

Integrity is the foundation of everything we build.

1. Introduction

We live in an increasingly regulated world, where ethics, transparency, and corporate responsibility are no longer just desirable concepts but indispensable foundations for the survival and growth of any serious company. In the U.S. construction sector — marked by legal requirements, strict oversight, and direct impacts on people's lives — these practices are even more crucial.

With this vision in mind, **4U Homes**, an American company headquartered in Florida and specialized in affordable and sustainable housing, decided to implement a robust, modern **Compliance Program** aligned with the best market practices. More than simply following laws and regulations, 4U Homes seeks to foster an organizational culture guided by integrity, respect for rules, and commitment to its clients, employees, partners, and society.

This program was created to present, in clear and objective sections, each of the internal policies that make up 4U Homes' Compliance Program. Each policy is addressed as an independent section, offering explanations, legal foundations, practical guidelines, and real-life application within the company's daily operations. More than just a technical manual, this program is also an educational guide, designed so that all employees can understand, engage with, and apply the rules with responsibility and awareness.

Even though this is the first edition originally prepared in Portuguese to promote understanding among 4U Homes' multilingual teams and international partners, all the policies described here are aligned with **U.S. laws**, especially federal and Florida state legislation, where the company has its strongest presence.

In the following sections, you will find topics such as ethics and personal conduct, anti-corruption, use of company resources, data protection, conflicts of interest, labor standards, workplace safety, technology use, among others. Everything is presented in an accessible, structured way, faithful to the reality of our sector.

This code is, therefore, more than a collection of corporate policies — it is a reflection of the values that sustain 4U Homes and the seriousness with which we treat legal compliance and our commitment to excellence.

At 4U Homes, we believe that the way we conduct our business is just as important as the results we achieve. Our reputation, built with dedication and transparency, depends directly on the daily conduct of every employee. That is why we established this **Code of Ethics and Personal Conduct** — an essential pillar of our Compliance Program.

This section opens our program with the most fundamental theme of all: **how we must behave, individually and collectively, inside and outside the company**. More than a set of rules, this code reflects the principles that sustain 4U Homes' culture — integrity, mutual respect, professionalism, and responsibility.

The purpose of this section is to establish clear standards of ethical and respectful behavior, promoting a safe, inclusive work environment in full compliance with U.S. laws, especially those applicable to the construction sector and labor relations in Florida, where we are based.

All individuals acting on behalf of 4U Homes — whether employees, contractors, suppliers, or representatives — are covered by these guidelines. Regardless of position or role, everyone has the duty to know, respect, and practice the values described here.

The following content provides guidance on how we should act in various situations, from routine matters to sensitive ones, such as external interactions, use of social media, harassment prevention, and conduct outside working hours. In case of doubt, this code should serve as an ethical compass for making decisions aligned with our values and legal requirements.

Acting ethically is not an individual choice: **it is a collective commitment to the company's integrity and future**. Welcome to the culture of **compliance** at 4U Homes.

Let's build together, with ethics and responsibility.

2. Professional Conduct and Mutual Respect

At 4U Homes, respect is the foundation of everything. Promoting a harmonious work environment where everyone feels valued is a daily, collective commitment. The way we communicate and relate — with colleagues, clients, partners, service providers, and suppliers — reveals who we are as an organization.

Code of Ethics and Conduct



An ethical and healthy environment is only possible when each employee acts with empathy, courtesy, and professionalism, even in the face of disagreements or daily pressures. Such conduct not only strengthens internal bonds but also projects the company's image positively to the market and society.

Expected behaviors:

- Treat everyone with respect, courtesy, and consideration, regardless of position, nationality, sexual orientation, gender identity, religion, ethnicity, physical condition, political opinion, or cultural background.
- Always maintain a collaborative, empathetic, and constructive attitude in the workplace — including during meetings, training, email exchanges, or instant messaging.

