



Third Party Code of Conduct



INDEX

PRESENTATION.....	4
COMMITMENT TO INTEGRITY	5
CONFORMITY WITH THE APPLICABLE LAWS AND REGULATIONS	6
ZERO TOLERANCE FOR CORRUPTION AND BRIBERY	6
RESPECT FOR HUMAN RIGHTS AND LABOR STANDARDS.....	7
PROFESSIONAL AND OPERATIONAL EXCELLENCE	8
ENVIRONMENT.....	8
NON-DISCLOSURE AND CONFIDENTIALITY OF INFORMATION	9
MONITORING AND AUDITING.....	10
THE ETHICS CHANNEL	11
FINAL PROVISIONS.....	13
RECEIPT AND COMMITMENT STATEMENT	14

PRESENTATION

Alubar Group firmly believes that corporate businesses must enforce straightforward conduct, in line with not only internal rules and procedures, but also with the legal requirements applicable to corporate businesses. To this end, we aim at full transparency and at evidencing our credibility through a full set of values that support our commitment to act in honesty, with respect and professionalism.

We are aware that the excellence of our products and services is directly linked to the partnerships we have established with our third parties (suppliers, service providers, sales representatives, consultants, contractors and subcontractors) thus, we value sound and stable relationships, bearing in mind the full accountability of our businesses and, above all, the commitment of these third parties to integrity. Therefore, we are now sharing our Third Party Code of Ethics.

This document presents our values through the modes of conduct Alubar Group expects to see in all our commercial relationships with our third parties in order to strengthen the ethical and transparent conduct we hope to obtain and that we are also committed to offer.

1. COMMITMENT TO INTEGRITY

We are a trustworthy company, and this is why we value sound relationships with our third parties. Alubar Group Group values partnerships with companies that share sound ethical values. Preferably, our third parties should have an Integrity Program in place establishing internal policies and/or rules capable of ensuring their commitment to ethics and integrity, including when the time comes to chose their commercial partners, and we are willing to assist them in this process of proliferation of corruption-free environments.

Learn more about our Code of Ethics.

2. CONFORMITY WITH THE APPLICABLE LAWS AND REGULATIONS

Our third parties are expected to act in full conformity with the laws and regulations applicable to their businesses, complying also with the internal policies established by Alubar Group, just as we do in our business activities.

3. ZERO TOLERANCE FOR CORRUPTION AND BRIBERY

Alubar Group will not tolerate corruption, bribery or embezzlement either the public or private sector. Our employees are formally instructed not to receive, promise, offer, authorize or directly or indirectly grant undue advantages to any persons. Hence, besides being fully compliant with provisions of Law 12.846/13 (the Anti-Corruption Law), we make sure that no third party will be granted any favors.

Consequently, our partners must stay away from involvement with public or private officials engaged in practices that adversely impact the public administration, the private sector, or offer benefits to any person associated to such parties as a way of influencing any action or decision to promote their own interests or the interests of Alubar Group.

Learn more about our Anti-Corruption Policy.

Learn more out more about our Policy of Relations with Public Officials and the Public Sector.

Learn more about our Policy for Gifts, Donations and other Contributions.

4. RESPECT FOR HUMAN RIGHTS AND LABOR STANDARDS

In conformity with the values that guide Alubar Group, and in line with the Human Rights principles, our third parties are not allowed to employ slave or child labor, excessive working schedules, engage in any form of discrimination (ethnicity, origin, gender, sexual orientation, religious belief, union membership status, political or ideological beliefs, social class, special needs, marital status or age) or in any form of moral or sexual harassment, thus, assuring equal and respectful treatment in all their internal or external relationships.

Our third parties have a duty to promote a healthy and safe environment for their employees and commercial partners.

5. PROFESSIONAL AND OPERATIONAL EXCELLENCE

Our products and services are supplied to our clients according with the highest professional and operational standards. In turn, as clients or business partners, we expect the same level of excellence from our third parties.

