4.** Regarding recruitment, selection, and promotion, the candidate must be evaluated on the requirements for the position, without discrimination based on race, creed, age, sex, gender, nationality, marital status, sexual orientation, or for having special needs.

**6.5.** When filling a vacancy, Omni considers internal hiring an opportunity for professional growth, and, whenever possible, internally discloses existing vacancies, as long as there is an internal candidate qualified to assume the position.

**6.6.** Omni follows performance evaluation criteria and training policy, developed based on its strategic planning. The company approves and, through specific policies, even encourages the constant learning, updating, and intellectual development of its employees.



**6.7.** It is the employee's duty to act, in the daily dealings, with professionalism and in full accordance with the principles of this Code, obligatorily observing that:

**6.7.1.** Work relationships must be guided by trust, honesty, integrity, impartiality, and respect.

**6.7.2.** No prejudice and/or discrimination of any kind is allowed - religious belief, philosophical or political conviction, nationality, sex, gender, age, color, marital status, sexual orientation, and disability.

**6.7.3.** The search for conciliation between Omni's and the employee's interests, through dialogue, in the direct relationship between leaders and subordinates, is a priority.

**6.7.4.** Abusive practices against employees, such as sexual harassment, arrogance, pressure, intimidation, or threats are not allowed, because the preservation of health and physical integrity is above economic interests.

**6.8.** Omni has a satisfaction survey system that aims to find out what employees think about the work they do, the conditions offered by the company, the atmosphere, and the internal investments in their personal and professional development.

**6.8.1.** Based on the survey results, Omni, whenever possible, makes the pertinent adjustments and takes the appropriate measures to meet the employees' demands and make their work even more pleasant and healthy.

**6.9.** Volunteer work activities are allowed and encouraged by Omni, as long as they do not compete with the time the employee must dedicate to the company.

**6.10.** Omni recognizes its employees' right of free association, respecting their participation in unions and does not practice any acts of negative discrimination with respect to a unionized employee.

**6.11.** Always meeting the general principles of conduct, Omni appreciates the commitment that brings innovation, as well as intrapreneurial actions.

**6.12.** It is mandatory for all employees to wear an identification badge and, when necessary, the badge of the airport administration or concessionaire since the company's activities are carried out in the airport area.

**6.12.1.** It is forbidden, however, to use the identification badge and/or the badge of the airport administration or concessionaire outside working hours and for any purpose other than accessing and remaining in the company or to demonstrate and/or to prove their relationship with Omni at places, organs, or agencies where they are on duty.

**6.13.** Omni employees must wear the full uniform provided by the company, except on dates and situations when it is expressly waived.

**6.13.1.** Employees from corporate areas are not required to wear the uniform, except trainees, who receive a shirt provided by the company.

**6.14.** The employee understands that the uniform represents the exposure of the company's name and brand, therefore, its use must be restricted to working hours, as well as when going to work and returning home or on occasions when the employee needs to be recognized as such.

**6.14.1.** Precisely in order to preserve Omni's name and image, employees must guide their actions and attitudes with common sense and good practices while wearing the company uniform, and improper use is considered a serious misconduct.

**6.15.** Employees who consider themselves discriminated against, subjected to prejudice, pressure or practices that make them work in fear or in a disrespectful situation must communicate the facts to the immediate leadership or the level immediately above, knowing that they will not be retaliated against as a result of such communication.

**6.16.** It is a good idea for employees to be careful when discussing work matters in elevators, cafeterias, cabs, and any other public areas, as in such situations one or more people may have access to internal information that is not authorized by the company.

## 7 | Relationship with Clients

**7.1.** Relationship with clients constitute business acts, operations, negotiations, and transactions that result in Omni providing its business(es) to any other company, corporation, association, Public Authority entity, legal entity, or whoever needs the service(s) performed by the company.

**7.2.** Relationship with clients are also considered to be the actions after the negotiations, the execution of the work, including the management of what was agreed upon after its completion.

**7.3.** In any case, it is the duty of all Omni employees, in any position or hierarchical level, to treat client representatives respectfully, cordially, with integrity and professionally.

**7.4.** Omni seeks, whenever possible and as long as it does not compromise the established principles in this Code nor safety, to adapt its activity to the client's

needs, treating with clarity and truth the cases in which such adaptation is not feasible, never committing to perform what it is not capable of, whatever the reason for the incapacity.

**7.5.** Regardless of the client's needs and the possibility to meet them, Omni will only perform activities in strict compliance with the legislation in force.

