



We feed new solutions

Code of Ethics  
and Conduct

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## Ladies and Gentlemen,

Throughout the company's existence we have achieved wonderful results based on moral, behavioral and legal values. We have always sought a guiding culture to bring sustainability and accountability to our work on behalf of an increasingly bright future for our nation.

We work together, determined as we are to become stronger, more competitive and more united, to grow together in the pursuit of integrity, solidarity, respect, and social and environmental justice. The present Code of Ethics and Conduct applies to all the links in our business chain: clients, suppliers, partners, shareholders, employees and communities.

Each of us plays an important role in ensuring that everyone can satisfactorily perform their tasks. That is why we have chosen the right people. And you are one of them. All of our activities must be carried out to the highest standards of ethics, integrity and honesty. Compliance with the law and with ethical principles is not optional. There are no half measures when it comes to ethics and conduct.

I am sure that all our employees are totally dedicated to adhering to and practicing the present code. We are thus honoring the company's history and strengthening – now and forever – the values that support and guide our behavior.

Please read the contents of the code with great attention, so that you fully understand all its guidelines. It is a joint commitment that is fundamental for the future of our company and of all its participants and those whom it assists.



**Geraldo Magela Camargo de Mello**  
President



# 1. Objectives

It is mandatory to apply this code: it contains clear non-negotiable guidelines about ethics and the behavior expected from all its audiences of concern.

It is based on our values, and presents the principles that will be used throughout our management, whatever the location of the office, plant, establishment, region, culture or market.

The Code of Ethics and Conduct aims to add value, support growth, and underpin the constant pursuit of excellence in the conduct of our business, through governance and transparency.

# 2. Field of Application

It applies to all Daus employees, both direct and indirect, whatever their hierarchical level.

It also applies to all target audiences, suppliers, business partners and shareholders.

# 3. Referenced Documents

**CORP-REG-GEN-005** Commitment Statement.

# 4. Definitions and Technical Terms

**“Antitrust”** refers to a branch of law which acts preventively or litigiously, for example the Brazilian Antitrust Authority (Conselho Administrativo de Defesa Econômica – CADE), scrutinizing mergers and acquisitions and so forth, in which economic agents can influence market structures, and in terms of sanctions, aiming to punish anti-competitive practices that can influence the economic order, in other words that are harmful to the market (to competitors and above all to end consumers).

**“Anticorruption”** refers to standards for combating corruption, whether private or public.

**“Cartel”** means an agreement between agents operating in the same stage of the production chain in a given market (competitors, in other words) who aim to eliminate, and indeed do eliminate, the competition.

**“Client”** – a client is someone who purchases our goods and services.

**“Collaborator”** any employee or service provider with or without an employment link to Daus.

**“Committee of Ethics”** the collegiate body responsible for making sure that the company and its employees act in accordance with external legal demands and internal policies.

**“Unfair competition”** means any unlawful act provided for in the intellectual property law to win over clients, by harming one’s competitors; the results obtained by the unfair act are not as important as the means employed to attain the purpose of the corporate activity, which is – apart from profit – to satisfy customers.

**“Competitors”** are economic agents operating in the same market, that is to say, at the same step in the production chain.

**“Collusion”** is an agreement between two or more individuals or economic agents to harm someone.

**“Active corruption”** means offering something (normally, but not exclusively, money or an asset) to a public employee so that they practice an undue act.



“**Passive corruption**” is the demand by a public employee for a bribe or an undue advantage in order to perform an undue act.

“**Supplier**” a professional, corporation or institution that supplies products, usually regularly, to customers.

“**Fraud**” is an unlawful or a bad-faith scam created in order to obtain personal gains.

“**Intellectual Property**” is the sum of the rights concerning inventions in all fields of human activity, scientific discoveries, industrial designs and models; industrial brands; commercial and service brands; commercial names and denominations; protection against unfair competition; for literary, artistic and scientific works; the interpretations of interpreting artists; the performances of performing artists; recordings and the rights of broadcasting: as well as other rights concerning intellectual activity in the industrial, scientific, literary and artistic fields.

“**Sustainability**” means meeting the needs of the present without affecting the ability of future generations to meet their own future needs. This is a systemic concept, in other words, it relates to and brings together, in an organized fashion, economic, social, and cultural, and environmental aspects of society.

## 5. Responsibility Matrix

Responsibility	Activity
<b>President and Top Management</b>	1. To comply with and enforce all the requirements in the code; 2. To ensure, for all members of their teams, access to, understanding of, and training in, the Code.
<b>Management and Coordinators</b>	3. To comply with and enforce all the requirements in the code; 4. To ensure, for all members of their teams, access to, understanding of, and training in, the Code.
<b>Supervisors and Leaders</b>	5. To comply with and enforce all the requirements in the code; 6. To ensure, for all members of their teams, access to, understanding of, and training in, the Code.
<b>All employees</b>	7. To comply with and enforce all the requirements in the code.



