



ALUBAR GROUP

**CODE OF ETHICAL
CONDUCT**

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Review: 03
Date: 09/10/2021
Issuer: Compliance

Title: Alubar Group's Code of Ethical Conduct

1. PREFACE

Message from the Executive Board

The trajectory of the Alubar Group shows that our achievements were based on the trust of employees, shareholders, customers and suppliers, financial and governmental institutions, the press, and the community. This trust ensures the sustainability of our relationships and business.

The purpose of this Code of Ethical Conduct is to transmit, to all those who directly or indirectly integrate Alubar Group's daily activities, that our values are responsibly guided by an ethical character that we use in our activities and that should ensure our actions in the future.

The Alubar Group is a company that is internationally recognized for its products and services and, therefore, believes that ethical conduct is indispensable in organizations that seek to stand out in the markets where they operate. Our ethical posture will allow us to maintain the trust we have earned with the organization's stakeholders and, at the same time, will contribute to the growth of our institutional image and market performance.

Alubar's Code of Ethical Conduct will also help us to fulfill, in an efficient manner, our Mission, Vision and Values; and it will be the basis for the implementation of the best Corporate Governance practices, which will allow us to combine Ethics and Effectiveness, to reduce the risks of our business and to increase the productivity of our operations.

José María Barale
Chairman of the Executive Board



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Message from the Executive Board

The Alubar's Group has demonstrated, since the beginning of its companies' activities, the commitment to act with integrity, honesty, respect, and professionalism in national and international business, always seeking to participate in strategic alliances with other leading companies in the world market.

We reinforce our commitment to continue acting in line with the most demanding ethical values in all environments that involve our business. Respect for standards of an ethical nature ensures the trust that shareholders have delegated to each of their employees towards the organization.

These standards are an integral part of the ethical conduct determined by the company and represent our commitment and active participation so that customers, suppliers, financial and government entities, and the communities where we do business, can perceive that the growth and recognition of the Alubar Group's companies are sustained by values that we proudly share.

We invite you to read, reflect on and apply the Alubar Group's Code of Ethical Conduct, using it as a guide to direct your daily behavior in the companies.

Ultimately, as we all come to fully incorporate this document, we will transform the way we act and relate to people and the organization. Thus, we will be committed to the responsibility we have to ourselves, to our families, to the Alubar Group and, mainly, to society.

Cordially,

Maurício Santos
Executive Director Alubar Metais e Cabos



2. PRESENTATION

The Alubar Group believes that its business must be conducted based on conducts with integrity and aligned not only with internal rules and procedures, but also in compliance with all applicable legislation to its line of business. To do this, we seek to maintain transparency in our activities and demonstrate our credibility through our set of values:

- Integrity - Means impartial, transparent, and honest conduct. It also relates to compliance with the laws and regulations that govern the activities of our industry and our organization.
- Customers - We build long-term relationships with customers by listening to them, understanding them, and exceeding their needs, in a timely and non-controversial manner.
- People - People are a differential in the Alubar Group's performance. We recruit, train, and promote the best people, and are committed to quality, innovation, fair compensation, diversity, and respect for others.
- Continuous Improvement - We know that sustainable success depends on our ability to continuously improve the quality, cost, and timeliness of our products and services.
- Entrepreneurship - Entrepreneurship is the incessant search for new opportunities and innovative solutions in the face of problems and needs that arise.
 - Proud to be Alubar - We are proud to be part of an organization that makes a difference in its field of activity and in its ability to face and overcome challenges. We truly assume the behavior as owners of the business, always pursuing the defined goals.

All Alubar Group's shareholders and employees must maintain a conduct aligned with these values, taking care to comply with them and disseminate them inside and outside the company.



