

“Ethical partnerships build lasting results — because trust, in the business world, is the most valuable input there is.”

1. Introduction

In any company, suppliers and service providers are a direct extension of the brand’s reputation and values. At 4U Homes, this connection goes beyond contracts and deliveries: it represents a commitment to integrity, responsibility, and excellence. Every third party involved in our processes contributes—positively or negatively—to what we deliver to our customers and to society.

Maintaining an ethical, reliable, and technically qualified supply chain is one of the foundations for ensuring business sustainability. It is not enough for partners to deliver on time or at the lowest cost: they must be aligned with our principles, comply with the law, and act with transparency. An unethical supplier can compromise not only the progress of a project, but also the reputation built with so much effort.

In the United States, practices such as bribery, personal favouritism, and lack of tax documentation can constitute serious infractions subject to federal and state sanctions—such as the Federal Acquisition Regulation (FAR), the Foreign Corrupt Practices Act (FCPA), and IRS rules. Therefore, 4U Homes adopts clear and objective criteria for selecting, contracting, and monitoring suppliers and third parties, ensuring that everyone involved in the chain is committed to ethics, legality, and transparency.

2. Ethical and Technical Selection Criteria

Choosing a supplier is not just a matter of cost or convenience. It is a strategic decision that reflects the company’s values and can directly impact the quality of what we deliver, legal compliance, and corporate image. For this reason, 4U Homes establishes objective and transparent criteria for every selection process, avoiding risks of favouritism, operational losses, or links to illegal practices.

The selection of suppliers and service providers must, mandatorily, consider technical, legal, and reputational factors. This means the lowest price is not enough: we seek partners that are solid, ethical, and committed to quality—in every stage, product, or service delivered.

Expected conduct:

- Priorly assess the supplier’s technical capacity and operational structure;
- Verify proven quality of products and services provided;
- Analyse competitive pricing and clear commercial conditions, without abusive clauses or omissions;
- Require legal and tax compliance, with updated and valid documents;
- Consider the company’s ethical reputation in the market and its track record of integrity.

In addition, it is highly recommended that, whenever possible, multiple suppliers be quoted. This practice ensures equal treatment, prevents favouritism, and increases healthy competitiveness in the purchasing process.

Practical example:

Imagine 4U needs to hire a company to supply electrical materials in large volume. An employee receives a proposal from a supplier with very attractive prices, but the company does not have a valid state license and has a history of delays in other projects. Even if the offer seems financially advantageous, hiring would put at risk delivery quality, tax regularity, and the reputation of 4U Homes.

Good practices:

- Document all quotation steps and keep records in the system;
 - Avoid decisions based on subjective or informal criteria;
 - When in doubt about a supplier’s integrity, consult the Compliance department;
 - Never prioritise a supplier without a clear, approved technical justification.
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3. Prohibition of Personal Favouritism

Integrity is not measured only by big decisions, but by the small deviations prevented every day. Among them, perhaps none is as common—and at the same time as sensitive—as personal favouritism in the choice of suppliers or service providers.

In everyday practice, it is natural for employees to have personal networks: friends who are contractors, relatives who sell materials, acquaintances who provide services. The issue is not these connections themselves, but the way they interfere (or may interfere) with company decisions. At 4U Homes, every contracting decision must be impartial, objective, and technically justified.

Even when the intention is to help someone close, favouritism breaks one of the pillars of corporate ethics: equal treatment—i.e., the guarantee of fair and equal treatment for all suppliers. This weakens the company's credibility, drives away serious partners, and can generate suspicion, complaints, investigations, and even lawsuits for unfair competition or fraudulent management.

 **What constitutes favouritism?** Personal favouritism can occur in several ways, even without the employee realising it:

- Inviting only suppliers with whom one has personal ties to submit quotations;
- Omitting relationships of kinship, friendship, or financial interests in contracting processes;
- Acting directly in the selection, analysis, or approval of proposals from companies linked to close persons;
- Inducing other employees to opt for a certain supplier out of affinity or personal convenience.

In all cases, the risk lies not only in financial damage, but in undermining 4U Homes' internal and external culture of trust.