# 6. Description of the Plan

## 6.1 Organizational Culture

### A. Our Mission

To provide profitable, practical and safe solutions for our customers.

### B. Our Vision

To be a leader in the markets in which we operate, while being innovative, consistent and profitable.

### C. Our Values

- We dream big and make things happen;
- We are simple, practical and transparent;
- **Our people** first;
- Ownership, focus on the result
- **Our clients** are the reason for our business;
- We keep our word;
- We believe in **God**.

#### 1. We dream big and make things happen!

Daus will always be as great as our dreams.

We are thankful for the opportunities and will always seek excellence and the best results.

We break paradigms and find good business where the market cannot see it.

We never lose heart, never complain: a mission assigned is a mission accomplished!

We believe that through faith, understanding, persistence, effort and passion, all targets are attainable.

#### 2. Simple, practical and transparent!

We are adaptable, practical and transparent. We seek to simplify everything and remove complexity.

Our leadership decides, streamlines and simplifies processes, and understands the independence and accountability that it confers.

We always question everything! We are open-minded towards change. We understand that everything evolves, and that processes, methods, rules and policies should be changed in order increasingly to generate results for our business.

We believe that it is quicker and more consistent to work with a method: we are not passionate about tools and processes, but rather about the results that they help deliver.

Reality! We face the truth head-on since that is the best way of understanding problems, and the quickest way of solving them.

We are transparent, we do not beat around the bush: our communication is simple and straightforward. We shun unnecessary bureaucracy and sophistication.

We do not always have to reinvent the wheel: we quickly choose the best solution available.



### 3. Our people first

We are very good at what we do, and are committed to developing our team: that is why we search for and seek to attract people as good as we are.

We drive our people to succeed through Meritocracy. We use challenges to guide the growth of those who deserve it because of their talent, efforts, attitude and the results they deliver.

We lead by example and train our personnel through beliefs, routines, methods and challenges.

Our personal example is so sound that it influences all our people in a positive way, and not only those whom we lead directly. We practice what we preach, we inspire, and we use our individual strengths at the right moment.

Everything we do, we do with excellence, because we love what we do.

We always celebrate our achievements and challenge the team to go beyond.

We believe that good thinking, discipline, and effective actions guarantee a culture in which we will all know what to do and why to do it.

We believe that healthy conflicts are based on cordiality and take us to a new level of maturity and results.

We are lean and efficient. We don the team jersey with pride and are passionate about the business. We work hard and we seek ever-better results tirelessly.

We are receptive to new ideas, we are open-minded, we examine every aspect, and we wish to hear everyone without preconceptions.

We are driven by the greatest force in the universe: EVOLUTION. Our people can be defined by this equation: pain + discomfort + reflection + learning = EVOLUTION.

The leadership equation: To take people where they would not otherwise have gone, and to lift them to their utmost potential, by doing what is right.

### 4. Ownership, focus on the result

Owners can clearly see what the business needs and they feel its pain, identifying all wastage and opportunities in current processes.

Owners are passionate about companies and lead by example, inspiring everyone around them to achieve success. Our own bold attitude is fully aligned with our culture, then we have no time for mediocre results.

We are owners and we are not afraid of challenging targets; we take on commitments, we take decisions, and we are accountable for the results because we know that when the company does well those who contribute can grow, while when it does badly everybody suffers.

Our posture is one of ownership, whatever the role we are currently playing. Our company is driven by passion, goals and targets, not by tasks.

An Owner defends the company at all costs. We will not put up with anything that jeopardizes our consumers, clients, processes, quality or our culture.

Profits measure how far our market values our business, and how much our clients value our products and services. Through profit we stimulate the market and new investment, we acknowledge our people and help take care of the community and environment around our business.

Our team stubbornly pursues the delivery of results and attainment of targets. Damaging our quality,



integrity or our culture is a deadly sin.

Owners leave nothing till later: the business is now, we have a sense of urgency, we move quickly to capture opportunities and solve problems, above all when we base our actions on data and facts.

Costs must be cut at every moment, intelligently, by innovating, seeking productivity, avoiding time-wasting and unnecessary tasks.

## **5. Our customers are the reason for our business**

Our clients and consumers are the reason for our business and our inspiration. We seek solutions, break paradigms, and deliver more, and better, every day.

We are where things happen, we go the extra mile to understand and fully know our market (our area), our customers, and thus to know what we have to do for them.

We enjoy credibility with our clients and consumers, because we keep our promises, we are transparent and sincere in identifying and addressing issues.