3. BASIC PRINCIPLES

These are fundamental principles for the Alubar Group:

- **Respect for life:** We conduct our business respecting man and nature, we value our employees, our greatest asset, providing a healthy, safe, and wellbeing work environment.
- **Good corporate governance practices:** Aligning with the best accounting and management practices, we adopt clear, objective, and timely communication to our shareholders, supporting the decision-making process and raising the level of excellence of our business.
- **Commitment to the protection, promotion, and awareness of Human Rights:** Throughout the production chain and the provision of our services, we follow the principles of the Universal Declaration of Human Rights to ensure freedom of thought, expression, and equality for all.
- **Achieving results with corporate social responsibility:** We consider the economy, education, the environment, health, local activities, and government to contribute to building a fairer society and a healthier environment.

These Principles must be observed, as far as possible, in the other entities in which the Alubar Group has direct or indirect participation in the countries where it operates.

These are Fundamental Principles for members of the board of directors and its advisory committees, directors, employees, interns, and underage apprentices of the Alubar Group:

- Act with responsibility, honesty, trust, respect, loyalty, transparency.
- Follow the legal obligations applicable in the countries where the Alubar Group operates, directly or indirectly, and with the Company's internal policies, instructions, and regulations.



4. SCOPE AND COVERAGE

This Code, which contains general rules of ethical conduct to be complied with, must be observed by all those who make up the Alubar Group, or who act, directly or indirectly, on its behalf. These rules serve as a guide for all Alubar Group policies and standards.

Rules of Ethical Conduct

These are expected behaviors:

1. Perform your activities in harmony with this Code, policies and other internal rules defined by the Alubar Group, making your co-workers aware of them.
2. Employees who manage or direct teams have an additional role in communicating our ethical values. They must lead by example to contribute to a fair and respectful working environment and ensure that those directly linked to their position act in accordance with our standards of integrity.
3. Maintain a collaborative, honest, respectful, loyal, impartial, and transparent professional attitude in the relationship with employees, suppliers, customers, and shareholders.
4. Participate in all the trainings that the company promotes and apply them in their daily routine, especially in the topics related to the Integrity Program.
5. Present yourself in the work environment fit for the development of your activities (no drunkenness, drug use, etc.).
6. Avoiding, discouraging, and reprimanding the making of mean comments or the continuation of indiscreet and unpleasant conversations about other professionals, clients, and suppliers (verbal or written).
7. Act in strict compliance with all laws applicable to the Alubar Group's operations in the countries where it operates, including the Brazilian Anti-Corruption Law (Law 12.846/13), the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) and Corruption of Foreign Public Officials Act (CFPOA).
8. To preserve the Alubar Group's assets, including its image and reputation, facilities, equipment, and materials, using them only for their intended purposes.
9. Keep a proper conduct in the work environment and outside it, including in social media, when using Alubar's name or logo, uniform or any other material that can identify you as its employee or representative, always aiming to preserve the company's image and reputation.
10. To be careful and responsible in the relationship with the authorities, customers, competitors, suppliers, members of the communities and all other individuals and organizations with whom the Alubar Group relates in the exercise of its activities, always seeking to preserve the good reputation, image, and relationships of our companies.
11. Competing openly and independently in all markets, not entering into agreements (formal or otherwise) with competitors to fix or determine prices, allocate products, markets, territories, or customers.
12. Respect the intellectual property rights of others.



13. Maintain the confidentiality of customer and supplier information, not disclosing their registrations, information, operations, contracted services, etc.
14. Be careful and prudent when holding meetings, or corporate interactions (face-to-face or virtual), especially in public places, such as airports, restaurants, elevators, cabs, etc.; always avoiding excessive language, bad language, infamous jokes, abuse of intimacy, or any other type of unprofessional and/or embarrassing behavior, especially in the presence of third parties or authorities.
15. Avoid situations in which there may be conflict of interests between yourself and the Alubar Group interests and, when this is not possible, abstain from representing the Alubar Group in the matter in question and immediately communicate the fact to your immediate superior and/or the Compliance Department.
16. Do not establish business relationships with companies or individuals that do not observe ethical, health, safety, and human rights standards in harmony with those of the Grupo Alubar.
17. Commit to the sustainable development of the regions where the Alubar Group operates and to adopt the precepts of conscious consumption such as: not wasting water, energy, paper, plastic objects, office materials, and selective collection.
18. Act with social responsibility and respect for human dignity inside and outside Alubar Group's companies.
19. Perform daily activities, respecting the internal and external health and safety applicable norms to the Alubar Group.
20. Collaborate effectively with public organs, entities, or agents, including in the scope of regulatory agencies and the inspection organs of the National Financial System, so that eventual infractions imputed to the organization are effectively clarified.