Not tolerated:

- Offensive comments, derogatory nicknames, inappropriate “jokes,” or any kind of behavior that could embarrass or marginalize colleagues.
- Aggressive, threatening, sarcastic language or behavior that ridicules someone.
- Actions that create a hostile, discriminatory, or intimidating environment, even if disguised as “jokes.”

Important: Good coexistence starts with active listening and recognition of differences. Respect for diversity is a non-negotiable value at 4U Homes.

Practical example:

During a team meeting, an employee is repeatedly interrupted or disqualified for their opinions, causing discomfort and embarrassment. This type of behavior is unacceptable and must be immediately reported to HR or the Ethics Channel, so appropriate measures can be taken.

3. Integrity and Honesty

The foundation of trust in any organization lies in the individual conduct of each person who represents it. At 4U Homes, we believe that integrity and honesty are not only desirable qualities — they are prerequisites for being part of our team.

Being ethical means acting truthfully, even when no one is watching. It means making the right decisions, even under pressure or when facing opportunities that may seem advantageous in the short term but compromise the company's reputation or the fairness of relationships.

Expected behaviors:

- Always tell the truth. Be honest in the information you share with colleagues, leaders, clients, public authorities, or any external partner.
- Maintain transparency in all actions and decisions, avoiding omissions, distortions, or manipulation of data.
- Avoid any behavior that could cause ethical, legal, or reputational harm to the company, even outside working hours.

External representation:

Whenever you are identified as a 4U Homes employee — at events, on social media, in public meetings, or in interactions with suppliers and authorities — your behavior must reflect the company's values.

Reminder: Representing 4U Homes means carrying the image of an organization committed to legality, ethics, and social responsibility.

Practical tip:

Being ethical is not only about avoiding what is wrong — it is about choosing to do what is right, even when it requires effort or personal sacrifice.

4. Behavior Outside Working Hours

At 4U Homes, we recognize that each employee's personal life is private. However, when certain actions outside working hours have the potential to negatively impact the company's reputation, they become subject to attention and, if necessary, disciplinary measures.

Being part of 4U Homes means representing the company in various social contexts, even when not wearing a uniform or formally on duty. Our commitment to ethics and common sense goes beyond the office or jobsite.

Code of Ethics and Conduct



Behaviors under attention:

- Involvement in illegal acts or offenses, such as vandalism, violence, public intoxication, or driving under the influence of illicit substances.
- Participation in public scandals or controversies that negatively affect the community, media, or social networks.
- Offensive, defamatory, or controversial social media posts directly or indirectly linked to the company's image.

Even in your free time, your conduct may affect the trust that clients, partners, and the community place in 4U Homes.

Consequences:

- For minor situations, formal guidance or warnings may be applied.
- For serious or repeated cases, a disciplinary process may be initiated, potentially resulting in termination for cause, as provided by applicable legislation and company policies.

Reflection:

The employment contract ends at the end of the workday, but the role of representing 4U Homes stays with you at all times.

5. Social Media

Social media has become an extension of our personal and professional lives. Therefore, it is essential to understand that whenever 4U Homes' name is directly or indirectly involved in any publication, there is institutional responsibility attached.

What is posted online can reach a wide audience in minutes and remain available indefinitely. In this context, a single inappropriate post can compromise the company's image, harm business relationships, and cause legal consequences.

General guidelines:

- Any publication mentioning or referencing 4U Homes must be respectful, truthful, and consistent with the company's institutional image.
- It is strictly forbidden to disclose confidential content such as internal documents, restricted-area photos, strategic discussions, board decisions, or confidential meetings.
- It is also prohibited to use the company's brand to publish offensive, sarcastic, or derogatory content that exposes colleagues or partners.

In case of doubt:

Before publishing any content involving the company, directly or indirectly, consult the Compliance Department or the Communications team. This helps prevent mistakes that could harm the company's image or cause civil and labor liability.

Example of what must never be done:

"My payment is late again... this company is a mess."

Even if the intention is only to vent, such a post violates the Code of Conduct, compromises the company's reputation, and can result in serious disciplinary consequences, depending on the severity of the infraction.

