



CODE OF ETHICS



GRUPOTECHNOS

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1. WORD OF THE PRESIDENT

Dear collaborator,

This code of ethics provides the behavior guidelines we expect at work, with practices consistent with our corporate policies, business strategy, and our way of being.

Therefore, this code of conduct is a guide to our best practices. It is a reference for all of your professional decisions, from the most ordinary to the most important ones. And it is applicable to each collaborator, regardless of his hierarchic position.

TECHNOS, as an organization, is included in the company in an honest and respectful manner, and will act as such in its relationship with customers, suppliers, work colleagues, business partners, competitors, and, mainly, in communities where it is present.

We are a company concerned both with the transparency of information and attitudes and the way our results are achieved. Use this document as a work instrument. Refer to it, share it, and be inspired thereby.

And always remember: your character and attitudes construct our company's reputation, reliability, and success.

Thank You,
Thiago Picolo

2. OBJECTIVE AND IMPORTANCE

“One who has principles and values for deciding, evaluating, and judging, is subject to the ethics field. Want I? Should I? May I? Three core questions for us to take care of the collective life. The ethics is what delineates the boundaries of our living together”.

Mário Sérgio Cortella

The purpose of this Code of Ethics is to serve as a practical guide for personal and professional conduct, and our commitment is to act with sincerity and authenticity in our business relations and in communication with the market. It contains the rules related to the individual responsibilities of all collaborators of Technos Group in its daily interactions and decisions, upon the application of the following assumptions:

- Compliance with the laws, rules, and regulations.
- Valorization of the work and treatment of collaborators with respect and dignity.
- Incentive to the constructive relationship and valorization of reliability in internal and external relations.
- Action in support of the Comp. results and become indispensable to the business of the client. Protection of confidential information and other Technos' proprietary information, as well as our customers' and suppliers' proprietary information.
- Protection and proper use of the company's assets and image.
- Resolution of conflicts of interests.
- Promotion of disclosure with complete transparency of complete, correct, accurate, and timely information.

This material aims at the adoption of attitudes in our daily lives, pointing out rights and duties, indicating preventive principles and rules to inhibit inappropriate behaviors that degenerate any good corporate practice.

3. DUTIES AND COMPREHENSIVENESS

The rights included in the Brazilian Federal Constitution, the civil, tax, and labor laws, are immutably complied with by TECHNOS. They are fully applied by its nominees and employees.

Everybody shall comply and cause the compliance with the current laws, as well as contracts, agreements, internal rules and collective negotiations, without exceptions or deviations.

To comply with professional liabilities with care, harmony, and respect to the occupational safety and health.

This instrument is applicable to all TECHNOS' collaborators, business partners, suppliers and contractors, controlled companies and companies under the same control, whether on a directly or indirectly basis.

4. PERSONAL AND PROFESSIONAL INTEGRITY

4.1 Description

Every collaborator is entitled fair treatment, whether by his/her supervisors, subordinates, and colleagues.

Technos Group does not approve any act of discrimination, harassment and/or stalking. Religion, ethnic, belief, nationality, sex, age, physical or mental impairment-based discrimination, or discrimination of any other kind, shall not be accepted.

4.2 Violence at the place of work

Our obligation is to preserve the collaborator's physical and moral integrity. Any attitude giving rise to physical violence or oral aggression shall not be accepted by TECHNOS. Our constant obligation is to build and maintain a healthy environment, even in the face of confrontation of ideas. What will always prevail will be the communion of values and mutual respect.

4.3 Use of illicit substances

The ingestion/use of drugs (except for medication cases, and under confirmed medical prescription) shall not be accepted at the work, or in external situations in which the collaborator is representing the company. The use of alcohol will only be permitted in commemorative activities, a moderate way, without disturbing the environment or cause embarrassment.

5. CONSTRUCTIVE RELATIONSHIPS

5.1 With Customers

Without having an ethic conduct as grounds, there is not customer-company relationship intended to last. Therefore, we must identify the customers' needs for being able to satisfy them, in harmony with security, quality, and profitability purposes, availing, further to courtesy and promptness, of the following conduct patterns:

≥ **Transparency in operations conducted:**

Not to make false affirmations or promises, nor avail of persuasion discrediting Technos;

To clearly establish with the customer everything that shall be delivered, how, when, at which price, without creating uncomfortable situations for both sides.

