



SUPPLIER'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 to 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.

CONDUCT AND ETHIC NORMS FOR THE SUPPLIERS

IT IS OF CRITICAL IMPORTANCE THAT ALL OF ASVOTEC'S SUPPLIERS ADOPT OUR COMMITMENT OF ACCOMPLISHING BUSINESSES WITH INTEGRITY.

These norms apply to individual or legal entities that provide services, raw materials, active ingredients, components, finished products or other ("suppliers"). If there are any existing norms about ethic and conformity published by the supplier itself, they can replace these norms, since they are coherent with the same standards and incorporated to a formal contract between Asvotec and the supplier.

LAW AND APPLICABLE REGULATION ADOPTION

- The suppliers must follow the laws, rules, regulations and applicable ethical norms accordingly to Brazil's current laws.

PROHIBITION OF BRIBERY, COMMISSION, ILLEGAL PAYMENTS AND OTHER CORRUPTION PRACTICES

- The supplier do not have permission to direct or indirectly, take any item of value to an employee with the intent of:
 - Earn or retain businesses or unduly influence the act or decision of any employee, or to obtain an improper advantage; or
 - Illegally influence the action of an individual, customer, company or company representative.
 - The suppliers must keep precise and clear records that reflect the actual transactions and payments.
 - Although Asvotec follow local precepts for negotiations and market practices, neither Asvotec nor any supplier must participate on corrupt, unethical or illegal practices.

BUSINESS RECORDS ACCURACY

- Every book and financial records must be accordingly to the accounting principles usually allowed.
- The suppliers' records must be precise on all relevant aspects.
- The records must be legible, be clear and reflect the actual transactions and payments.
- The suppliers must not hide, refrain to record nor make false posts.

FAIR AND ANTITRUST COMPETITION

- The suppliers must follow every laws and applicable regulations regarding a fair and antitrust competition.

INTELLECTUAL PROPERTY AND CONFIDENTIAL INFORMATION

- Any suppliers that need to exchange confidential information with Asvotec must sign a confidentiality contract with Asvotec in advance.
- The confidential information exchange shall be limited to the necessary in order to complete the demands of the contracted performance.
- The suppliers cannot disclose any intellectual or confidential information from Asvotec, neither any other information acquired that regards to Asvotec's businesses (including information developed by suppliers and others, related to products, customers, suppliers, price formation, costs, know-how, strategies, programs, processes and practices).
- The suppliers must immediately report every unauthorized disclosure of confidential information from Asvotec, involuntary or not, through the reporting channel www.asvotec.com.br/compliance or e-mail ouvidoria@asvotec.com.br.

DATA PRIVACY

- The suppliers must follow the laws and applicable regulations regarding the data privacy upon manipulating person information.
- The suppliers must immediately report every unauthorized use, disclosure or loss regarding Asvotec's confidential information, through the reporting www.asvotec.com.br/compliance or e-mail ouvidoria@asvotec.com.br.

GUIDELINES FOR EMPLOYMENT PRACTICES

- The suppliers must treat Asvotec's employees with dignity and respect.
- The suppliers must follow the laws and applicable regulations regarding the employment relationship, including statutes that prohibit discrimination inside the workplace.
- The suppliers are not allowed to have, use, or sell illegal drugs inside Asvotec's facilities; neither do their job under the influence of such drugs or alcohol.
- The suppliers cannot produce or fabricate goods or services using child or slave workforce. Regular full-time employees must be at least at the age of 18. The suppliers must report Asvotec's management if there are any half-time jobs, work during vacation or trainee programs for individuals up to the age of 18 years.
- Asvotec does not allow intimidation or hostility and will not tolerate any kind of behavior from a supplier that harass, molest or interfere in the work capability of another person.