## **6. We keep our word**

Honesty and Ethics are the foundation of our business and help sustain our results, because that is the only way business can be done.

We do not allow bias, injustice, discrimination or misinformation.

Cheap tricks, lies and gossip are like termites, eating away at the heart of the company, and will be treated like a deadly sin.

We are the agents of our own destiny. When something is going wrong, we address its cause and speak frankly, even if this can cause discomfort – because we believe that conflict is constructive.

We insist on discipline in compliance with rules, policies and standards. Whenever necessary, we question the responsible areas.

We are what we say and do. We always keep our word.

Any situation that goes against our culture and code of ethics will be reported to the hotline: 0800 377 8009.

## **7. We believe in GOD!**

“Have I not commanded thee? Be strong and of a good courage; be not afraid, neither be thou dismayed; for the LORD thy God is with thee whithersoever thou goest.” (Joshua 1,9) GOD bless our work and our team!





## 6.2 Target Audience Relations

We treat all our target audiences with dignity and integrity, and we give our workers a workplace with equal opportunities for professional and personal growth, respecting individual freedoms.

### A. Employees

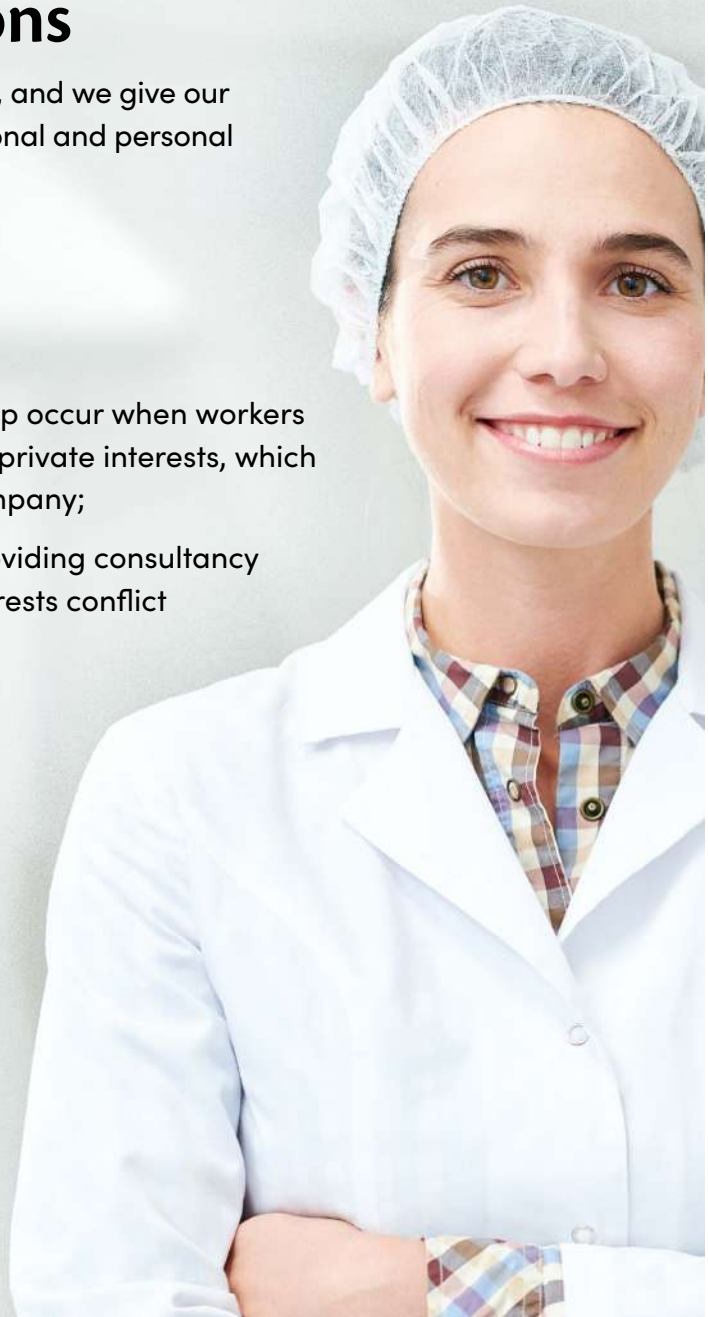
#### I. Conflict of Interests

Conflicts of interest in the employee-company relationship occur when workers use their influence or commit actions intended to benefit private interests, which might damage and/or jeopardize the interests of the company;

Employees cannot perform external activities such as providing consultancy services, or holding positions in organizations whose interests conflict with – or which do business with – Daus;

No partnership connections, either of individuals or through spouses or family members, with the company's suppliers or competitors will be accepted, if the position that the employee holds gives them the power to influence deals or have access to privileged information;

Any employee holding a position in an external entity, or whose spouse or relatives work for competitors, suppliers or customers, must notify their immediate leader of this within 3 (three) days of receiving the present code, and then leader will assess possible conflicts of interest and how this can affect their working hours.