Our third parties are expected to honor the contracts executed with our companies, committed to the regular development of their activities, complying with the agreed terms and quality assurance requirements, always focusing on the continuous improvement of the operations of their companies and, consequently, of Alubar Group.

[Learn more about our Due Diligence Policy.](#)

6. ENVIRONMENT

We work fully aware of our responsibility towards the environment, and we comply with the environmental laws. Thus, third parties are required to act in conformity with the environmental licenses and authorizations, being fully aware of the aspects and impacts to which their businesses are subject and implement control actions for their activities.

[Learn more about our Environmental Policy.](#)

7. NON-DISCLOSURE AND CONFIDENTIALITY OF INFORMATION

We consider confidential any piece of information that has not been publicly disclosed. We have undertaken to keep the confidentiality needed to safeguard the image and the businesses of Alubar Group, its clients and third parties.

Therefore, independent from the level of involvement and familiarity with our activities, our third parties are bound not to disclose and to keep the confidentiality or any information they had access to and to use it in a responsible and professional manner.

8. MONITORING AND AUDITING

The process of monitoring and auditing is one of the pillars of our Integrity Program specifically designed to enable prevention, detection and remediation of situations where the conduct expected by Alubar Group is not complied with.

Alubar Group reserves itself the right to carry out due diligence in any phase of the relationship with a third party with the purpose of increasing the reliability of established relations, being entitled require the enforcement of corrective measures, under penalty of contract termination.

[Learn more about our Due Diligence Policy.](#)

9. THE ETHICS CHANNEL

Alubar Group believes that the effectiveness of an Integrity Program relies on the unconditional participation of all the persons who constitute our companies, whether employees or third parties. Thus, each person must abide by the rules of conduct described in this Code, as well as by the internal policies and the laws that govern our businesses.

If faced with an incident of non compliance with the rules of conduct set out by this Code, third parties are required to report it as a way of assisting in the building of an environment where integrity is prevalent. The incidents may be brought to the attention of contract manager, and if the person reporting the incident does not feel comfortable, he/she may contact Corporate Compliance by telephone +55 91 3322-7212, send an e-mail to compliance.alubar@alubar.net.

If the third party prefers to report the situation ANONIMOUSLY, it may do so through the Ethics Channel, which is operated by an independent company providing a high standard of information security and confidentiality, using one of the following methods:



Brazil: 0800 721 1288
Abroad: +55 71 3507 1818



canaldeetica@deloitte.com



www.ethicsdeloitte.com.br/alubar

- ➔ All and every information reported will only be seen by the Ethics Committee of Alubar Group which is in charge of receiving and handling the incident reports, always safeguarding the confidentiality of information. If the person reporting the incident wishes to have his/her identity disclosed (solely to the Ethics Committee) the report must CLEARLY STATE that he/she WISHES TO BE IDENTIFIED.
- ➔ Alubar Group WARRANTS that its third parties WILL NOT be subject to any type of retaliation or intimidation for reporting a violation in good faith.

Learn more about our Ethics Channel Use Policy.

10. FINAL PROVISIONS

This Code does not approach all ethical behaviors to be adopted by our third parties, and should rather be used as reference to make sure that activities are carried out in conformity with our values and the applicable laws. Top management support is critical to disseminate the ethical principles among company personnel, thus enabling smooth compliance with the desired mode of conduct.

Any doubts or questions about the interpretation and the scope of procedures related to any subject approached in this Code, our Policies or our Integrity Program may be shared with Alubar Group Corporate Compliance.

Conformity with these guidelines is a mandatory condition for the establishment and the continuity of a relationship between Alubar Group and our third parties.

Being ethical is a major decision.

Make the right choice!

Learn more about our Compliance Program.

11. RECEIPT AND COMMITMENT STATEMENT

I declare, for all due purposes, to have received a full copy of the Third Party Code of Ethics of Alubar Group, to have read it and hereby undertake to fully comply with all its provisions.

I am aware that failure to comply with the Third Party Code of Ethics will subject me to administrative and legal penalties.

Full Name

CPF

Job

Company

Site

Date

Signature



