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Quality Management Policy



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1. Introduction

Ernesto Borges Advogados (“Firm”) is committed to delivering legal services with a high standard of excellence, aiming at the continuous increase of the satisfaction of its clients and other stakeholders by meeting their expectations and needs. Through a clear and straightforward approach, it conveys dependability on the capacity of its internal processes and quality of its services, thus supporting the integrity of its Quality Management System, structured based on ABNT ISO 9001:2015 standard.

Hence, it establishes this **QUALITY MANAGEMENT POLICY** (“Policy”), a document that is part of its Quality Management System, intended to guide and direct efforts pertaining to quality maintenance in line with organizational purposes and strategy.

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2. Concepts and Definitions

The terms set out in this Policy should be interpreted in keeping with the definitions herein:

2.1. Quality Management System: Set of interrelated elements to achieve the Firm's goals and quality processes, fully complying with this Policy.

2.2. ABNT NBR ISO 9001:2015 Standard: Standard that sets out the technical guidelines of a quality management model earmarked for organizations.

2.3. Members: Members, lawyers, associates, employees, interns, suppliers, and service providers;

2.4. Stakeholders: Individuals or corporations that interfere directly or indirectly with the Firm's service provision.

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3.Guidelines

3.1 The Quality Management's principles were set forth by the Brazilian Association of Technical Standards (“ABNT”) and should be interpreted jointly, taking the relevant equivalence into account. The tenets below serve as the basis of this Policy and govern the Firm's Quality Management System:

3.1.1 Focus on the Client: Conditions imposed by the client should be assimilated, their needs met, and expectations exceeded.

3.1.2 Leadership: Holders of leader positions should commit to the Quality Management System and its effectiveness, ensuring that the quality policy and its goals are consistent with the Firm's underlying context, availability of funds required for its going concern and development, in addition to the furtherance of an environment that facilitates and spurs on the members' participation in the pursuit of the goals set.

3.1.3 People's Engagement: All members should know and engage with the Firm's goals. The organization should communicate assertively, and further the enhancement of skills, with a view to consistent results.

3.1.4 Approach to Process: Assimilation and management of processes allows controlling interrelations and interdependences among processes with a view to improving performance as a whole, thus adding up to the Firm's achievement of intended results.

3.1.5 Improvement: The Firm understands the importance of cherry-picking opportunities and implementing procedures necessary for meeting clients' needs, always seeking to improve the effectiveness of the Quality Management System.

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3.1.6 Evidence-Based Decision Making: Decisions should be made based on the review and assessment of data that implies improved objectivity and trustworthiness, through spotting, monitoring, and estimating performance indicators with a view to accomplishing intended results.

3.1.7 Relationship Management: To show appreciation of the creation, maintenance, and management of relationships with stakeholders.

3.2 The Firm's Quality Policy is intended:

3.2.1 To grow in a sustained manner, being a benchmark for its outstanding legal services, provided by professionals trained and committed to the ethics and integrity set out in the Quality Management System.

3.2.2 To ensure its financial sustainability, always seeking to improve financial management and fiscal accountability controls.

3.2.3 To focus on full customer satisfaction and establish a consistent and ongoing relationship.

3.2.4 To constantly improve the effectiveness of internal processes, and of the Quality Management System alike.

3.2.5 To invest and continuously spur on the professional training of our members.

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4. Quality Purposes

4.1 Aiming at the continuous improvement of the services provided, the expectations of stakeholders, and the intended results, the Firm, within the scope of its Quality Management System, established its quality purposes in line with the strategic planning indicators, namely:

4.1.1 As for Finance: To deliver the intended profitability, and control the budget, using the operating cash generation margin and the gross margin as strategic indicators.

4.1.2 As for Clients: To achieve the goals established by the clients, meeting their assessment and performance criteria; to monitor and critically review client satisfaction, using, as strategic indicators: meeting clients' goals; NPS research; noncompliance and noncompliant output.

4.1.3 As for Internal Processes: Investment in training and qualification, using investment spent on training as a strategic indicator.

4.1.4 As for Knowledge and Learning: To implement management by indicators, using turnover and engagement assessment as strategic indicators.

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5. Performance of Quality Management System

5.1. Scope

Provision of legal services to the business segment, with judicial, extrajudicial, and advisory activities, in the following areas of law: Agribusiness, Environmental, Judicial and Arbitration Litigation, Banking, Consumer, Real Estate, Infrastructure, Digital, Privacy and Data Protection, Estate and Corporate Planning, Credit Recovery, Corporate Restructuring, Health, Social Security, Telecommunications, Energy, Labor, and Tax.