[*Learn about our Souvenirs, Gifts, Donations and other Contributions Policy*](#)

These are intolerable conducts and subject to disciplinary measures:

1. Use the position aiming at obtaining personal advantages, facilities and/or granting any form of favoritism or illegitimate personal benefit to employees, relatives or third parties.
2. Allow Alubar Group's businesses and operations to be used in the practice of illicit acts, such as: local or transnational corruption, bribery, money laundering, fraud, etc.
3. Mislead someone, blaming them unjustly, or causing them harm of any kind.
4. Discriminate against someone based on gender, sexual orientation, religious belief, ethnicity, race, origin, social class, age, union status, political or ideological conviction, disability, marital status, or any physical characteristic.
5. Practice harassment of any nature, including moral or sexual, as well as situations that represent disrespect, intimidation, vexatious situations, hostility or embarrassment or threats in the relationship between its employees, regardless of their hierarchical level.
6. Allow or make political or religious advertising on the premises of our companies, or even outside them, if the action could be in any way associated with the company's brand.
7. Participate in activities or make political-party manifestations involving or causing association to the Alubar brand. The employees who wish to get involved with these issues,



or who manifest themselves in this sense, must make clear their personal character and there must not be, under any circumstances, the association of the Alubar Group image.

8. Force employees to participate in religious and/or cultural events promoted by the Group.
9. Give preferential or privileged treatment to any customer or supplier in disagreement with Alubar Group policies and standards.
10. Offer or receiving anything of value in disagreement with Alubar Group's policies and norms, as a means to exert undue influence, or to obtain personal gain or a prize for oneself or a third party.
11. Request, accept or, in any way, benefit from gifts or favors from an individual or legal entity, public or private, that is related to Alubar Group, in violation of the Policy of Souvenirs, Gifts, Donations and other Contributions and/or Conflict of Interests.
12. Make donations or social contributions on behalf of Alubar Group in disagreement with the Souvenirs, Gifts, Donations and other Contributions Policy and other grants.
13. Promise, offer, give, or authorize, directly or indirectly, an undue advantage (anything of value) to a Public Agent or third party related to it.
14. Commercialize and/or advertise one's own products or services or those of third parties on the company's premises.
15. Destroy, delete, or copy confidential or sensitive information produced in the exercise of its activity, as the materials produced by our employees are the property of Alubar Group.
16. Use for private purposes or pass on to third parties the internal information and know-how (knowledge, technologies, methods, systems, software, etc.) of Alubar Group, without prior authorization or specific contracting for such.
17. Disclose any of Alubar's Group confidential or sensitive strategic information to which he has access, including if he ceases to be linked to the Group as stipulated in contractual clauses.
18. Consume alcohol or use illegal psychoactive drugs during working hours or on Alubar's premises.

These rules do not exhaust all the expected and intolerable conduct to be practiced by our employees, but are references related to most of our activities. Thus, every action must consider common sense in attitudes and compliance with internal and external regulations.

Non-compliance with the conducts will be subject to disciplinary measures set forth in Alubar Group's Consequences Policy.

[Learn about our Consequences Policy](#)

5. ASPECTS OF CONDUCT PER PUBLIC OF INTEREST (STAKEHOLDERS)

Customers

They are the basis for the growth and maintenance of our business. For this reason, we must respect them and ensure a good relationship and satisfaction.