#### II. Conduct outside the Company.

As a member of Daus, an employee must be judicious about their behavior in public places, whether as a result of their professional activity or within the context of their private lives, and act with prudence and zeal so as not to jeopardize either the company or their own career;

In any internal or external environment in which an associate can be identified as a Daus employee, their behavior in working situations must be compatible with the company's values and thus boost recognition of the company's good image.

#### III. Privileged or confidential information

Strategic or confidential information is any information that the market does not know, to disseminate which could affect the company's operations. Examples of such information are: financial results, acquisitions or sales, industrial secrets, strategies, investments and the like;

Any employee who by virtue of their position or responsibilities has access to strategic or confidential information that has not yet been released publicly is forbidden to share it with third parties;

In such a case, it is the employee's duty to prevent the access of any other person to such information, taking extra care with documentation, and being aware of material left on tables, in drawers, or in cabinets, and this includes electronic and digital media.



#### **IV. Management stance**

If a subordinate shows interest in taking part in an internal recruitment process, their leader should understand this as a natural choice in the growth of their career, and it must not give rise to any type of retaliation;

Mistakes that may come to be committed by employees must be pointed out by the leaders, but at the time they are committed, the employee should be given instruction and the necessary guidelines in order to avoid any repetition;

The repetition of a mistake due to carelessness, neglect or indifference deserves strict correction. However, the correct attitude is to look at mistakes from the standpoint of learning, rather than simply reprimanding them;

The behavior we expect of everyone is to listen and pay heed to new ideas, divergent opinions, questioning and arguments that can represent a way of learning and improving processes;

Daus values integration between areas, cooperation between employees, and the sharing of knowledge, as a way of learning and disseminating best practices, while ensuring the criteria of confidentiality set forth in item III, which addresses privileged information.

#### **V. Harassment and abuse of power**

Moral harassment is taking advantage of a position of privilege in order to humiliate, disrespect, browbeat or embarrass an employee in the workplace;

Sexual harassment is characterized when a privileged position is abused in order to obtain an advantage or a sexual favor;

Daus does not condone any type of harassment or situations that characterize disrespect, bullying or threats in relations between employees, whatever their hierarchical level;

Any employee who thinks they have been discriminated against, humiliated, or been the target of prejudice, pressure, abusive practices, or disrespected should notify the corresponding confidential channel.

#### **VI. Relations with trading partners and competitors**

Daus aligns with the principles of ethics and free competition; it respects competitive and antitrust standards.

All information concerning the market and the competition, which is legitimate and needed in business, must be obtained transparently and honestly; obtaining such information by unlawful means, (illegal or morally unacceptable means of access to confidential information) is not condoned.



Employees may not take any actions that denigrate the image of competitors or the company's trading partners;

Daus' business activities must be guided by compliance with laws, with the company's values, and with the Code of Ethics and Conduct, and all employees are responsible for ensuring such compliance;

Understandings must not be entered into with competitors with the objective of committing active or passive corruption, collusion, the formation of a cartel, the abuse of economic power, or arbitrary trading practices;

It is our responsibility neither to accept, nor to offer – either directly or indirectly – favors, money or personal gifts that could affect decisions, facilitate business, all benefit Daus or third parties.

## **VII. Prejudice**

Daus values diversity in working relations. And therefore everyone must be treated respectfully, cordially and fairly, regardless of their position or role;

We do not condone discrimination or prejudice of any kind, whether by race, religion, age, gender, political belief, nationality, marital status, sexual orientation, physical condition or of any other type;

In our recruiting, selection and promotion processes, candidates are to be assessed only for their ability to meet and adapt to the expectations inherent to the roles they will play.

## **VIII. The company's patrimony**

Daus' assets, equipment and facilities are to be used exclusively in operations, and may not be used for private ends, except in specific circumstances;

Employees must strive correctly to use and to preserve company assets entrusted to them, including assets allocated by Daus for employees to use;

Matters concerning donation, sale and the assignment for use of real estate must be submitted to the appreciation of the Ethics Committee and the Legal Department.

