



*Code of  
Conduct and Ethics*

003.00089-1197 – Rev. 003

## *1. Introduction*

The Vamtec Group Code of Ethics aims to provide a brief explanation, for all employees and partners, of the ethical conduct that forms the basis of the Vamtec Group's commitment to fair business and appropriate internal and external relationships. Staff are expected to demonstrate this conduct in their daily work and they must conduct themselves in accordance with the law and the standards, regulations, policies and internal procedures of the company. We believe that it is important that you understand and consider this Code, as it is essential that we ensure that ethical principles are behind all our relationships, which will enable us to display ever higher moral standards. This document applies to all of the Business Units in the Vamtec Group.

The Board



## **MISSION**

To provide materials and services that meet the needs of the customer, so that they can achieve their best results, profitably and sustainably, generating wealth for their shareholders, employees and the community.

## **VISION**

To be recognized by employees, partners and customers as an international leader in supplying innovative materials and services for the markets we operate in.

## **VALUES**

Creativity - Innovation is part of the DNA of the Vamtec Group.

Effort - We appreciate hard work and commitment.

Truth - This is fundamental to any activity.

Humility - Relationships between everyone built on mutual respect.



## 2. General Principles

You are expected to behave in a manner that is based on justice, loyalty, common sense, the law and respect for general rules. We do not tolerate corruption, extortion, bribery and law breaking of any kind, as well as failing to respect human rights. Everyone must be treated fairly, equally, politely and with respect, regardless of their position.

We do not accept:

- Discrimination or prejudice of any kind, including in relation to race, gender, religion, age group, political conviction, nationality, marital status, sexual orientation or any particular condition;
- moral or sexual harassment or situations where someone is being pressured, intimidated or threatened, regardless of the seniority of those involved;
- forced or child labor or anything that supports it.



### *3. Relations between Staff*

3.1. The Vamtec Group wishes to have a healthy working environment, which helps all staff to be successful and happy in their work. 3.2. The Vamtec Group does not accept any discrimination in relation to the selection, hiring, relationships between, assessment or promotion of staff. 3.3. The Vamtec Group does not accept child labor or any form of exploitation that offends human dignity, whether inside or outside the company. 3.4. The Vamtec Group does not accept that any staff should have any privilege or that their work for the company should be negatively affected, because of a relationship they have with another member of staff.



### *4. Relations with Shareholders.*

4.1. The Vamtec Group's relationship with shareholders, potential investors and analysts must be on an equal basis, without any preference for any party. We will always act on the basis of transparency and commitment, in order to maximize the level of competitiveness and profitability.

## *5. Relations with Customers, Suppliers and*

5.1. All our customers must be treated without any discrimination or favoritism. Dealings must respect the commercial agreements between the parties. 5.2. We promise to fulfill the contracts we sign with our customers, employees of the Vamtec Group, service providers and suppliers. 5.3. We will provide our customers with all the necessary information about our services and commercial terms, clearly and accurately. 5.4. We do not accept any benefit from favoritism or any incentive or inappropriate benefit. 5.5. When choosing a supplier or service provider, we not only consider the commercial terms and the quality of the products, but also the ethical behavior of the companies. 5.6. Negotiations with suppliers and service providers are conducted in a transparent, professional and ethical way, and only by authorized personnel. 5.7. Our workers are not allowed to accept any personal benefit from negotiations with customers, suppliers or service providers, such as gratuities, bribes or similar. 5.8. Vamtec Group tries to not spread any information that could harm the business or the image of the company or its customers, suppliers and competitors.

## *6. Relations With The Community*

6.1. The Vamtec Group aims to show respect for the communities it operates in and establish partnerships that help to improve the condition of the community. We try to support and protect local culture and minimize our impacts of their activities.

## *7. Relations With Other Entities.*

7.1. We do not allow the paying of bribes to anyone when we deal with public or private entities in this country or abroad, which allow the company to commit irregularities. 7.2. Similarly, employees are not allowed to offer commission or benefits to governmental or non-governmental officials, directly or indirectly, in this country or abroad, in order to influence decisions or gain an advantage. They are also not allowed to do anything that is not in the interests of government, here or abroad.



## *8. Environment*

8.1. The Vamtec Group is committed to preserving the environment and complies strictly with the relevant legislation. The Vamtec Group acts responsibly to protect people's health and the environment. Our objective is to meet existing needs without harming the environment and without compromising the future of later generations.

8.2. The Vamtec Group encourages staff to be aware of their use of natural resources and to do so sustainably. We encourage the preservation of the environment and we prevent environmental damage occurring due to our activities.



## *9. Occupational Safety*

9.1. The Vamtec Group considers safety of the utmost importance in all its activities and prioritizes reducing the risk of accidents and providing a safe and healthy place to work. 9.2. The Vamtec Group instructs staff, both its own and those of third parties, to comply with its Health and Safety Policies. No activity must be undertaken in risky conditions. 9.3. All staff and contractors must report any situation that is unsafe, and any accidents or incidents, immediately.