Our Commitment:

- To be transparent and ethical in our business relationships.
- To maintain confidentiality about our clients' information.
- To honor the negotiations and contracts signed.
- To maintain excellence in the supply of products and services, seeking to understand their needs and, as far as possible, exceed them within the established commercial context.

Employees

Behind every function, every position, and every activity carried out by the Alubar Group, there are people who are part of families, and these families make up our society. We see each person that makes up the Alubar Group a vital organism to make our business happen. That's why we have legitimate commitments to all our employees, while remaining consistent with our principles.

Our Commitment:

- To maintain transparency and open dialogue in all relationships.
- To recognize our employees for their effort and competence in performing their activities.
- To promote professional development in the activities in which they operate.
- To adopt the best practices to promote the well-being of the people who make up the Alubar Group.
- To invest time and resources in strengthening the ethical culture of our professionals.

Community and Society

We base our business on the positive and negative impacts these have on the places where we operate. The search for the well-being and development of the communities in which we operate is a constant for us to have harmonious relations with society.

Our Commitment:

- To conduct our business as responsible companies for the development and progress of society.
- To look for opportunities to improve our processes, to enhance the positive impacts identified.
- To adopt prevention and remediation measures to minimize negative impacts caused by our operations.
- To invest in projects for social, economic, and cultural development in communities we understand as being most in need.
- To honor legal commitments and regulations concerning health, safety, and the environment.

Competitors

We have total respect for our competitors and believe that this is a way to contribute to the improvement of a healthy market. We value ethical and fair competition in all our business



dealings, maintaining the necessary confidentiality to give our clients the assurance that we create our proposals with the necessary independence to better serve them.

Our Commitment:

- To comply with antitrust legislation and Alubar Group's Competition Policy.
- To keep strategic matters under the necessary confidentiality regard to our competitors.
- To respect the image of our competitors, not commenting on or spreading any rumors about them.
- To elaborate our commercial proposals based on internal strategic projections, disregarding the financial and economic situation of our competitors.

[Learn about our Anti-Corruption Policy](#)

Suppliers

The excellence of our products and services is directly linked to the partnerships we establish with our suppliers. We cherish solid and stable relationships, considering the commitment that our partners have with integrity, quality, and punctuality of their deliveries. Alubar Group does not condone illicit practices and maintains impartiality in its negotiations.

Our Commitment:

- To respect the parties with whom we relate, with the same integrity and transparency that we also expect to achieve.
- To practice free competition, conducting the process of purchasing or contracting services, with honesty and without conflict of interest.
- To prioritize suppliers that have proven responsibility with the applicable legislations and maintain the sustainability of their companies based on ethics and integrity.
- To honor the negotiations and contracts signed.

[Learn about our Third Parties' Code of Conduct](#)

[Learn about our Due Diligence Policy](#)

[Learn about our Conflict-of-Interest Policy](#)



Public Sector

Our relationship with the government is based on pillars of transparency and control. We interact with agents or public sectors basing our activities in compliance with the Brazilian Law 12.846/2013 (commonly called "Anti-Corruption Law") and guidelines from regulatory and inspection agencies, extending our conduct in national and international units.

Our Commitment:

- To strictly comply with the requirements of the Brazilian Anti-Corruption Law in all relations with the government, whether they are of a commercial nature, or of day-to-day interactions (federal, state, or municipal level).
- To be upright, truthful, and transparent in all dealings with the public sector.
- Not to tolerate any type of corruption, direct or indirect, practiced by an employee or third party that acts on behalf of the Alubar Group.
- To report to the competent authorities, supported by legal opinion and subsidized by the Compliance Department, proving good faith, and avoiding or mitigating eventual consequences, the cases of proven identification of criminal and/or administrative illicit acts involving the Alubar Group and/or public agents or agencies, respecting the legal and constitutional guarantees foreseen in the legislation.