## **IX. Use of electronic information systems**

Electronic systems and IT resources are put at the disposal of employees so they can perform their tasks well;

Use for personal affairs is allowed provided it does not go against internal standards and guidelines or harm the performance of the work;

The following are forbidden: the exchange, retrieval, storage or use of obscene, pornographic, violent, discriminatory, racist, defamatory content, or content disrespecting any individual or entity, and content that is against the policies and interests of Daus;

The following are forbidden: the exchange, retrieval, storage or use of contents for financing, paying, sponsoring, or in any other way supporting the practice of unlawful acts as defined by the Legislation;

The dissemination and handling of games and chain messages is likewise forbidden;

At its discretion, Daus may use and monitor any information transmitted or residing on the company's own electronic media. This rule covers written information or information stored in an electronic system, as well as any other medium associated with it. It also includes information prepared technically by, or entrusted to, the company;

All files and information concerning professional activities that are created, received or stored in its electronic systems are the property of Daus and comprise commercial and legal assets.

Thus, in the event of the transfer or release of an employee, the information kept by that employee must immediately be passed on to the leadership for saving or deletion;

The password to access systems is exclusive and for personal use and constitutes a responsibility: they may not be revealed to third parties, even if the third-party is a coworker;

No type of software or program may be copied or installed on the company's computers without prior authorization by the Information Technology department.

#### **X. Child labor or labor akin to slave labor**

Under no circumstances does the company condone the exploitation of child labor and/or labor akin to slave labor in its facilities, or the hiring of services, or commercial relations with companies, entities or institutions that adopt such practice;

Minors (people under 16 years of age) may only be hired as apprentices; people between 16 and 17 years of age may be hired provided that the laws in force in Brazil are strictly complied with, and that the employment is guaranteed not to hinder their studies.

#### **XI. The use of alcohol and drugs, the bearing of arms, and the sale of merchandise**



Alcoholic beverages may not be ingested during working hours, nor may professional activities be exercised in a state of drunkenness;

Additionally, the use and possession of drugs, or being present in the workplace in an altered state owing to the use of such substances, possibly affecting safety and performance both of the employee and of their coworkers, are also banned;

Cigarettes may not be smoked in any form during working hours, or when people are performing their tasks;

No type of weapon may be carried on company premises, except by professionals expressly authorized and trained for that purpose;

It is forbidden to exchange or trade merchandise of private interest on company premises.

#### **XII. Political participation**

Employees may not, on behalf of Daus, make any contribution in terms of currency, goods or services to political campaigns or causes, except after deliberation of the Board of Directors.

Such contribution, when finally, will be performed in accordance with current legislation.



Daus respects the individual rights of employees to engage in civic affairs and take part in the political process. However, such participation should occur in their free time, and may not lead to any burden for the company. In this situation, the employee must make it clear that their opinions are their own, and not those of the company.

The resources, spaces and images of Daus may not be used in order to serve personal or party political interests.

### **XIII. Trade unions**

Daus respects the rights to free association and acknowledges trade unions as the legal representatives of employees;

Negotiations and dialogue with such entities are to be carried out only by formally authorized personnel.

## **B. Suppliers**

Daus suppliers must be evaluated using clear, non-discriminatory, criteria. All decisions must be taken on technical and economic grounds, and no type of special favor is permitted;

Daus suppliers are to be familiar with the company's Values and act compatibly with the principles of the present code. In order to be accepted as a supplier to Daus, a company must respect the environment and declare that it does not exploit child labor and/or slave labor, and comply with the protection provided for privileged or confidential information, and information concerning industrial property, and the combat against corruption;

The hiring of companies belonging to or run by former employees must be addressed with all necessary precautions so as not to expose Daus to labor legislation risks;

Daus expects that its suppliers characterize their products and services clearly, and take precautions regarding health, safety, sustainability, the environment, and active or passive corruption.

Daus may terminate a business relationship with the supplier whenever its interests are harmed, or legal issues are ignored, or other issues such as taxation, environment, health and/or workplace safety, and acts of active or passive corruption.

## **C. Customers**

Daus is committed to helping its customers create value by meeting their expectations and by providing innovative solutions;

Customers' requirements and expectations are to be taken into consideration, and all those that have been established must be strictly complied with;



Daus does not discriminate against customers by origin, by location, or by economic size. However, it reserves the right to terminate any commercial relationship whenever its interests are not being met, or whenever the relationship represents a legal, social, or environmental risk, or the risk of active or passive corruption.

Information about our products and services must always be clear and truthful. Technical data, above all the requirements regarding quality, safety, health, sustainability and the environment, must compulsorily be transmitted to customers;

Improper payment to any individual in order to facilitate the sale of our products or services is forbidden, even if this means the loss of business opportunities.