**7.6.** Any complaints, disagreements, conflicts, or inadequacies raised by clients will be heard and managed by the company, always within the possibilities and in compliance with this Code.

**7.7.** Omni will make the client aware of the existence of its Code of Conduct whenever it is established in service contracts.



# 8 | Relationship with Competitors



**8.1.** The employee must ensure fair competition and not engage in activities or business that are harmful to the consumer, the public administration, or society.



**8.2.** All Omni's relations with its competitors are based on ethics, respect, and honesty, adopting explicit rules about its competition procedures and business practices.



**8.3.** 8.3. Not to relate to competitors, aiming at agreements on prices, production capacities, market, territory, or production programs sharing, and attitudes that eliminate healthy competition.



**8.4.** 8.4. Not to make agreements with competitors in the sense of not competing, restricting business with suppliers, making fictitious offers within the scope of proposals, or sharing clients, markets, territories, or production programs.



**8.5.** Not to obtain nor use confidential information from competitors.



**8.6.** Omni is committed to maintaining transparency and loyalty in negotiations, including when such negotiations involve disputes with competing companies, always explaining the truth about the characteristics and peculiarities of the activity or service.

## 9 | Relationship with Suppliers and Business Partners

**9.1.** All of our suppliers must act according to the principles outlined below, and our employees must assist in monitoring them:

**9.1.1.** Comply with all applicable laws.

**9.1.2.** Prohibit acts of corruption

**9.1.3.** Engage in the implementation of mechanisms to combat corruption, fraud, money laundering, cartel, and other illegalities in the public administration.

**9.1.4.** Respect employees' basic human rights.

**9.1.5.** Prohibit slave labor and child labor.

**9.1.6.** Take responsibility for the health and safety of their employees.

**9.1.7.** Act in accordance with applicable local and international standards relating to environmental protection.

**9.1.8.** Promote, within their supply chain, compliance with these requirements.

**9.2.** Any legal entity that manufactures, resells, or holds expertise used by Omni due to its activity(ies) is considered a supplier.

**9.3.** Omni disapproves the attitude of employees who, with decision-making power or interference determined by the position they hold, accept, or receive any kind of benefit to enable or facilitate suppliers' access to the company, and such attitude is considered a serious misconduct.

**9.4.** Discriminatory or restrictive acts will not be accepted, either to suppliers who already work with Omni or to those who intend to or come to work with Omni. The company, however, reserves the right to apply strict criteria to select such suppliers, always with the major aim of ensuring excellence in the quality of its activities and safety, in addition to all the other principles contained in this Code.

**9.5.** Contractors are those service providers who are not part of Omni's staff, but who perform functions as part of the company's core activity.

**9.5.1.** All the standards contained in this item, respective sub-items, and in this Code of Conduct are applied to the contractors.

**9.6.** Omni employees must report directly to their supervisors when they identify any situation established with suppliers or contractors that violates or may violate the standards or principles of this Code, that shows non-compliance with legal requirements, or that compromises the excellence in quality, safety and/or the environment and that is causing or may cause losses to the company.





## RELATIONSHIP



# 10 | Relationship with Public Bodies

**10.1.** Contacts with the government on behalf of the company are coordinated exclusively by the Executive Board.

**10.2.** The duties of management and employees are:

**10.2.1.** To respect the applicable legislation and the principles of this Code in the relationships established with public bodies in general.

**10.2.2.** To establish relationships with authorities, politicians and public agents guided by ethics, professionalism, and transparency, immediately reporting to the company any form of pressure, offer or request by a public agent contrary to these principles.

**10.2.3.** Not to offer gifts, presents or any kind of advantage, financial or otherwise, to any public or political agent, or to people related to them in exchange for private benefits or for the company.

**10.2.4.** Not to use an interposed individual or legal entity to hide or disguise interests or the identity of anyone who might benefit from any illicit acts committed.

**10.3.** It is expressly forbidden for the company's employees in contracts and bids with the Public Authority:

**10.3.1.** Prior agreements or arrangements with competitors, with the aim of defrauding the competitive nature of the bidding procedure established by Laws Nº 8.666 and Nº 13.303 and other applicable standards.

**10.3.2.** Defrauding the performance of any bidding or contract, including practices that aim to illicitly alienate competitors, including by offering any kind of advantage.

**10.3.3.** Hindering investigation or inspection activities by public bodies, entities, or agents, or to intervene in their performance.