[Get to know our Agents and Public Sector Relationship Policy](#)
[Learn about our Anti-Corruption Policy](#)

Press

The press is a strong ally in the process of externalizing Alubar Group's image to the stakeholders. We believe that a good image is built on ethical and exemplary conduct. To this end, we are committed to providing understandable and truthful information.

Our Commitment:

- To care for the reliability and transparency of the information transmitted to the communication vehicles.
- To ensure that all comments, statements, or pronouncements on behalf of the Alubar Group are made only by authorized personnel.

Shareholder

The Shareholders determine the policies and guidelines that must be practiced by the Alubar Group, including ethical conduct.

Our Commitment:

- To execute the activities in a way that maintains the economic/financial sustainability of the Alubar Group.
- To act in a way to avoid that Alubar Group Companies are exposed to market, financial and labor law risks, always preserving our business.



6. ETHICS COMMITTEE

The Ethics Committee of the Alubar Group is an independent body, of consultative and permanent nature, composed of 7 (seven) members, as specified below:

- Executive Board Representative
- Audit Committee Representative
- Executive Board - Alubar Metais e Cabos (Metals and Cables)
- Industrial Department Representative
- Compliance Representative
- Legal Representative
- Human Resources Representative

Its objective is to advise the Executive Board in the performance of its attributions, the Ethics Committee has as its main responsibilities to watch over:

- a) By complying with the requirements described and disclosed in the Alubar Group's Code of Ethical Conduct.
- b) For receiving, analyzing, and treating the denunciations managed by the Ethics Channel, respecting the impediments that may characterize conflict of Interest foreseen in the Alubar Group's Integrity Program Policies.
- c) Demanding, if necessary, the services of the Internal Audit Department or independent audit company to help in the decision-making process.
- d) For contracting, if necessary, the services of an external and independent company to investigate the complaint.

The Committee has the obligation to report all meeting minutes (ordinary and extraordinary) to the Executive Board and has other duties and responsibilities:

- e) To look out for the interests of the organization, within the scope of his attributions.
- f) To ensure that the Executive Board is aware of matters that could have a significant impact on the Group's financial conditions and business.
- g) To advise the Compliance department in strategic decisions that have a significant impact on the Integrity Program.
- h) To appreciate the reports issued by regulatory agencies.
- i) To keep under due confidentiality all the facts, conducts and information received and ascertained, as well as the topics put on the agenda during the meetings.

The participation of members in the Ethics Committee does not guarantee stability, additional remuneration, or any other form of benefit.



7. ETHICS CHANNEL

The Alubar Group believes that the effectiveness of an Integrity Program is only real with the unconditional participation of all the people that make up our companies. In this way, it is the responsibility of each employee to comply with the explicit conducts in this Code, as well as with the internal policies and legislations to which we are regulated.

When verifying situations that characterize a violation of the conducts foreseen in this Code, the employee must report it to help the company build a more wholesome environment. The situations can be presented to the immediate manager, who has the commitment to propagate to his team the precepts of this Code. And in case the informant does not feel comfortable, he/she may contact the Compliance department by phone +55 91 3322-7212 or +55 (91) 99164-8655, and by e-mail compliance.alubar@alubar.net, or in person.

If the employee prefers to report the situations ANONYMOUSLY, he/she can do so through the Ethics Channel, which is operated by an independent company and has a high standard of security and confidentiality of information, through the methods below:



Brazil: 0800 900 9098
USA/Canada: 1 (800) 870-3866
Other countries: +555123132309



ethics.alubar@contatoseguro.com.br



www.contatoseguro.com.br/alubar

All information regarding the report will only be accessed by the Ethics Committee, and it has the ethical responsibility to maintain the confidentiality of the information received. If the informant wishes to have his/her identity revealed (only to the Ethics Committee), he/she must clearly express in his/her manifestation that he/she wishes to be identified.