Requirement deleted:

5.1.2 Monitoring and Measurement Resources: The firm does not use equipment that can be checked and calibrated.

5.2 Change Planning and Control

Considering that the Firm's core business is the provision of legal services, which depends on the performance of external agents. All possible changes that may impact the compliance of the legal services performed, as well as the processes of the Quality Management System should be planned, recorded, implemented, and assessed through SGQ-RG-02 Change Planning and Control.

It is the responsibility of the divisions to spot and record the changes in the said record.

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5.3 Document Management

In order to standardize and safeguard the Firm's documents, in the case of change in procedures, members should request a change in the Quality Management System, which will proceed with the necessary updates.

It is important to highlight that documents should be reviewed and approved by the requesting division before being disclosed again.

5.4 Internal Audit

Internal audits are carried out annually within scheduled timeframes, and are conducted by duly qualified and certified internal auditors through training relating to ABNT NBR ISO 9001:2015.

At the end of each internal audit, if necessary and at the auditor's discretion, the record of noncompliance or opportunity for improvement is made, as well as the communication to those responsible for their handling who should take the measures and efforts they deem fit.

5.5 External Audit

Carried out annually, in cycles of maintenance and recertification, by an external and independent organization qualified to provide certification in the ABNT NBR ISO 9001:2015 standards.

In the external audit, the compliance of the Quality Management System in relation to the requirements pre-established by the standard in question is assessed, in order to assess the feasibility of maintaining the intended certification.

The ISO 9001 certificate is valid for 03 three years, during which certification maintenance audits are carried out annually, and, in the third year, an audit for recertification is accomplished.

It is the responsibility of the Quality Management System to maintain certification in ABNT NBR ISO 9001: 2015 standards.

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5.6 Noncompliance, Noncompliant Output, and Opportunity for Improvement.

Cases in which one or more requirements or standards pre-established by the Firm in its internal processes, described through workflows, are not met will be considered Noncompliance.

Cases in which service provision is not in keeping with the client's requirements at the time of delivery or that will not be delivered as intended are considered as Noncompliant Outputs.

In our context, Noncompliant Output refers to the procedural errors found in the regular processing of judicial and administrative cases that bring losses to clients and the firm, thoroughly described in Work Instruction 02 of the Firm's Legal Assistance division.

In turn, Improvement Opportunity revolves around the ongoing search for improvement of our internal processes, focusing on customer satisfaction and the effectiveness of the quality management system. Thus, our members should be able to spot opportunities for improvement in their professional daily lives, and point out which measures should be taken for enhanced efficiency of internal processes.

It is worth mentioning that whenever noncompliances, noncompliant outputs or opportunities for improvement are spotted, entry on the system should be made pursuant to SGQ-DOC-10 Manual – EBTECH Noncompliance Module.

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6. Roles and Responsibilities

6.1 It is the responsibility of the Board of Directors:

6.1.1 To approve the Quality Policy and its subsequent revisions;

6.1.2 To resolve on issues, recommendations, and reports submitted by the External Auditor.

6.2 It is the responsibility of the Members:

6.2.1 To know, disclose, and comply with this Policy and other Firm's internal procedures;

6.2.2 To forward any questions and/or requests about this Policy, its standards, and procedures to the Quality Management System.

6.3 It is the responsibility of the Quality Management System:

6.3.1 To guide the members regarding the measures to be taken concerning ABNT NBR ISO 9001:2015 standard;

6.3.2 To make changes to Firm's corporate instruments, whenever triggered;

6.3.3 To plan and carry out internal quality audits.

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7. Related Documents

- I. ASSOCIAÇÃO BRASILEIRA DE NORMAS TÉCNICAS. ABNT NBR ISO 9001:2015. Quality Management Systems
- II. ASSOCIAÇÃO BRASILEIRA DE NORMAS TÉCNICAS. ABNT NBR ISO 9000:2015. Quality Management Systems — Principles and Vocabulary
- III. Scope of Law Firm Ernesto Borges Advogados
- IV. Quality Manual of Law Firm Ernesto Borges Advogados
- V. Manual – Ebtech Noncompliances Module
- VI. Quality Goals of Law Firm Ernesto Borges Advogados

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8. Policy Management

The guidelines established in this Policy and in the other standards and procedures of the Quality Management System are not exhaustive, owing to the continuous development of the internal and legislative system, and it is the obligation of the subjects performing under this Policy to take, whenever necessary, other measures in addition to those set forth herein, in order to ensure the quality of the services provided and the maintenance of the Quality Management System.

The Quality Policy was proposed by the Risk Management and Compliance Board and approved by the Board of Directors on **July 10, 2023**, is effective as of this date, and the responsible Board is expected to ensure its updating within timeframes not exceeding one (01) year.

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ERNESTO BORGES NETO

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