## **D. Shareholders**

### **I. Business relations between shareholders, family members and the Company**

Shareholders and their family members are to follow the same rules that apply to employees in the purchase of the company's products or services;

Commercial relations will be allowed between shareholders, their family members and the Company, either as individuals, or through companies in which they directly or indirectly take part;

The aforementioned business must strictly respect the principles of fairness and transparency, ethics, competition, the absence of conflicts of interest, and this is why shareholders and their family members must not practice business or activities whose feasibility depends exclusively on the company;

With the family members of controlling shareholders, the company will adopt the same rules (publicity, price, form of payment, contractual terms, quality, etc.) that it adopts in the treatment of third parties;

Individuals or corporations interested in entering a commercial relationship with Daus must, whenever this is the case, notify the company of the existence of the aforementioned family links;

All transactions provided for in the present chapter will require the prior approval of the Board of Directors of Daus, except for the case of the purchase of products. The chief executive of the area is to notify the company of these proposals, presenting his or her comments, when he or she understands that the propositions contained in the preceding paragraphs have been met.

### **II. Relations with companies in which Daus has, or may come to have, a share**

In companies in which Daus is a part of the controlling block, relations with other partners must be carried out only by the legal representatives appointed by its Board of Directors. Confidentiality about the matters addressed must always be observed;



Contact with outside investors into Daus companies must only be made by the area defined to be responsible for the role, and in accordance with specific standards attributed to it.

## **E. Communities – Commitment and Sponsorship**

Daus is committed to the economic and social development of the communities in which it operates.

All its employees are committed to acting in accordance with Daus' values and keeping the channels for dialogue permanently open with all the communities in which we are present.

Investment in social, cultural and environmental must be guided by the real necessities of the communities, in addition to being aligned with the guidelines of Daus, in order to ensure projects that are effectively committed to promoting social change.

Daus encourages its employees to take part in volunteer programs.

Regarding sponsorship for communities, and contributions through sums of money, assets or services, representing a value above R\$ 5,000 (five thousand Brazilian Reals), these must be deliberated by the Committee for Ethics.

## **F. Government - Donations and Sponsorships**

Daus abides by the legislation and the authority of all levels of government.

Information is always to be given to all spheres of government, including municipal-level, state-level and federal public agencies, in writing, through a protocol, and having received due guidance from the Legal Department or the Personnel, Management and IT Directorates, depending on the topic involved;

Whenever a demand is put forward by a government representative, including oversight processes, the employee must submit it to the Legal Department before forwarding it elsewhere;

Sufficient information to clarify the issue must be sent, in order to comply strictly with the applicable standards. Employees must analyze whether the information provided is intended to be marked "confidential" and whether suitable measures have been taken to protect the confidentiality.

The company's Legal Department must always be consulted in order to offer the necessary assistance.

Daus forbids payments to be made by way of gratification, or any advantage to be offered to public employees and/or servants, to streamline routine services or administrative actions.

The company also reserves the right publicly to put forth an opinion on government policies and decisions that may affect the business process and its relations with employees, consumers or shareholders. However, this action may only be taken or authorized by the Board of Directors;

Employees may not use the name of Daus when addressing personal matters of any nature in their relations with any sphere of government;

In the case of donations to political parties, since September 17, 2015, when the Plenary of the Federal Supreme Court ruled that the standard that allowed electoral financing by corporations was unconstitutional, Daus respected this decision, and does not make such donations, additionally suggesting that its representatives likewise do not;

Concerning sponsorship of the government, as represented by municipal-level, state-level and federal public agencies, contributions through sums of money, assets or services worth more than R\$ 5,000 (five thousand Brazilian Reals) are to be deliberated by the Ethics Committee.

## G. Publicity market

All of Daus' dissemination of publicity must be accurate and avoid overstatement. Arrogant, high-handed and prejudiced attitudes will not be tolerated;

The company condemns misleading advertising. Marketing initiatives concerning Daus products are characterized by respecting the current legislation, ethics, and local and international standards of reference;

The institutional publicity of Daus is to be suitable to the company's positioning and follow the guidance given by the company directors.

## H. Press

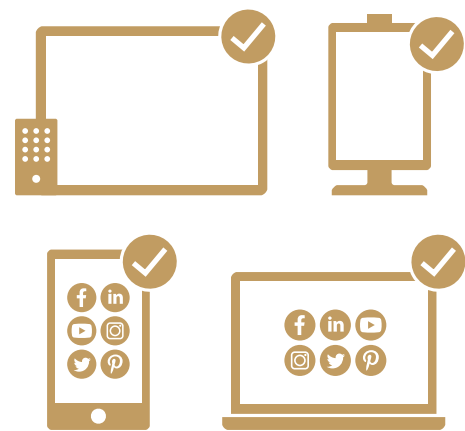
Daus is objective and clear in disseminating information to the press, and seeks to satisfy the interests of the parties involved;

Press relations must privilege the dissemination of relevant facts and the promotion of the company's business.

