



COLLABORATOR'S CODE OF CONDUCT AND ETHICS



Message from Christian Mader

The hard work generation and honest achievements made Asvotec a synonym of respect and reliability. Our 50 years history of the company is due to our unwavering commitment with the ethical behavior, doing the right thing, the right way. The intense dedication to integrity is fundamental to maintain the business performance and achieve our future objectives.

OUR VALUES

WHAT IS EXPECTED FROM EVERYONE

All Asvotec's Employees are subjected to this Code of Conduct and all of us must understand and follow the Code and the laws of our daily job.

We must use our common sense complying with our **VALUES** and evaluate all of our actions. Sometimes we can face situations where the right choice is not clear.

In these situations, ask:

- Is it consistent with the code?
- Is it Ethical?
- Is it legal?
- Is it going to have good repercussions for Asvotec and for me?
- Would I like to read about this on the newspaper?
- Would my family and friends approve this?

Violation Reporting

If you have any reason to believe that an employee from Asvotec or any person that might be working in the name of Asvotec has been involved in an improper or unethical conduct, you have the obligation of reporting the incident immediately through our reporting channel www.asvotec.com.br/compliance or the e-mail ouvidoria@asvotec.com.br. It is a safe way to confidentially receive your information, 24/7.

Non-Retaliation and Secrecy

Asvotec values the help of employees that identify potential problems that we need to take care of. Asvotec will take the applicable measures to ensure that the reports are kept secret, including the identity of the rapporteur (if the person identifies themselves). Asvotec do not accept any retaliation against the employees that, with goodwill, report any breaks or violations on the Code of Conduct and Ethics. Asvotec will investigate any kind of retaliation claim.



OUR MISSION

APPLYING OUR CODE

ASVOTEC is a company that has as its mission and purpose:

“Provide viable technical solutions through special equipment and services with technology and quality, acting with pro-activity on the market, respecting the commitments made with its customers, employees and suppliers, as well as with the society and the environment, meeting the economic interests of the shareholders”.

The elaboration of this Code of Conduct was inspired in this mission.

Every situation that may result in violation to the Code of Conduct must be reported in our Reporting Channel www.asvotec.com.br/compliance or ouvidoria@asvotec.com.br.

HOW WE DEMONSTRATE OUR COMMITMENT

- Read and understand our Code, the work policies to incorporate them in our work and behavior
- Report possible illegal behavior and violations of our Code of Conduct or [referred policies](#)

- Do not Retaliate an employee that made a report
- Fully cooperate with the investigations (even with administrative scope problems)
- Complete all training
- Ask whenever there are doubts

AS A LEADER, YOU MUST ALSO:

- Promote the Code and the specified work policies incorporating them to the work of your employees
- Grant enough time so that all employees can complete the training and certify their conformity with the Code of Conduct
- Demonstrate a positive attitude with you own behavior
- Do not create behavior policies and rules that are not in the Code of Conduct
- Ask whenever questions arise

CONDUCT & ETHICS

– RESPECT TO PEOPLE

HOW WE DEFINE OPPORTUNITY EQUALITY

We respect the opportunity equality on the recruiting processes, selection, development and remuneration, regardless of the position and role occupied.

The same fair, equal, and respectful treatment must be given to every employee.

HOW WE INTEGRATE DISABLED PEOPLE

For ASVOTEC, disabled people are part of society and the corporate life with the same rights. The support to these people and their integration in the company, as well as the respectful cooperation between us are fundamental principles of our corporate culture.

CHILDREN'S RIGHTS

We do not tolerate child work and respect the children's rights. The arrangements of the Conventions no. 138 and no. 182 of the ILO are observed in the company.

We do not accept products and services of suppliers and subcontracted companies that use slave or child labor in their personnel, or other relationships for the manufacturing of their products.

HARASSMENT AND ABUSE OF POWER

We do not tolerate harassment such as sexual, economic, and moral, or situations that characterize pressure, intimidation or threats in the relationship between employees, regardless of their hierarchical level.

RELATIONS WITH THE WORKER'S REPRESENTATIVE

ASVOTEC acknowledges the fundamental right of all employees to be affiliated to the Unionist Organization by their own free will, not being privileged or impaired by this action.

We respect and acknowledge the syndical entities as legal representatives of the employees searching for the continuous exchange of ideas to solve the labor and unionist conflicts.

REMUNERATION

ASVOTEC will ensure that the salaries be according to the minimum legal or industry standards, that they are paid in complete accordance with the applicable laws and that the salary and benefits composition shall be clear and regularly detailed for each employee.

SAFETY AND HYGIENE AT WORK

Safety in the workplace and the employees' physical health are important priorities for ASVOTEC, which does all of its best to ensure the adequate work conditions, offering equipment, facilities, and needed methods for a safe work environment that matches your activities.

ASVOTEC frequently provides training for the employees, so that they can get to know the routines of health, safety and environmental protection, and be responsible for them.

DISCRIMINATION

ASVOTEC condemns every kind of discrimination, whether it is racial, color, gender, nationality, social background, disability, and sexual orientation, respecting the political or religious beliefs of its employees, third-party companies, suppliers, and the community, as far as these are based upon the democratic principles and on the tolerance regarding those having different opinions.

We demand treatment with due confidentiality and respect towards sensitive information obtained by the HR (especially medical information).

HUMAN TRAFFICKING

Asvotec protects its employees from the human trafficking and, based on Article 207 of the Civil Code, it informs that it is not allowed to attract employees, with the intent of taking them to another location of the national territory, and protected by the presidential decree no. 5948/2016, which defines, as human trafficking: "the recruitment", transportation, transference, sheltering, and keeping people through threatens, use of force or another means of coercion, abduction, fraud, deceit or abuse of power and vulnerability, with the payment or receipt of benefits that ease the consent of a person that has control over another, with exploitation purposes.