Expected conduct

- Report to Compliance any personal, family, political, or corporate ties with suppliers under evaluation—regardless of the degree of closeness;
- Recuse yourself formally from decisions involving companies linked to you or to people with whom you maintain close relationships;
- Do not accept informal referrals that do not follow the company's approval and quotation processes;
- Do not use your position to make exceptions, speed up approvals, or “give a hand” to acquaintances;
- Act as a guardian of impartiality: upon noticing any risk of favouritism in your team or department, guide, question, and report.

Practical example

Imagine Ana, an engineering coordinator, organising an emergency hiring for a drywall installation service. Her brother-in-law works at a company in the field and, indeed, has competitive prices. Although Ana has not had direct contact with him for years, she is obliged to declare this tie to Compliance and recuse herself from the decision.

The choice may even fall on the brother-in-law's company—but it will only be legitimate if the process is conducted with total impartiality, transparent documentation, and without Ana's participation. Omitting this fact would compromise the integrity of the hiring, even without bad faith.

Good practices

- If in doubt about the need to declare a tie, prefer excess transparency over silent omission;
- Guide teammates who mention referring relatives or friends, explaining the correct procedure;
- Remember that even the appearance of a conflict of interest is enough to compromise the company's reputation—ethics is not only what we do, but what we appear to do;
- Always keep the focus on the institutional mission: 4U Homes' commitment is to quality, efficiency, and fairness in contracting—not to personal preferences.

4. Mandatory Formalization of Contracts

In building a solid company, contracts are not just legal documents—they are pillars of trust, traceability, and mutual responsibility. Every relationship with suppliers, partners, or service providers must begin with a clear, documented agreement validated through the company’s official channels.

Verbal engagements, informal arrangements by phone, or “word-of-mouth” deals are common practices in older businesses, but do not match the professional, ethical, and safe standard that 4U Homes adopts. Informality is fertile ground for operational errors, misunderstandings, non-compliance, and disputes that could be avoided with proper formalization.

In addition to legally protecting the company, a formal contract promotes clarity between the parties, defines expectations, and enables the compliance team’s role in audits and inspections. In the United States, well-structured contracts also help avoid costly litigation, especially in states with strict legislation such as Florida and Texas—where 4U Homes operates directly.

Expected conduct

- Every hiring must be formalized with a document signed by both parties before starting service provision or material delivery;
- The document may be:
 - A full contract, with detailed clauses for scope, deadlines, values, payment terms, liability, and warranties; or
 - A Purchase Order or Work Order with a simplified scope, provided it is recorded in an official system and previously authorized;
- No employee is authorized to make verbal agreements or start activities before contract signature or formal order issuance;
- In urgent and exceptional cases, it is mandatory to:
 - Record the justification for urgency;
 - Request express authorization from management or Legal;
 - Formalize the contract immediately after the emergency execution.

Practical example

Suppose a project manager, under pressure to meet a schedule, hires a local “trusted” electrician to speed up an installation. The agreement is made by text message, with no contract, invoice, or defined scope. After the service, the supplier charges double the amount and refuses to redo sections with technical issues.

In this scenario, 4U Homes is exposed to financial, legal, and reputational risks—and the responsible employee may be held accountable for breaching internal guidelines. If the process had been formalized, with approved scope and recorded values, the company would have clear mechanisms to ensure correct execution or demand corrections.

Good practices

- Always use contract templates approved by Legal or Procurement;
- Complete all required fields: scope, dates, values, responsible engineer, and termination conditions;
- Ensure the supplier has received, understood, and signed the contract before any financial or operational movement;
- In case of doubt, consult Compliance or Legal—never assume risks on behalf of the company without formal backing.

5. Documentation and Tax Regularity

No commercial relationship should begin without first ensuring that the partner is legally able to provide services. At 4U Homes, we contract responsibly—which means verifying, before any agreement, whether the supplier is compliant with the law, has formal structure, and fulfils tax and regulatory obligations.

This verification is not mere “bureaucratic checklist”—it is an ethical and strategic filter that protects the company from labour, tax, and reputational risks. Working with irregular suppliers can result in stoppages, fines, legal liabilities, and, in extreme cases, in the company’s involvement in investigations for connivance or omission.

Moreover, U.S. legislation—especially at the federal and state levels—requires active diligence in verifying any contractor’s regularity, particularly in regulated sectors such as construction, engineering, and transportation.

