

Code of conduct



CHEMYUNION
Inspiring Innovation

Introduction

The objective of a code of conduct is to encourage partners, managers, and employees to commit themselves to the principles and policies established by the company for its legal and ethical operation. It addresses practices and values of what is considered right or wrong.

The code of conduct outlines attitudes and responsibilities of the company and its employees while interacting with peers, customers, vendors, public agencies, and the society as a whole.

Reputation and credibility are the most important aspects of Chemyunion's image, because they convey stability and reliability to everybody with whom the company interacts. The code of conduct must be the core instrument for the continuity of such relationships.

Chemyunion encourages the exercise of judgement and reasoning as a method to get acquainted with the guidelines listed here.

Human rights

Respect for others and openness in our dealings are a core value at Chemyunion. That's why we value the human rights which are inherent to each individual.

We abide by the principles set forth in the United Nation's Universal Declaration of Human Rights, among which we consider these as being the most important:

- Human rights are universal; in other words, they apply equality and without distinction of any kind to everyone;
- Human rights are inalienable, and no one can be deprived of them; they might be limited in specific situations;
- Human rights are indivisible, interrelated and interdependent. In practice, violating one right will affect the respect towards several others;
- All human rights shall be seen as equally important and essential to ensure everyone's dignity and value are respected.

Learn more at <http://www.un.org/en/universal-declaration-humanrights/>

Code of conduct

I. Compliance

Compliance means a set of disciplines to enforce legal and regulatory norms, policies and guidelines established for the business and company's activities, as well as to avoid, identify, and address any deviation or non-compliance that may occur.

Compliance is a word that comes from the verb to *comply*, which means to agree with, to be committed to, to be bound by something.

An organization's excellence essentially depends on its ability to pursue its goals in a complete harmony with its workplace.

Today, organizations should not only deal with legal risks, that is, those connected to the failure to observe laws or applicable norms, but also with risks related to their image and reputation.

As such, a company's reputation is strongly connected to the level of public trust it enjoys amid pressures from customers and society for a more ethical attitude.

The adoption of the compliance practices has become a very important tool for organizations to minimize legal risks to their businesses' reputation, as well as to demonstrate commitment not only to the law, but also to a responsible and transparent management, doing business with excellence, ethics, and integrity.

Compliance is about employees' behavior in accordance with norms of conduct, but that's not all. It must include the conduct of vendors, customers, and managers to protect the interests of everyone (customers, employees, partners, public agencies, and society) against any dishonest acts and the inappropriate use of information.

Chemyunion's employees must never bribe or unduly influence a public agent or an employee of another proprietary company who has or may have a direct, indirect, or even occasional relation with Chemyunion, aiming to obtain any kind of advantage and/or satisfaction of direct or indirect interest. This conduct is strictly forbidden by the company.

If the company is held liable on a civil or criminal basis as a result of that kind of conduct by a Chemyunion employee, despite the absence of a legal action, even if indirectly, recourse civil actions may be filed for the full indemnification of any kind of damages, including attorneys' fees and expenses connected to the lawsuit and/or administrative proceeding, in addition to the discharge of the offender for cause, without any possibility of reconsideration.

Aligned to global concepts of business best practices, Chemyunion has selected a world-class partner of compliance services to operate, in a safe and anonymous way, its whistleblowing channel.

Suspensions of psychological and sexual harassment, corruption, or other situation not in compliance with Chemyunion's policies must be reported in strict confidence through this channel, available in <http://chemyunion.com/en/whistleblowing-channel>

Chemyunion emphasizes that people must provide information in good faith, reminding that reporting fake information may lead to irreparable losses and constitute a legal infringement.

2. Relationship between company and employee and among employees

2.1 Professional attitude

It is everyone's duty to understand and comply with the internal norms and administrative practices to which they are subject at the workplace. Everyone must follow the guidelines of the management policies established by Chemyunion.

It is everyone's duty to follow the guidelines, norms, and instructions provided according to the roles and responsibilities assigned in the processes and hierarchical chain to maintain the order and a good workplace environment.

Professional activities must be performed with safety, competence, and diligence, continuously seeking the technical enhancement and professional development.

At the workplace, you must pay attention to the risks involved in your activities and foresee any situations that may lead to mistakes or delays.

It is everyone's duty to conserve and maintain organized all the instruments and documents related to their professional activity.

Always consider the intellectual property when performing your activities.