CONFLICTS OF INTEREST

It is strictly prohibited the Conflict of Interest inside Asvotec.

It is the duty of every single employee to avoid being a competitor or developing interests that go against Asvotec's interests. Upon leaving the company, the employee must keep an ethical attitude, not being an unfair competitor or disclosing confidential or strategic information proprietary to the company.

Asvotec's employees and employees that keep a contract with customers, suppliers, competitors or any other person must always act aiming at the company's interests, without taking into consideration any kind of personal interest or promotion.

The main issues involving Conflicts of Interest are the following:

- Investments and financial interests (no employee must invest or have any participation in the investments of competitor companies, customers or suppliers from Asvotec, in case these actions imply on loss to its independency);
- Asvotec's employee is prohibited of accepting any kind of gift, with the exception of agendas, pens, calendars, and other institutional materials from its customers, suppliers, distributors, and others, with a value higher than R\$ 300,00 (three-hundred reais);
- In case of it not being possible to refuse the gift offered by the customers, suppliers, distributors and others, the received gift must be immediately given to Asvotec, that will be in charge of donation it to Charity;
- All and every kind of parallel agreement with suppliers and customers must be declined;
- No employee must use Asvotec assets to do activities that are not related to the company's interests, especially during the working hours;
- Suggest relatives to the selective process or working with relatives.

CONDUCT & ETHICS

– RESPECT TO THE MARKET

LEGAL COMPETITION

We aim at maintaining respectful and cooperative relationships with customers, suppliers, community, government and every party involved in the company's activities.

We act in compliance with the norms and principles of free competition, refraining ourselves from the exchange of sensitive information with competitors that might affect the free competition or result in abuse of the economic power.

ETHICS ON CONFIDENTIAL INFORMATION

We keep secrecy of any information that has not yet been disclosed to the market.

BRIBERY AND CORRUPTION

We emphatically disapprove attitudes that involve payment or receipt of improper objects or values that are

characterized as bribery, corruption, and kickback or the like.

PIRACY AND SMUGGLING

ASVOTEC worries about helping to fight off Piracy, smuggling, brand adulteration, and products falsification, besides tax evasion.

CONDUCT & ETHICS

– RESPECT TO THE COUNTRY AND GOVERNMENT

LEGAL COMPLIANCE AND TAX PAYMENT

ASVOTEC is committed to legal compliance and payment in due time of its tax responsibilities.

CONTRACTS AND ACCOUNTING RECORDS

Every financial and business transaction is ready and correctly recorded by the company. Our employees must not enter into unusual financial contracts with customers or suppliers, such as the ones with over or under invoicing.

Every contract must be precisely written, without margins for interpretations, and preferably with the assistance of the company's lawyers.

CONDUCT & ETHICS

– RELATIONSHIPS

WITH THE CUSTOMERS AND GOVERNMENT ORGANIZATIONS

It is necessary to be extremely honest in every business with the government, businesses, and other organizations that are or may potentially become customers and / or business partners. Every contract with customers and partners must be negotiated and completed with transparency, without any spurious operations or unspoken agreements, and must be completely recorded in writing.

It all must be provided for with respect, education and courtesy, and the information given quickly, clearly and precisely, with treatment equality, without distinctions moved by personal interests or feelings.

WITH THE SUPPLIERS

As far as possible, the choice of third-party companies must be made based on strictly objective criteria that include quality, technological excellence, cost / price, schedule / delivery, services and maintenance of adequate sources and safety record.

The integrity, the great reputation and the fulfilment of the regulations, are key factors for the establishment of this relationship.

WITH COMPETITORS

We aim at keeping respectful and cooperative relationships with all parties involved in the company's activities, acting in accordance with the norms and principles of free competition, keeping ourselves from exchanging sensitive information with the competitors that may affect the free competition or bring about abuse towards the economic power.

CONDUCT & ETHICS

– RELATIONSHIP WITH THE COMMUNITY, SOCIETY AND ENVIRONMENT

COMMUNICATION

ASVOTEC favors a transparent and open communication with the group of all parties involved, aiming at the greater good of everyone involved in short and long term.

COMMITMENT WITH THE WORK ON THE COMMUNITY

We are aware of the importance of the communities where we work, and we want to contribute positively for their improvement. It is a privilege to work inside our communities and do our best to deserve such privilege. It is our commitment to keep dialogue channels permanently open with the communities which we are in.

ENVIRONMENT

ASVOTEC aims at using the resources in a sustainable way, besides acting proactively to identify, evaluate, and prevent risks to the environment.

And it also looks forward to immediately informing the Safety and Environment Areas about any environmental accidents, as well as of any fact that might represent a legal infraction or environmental damage.

RELATED POLICIES

[IT/GR/005 backup policy](#)

[IT/GR/006 information security](#)

[IT/GR/007 computer equipment maintenance](#)

[Employee's Integration Guide *recycling](#)

[PGQ RP 004 – supplier](#)

[ADDENDUM PROVISION OF MOBILE DEVICE – HR](#)

[STATEMENT OF RESP. REGARDING THE SOFTWARE USAGE – HR](#)

[TERM OF IMAGE USAGE – HR](#)

[CONFIDENTIALITY AGREEMENT – HR \(clause 11 employment contract\)](#)

[PROGRAM: COFFEE WITH THE DIRECTOR](#)

[SUGGESTION BOX](#)

[PROGRAM: ASVOTEC LISTENS TO YOU!](#)

[STATEMENT OF RESP. REGARDING THE SOFTWARE USAGE AND DIGITAL CONDUCT – VISITORS](#)