Expected conduct

Before formalizing any hiring, it is mandatory to request, verify, and file the following updated documents:

- W-9 form (for U.S. legal entities) or the equivalent form for foreign entities;
- Certificate of liability insurance and, where applicable, workers’ compensation insurance;
- Business license (state or municipal), valid in the jurisdiction where the service will be provided;
- Proof of no outstanding tax debts or relevant litigation, such as negative certificates or compliance declarations;
- Technical qualification documentation in specific cases (e.g., professional board registration, electrical installation license, environmental certifications, etc.);
- Supplier registration form, completed and signed according to 4U Homes’ standards;
- Registered business address, CNPJ (if Brazilian) or EIN (U.S. Employer Identification Number).

Periodic update and revalidation

- Supplier documentation must be reassessed periodically—preferably every 12 months or as per the contract;
- Any change in company data, such as address change, new corporate name, or insurance coverage change, must be immediately communicated to the responsible department and recorded in company systems;
- Suppliers with expired or pending documentation may not be engaged or paid until fully regularized.

Practical example

Imagine the procurement team hires an excavation service with a supplier indicated by the site, who does not have an active license to operate heavy machinery in that municipality. During execution, an accident involving a third party occurs, and the authorities identify the irregularity.

Responsibility, in this case, also falls on 4U Homes, which should have required proof of the proper license. In addition to possible fines, there is risk of project stoppage, lawsuits, and negative impact on the company’s image.

Good practices

- Keep a checklist of mandatory documents for each supplier/service type;
- Centralize documents in the company’s official system, ensuring quick, traceable access for audits;
- Never accept incomplete, illegible, or altered scans;
- If in doubt about a document’s validity or applicability, consult Compliance, Legal, or Finance.

6. Integrity Clauses in Contracts

Signing a contract is more than formalizing a commercial agreement—it is entering into an ethical commitment. At 4U Homes, every contract with suppliers and partners must reflect not only the service’s technical and financial conditions, but also the values that sustain our culture of integrity.

Including specific ethics and compliance clauses in contracts is essential to ensure that all involved know and assume clear responsibilities regarding expected behaviour. These clauses protect the company from legal, reputational, and operational risks and create a safe basis for resolving potential irregularities.

Companies operating in the United States, especially in regulated sectors such as construction and development, are subject to strict rules such as the Foreign Corrupt Practices Act (FCPA), Sarbanes-Oxley (SOX), and various state corporate responsibility laws. Therefore, ignoring the ethical aspect in contracts is not only risky—it is legally imprudent.

What every contract must include

Every contract signed with suppliers, service providers, or strategic partners of 4U Homes must mandatorily include clauses that reinforce our commitment to:

- **Anti-corruption and anti-bribery:** formal agreement that no undue advantage will be offered, requested, or accepted by the parties;
- **Termination for ethical violation:** company's right to terminate the contract immediately in case of fraud, bribery, discrimination, forced labour, money laundering, or any other illegal or unethical act;
- **Compliance with laws and regulations:** express statement that the supplier complies with labour, tax, environmental, and safety laws applicable to its sector;
- **Cooperation with audits and inspections:** commitment to provide documents, clarifications, and cooperate with internal or external verifications;
- **Confidentiality and data protection:** where applicable, clause ensuring confidentiality of strategic, personal, or operational information, pursuant to LGPD or equivalent U.S. norms.

Practical example

Suppose 4U Homes hires a third-party company to perform post-construction cleaning at its properties. If the contract lacks an integrity clause and, during execution, it is discovered that this company employs workers in conditions analogous to slavery or without documentation, 4U Homes may be held jointly liable, even without prior knowledge.

With a well-drafted integrity clause, the company can immediately suspend the contract, demonstrate prior diligence, and avoid greater damage—both legal and reputational.

Good practices

- Use standard contract templates approved by Legal and Compliance;
- For smaller engagements, use work orders with reduced clauses but including essential integrity elements;
- Reinforce with suppliers that breaching ethics clauses may lead to future disqualification in new processes;
- In international contracts or with foreign companies, consult Legal to ensure compliance with local laws and international treaties.

7. Prohibition of Gifts and Undue Advantages

Integrity is not for sale. Nor for trade. Nor to be bought. However innocent it may seem, accepting gifts, favours, or benefits can cast doubt on the impartiality of corporate decisions. And at 4U Homes, the reputation for integrity is worth more than any momentary advantage.