Reminder:

What you post on social media is not limited to a private circle. By associating your image with that of 4U Homes, you become a spokesperson for our culture, values, and credibility in the market.

6. Responsibility of Representation

Being an employee of 4U Homes means representing the company at all times, even outside the workplace, without a uniform or badge. The way you behave in public directly impacts how the market, clients, and community perceive our organization.

Every action — no matter how small — can reinforce or undermine the image of trust and professionalism that 4U Homes strives to build daily.

This means:

Code of Ethics and Conduct



- During visits to jobsites, external meetings, restaurants, industry events, or supply stores, your behavior must reflect the company's values.
- Words, attitudes, or expressions showing disregard, rudeness, impatience, or disrespect damage the company's reputation.
- Client, supplier, or partner complaints about employee misconduct will be taken seriously and rigorously analyzed.

Key phrase:

"The company's reputation is built by the attitudes of every employee, every day."

You don't need to be formally "on duty" to act with ethics and professionalism. Expected behavior must always align with 4U Homes' values in all public interactions.

You are an ambassador of the **4U Homes** brand.

And like any ambassador, your credibility is an essential part of the success of the organization you represent.

7. Consequences of Non-Compliance

Compliance with the guidelines set out in this **Code of Ethics and Personal Conduct** is mandatory for all employees, partners, and representatives of 4U Homes. By establishing a relationship with the company, each person commits to respecting these standards as an essential condition for maintaining the professional relationship.

When these standards are violated — whether by action, omission, or negligence — the company will respond proportionally to the seriousness of the conduct, always ensuring the right to due process and fair fact-finding.

Possible consequences include:

- Verbal or formal orientation/warning (in minor cases or as a first educational measure).
- Temporary suspension of activities.
- Termination for cause, in accordance with labor laws in force in the United States.
- Reporting to legal authorities, in cases of crimes, fraud, harassment, or civil rights violations.

4U Homes does not tolerate retaliation against those who report misconduct.

The use of the Ethics Channel is protected and encouraged.

8. Prevention of Discrimination and Harassment

4U Homes adopts a **zero-tolerance policy** toward any form of discrimination or harassment, regardless of who the perpetrator or target is. Ensuring a safe, welcoming, and fair environment for all is an absolute, non-negotiable priority of the company.

We recognize that inappropriate conduct, often disguised as "jokes" or "personal opinions," can deeply hurt colleagues, affect team mental health, and compromise productivity. At 4U Homes, such behavior has no place.

Acts considered discrimination or harassment include:

- Comments, jokes, or insinuations with sexual, religious, racial, xenophobic, or prejudiced connotations.
- Invasive or insistent personal advances, including via messages, social media, or outside the workplace.
- Public exposure of employees through yelling, humiliation, offensive nicknames, psychological pressure, or veiled threats.
- Repeated behavior that generates embarrassment, fear, or discomfort, even without physical contact.

Harassment can be verbal, physical, psychological, or digital. None of these forms will be tolerated.

What to do if you witness or experience harassment or discrimination:

- Do not remain silent. Silence contributes to perpetuating the problem.
- Use the company's Ethics Channel, available 24/7, or contact HR.
- If preferred, reports can be made anonymously and securely. All communication will be treated with confidentiality and seriousness.
- The company guarantees protection against retaliation for any employee who, in good faith, reports inappropriate conduct.

Reminder:

Speaking up is an act of courage. Combating harassment is everyone's responsibility — victims, witnesses, and leaders.

9. Final Reflection

Ethics should not only be remembered when a problem arises. It must be present in small daily actions, silent decisions, informal conversations, and sent emails. This is what gradually builds the organizational culture we desire: solid, ethical, and admired.

Before acting, ask yourself:

“If everyone in the company acted like me, would 4U Homes be better or worse?”

This simple question can prevent mistakes, guide decisions, and reinforce a genuine commitment to excellence and responsibility.

Being ethical is not a differentiator — it is a duty.

And at 4U Homes, this duty is shared by all of us.