Whenever possible, the highlight should draw attention to the activities of Daus;

Contact with the press will exclusively be handled by company-appointed spokespeople, who receive guidance from the Commercial and Legal areas. It is therefore forbidden that unauthorized people speak to the press on behalf of Daus, and favors or payments of any nature are also forbidden;

Employees may not promote the dissemination of confidential or inaccurate information in the press, or concerning the company.







## 6.3 Issues of General Interest

### **A) Image and Reputation**

Our dialogue and our behavior – as regards the target audiences with whom we relate – build and strengthen Daus’ image and reputation. To this end, our actions inside and outside the company must always be in alignment with Daus’ principles, values, and Code of Ethics and Conduct.

### **B) Health, Safety and the Environment**

The health and physical integrity of employees, and the protection of the environment, are priorities for Daus, and are above economic or production issues.

Daus treats all information concerning health, safety and the environment, which may impact its employees, or the communities, or the environment itself, transparently.

The company constantly trains its employees so that they understand their routines and are accountable for them.

Employees must be familiar with the policies, procedures and practices of health, safety and the environment, and abide strictly by them.

All are expected to observe their workplace attentively, identifying possible risk situations. If any signs of risk are identified, leaders must immediately be informed of this, and those involved warned.

Service-providing companies hired by Daus are to comply with all health, safety and environment procedures defined in a specific policy for their activities.

In emergency situations such as environmental or workplace accidents, those involved must follow procedures laid down for the situation and report promptly to the administration on the situation.

Only the appointed spokespeople may give interviews or communicate with authorities, press and the community.

### **C) Internal policies**

All employees, whatever their hierarchical level, must be familiar with all the company’s guidelines, such as: policies and procedures pertaining to the personnel and management departments, sourcing policies, technology systems, and information security.

Management is to make sure that policies and procedures are complied with and applied, and must set an example.

Failure by any employee to comply with, or failure to adhere to, such policies and procedures may result in the disciplinary sanctions mentioned in the present code.

### **D) Gifts, Presents and Invitations (Entertainment and/or Courses and/or Congresses)**

Gifts, presents and institutional entertainment in general are practices related to courtesy and cordiality and accepted in a commercial relationship. Therefore, in institutional settings, and provided they do not characterize the obtaining of benefit in any negotiation, such practices may be performed and accepted by employees.



Gifts, as laid down in RESOLUTION NO. 3/2000, which addresses the rules applicable to public authorities covered by the Federal Higher Administration Code of Conduct, may be offered and accepted provided they do not exceed the parameter of R\$100.00 (one hundred Brazilian Reals) in public interactions. Therefore, in public interactions, a Daus agent must respect the R\$100 (one hundred Real) limit and not deliver anything above this value;

In private interactions, any directorate or department is free to give a gift, a present, or offer an invitation, provided that the corresponding amount complies with the budget approved for that directorate or department by the Board of Directors for that year. Exceptionally, and provided that the reasons and justifications have been put before the Ethics Committee, the Committee may specifically authorize an event (for an amount exceeding the budget for that department for the year), provided that it formally registers such authorization and that financial resources exist for that purpose.

Invitations to events with expenses borne by clients, suppliers, government agencies and other target audiences of interest, may only be accepted when there is a real opportunity to develop a commercial contact, and when such invitations have also been extended to professionals from other companies, and after authorization by the leadership.

Objects received by way of awards representing a distinction or a tribute paid to Daus must be submitted to the immediate leadership.

When presents or advantages otherwise than in accordance with the aforementioned conditions are received, the employee is to return the item in question to the company that offered it, and notify the immediate leadership in Daus for the appropriate measures to be taken.

All must be attentive to the context in which gifts are received, and not only their value; in case of doubt, the immediate leadership must be consulted.

Under no circumstances must offers in cash be offered, delivered or received.

Employees must inform those entities with which they have relations on behalf of Daus, about the company's conduct concerning gifts, presents, invitations and institutional entertainment in general.

## **E) Contracts and Accounting Records**

All financial and commercial transactions will be transparent, and posted quickly and correctly into the books and ledgers of Daus.

Employees must not enter into irregular financial agreements with customers or suppliers, by way of over- or under-billing.

The contracts that Daus signs must preferably be drafted as accurately as possible, must always be revised by the Legal Department, and must not leave room for equivocal and/or ambiguous interpretation.



Documents not attached to the main text may only be accepted or provided after assistance by the Legal Department.

All payments and commitments assumed must be approved by the competent hierarchical level and underpinned by legal documentation.

## **F) Intellectual or Industrial Property**

Intellectual or industrial property is a strategic asset for Daus. This includes patents, registered brand names, formulations, know-how, technical data and process and market information, among other items that it would benefit a competitor, through unfair competition, to know.