Gifts may be a legitimate form of appreciation in some cultural contexts. In the corporate world—especially in regulated sectors like construction—they can also be used as attempts to influence decisions, directly or indirectly. Therefore, setting clear limits is essential to protect the company and its employees.

Our policy follows best governance practices and is aligned with internationally recognised compliance guidance, including the U.S. Department of Justice (DOJ) recommendations for corporate integrity programs.

What is prohibited

No 4U Homes employee may solicit, accept, offer, or allow the receipt of:

- High-value gifts, especially during contracting processes or contract renewals;
- Commissions, tips, bribes, or any form of off-the-books payment;
- Personal invitations to luxury events, trips, or experiences funded by suppliers or partners;
- Indirect benefits, such as payment of expenses, donations in the employee's name, or advantages for family members.

These practices—even if disguised as courtesy—compromise trust in the impartiality of business decisions and may constitute private corruption as defined by U.S. (e.g., FCPA) and Brazilian law (Anti-corruption Law 12.846/13).

What is permitted (with caution)

Acceptable, provided not linked to ongoing decisions and within a symbolic limit:

- Promotional swag bearing a logo (e.g., pens, notepads, planners);

- Commemorative souvenirs under US\$50;
 - Occasional business lunches, provided they are not excessive or frequent, and always with the direct manager's approval.
- If in doubt, the employee should seek guidance from Compliance or their manager.

Practical example

Imagine an engineer at 4U Homes, responsible for evaluating proposals from hydraulic-materials suppliers, receives a watch as a gift from a representative of one of the competing companies. Even if the intention is merely to “thank for the partnership,” accepting this gift can be interpreted as a breach of impartiality—especially if that supplier is selected soon after.

The proper response is to politely decline, explaining that the company policy does not allow such a benefit. If that is awkward, the employee can record the situation with Compliance and, if necessary, return the item formally.

Good practices

- When in doubt, decline politely and record the incident;
- Avoid accepting any advantage you would not feel comfortable disclosing internally;
- Inform Compliance whenever you receive an offer exceeding the symbolic limit;
- Never allow personal relationships to interfere with professional decisions—integrity is impartiality.

8. Ongoing Evaluation and Disqualification of Suppliers

Selecting a reliable supplier is only the first step. The real commitment to integrity lies in continuously monitoring behaviour, performance, and alignment with the company's values. Just as we demand excellence and ethics from our own employees, it is fair and necessary to maintain the same standards with our business partners.

At 4U Homes, relationships with suppliers and service providers are not static. They are living, dynamic—and must be constantly observed. This does not mean excessive surveillance, but responsibility. When we hire someone to represent us, we expect them to do so with professionalism, respect for the law, and irreproachable ethical conduct.

Companies that engage in dubious practices—such as using irregular labour, tax evasion, or disrespecting safety standards—put at risk the reputation, projects, and even the operating license of 4U Homes. Therefore, our evaluation process is continuous and structured.

What we regularly evaluate

Throughout the contractual term, suppliers are monitored based on objective criteria, such as:

- Quality of products or services delivered;
- Compliance with deadlines and schedules;
- Compliance with contractual clauses and legal obligations;
- Respect for labour, environmental, and occupational-safety standards;
- Ethical conduct and absence of involvement in scandals, fraud, or relevant lawsuits.

The responsible team may use performance reports, site feedback, and document analyses as monitoring tools. Whenever necessary, technical visits, interviews, or formal audits may be conducted.

When there is risk: criteria for disqualification

Disqualification or suspension of a supplier may occur in the following cases:

- Confirmed unethical behaviour, such as bribery, harassment, or fraud;
- Serious or repeated breach of contractual obligations;
- Absence of mandatory documentation, even after notification;
- Involvement in relevant investigations or criminal proceedings;
- Acts that harm the image of or compromise the trust in 4U Homes.

This measure may be temporary (suspension) or permanent (disqualification), depending on the severity and history of the business relationship.

Practical example

Suppose a service provider hired for a project begins systematically delaying deliveries and, at the same time, reports arise that they are using unregistered workers. Even if the delivered service has reasonable quality, these behaviours put 4U Homes at legal and reputational risk.

The responsible decision, in this case, is to suspend the hiring, investigate the facts, and—if confirmed—apply disqualification based on contract clauses.