INTEREST CONFLICTS

- An interest conflict comes up when the interests or personal activities influence or seem to influence the capability of acting towards the better interest of Asvotec. Some situations that could cause an interest conflict are:
 - Have a significant financial investment in any competing company that has or intends to do business with Asvotec. Significant financial interest includes control upon vote or share property of more than 1% of the currently active shares of a company or investment that represents more than 5% of the investor's total assets.
 - Provide similar services to direct competitors of Asvotec, with access to confidential information, or from the competitors.
 - When family members (or domestic partners and people who are close to you) work for Asvotec, another supplier from Asvotec, a customer from Asvotec or a competitor to Asvotec.
 - The suppliers must report interest conflicts, real or apparent, to Asvotec's management. If Asvotec's management approves a real or apparent conflict, the decision of the approval must be documented.

MOBILE DEVICES, ELECTRONIC MEDIA, INTERNET USAGE AND E-MAIL

Under circumstances where the suppliers have access to Asvotec's electronic environment (intranet, e-mail, voice mail or other), the suppliers must:

- Protect Asvotec's confidential information and electronic media;
- Encrypt or password protect the data;
- Keep mobile devices with them or locked during the trips;
- Follow the local data protection laws;
- Use these tools from Asvotec for business purposes only; and
- Use these tools accordingly to the global policy of acceptable usage of Asvotec's information and technology, including:
 - Do not intentionally download, nor exhibit or forward any materials that might discriminate, harass, endanger or contain sexual, pornographic, racist, sexist, or defamatory connotation or that are, by any other means, offensive. Use the electronic media basically for business purposes.
 - Transmit protected information (personal or business secrets) in a way that it is possible to acknowledge the secrecy of this information, possibility of unauthorized access and conformity to the local data protection laws.
 - Comprehend that documents, software, e-mails and another Internet pages can bring computer viruses that could damage Asvotec's network. Do not intentionally remove, unzip, execute / start or install files or programs on Asvotec's systems, neither open attachments that contain harmful computer viruses. Do not download nor disseminate any Internet material, unless if the copyright owner gives consent.
 - Adopt the deadline and the retention and disposal methods for corporate data from Asvotec stored in electronic media.

BUSINESS CONFORMITY

- The suppliers must comply with the text and the spirit of every controller and applicable sanctions of import and exportation and other Brazilian business conformity laws, in addition to the applicable laws of the countries where the exchanges do occur.

HEALTH, SAFETY AND ENVIRONMENT

- The suppliers must follow the laws and applicable regulations regarding health, safety and environment.
- The suppliers that work with Asvotec or on-site of Asvotec's facilities must do it in order to ensure their own safety and others, in conformity with the applicable governmental and Asvotec's requirements related to health, safety and environment. Any emergencies that may cause impact on Asvotec must be immediately reported.

GIFTS AND ENTERTAINMENT

- Gifts and entertainment are not necessary for the business achievements with Asvotec and are completely discouraged.
- The following situations are always inappropriate and expressly prohibited:
 - Offer a gift, provide entertainment or dedicated preferential treatment with the intent of influencing the objectivity of the decision taking from Asvotec's employees.
 - Offer any gift, entertainment or any preferential treatment during the engagement in a current purchase or hiring decision process. (Information or RFI request; Quotation or RFQ request, Public Bid Notice or RFP).
 - Any kind of gift, including "gift vouchers".
 - Provision of entertainment while the supplier is not present / represented (for example, tickets for sport events or other).
 - Provision of leisure excursions, trips or extravagant accommodations in events sponsored by the supplier.
- Occasionally, on very rare occasions, Asvotec's employees will be able to accept gifts, entertainment or other modest business courtesies, if this helps to strengthen the business relationship and if it is possible to repay at the same level.
- Asvotec's employees cannot request for gifts to the suppliers, including the ones who are willing to support charitable causes.
- The suppliers must not offer the opportunity to purchase products or services, not even with financial interests to any of Asvotec's employees in special conditions and not available to every employee from Asvotec.

RESOURCES

- If you need more information or guidance about any of these norms, or want to report a potential violation, contact the Reporting Channel www.asvotec.com.br/compliance or send an e-mail, ouvidoria@asvotec.com.br to Asvotec.

APPROVAL

Accordingly:

Signed by the Company's responsible

Data ____/____/____