## *10. General Standards*

10.1. The Vamtec Group expects all employees to comply with the provisions in their respective contracts, to behave with integrity at work and to keep information secure and confidential. We do not allow any conflicts of interest between our employees' work for the company and their private affairs and likewise for third parties. When an employee engages in any activities that are incompatible with the interests of the company, this raises a conflict of interest. 10.2. The Vamtec Group does not allow donations or receiving money, gifts or private services, from suppliers, service providers, business partners or any third parties that could be construed as a way to obtain an advantage for themselves or for third parties. 10.3. The Vamtec Group considers the following to be unacceptable behavior by employees:

- a) Being the owner, a partner, director, employee or service provider of a company that has a commercial relationship with the Vamtec Group, or is a competitor;
- b) Using the assets or services of the Vamtec Group for their own benefit or for the benefit of a third party;
- c) To offer an advantage to or favor a supplier or service provider of the Vamtec Group, in exchange for some benefit for themselves or a third party;
- d) Undertake any activity that affects their working hours or performance for the Vamtec Group;
- e) Ask suppliers or service providers to sponsor activities, except for charity; and only then when the request has been approved by the Board of the Vamtec Group in advance;
- f) Refuse to use the mandatory safety equipment for their work; Use technology, methods or information that belong to the company or to third parties, but which is in the possession of the Vamtec Group, for their own purposes or those of third parties, without this being expressly approved in advance;
- h) Break the safety regulations for the company's premises, or for travel to and from work, thereby making the working conditions less healthy and more dangerous;
- i) Publish material in the company's name, including on social media, in blogs or any other type of media, without approval in advance;
- j) Develop external projects that compete with the company's business;



- k) Use the company's systems and resources for non-work activities, including sharing memes, jokes, games or party political publicity;
- l) Buy or sell shares in the company, or advise others to do so, based on information that is not in the public domain, as well as sharing privileged information;
- m) Sell any products or services, privately, on the company's premises;
- n) Make false records, statements, time cards, expense claims or any other type of document;
- o) Work while under the effect of alcohol or illegal drugs;
- p) Use their privileged position with the Vamtec Group or knowledge for their own benefit, or that of third parties;
- q) Hand out written or printed material, collect contributions, sell raffle tickets or stakes to friends, without the approval of management;
- r) Conduct private work during working hours or leave the workplace without informing their line manager;
- s) Smoke on company premises, except at those locations specifically designated for this purpose;
- t) Do anything that might damage company assets;
- u) Offer gifts, bribes or benefit or agree to pay a bribe. Active and passive corrupt practices are forbidden.

## *10. Reporting and Complaints*

11.1. The Vamtec Group encourages its staff, suppliers, service providers and anyone else to report any breach of this code. 11.2. The Vamtec Group does not encourage unfounded accusations. Staff should only make a report when they have information or facts that show that the code has been breached. 11.3. Any situation that would be a breach of the Code, must be immediately forwarded to the Ethics Committee. We will follow procedures intended to protect the rights of the reporter and the subject, while adhering to local legislation. Details are in the Investigation and Response to Complaints Procedure. 11.4. Under no circumstances should a report about possible breaches or impropriety lead to retaliation or intimidation of any employee. 11.5. Any individual who breaches the provisions in this Code, the rules or the disciplinary guidelines of the Vamtec Group will be subject to disciplinary measures, which may

include a warning (verbal or written), suspension or dismissal. 11.6. The General Board and the Chairman are responsible for ensuring compliance with this Code. They are also responsible for making recommendations to the Committee on improvements to ensure it remains up to date. 11.7 It is also important to state that the Ethics Committee will consists of three specific people: (i) The Corporate Commercial Manager of the Vamtec Group, Mr. Humberto Henrique F. de A. Procópio; (ii) The Legal Director of the Vamtec Group, Dr. Yuri Frias Varella; (iii) The Financial and Administrative Director of the Vamtec Group, Ms. Cristiane Porchera.

### ***COMMUNICATIONS CHANNELS FOR CRITICISM, SUGGESTIONS AND REPORTS***

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Any criticism, suggestions or reports relating to the Vamtec Group Code of Ethics and Conduct can be sent to the Varella Advogados law firm, for the attention of the Legal Manager, Fernanda Magalhães, who is responsible for dealing with these, at [eticavamtecgroup@gmail.com](mailto:eticavamtecgroup@gmail.com), or by phone (27) 30252429. They may also be sent by mail to Rua José Alexandre Buaiz, No. 300, 5th floor, Ed. Work Center, Enseada do Suá, Vitória-ES (State of Espírito Santo) - Zip Code 29.050-545, or submitted to the suggestion box, which is available in accessible locations and has a confidential-marked envelope for submissions. In this case, the information will be sent to be processed and dealt with, on behalf of Varella Advogados, by the Personnel Department of the Business Unit in the Vamtec Group. Note: the envelope is only for information relating to the Code of Ethics and Conduct, which will be sent to the Legal Department. Other communications do not need to use the envelope!

## *Terms of Agreement and Commitment*

All members of staff of the Vamtec Group are expected to dedicate themselves loyally to the company and avoid any interests or relationships that could damage the company's business or that might be at odds to the standards detailed in the code of ethics and conduct.

Therefore, having read the Code and received training on it, I confirm that I fully understand the code of ethics and conduct and I have received a copy to refer to as necessary.

I further declare that I will fully comply with all the rules established by the code, and I have no further questions about the contents.

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_