≥ **Receptivity and proper treatment of suggestions and criticisms received;**

Clarify in a transparent manner and friendly the rights and duties of Technos and its clients seeking better handling for the solution of the problems.

≥ **Effective attendance:**

Comply strictly with all contractual terms, acting always that the best conditions are in favor of the reach of the purpose in making consumers fall in love and be essential to Technos' clients.

≥ Confidentiality of the information received because of the commercial relations:

To keep customers' confidentiality, not informing contact persons, names, functions, activities, projects, and not giving any information that may be used by persons with bad intentions or competitors.

5.2 With Suppliers

We opted for conducting open, transparent, and fair transactions. We do not consider entering into agreements with customers, suppliers, competitors or third parties which seem to breach, or which directly breach laws and regulations applicable to the fair and open competition.

All suppliers are assured that their products shall be treated by Technos only based on marketing and quality criteria, without the interference of any aspect that may feature privilege or discrimination. The supplier feeling jeopardized by any TECHNOS' Collaborator shall be assured the possibility of directly reporting the occurrence to the Administration or Managers.

5.3 Media relations

Only authorized persons may speak in the company's name. Any statement must be made with the support of the press, invitations to media interviews written or spoken should be communicated to the immediate leadership, HR management and/or the Board to support the Press Office employed by company, if necessary.

5.4 Procurement Professional

The Professional of TECHNOS' supply area shall assure frankness and honesty in acquisition processes and in the relationship with product suppliers and service providers complying strictly with the current manual of purchases based on a consistent and transparent process.

Sentimental, familiar or love involvement is sealed the developer of Technos group in business deals with suppliers/partners/service providers engaged in the role of owner, partner, director or negotiator.

6. CONFLICT OF INTERESTS

Any situation featuring conflict of interest by any contributor is not allowed. No collaborator may, whether on a directly or indirectly, offer or give any kind of bribery, favoring, commission, allowance and/or personal favor, or any other abusive benefit to TECHNOS' or third parties' collaborators or other representatives or associates. Any offer or agreement proposed should be immediately informed to the company's direction.

6.1 Parallel activities

Volunteer activities especially in educational character are allowed as parallel activities. Other activities together with work the at Technos should be evaluated considering that:

- any extra activity is communicated to the immediate leader;
- there is no conflict with the interests of the Comp.;
- it does not compromise performance and hours of work;
- that materials, equipment and information owned by the company are not used.

Must refuse any performance that features use or provision of service/consulting to any supplier, service provider, partners, customers or competitors. Employees allowed by Technos must inform on admission if they have relatives who work in competition to avoid any speculation of conflict of interest.

6.2 Indication of professional/Hiring of relatives and spouses

It is allowed to indicate professionals to work at Technos. Hierarchical relationship is constrained for employees who have love or family link.

6.3 Restriction to favoritism

All evaluations of performance and potential should be based on merit, in order to provide equal access to professional development opportunities that exist in accordance with the competencies, skills and knowledge, in any forum, leaders that have sentimental involvement (love or family) with some collaborator, will be invited to retreat to ensure the preservation and impartiality of information. Close any kind of agreement is not allowed at the time of voluntary dismissal of the collaborator, characterizing fraud of labor laws.

6.4 Gifts

Everyone who have a direct relation with suppliers and partners should send standard letter of thanks Technos on offer of gifts, social events (such as dinner, lunch, cocktail), travel and others (sporting events for example) highlighting that we do not accept such offers. Still, if the offers are sent the collaborators may only accept those items that do not exceed 20% of the value of the minimum wage. If the offering is of greater value, it should be refused directly to supplier or delivered to us for internal action or donated to a charity.

Gifts purchased by Technos to customers and/or internal actions shall be estimated in the correct amount, if there is left over they should be sent to us for internal action with fair criteria that don't yield the favoritism in the Comp.

The samples of products owned by third parties should be immediately returned upon completing the acquisition process.

The use of TECHNOS' information and resources for own benefit shall not be allowed. Obtaining benefits and favors is considered a poor posture on the part of any collaborator.

6.5 Hiring of suppliers/partners

The contracting of service companies where owners, partners, directors and/or negotiators are relatives in any level of Technos' collaborators is not allowed. Any procurement process should be evaluated by the purchasing process in force with total accuracy and impartiality being best proven commercial terms and lowest quote for Technos.