Good practices

- Always record interactions with suppliers in official systems—this helps with traceability and impartial decision-making;
- If you have ethical doubts about a supplier's behaviour, consult Compliance before taking isolated decisions;
- Value suppliers who are proactive, transparent, and willing to evolve with the company.

9. Promoting Integrity Across the Supply Chain

No company builds alone. Every brick, every delivery, every service contracted carries not only a cost, but also a choice—the choice of whom we want to walk with. And at 4U Homes, we want to walk alongside partners who share our principles: integrity, respect, social responsibility, and commitment to quality.

Therefore, our relationship with suppliers goes beyond the contract. It is also an invitation: let's grow together, with ethics and purpose.

Building an integral supply chain means supporting, guiding, and, whenever possible, inspiring our partners to adopt good practices. Even if some suppliers do not yet have a structured compliance program, it is 4U's role to encourage the development of these initiatives, contributing to a more ethical and prepared market.

Ethics is not a differentiator—it's a prerequisite

During the approval and contracting process, it is mandatory that the person in charge asks the supplier about the existence of:

- A Code of Ethics or Conduct;
- A structured Compliance Program;
- Anti-corruption, anti-discrimination, and anti-harassment policies;
- Environmental and social responsibility initiatives.

If the supplier still does not have these instruments, the person in charge must:

- Formally record the response;
- Ask whether there is an intention to implement them;
- Request, when applicable, an estimated timeline for implementation.

These points will be taken into account in the evaluation and in the future relationship with the company.

Practical example

Imagine 4U Homes' procurement team is hiring a new earthmoving company. During the approval process, the supplier reports that it does not have a Code of Ethics but shows interest in creating one if required.

In this case, the contract owner may forward good-practice templates, refer the Compliance department as support, and record this commitment as a future condition. The idea is not to exclude good professionals for lack of structure, but to help them develop with integrity.

Committed suppliers will be valued

4U Homes will prioritise, whenever possible, suppliers who:

- Have their own compliance and ethics policies;
- Maintain internal whistleblowing or ombudsman channels;
- Carry out relevant environmental, social, or educational actions;
- Agree to take part in audits, training, or verification processes promoted by the company.

These criteria may even influence the final score in competitive processes or contract renewals.

Good practices

- Keep clear records of the responses received at the supplier-approval stage;
- Value transparency: a supplier who acknowledges limitations and wants to evolve is better than one who withholds information;
- Promote dialogue with strategic partners on topics such as diversity, inclusion, sustainability, and human rights.

10. Shared Responsibility

Working with integrity is a two-way street. 4U Homes expects suppliers and service providers to uphold high standards—and, in return, we commit to a fair, transparent, and respectful relationship.

Rights and duties on both sides

- **Transparency and clarity:** 4U Homes undertakes to set realistic deadlines, clear instructions, and accessible communication channels. Suppliers must promptly notify any risk that could impact delivery or quality.
- **Safety and compliance:** All services provided on 4U Homes' premises or worksites must follow safety standards (PPE, training, access control). Suppliers must ensure their employees are legally authorised to work in the U.S. and are duly registered with the competent authorities.
- **Fairness in evaluation:** Performance assessments will be based on technical and objective criteria. Personal preference or undue influence will not be tolerated.
- **Respectful treatment:** We reject discriminatory attitudes, harassment, or disrespect in any interaction. Mutual respect is non-negotiable.

⚠ Situations that constitute non-compliance

- Using unregistered labour, employing minors illegally, or not providing safety equipment;
- Offering or accepting gifts that create obligations or influence decisions;
- Presenting false documents, invoices, or information;
- Systematically failing to meet deadlines or delivering below quality standards;
- Disrespecting local laws (labour, tax, environmental) or 4U Homes' internal policies.

💡 Practical example

A subcontractor reports to 4U Homes that, due to unexpected heavy rainfall, the scheduled delivery will be delayed by two days. The supplier proposes a revised schedule and additional measures to avoid further impact. This is the correct conduct: transparency, responsibility, and collaboration. Conversely, hiding problems, improvising without authorization, or delivering something below standard contradicts the spirit of partnership we seek to build.