# 11 | Conflict of Interest

**11.1.** Omni admits no conflicts of interest, either potential or real. They can occur, among others: in a paid activity that may harm professional performance or represent competition to our company; in decision-making, which may configure personal interest to the detriment of the company's interest.

**11.1.1.** It is the employees' responsibility to inform their superiors, through formal processes, of the existence of a potential conflict of interest.

**11.1.2.** Relatives, to any degree, of Omni employees may be hired, but they must compete

on equal terms with the other candidates, respecting the honesty of the selection process and the candidates' ranking order. No preference, favoritism, or facilitation in the selection process will be given to relatives of employees of the company.

**11.1.3.** Relatives of employees are allocated to areas or bases where there is no direct subordinate relationship between relatives.

**11.2.** Employees are forbidden to perform activities that conflict with Omni's interests.



# 12 | Omni Assets and Information

## **12.1.** Use of assets:

**12.1.1** Omni's assets, equipment and facilities are intended for exclusive use in company operations, and employees are responsible for safeguarding and protecting them from unauthorized or improper use. The improper or unauthorized use of property and equipment outside the company's premises is considered misappropriation, constituting serious misconduct.

**12.1.2** IT equipment, programs, applications, data, and information stored in Omni's computerized systems must be adequately protected against damage, loss, theft, duplication, alteration, or unauthorized access. It is the duty not only of the IT team but of all the company's employees to ensure such compliance.

**12.1.3** Omni reserves the right to monitor the use of computer systems and to access employees' electronic messages and files, upon prior approval by the company's CEO, always based on strong indications of violation of the rules of this Code.

**12.1.4** No employee, of any hierarchical level, is allowed to install in its machines any system, program, or application, of any nature, without prior authorization from IT and without a license to use it in Omni's name.



## **12.2.** Information processing:

**12.2.1.** Information is one of Omni's main assets for its business operations and must be managed with care. Thus, the disclosure of company information that is not in the public domain is prohibited, regardless of the existence of a formal confidentiality obligation. The same applies to information of third parties protected by signed legal terms and conditions, with special attention to personal data in the form of clause 12.3.

**12.2.2.** All information obtained in the work environment, even if not related to their specific area and even if it does not contain an explicit warning, must be treated confidentially, because it may contain business secrets, commercial, economic, and financial information, strategic or legal data, among others.

**12.2.3.** It is forbidden for employees to speak on behalf of the company before the press, public institutions, and the market in general, without being expressly authorized by the Executive Board.

**12.2.4.** Employees must not disclose or disseminate any information about Omni through any media and in any way that may expose such information to the external public, with the exception of employees whose duties involve external communication.

**12.2.5.** Care must be taken with the storage, transportation, transmission, and disposal of corporate information and documents.

**12.2.6.** The employee is the guardian of the company's confidential information, and this secrecy must be maintained even after the employment contract.

**12.2.7.** Employees and third parties must always take care of the security of information in accordance with the company's Information Security Policy and not disseminate messages that have illegal, abusive, pejorative, pornographic, racist, sexist, prejudiced, and religious or political content.

**12.2.8.** Original documents of probative value must be protected and kept on file for the periods defined by law.

**12.2.9.** It is forbidden to use confidential or privileged information for one's own benefit or for the benefit of third parties.

**12.2.10.** If there is any doubt about the confidentiality of any information, just contact your immediate superior, who will be able to help you with this.

**12.2.11.** The exchange of messages and dissemination of information, especially those involving Omni and its employees, must always be guided by the ethical, transparent, and truthful character that underlies the relationships of all those subject to this Code of Conduct. The dissemination of information that may embarrass, intimidate, or negatively affect others will be considered serious misconduct.

### **12.3.** Processing of Personal Data:

**12.3.1.** Personal data is all information relating to a natural person who is immediately identifiable or can be indirectly identified based on the set of information available to the company.

**12.3.2.** Omni is aware of and committed to ensuring the protection of personal data in its possession, both of its employees and of third parties, a commitment that must be respected by each one for the benefit of all.

**12.3.3.** Every employee, when engaging in a company-related activity involving the handling of the personal data of any data subject, must always have in mind the privacy and protection of this data, so that the processing of such data meets the principles of

purpose, adequacy, necessity, data quality, security, prevention, responsibility, and accountability.

**12.3.4.** Employees must respect the Privacy Policy maintained by Omni, especially by not processing third parties' personal data, whether they are co-workers, clients, suppliers, or any others to which they may have had access during their activities, except when the processing is strictly related to their duties.