Alubar Group GUARANTEES that its employees, or third parties, will NOT suffer any kind of retaliation or intimidation for acting in good faith when making a report.

[Learn about our Ethics Channel Use Policy](#)



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8. GENERAL PROVISIONS

Doubts or questions about the interpretation, the scope, or the procedures regarding any subject to be dealt with regarding this Code, Policies or the Alubar Group Integrity Program must be shared with the Compliance department, which will direct the questions to the specific departments and instances, when necessary.

The Compliance Department is responsible for coordinating the Integrity Program and is also responsible for proposing to the Ethics Committee and to the Executive Board recommendations for its improvement, aiming at its permanent updating.

Compliance with this code may give rise to the processing of personal data of employees and third parties.

Therefore, Alubar Group is committed to guaranteeing to the owners the safety of the personal data treated, using them only for specific purposes, besides taking care of the data in accordance with the determinations of the Brazilian General Data Protection Law and with Alubar Group's Privacy Policy.

We end this document reinforcing that YOU are the only one responsible for ethics in the Alubar Group and in the society that you are part of. Don't expect attitude from other people to do what is right.

Being ethical is a matter of decision. Make the right choice!



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9. DECLARATION TERMS

I declare for all due purposes that I have received, read, and understood Alubar Group's Code of Ethical Conduct. I have been trained by Compliance on its contents and am aware of my duty to comply with it in its entirety.

I am aware that failure to comply with the guidelines set forth herein will be evaluated by the Company and/or regulatory agency, and will be subject to administrative, civil, labor, and criminal disciplinary measures.

Full Name

Individual Taxpayer Registration Number

Unit

Registration

Place, date.

Signature



10. DECLARATION TERM OF CONFLICT OF INTEREST

In order to guarantee the transparency of our actions, it is necessary to know about situations that may conflict with Alubar Group's interests.

We count on your commitment to position us on situations that can be understood as a conflict of interest, so that we can take actions that are aligned with the Group's strategies, and with our Code of Ethical Conduct, harmoniously safeguarding the integrity of our business and our employees.

Relationship with Public Agents:

- Do you hold, or have you held in the last 6 (six) months, direct or indirect public positions? () Yes () No

DESCRIBE:

Position: _____

Public Entity: _____

Period: _____

- Do you have first- or second-degree relatives (spouse, parents, children, siblings, grandparents, uncles) who work directly as a Public Agent? () Yes () No

DESCRIBE:

Degree of Relationship: _____

Name: _____

Position: _____

Public Entity: _____

- Do you have any close relationship with civil servants (from a public agency or a mixed economy company) who occupy positions with decision-making power? () Yes () No

DESCRIBE:

Relationship: _____

Name: _____

Position: _____

Public Entity: _____

- Do you hold or have you held a position in a political party or are you a candidate for political office or do you have a relationship with a politically exposed person? () Yes () No

DESCRIBE:

Name: _____

Political Party: _____

Position: _____

Relationship: _____



Employee Relationships

- Do you have relatives or people with whom you have an affective relationship within the Alubar Group? () Yes () No

DESCRIBE:

Degree of Relationship: _____

Name: _____

Position: _____

Relationships with third parties, companies or competitors.

- Are you related to third parties that have some type of commercial relationship with the Alubar Group? () Yes () No

DESCRIBE:

Degree of Relationship: _____

Name: _____

Company: _____

Position: _____

- Are you a partner, shareholder, board member, executive, negotiator or commercial representative of companies that compete or have commercial relations with Alubar Group?

DESCRIBE:

Company: _____

National Register of Legal Entities: _____

Position: _____

- Do you have relatives, in decision-making position in companies that, even not competing or having direct relation with Alubar Group, can generate potential conflict given the position you exercise in the Group?

DESCRIBE:

Degree of Relationship: _____

Name: _____

Company: _____

Position: _____

SIGNATURE: _____