



ALUBAR GROUP

THIRD PARTIES' CODE OF CONDUCT

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THIRD PARTIES' CODE OF CONDUCT

PRESENTATION

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

We know that the excellence of our products and services is directly linked to the partnerships that we establish with our third parties (suppliers, service providers, commercial representatives, consultants, beneficiaries of social projects, among others). This way, we cherish solid and stable relationships taking into account the responsibility that we establish in our business, especially with the commitment that these third parties have with integrity. Thus, we share our Third Parties's Code of Conduct.

This document outlines our values through the conduct that the Alubar Group expects to obtain in all business relationships with our third parties, in order to reinforce the ethical and transparent conduct that we expect to obtain and are committed to providing.

1 - Commitment to integrity

We are a company of integrity, so we cherish healthy relationships with our third parties. Alubar Group is pleased to establish partnerships with companies that share solid ethical values. It is desirable that our third parties have an Integrity Program containing internal policies and/or rules that ensure their commitment to the subject of ethics and integrity, including in the choice of their business partners, and we are willing to help them in this process of propagating corruption-free environments.

[*Learn about our Code of Ethical Conduct*](#)

2 - Compliance with applicable laws and regulations

Our third parties must act in strict compliance with the laws and regulations applicable to their activities, including complying with the Alubar Group's internal policies, just as we do in our business.



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3 - Intolerance to corruption and bribery practices

The Alubar Group does not tolerate corrupt practices, bribery or contraventions, whether in the public or private sphere. Our employees are formally instructed not to receive, promise, offer, authorize, or give, directly or indirectly, an improper advantage to anyone. Thus, in addition to strictly complying with Law n. 12.846/2013 (Brazilian Anti-Corruption Law), the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA) and CFPOA (Corruption of Foreign Public Officials Act), we ensure that we do not favor any third party.

Consequently, our partners must not be involved with public or private agents in practices harmful to the public administration, private sector, third sector, or benefit third person related to these agents to influence any act or decision to promote their own or Alubar Group's interests.

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

[Get to know our Agents and Public Sector Relationship Policy](#)

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

4 - Respect for Human Rights and labor standards

In accordance with Alubar Group values, and aligned to the principles of Human Rights, our third parties are not allowed to use slave labor or similar to slavery, child labor, excessive working hours, discriminatory treatment (ethnicity, origin, gender, sexual orientation, religious belief, condition of unionization, political or ideological conviction, social class, disability, marital status or age) or to practice harassment of any nature (moral and sexual), thus ensuring equality and respectful treatment in all its relations (internal or external).

It is our third parties' duty to promote a healthy and safe environment for their employees and business partners, by implementing occupational health and safety actions.

5 - Professional and operational excellence

We keep a high professional and operational standard in providing products and services to our customers. As customers, or business partners, we expect to be served by our third parties with the same level of excellence.

Our third parties must honor the contracts signed with our companies, committing themselves to the regularity of their activities, compliance with the stipulated deadlines and quality assurance,



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always striving for the continuous improvement of their companies' operations and, consequently, of the Alubar Group.

[Learn about our Due Diligence Policy](#)

6 - Environment

We work aware of our responsibility to the environment and comply with environmental legislation. Thus, it is our third parties' duty to act in compliance with environmental licenses and authorizations, being aware of the aspects and impacts to which their businesses are subject to, as well as actions to control their activities.

[Learn about our Environmental Policy](#)

7 - Secrecy and information confidentiality

We consider as confidential any information that has not been publicly disclosed. We are committed to maintaining the necessary secrecy to safeguard the image and business of both the Alubar Group, its customers and third parties.

Thus, it is our third parties' duty, regardless of their level of involvement and knowledge about our activities, to formally express their commitment to keep under secrecy and confidentiality all and any information to which they have access, using them responsibly and professionally.

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 General Data Protection Brazilian Law and with Alubar Group's Privacy Policy.

Accounting and financial records

We are committed to the integrity of our accounting and financial books, records, and reports.

Accordingly, while we cannot guarantee the integrity of our third parties' accounting and financial records, they are expected to keep their accounting and financial books, records and reports complete, updated, accurate and in compliance with applicable laws and regulations.

8 - Monitoring and Audit



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The monitoring and audit process is a pillar of our Integrity Program that enables the prevention, detection and remediation of situations that disagree with the conduct expected by the Alubar Group.

Alubar Group reserves the right to perform the due diligence, in any phase of the relationship with the third party, with the purpose of increasing the reliability of the relations established, and may even request the adoption of corrective measures under penalty of contractual termination.

[Learn about our Due Diligence Policy](#)



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9 - ETHICS CHANNEL

Alubar Group believes that the effectiveness of an Integrity Program is only real with the unconditional participation of all the people who are part of our companies' activities, whether they are employees or third parties. Thus, it is everyone's responsibility to comply with the conduct explicit in this Code, as well as with the internal policies and legislations that regulate us.

When verifying situations that characterize a violation of the conducts provided in this code, third parties must report them as a way to help build a more wholesome environment. The situations can be presented to the contract manager, and if the informant does not feel comfortable, he/she can contact the Alubar Group's Compliance Department by phone +55 (91) 3322-7152 or +55 (91) 99164-8655, and/or through the e-mail compliance.alubar@alubar.net.

If the third party prefers to report the situations ANONYMOUSLY, he/she can do it through the Ethics Channel, which is operated by an independent company and has a high standard of security and confidentiality of the 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

Any and all information regarding the report will only be accessed by the Ethics Committee, which is responsible for maintaining 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 WARRANTS that its employees, or any third party, will NOT be retaliated against or intimidated in any way for making a report in good faith.

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

10 - FINAL PROVISIONS



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This Code does not exhaust all ethical conduct to be practiced by our third parties but serves as a reference so that the activities are conducted in regularity with our values and applicable laws. The support of the third parties' top management is fundamental to disseminate the ethical precepts to their respective employees, thus allowing the compliance with these conducts to be carried out without setbacks.

Doubts or questions about the interpretation, scope or procedures regarding any subject of this Code, Policies or our Integrity Program, can be shared with Alubar Group's Compliance Department.

Compliance with these guidelines is an indispensable condition for the establishment and permanence of the relationship between the Alubar Group and our third parties.

Being ethical is a matter of decision.

Make the right choice!

[*Learn about our Compliance Program*](#)



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TERM OF RECEIPT AND COMMITMENT

I declare, for all due purposes, that I have received a full copy of the Alubar's Group Code of Conduct for Third Parties, I have taken note of its provisions and I commit to fully comply with them.

I am aware that failure to comply with the guidelines set forth herein will result in administrative and legal penalties.

Full Name

Individual Taxpayer Registration Number

Position

Company

Local

Date

Signature