The result of intellectual work and of strategic information generated in the company is the exclusive property of Daus.

Employees are responsible for treating confidentially all information on intellectual property to which they have access as a result of their work, and use such information carefully. Such information may not be disseminated without the express approval of the company directors.

## **G) External Lectures and Presentations**

In talks given, and participation in seminars and other public events, the secrecy of confidential information about the company and its business must be strictly respected.

Participation as an exhibitor in events, as well as the topics to be addressed, must previously be approved by the leadership of the employee who is involved.

# **6.4 Clarification and whistleblowing**

Any queries of interpretation, if not covered by explanation in the present code, as well as reports of failure to comply with the code, must be put forward via a confidential channel.

Accusations of fraud, embezzlement, bribery in commercial acts or transactions involving employees, suppliers, outsourced individuals, and business partners, must whenever possible be accompanied by concrete facts and data.

Any accusation received by Daus will be treated with strict confidentiality. No retaliation against an employee will be condoned when reporting in good faith. If an employee suffers any kind of retaliation, they must immediately inform the Ethics Committee.





## **A) The Ethics Committee**

The Committee will analyze issues concerning the Code of Ethics and Conduct, sent in by means of a confidential channel, impartially and with accountability, seeking solutions to the situations that are raised, and providing feedback to the whistleblowers, when identified.

The Ethics Committee, which is made up of members of top management and the Compliance Officer, will guarantee transparency and uniformity in the criteria used to solve similar cases, and will check the validity of the issues raised, taking measures when appropriate, and feeding back to the denouncer, when identified.

The Committee is also responsible for laying down criteria for cases that are not provided for in the Code, and for making sure that the company's communications and interface system is operational, setting up a database of decisions for the entire company, thus extending criteria and parameters forwards to future decisions.

## **B) Audits**

Cases in which resources are embezzled and the company patrimony is harmed will be addressed by an audit process, jointly with the Ethics Committee.

In all situations, lack of bias in addressing the issues, and secrecy as to the identity of those involved, are guaranteed. If necessary, if there are signs of materiality in possible deviations, which may be deemed crimes, the competent authorities will be notified for the setting up of the due criminal process.

## **C) Disciplinary measures**

The leadership is to inform, guide and prepare teams for the correct enforcement of the organization's policies and standards, and is to set the example;

Failure to comply with the standards and rules of the company will not be tolerated, and is liable to punishment, in accordance with CORP-REG-GEN-003 Disciplinary Warning;

Recidivism, including failure to comply with action plans laid down by the management or by the leadership, after due instruction, will also be subject to disciplinary measures. Respecting the following order of application of the measures, these are the appropriate punishments:

**I. Verbal Warning**

**II. Written Warning**

**III. Suspension**

**IV. Firing for cause**

Whenever possible, penalties must be applied soon after the offense has been committed;

A longer period of time may be allowed for the application of a penalty when the offense requires investigation of facts and of due responsibilities. The sanctions must be fair, reasonable and proportional to the offense committed. Similar offenses must receive similar sanctions;

The Personnel Department must always be consulted about the correct disciplinary measure to be applied, and when necessary must consult the Legal Department for guidance.

## **D) Management of the Code of Ethics and Conduct**

Approval of the present Code and its later amendments are the responsibility of the Ethics Committee and the Board of Directors of Daus;

Leaders of all levels must make sure that their subordinates and hires understand and apply the precepts of the present Code, which must be an example of ethics and the conduct to be followed by all employees;

Suggestions for improvement must be forwarded to the Ethics Committee, by each leader or by the Personnel Departments. The Committee must analyze them and include them in the next edition, when deemed relevant.

## **E) Communication – Confidential Channel**

In order to become aware of, analyze and solve any issue concerning the Code of Ethics and Conduct, Daus has set up an internal and external communications channel:

**Customer Service: 0800-377-8009**

**Site: [canalconfidencial.daus.global](https://canalconfidencial.daus.global)**

**E-mail: [canalconfidencial@daus.global](mailto:canalconfidencial@daus.global)**

Impartial and transparent, this channel ensures that information will be treated confidentially, protecting the identity of the people involved, and promotes a better environment for all;

The channel enables all questions of interpretation to be clarified, and accusations of failure to comply with the Code of Ethics and Conduct to be posted – corruption; bribery; fraud; harm to the environment; false information; inappropriate accounting records; misuse of company assets; discrimination according to race, color, religion, gender, physical or social conditions; and unethical behavior and actions.





## 7. Revision Control

Version	Date	Revisions	Resp. Individ.
04	15/05/2021	Material revised for transitioning from the Orolac Brand to Daus	Alonso Neto Legal Director

## 8. Appendices

Version without appendices