**12.3.5.** Employees may not assign, disclose, use, or discuss any information about personal data of which they may become aware due to their activities, except in the case of strict compliance with their duties or fulfilling a legal duty, undertaking to always keep Omni informed about such situations.

**12.3.6.** In case of doubt as to the regularity of any processing of personal data, the employees must report to the Data Protection Officer or to their immediate superior, so that it can be clarified whether or not the respective processing is possible.

# 13 | Media and Social Networks



**13.1.** The use of social networks in the workplace:

**13.1.1.** Omni does not allow access to social networks in the work environment.

**13.1.2.** Only authorized employees are allowed to post Omni information on social networks.



**13.2.** The use of social networks in the personal environment:

**13.2.1.** As social network users convey a message to those who visit their profile, since they communicate likes and opinions, even though these are private life choices, Omni recommends caution when users associate their profile with the company they work for, since they begin to represent the company in the digital environment. Therefore, any expression and action begins to indirectly communicate the values of the company where you work.

**13.2.2.** Recognizing that its employees carry the “company’s name”, Omni recommends that they adopt an ethical and responsible attitude in both their professional and personal lives.



# 14 | Additional Requirements for Leadership Positions

**14.1.** The employees with leadership positions in Omni must:

**14.1.1.** Select their employees by their qualifications and suitability for the job.

**14.1.2.** Provide accurate instruction, especially in law enforcement.

**14.1.3.** 14.1.3. Clearly communicate the importance of ethics and integrity and encourage their employees to use the Code of Conduct as a reference in their day-to-day work, as well as communicate that violations of the Code are unacceptable and will lead to disciplinary measures, in addition to legal consequences.

**14.1.4.** Set challenging yet attainable goals.

**14.1.5.** 14.1.5. Monitor compliance with company guidelines, compliance with laws, and the requirements of this Code.

**14.1.6.** Evaluate the performance of their employees and apply the principle of meritocracy.

**14.1.7.** Lead their team with openness, professionalism, politeness, respect, and fairness, setting an example of compliance with the principles that guide this Code and the company's policies.

**14.1.8.** Be accessible and willing to engage in frank and constructive dialogue.





# 15 | Occupational Health and Safety

**15.1.** Considering the general principles of this Code and that life and the preservation of health and integrity are primary values to Omni, the company is committed to promoting the continuous improvement of working conditions, which is considered the right and duty of all involved.

**15.2.** It is the duty of all employees and third parties to act in accordance with the standards and care established by the HSE Policy - Health, Safety, and Environment -, with the focus on preventing and avoiding accidents and/or any type of risk in the work environment and in the execution of the company's core activity.

**15.3.** Safety at work is the company's duty, that is committed to supplying any and all protection equipment necessary for the employees to perform their activities with total safety and in compliance with the regulations/laws in effect regarding the company's core activity.

**15.4.** Safety is also the duty of the employees, who have the obligation to use the protective equipment

provided by the company, reporting to the immediate leadership any abnormal situation identified or suspected, and also informing their eventual temporary inability to perform a certain function that poses some kind of risk to themselves or to others.

**15.5.** Smoking is prohibited within the work environment, especially in closed facilities. Therefore, smoking is allowed only in the company's external areas, but never, and under no circumstances, in the airline operations areas, where smoking is expressly forbidden, due to the presence of flammable products and also due to airport and aviation rules.

**15.6.** The consumption of alcoholic beverages and illicit drugs that may affect performance during working hours and safety, and consequently represent a risk to the health of the employee and third parties, is forbidden. Because of that, Omni developed, implemented, and maintains a policy and a program for prevention and treatment of risk associated with the misuse of psychoactive substances (drugs and alcohol), which contains the rules pertaining to the topic.

# 16 | Social and Environmental Responsibility

**16.1.** Omni is committed to conducting its activities with social and environmental responsibility, contributing to sustainable development, caring, acting proactively, and ensuring conditions for a safe and healthy work environment, according to the HSE - Health, Safety and Environment - Policies established in the company.

**16.2.** Omni does not handle or make use of child labor, under the terms of the legislation in force in the country, reporting to the competent authorities if it has evidence and/or knowledge of this practice in other companies or other parts of society.

**16.3.** Omni repudiates forced labor, under any circumstance, and is committed to not using or allowing the use of forced and/or slave labor, reporting to the proper authorities if it has evidence and/or knowledge of this practice in other companies or other parts of society.

**16.4.** To defend and ensure the rights of minorities is Omni's premise, which respects social, cultural, and religious differences, as well as all individual values.