11. Travel and Lodging Costs for Visitors and International Employees

At 4U Homes, welcoming our global partners and collaborators is part of our commitment to building bridges and ensuring that each visit contributes to high-quality, safe, and ethical operations.

This policy establishes transparent and equitable guidelines for reimbursing or covering travel and lodging expenses for visitors and international employees, ensuring compliance with legal and tax standards in the United States while maintaining operational efficiency and integrity.

Purpose: To guide the coverage or reimbursement of essential expenses for visits to projects, training sessions, and other professional activities in the United States, always in accordance with the company's internal policies, the foreign visitor's labour status, and U.S. legal regulations.

Who it applies to:

- Foreign visitors invited by 4U Homes for professional purposes (e.g., training, technical visits, meetings);
- International employees of 4U Homes (or partner companies) performing activities in the U.S.;
- Guests attending company-sponsored events, where appropriate and pre-approved.

General principles:

- Legality and compliance;
- Transparency and documentation;

- Reasonableness and austerity;
- Prior approval;
- Equal treatment, regardless of nationality.

Typical covered items: airfare (economy), lodging (standard room), local transport (rideshare/taxi to business activities), per diem/individual meals per policy limits, insurance/health coverage required by law.

Non-covered items: luxury upgrades, leisure expenses, tips/gifts beyond policy limits, companion costs, anything unrelated to the business purpose.

Process: pre-approval → documentation/receipts → reimbursement/payment → accounting recordkeeping and audits.

Tax and immigration note: compliance with applicable U.S. rules (IRS substantiation, visa status), and observance of anti-corruption standards (FCPA) regarding travel benefits.

Good practices: plan ahead; document everything; maintain clear communication; when in doubt, contact Compliance/Finance.

12. Medical Emergency or Accidents on Business Trips and in the Workplace

Commitment to safety: The health and safety of our employees and visitors is a top priority at 4U Homes. Whether on business trips or at our facilities, we are prepared to support urgent needs and follow the necessary procedures to protect people and comply with legal obligations.

In the event of a medical emergency: call 911; provide first aid if trained; contact immediate leadership/HR; record the incident; follow medical instructions.

What 4U covers:

- **Emergency care:** urgent medical assistance to preserve life and health;
- **Essential medications** prescribed during the emergency;
- **Transport** to medical facilities when necessary;
- **Accommodation changes** if medically required.

Coverage depends on the visitor's/employee's status and insurance arrangements; all must comply with internal policies and applicable law.

Worker's compensation: In the U.S., work-related injuries are generally covered under workers' compensation insurance; visitors should have adequate insurance coverage prior to travel.

Respect and confidentiality: handle all information with discretion, comply with privacy regulations, and ensure supportive, non-retaliatory treatment.

Good practices: always carry ID and emergency contacts; know your insurance details; inform leadership about any incidents; prioritise safety over schedules; when in doubt, ask for help.

13. Monitoring, Auditing, and Consequences for Non-Compliance

Compliance is part of everyday life at 4U Homes. To ensure this policy is effective, the company may carry out periodic checks, request documents, and conduct audits whenever necessary—always with respect, transparency, and a focus on continuous improvement.

How monitoring works

- The company may request documentation, records, and information to verify compliance;
- Performance evaluations consider not only technical delivery, but ethical conduct and legal compliance;
- Suppliers may be invited to training sessions and dialogues on good practices.

Consequences for violations

- **Warning or formal notice**, with deadline for remediation;
- **Suspension** from new engagements until resolution;
- **Contract termination** in cases of serious or repeated violations;
- **Reporting to competent authorities** when illegal acts are identified.

Right to be heard

- The supplier or third party has the right to present explanations and supporting documents;

- The company values dialogue and due process but will act firmly to protect the integrity of operations, people, and customers.

Final message: This policy is not a barrier; it is a bridge. It protects those who do the right thing and opens doors to long-term partnerships based on trust.

14. Inspiring Closing

“Ethical partnerships build lasting results—because trust, in the business world, is the most valuable input there is.”

At 4U Homes, we believe that how we build is as important as what we build. Every supplier, every service provider, every partner is part of this story. If you share our values—integrity, respect, and responsibility—you are in the right place.

Let us move forward together, with transparency, professionalism, and a commitment to doing what is right. Our doors are open to those who want to build with us—not only projects, but a market that is fairer, safer, and more ethical for everyone.