It is everyone's duty to avoid wasting and always contribute to the best use of material and financial resources, as well as work time.

Everyone must wear discreet clothes or the assigned uniform, within the standards of hygiene and cleanliness.

It is everyone's duty to value the company's name and image both inside and outside the workplace. Each employee is a representative of the company to the community.

Chemyunion values transparency in work relations and the freedom of speech. Criticisms and suggestions contribute to our continuous improvement.

2.2 Interpersonal relations, communication and organizational environment

In the interpersonal relationships, you must always maintain a professional, and responsible treatment, with the proper friendliness, dignity, discretion, and attention to everyone with whom you interact, respecting individual differences.

Chemyunion encourages the sharing of knowledge, data, and information among its employees, so to keep the integrity and continuity of processes and activities.

It is everyone's duty to promote actions that make it possible to improve the quality and effectiveness of the internal communication, eliminating the dissemination of unverified information (rumors and the so-called "gossip" or "grapevine"). Damages to the reputation of co-workers through prejudiced judgements, false statements, or unproven information are not tolerated.

There will be no tolerance for the use of the inherent power of a position or role for obtaining favor or personal services from subordinates and for the bargaining that may lead to any kind of personal commitment or obligation.

2.3 Discrimination at the workplace

Nobody – partners, directors, employees, customers, third parties or any other stakeholder to whom the company interacts, including the surrounding community – shall be discriminated by sex, race allegation, age, origin, sexual orientation or gender identity, religion, physical condition, health conditions, etc.

2.4 Psychological or sexual harassment

No behavior characterized as psychological or sexual harassment shall be tolerated. Any conduct deviations that characterize such attitudes must be reported to the company's whistleblowing channel.

2.5 Adult or child labor exploitation

Labor shall always take place under formal, safe, and healthy conditions. No form of forced, compulsory, or child labor shall be tolerated.

2.6 Use of drugs, tobacco, and other drugs

No behavior characterizing the use of alcohol or other drugs at the workplace shall be tolerated; and the presence or entry of employees into Chemyunion facilities or in any external activity related to Chemyunion when under the influence of alcohol or drugs is prohibited. The company has defined a specific area for smokers. Employees must indicate this area to visitors.

2.7 Occupational safety

Chemyunion is committed to provide a safe workplace under appropriate conditions for the professional practice.

The work must be always done observing Occupational Safety and Health guidelines and rules.

Chemyunion shall properly provide personal protective equipment (PPE), making sure that everyone understands how important such equipment is and how to use it correctly. Employees, on their turn, shall strictly follow all the

instructions and training that may be provided by Chemyunion on that topic.

2.7.1 Possession of weapons

The possession of any kind of weapons shall only be permitted for duly qualified and licensed security guards, and it is prohibited for all other employees, either at Chemyunion's facilities or in any external activity related to their assignments.

2.8 Use of the organization's assets

You shall protect Chemyunion's property by preserving materials, work instruments, facilities safety, furniture and other equipment made available for use.

Likewise, computer resources – hardware and software – must be exclusively used for professional purposes according to the internal norms.

Please, pay special attention to the use of Chemyunion's equipment and communication means, such as telephone, email, internet access, etc. considered work instruments and, therefore, company's property, which may be subject to audit and tracking. No electronic means shall be used for the transmission or reception of offensive, aggressive, pornographic or discriminatory materials.

Disclosure or handling of information from stakeholders with whom the company interacts (customers, vendors, etc.) is prohibited.

3. Conflict of interests

There is a conflict of interests whenever an employee, contracting party, director, representative, vendor, or service provider of Chemyunion, by virtue of his/her influence, position, or accesses inherent to the activities he/she performs for Chemyunion, makes a decision where his/her personal interests prevail or oppose to Chemyunion's interest, resulting in personal benefits of any kind, either directly or indirectly, for his/herself or for his/her family members or friends.

Everyone in this situation must state such conflict of interests or personal interest; alternatively, another person may state that, if the relevant person fails to do so.

The involvement or influence of personal relationships when making decisions related to the hiring of third parties is prohibited.

Negotiations other than those related to company's activities and the sale of products or provision of services between employees is prohibited at company's facilities.

It is also prohibited the exercise of parallel activities by the employees in disagreement with Chemyunion's objective, such as providing consultancy services or holding a position in organizations with conflicting interests or that do business with Chemyunion. Commercial relationships, by the very employee or by means of his/her spouse or relatives, with Chemyunion's vendors or competition, to the extent that the position held allows him/her to influence transactions or even grants him/her access to privileged information, are prohibited.