**16.5.** The company will develop, participate, and support social projects, contributing with whatever is within its reach for the good of society.

**16.6.** Omni is committed to contributing to the preservation of biodiversity, through projects it carries out or in which it participates, managing and mitigating the impacts of its activities.

**16.7.** Omni is committed to promoting the sustainable use of water, recycling, proper disposal and reduction of waste generation, conscious use of energy and use of biofuels, and it has contracts with companies specialized in these areas.

# 17 | Anti-Corruption Practices

**17.1.** Omni has an Anti-Bribery and Anti-Corruption Policy that describes the company's anti-corruption practices. All employees, third parties, and business partners must follow the rules of this policy.

**17.2.** Employees and third parties must not offer or grant undue advantages, directly or indirectly, to any person or organization.

**17.3.** Employees and third parties must not take advantage of their position to demand, accept, seek to obtain, or promise undue advantages.

**17.4.** Presents, gifts, hospitalities, donations, and sponsorships must be given or received in accordance with the rules set out in Omni's Policy on Presents, Gifts, Hospitality, Donations and Sponsorships.

**17.4.1.** Presents, gifts and hospitalities may only be given if they are in accordance with the company's policy and applicable laws.

**17.4.2.** Donations are forbidden to individuals, organizations of dubious reputation, political parties, candidates for public office, and religious institutions, as well as to cases prohibited by the company's policy and by law.

**17.4.3.** All contributions under the form of sponsorship must be transparent, based on a written contract and they must have a legal business purpose and be authorized by law and the company's policy.



# TRANSPARENCY



# 18 | Transparency Channel

**18.1.** Omni's Transparency Channel is an exclusive means for secure and, if desired, anonymous reporting of acts or attitudes that violate this Code of Conduct, the company's standards, the legislation in force and/or involve acts of corruption.

**18.2.** This can be reported through the Transparency Channel:

**18.2.1.** Violation of the Code of Conduct, laws, and regulations.

**18.2.2.** Fraud, theft, or robbery.

**18.2.3.** Improper payment or receipt.

**18.2.4.** Conflict of interest.

**18.2.5.** Inappropriate conduct with suppliers and clients.

**18.2.6.** Leakage or misuse of information.

**18.2.7.** Behavior deviation.

**18.2.8.** Moral/sexual harassment, physical assault, or discrimination.

**18.2.9.** Destruction or damage to assets.

**18.3.** Employees, suppliers, third parties, clients and other interested parties can access the Transparency Channel by the following means:

**18.3.1.** [www.canaltransparencia.com.br/omnitaxiaereo](http://www.canaltransparencia.com.br/omnitaxiaereo)

**18.3.2.** Phone: 0800-721-0722

**18.4.** Complainants can follow the progress of the investigation of their reports by means of a protocol, generated when the complaint is registered in the Transparency Channel.

# 19 | Violations and Disciplinary Measures

**19.1.** Omni defines violations of this Code as:

**19.1.1.** To intentionally act in disagreement with the Code.

**19.1.2.** Request or demand that others violate it.

**19.1.3.** Being aware of acts/attitudes that violate the Code and not properly report them to the proper authorities.

**19.1.4.** Retaliate an employee who has reported a concern about ethical conduct or reported a violation.

**19.2.** Employees who violate this Code or its essence will be subject to appropriate disciplinary measures, ranging from verbal warnings to the termination of their respective employment contracts for cause, in the cases provided by law.

**19.3.** Omni will maintain a Committee, the responsibilities of which will be to ensure compliance with the principles contained in this Code and to analyze the infractions committed. The Committee has the power to guide measures to be adopted, with the final decision being attributed to the company's Executive Board.

**Approved by:** Roberto Coimbra (CEO) and Omni TÁxi Aéreo Conduct Committee.







*Code of*  
**Conduct**



## *Declaration of Receipt*

Now that you are familiar with Omni's Code of Conduct, fill out the receipt below, detach it, and give it to Human Resources.

I hereby declare that I have received Omni's Code of Conduct, understood its provisions, and commit to faithfully and fully comply with it and the policies mentioned therein.

---

Employee's Full Name

---

Signature

---

Place

Date

Month

Year

Omni Táxi Aéreo S/A believes in a sustainable world. For this reason, this Code of Conduct had a low print run. Our employees have shared access in the facilities, and they can access the digital code from anywhere via QR Code.



 [www.omnibrasil.com.br](http://www.omnibrasil.com.br)

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## *Código de* **Conduta**