The employee who holds positions (either paid or not) in external entities, and whose spouse or family members work for competitors, vendors, customers, government agencies or non-profit organizations that may interact with Chemyunion, shall communicate this fact to the line manager, so that the existence of any conflict of interests may be assessed.

Any opportunities for service provision by external providers of Chemyunion, who have any relationship with its partners, directors, and employees, shall be communicated and discussed with the line manager.

4. Receipt of gifts and benefits

Everyone shall communicate to Management on the receipt of giveaways, gifts, or any other benefit offered by vendors, service providers, and customers that exceed \$100.00. It also applies to the intention of offering gifts. It is up to the department Director to assess the case and make a decision.

5. Confidentiality

Strict confidentiality shall be kept on any secret or strategic information of Chemyunion and its customers. Only duly authorized people can provide third parties with relevant information.

Regarding customers' information, no Chemyunion employee shall transfer data or information from customer A to customer B. Acts like this are considered a major misconduct. It is worth mentioning that many confidentiality agreements have been executed, many of which may bind you directly as a witness; nevertheless, we cannot communicate the existence of all these agreements to everyone, so that we reinforce the importance of this provision.

Confidential information means technical and commercial data on our products, objectives, tactics, and business and trade strategies, annual budgets, short- and long-term planning, sale volume and conditions, result of research, financial and accounting data, as well as any other information or data connected or related to the business interests of Chemyunion.

Privileged information is understood as the knowledge of acts, facts, or events that may influence the market and the implementation of sales, marketing strategies, commercial negotiations or any other that may cause losses and risks to Chemyunion.

As a security mechanism when handling confidential information, Chemyunion recommends the adoption of certain practices in public places, such as: extra care when talking about business in restaurants, events, cabs, airports, etc.; avoid using computers in crowded places (airports, for instance), so to minimize losses or thefts that may lead to the disclosure or leakage of Chemyunion's confidential information; pay attention to the submission of confidential emails and documents, making sure that only the addressee will receive them.

6. Observance of laws and payment of taxes

The work shall be done always in compliance with laws, covenants, and collective agreements. It is everyone's duty to understand and observe the legislation to which they are subject when carrying out their professional activities.

7. Prevention and handling of frauds

It is everyone's duty to make efforts to prevent money laundering, which is a process to disguise the nature and origin of money associated to an illegal activity, by integrating the "dirty money" to the business flow, so that it seems legitimate or that one cannot identify its actual origin.

Everyone must pay attention to and report suspicious behaviors from customers and business partners regarding the observance of all accounting requirements, maintenance of records and financial reports applicable to payments made for transactions and contracts.

8. Relationship with the community

It is everyone's duty to act in a strictly professional and equitable manner when dealing with the external public. The use of the title, role, position, or influence to obtain any benefits shall not be tolerated.

9. Surveys, interviews, and press

The Communication department is in charge of the relationship with the press, managing demands, opportunities and specific press issues. As such, every request must be forwarded to them, and the employees must not make statements to the press, unless when guided to do so.

Researches or information surveys made by entities such as education, professional, and class institutions, among others, must be communicated and authorized by the Management.

10. Disciplinary actions

Once a conduct not in compliance with this code of conduct or the legislation is identified, Chemyunion Management will assess the case and recommend actions in accordance with the appropriate disciplinary measures.

11. Effectiveness

This code of conduct shall be reviewed annually or whenever a relevant situation not provided here demands an anticipated update.

Latest review: August/2018

ADHESION AND COMMITMENT TERM TO THE EMPLOYEE'S MANUAL AND CHEMYUNION'S CODE OF CONDUCT

Full name: _____

Position: _____ Area: _____

I do hereby state that I have received a copy, read it, and that I am aware of the provisions of the Employee's Manual of Chemyunion, and I am committed to fully comply with it in my professional duties.

I understand that this is my duty to observe established policies, practices, and norms. I also understand that the Employee's Manual is intended to be a guidance to the development and application of Chemyunion's policies in the operation of its businesses and constitutes an addendum to the individual labor contract.

By signing the Adhesion and Commitment Term to the Employee's Manual and Chemyunion's Code of Conduct I express my free consent and agreement with the observance of such principles.

Place and data

Signature



CHEMYUNION

Inspiring Innovation

chemyunion.com