6.6 Company equity

It is the duty of all employees to be aware of the company's equity.

Use the facilities, equipment and materials in a proper and responsible way, avoiding unnecessary losses and expenditures. Remember that they are your work instruments, and are solely intended to use in the discharge of your duties, and not for private purposes.

In the event of a termination of the employment agreement, all materials (equipment, uniforms, and apparatuses) shall be returned to the company. Use the Internet, e-mail and other computer and telecommunications capabilities of Technos for professional purposes. Use for personal purposes should be conscious and moderated without prejudice to the performance and without expenses to the Co. Information sent through such tools are a company's property and may be rescued at any time, without prior notice, in compliance with the internal rules and directions in the IT Conduct Code, signed upon you admission.

We value respect to all employees acting to preserve the good working environment and cleanliness of the facilities.

6.7 Opening of shops and franchises

Employee or family is not allowed to be owners of stores that sell products of the Co. or competitors, as well as opening franchises or stores ensuring that there is no conflict of interest with the use of information and trading conditions. Exceptional cases shall be analyzed by the Administration.

6.8 Acquisition of products

Employees can purchase products marketed by the Co., observing the limit set. It is not allowed to use the limit of colleagues, when your balance for purchases is unsatisfactory. It is forbidden to market gaining profit / trade profit obtained from products purchased of the brands of Technos at any time while active collaborator.

6.9 Work shift

Use your working hours only for exercising professional activities of TECHNOS. If you need to solve personal matters that do not involve statements attesting to the total or partial absence from the Co. talk to your direct superior. If necessary to exceed your business hours ask your direct superior's approval in advance.

7. PROTECTION OF TECHNOS' CONFIDENTIAL INFORMATION

TECHNOS' collaborators have access to proprietary information of the company, and sometimes, also to third parties' proprietary information. Such information may be financial information, commercial plans, techniques, information on collaborators or customers, and any other type. The non-authorized access, use or disclosure of such information may jeopardize TECHNOS or third parties, therefore the collaborator is not authorized to assign, use, or disclose the information, unless he/she is duly authorized for such. Whenever you have doubts on your authorization, ask for directions. Employees must follow the official communication channels of the Co. if getting come in contact with any information of confidential nature, although not intentionally, shall notify the party who provided the information and don't spread it.

Do not disclose confidential information to third parties. It has not, directly or indirectly, access, copy, reproduce or use confidential information, except in the course of their professional obligations to Technos. If you know of any incorrect use or handling of confidential information, notify your manager immediately and cooperate to protect this information.

Do not keep TECHNOS' information in personal computers or other media not provided by the company. If you need to take information outside TECHNOS' facilities for discharging your professional tasks, then you shall return the information when the tasks out of the company's facilities are completed. You must not keep company's information at home or another place whatsoever.

8.RESPONSIBILITIES AND PRESERVATION OF THE INSTITUTIONAL IMAGE

TECHNOS' institutional image is its most important patrimony, which shall be permanently preserved by all collaborators.

The image reflects the behavior, the ideas, and the direction the company wants for its day-to-day and future. Any action or attitude by the Collaborators, whether on an individually or collectively basis, which shall impair such image, shall be deemed a gross negligence.

Releases or exceptions to this corporate Code of ethical conduct may be admitted on a case-by-case basis, and only in extraordinary circumstance. The exceptions to this Code by collaborators should only be granted by a member of the Executive Board.

8.1 Dress Code

The dress code applies to all units and does not allow: slippers, bathing suits, excessively short and tight costumes, shorts and sleeveless shirts (for men). At the factory and other workplaces where the use of uniform is mandatory as personal protective equipment, more restrictive rule will be observed.

9. TECHNOS' ASSETS AND SERVICES

Every collaborator must use, in an appropriate manner, the company's assets and services, once they are only made available for the discharge of the organization's duties. The use, whether on a directly or indirectly basis, of such resources in own benefit shall not be admitted. You should not:

- Improperly use the resources available only to the company, such as printings, copies, express delivery services, car rental, and courier services, among others;
- Improperly and unnecessarily use the health plan made available as benefit to collaborators and dependents, as well as to lend your (personal and non-transferrable) identification badge to third parties;
- Placing long distance personal calls, except upon prior consent by your boss;
- Using work instruments for purposes other than those for the company, such as cars, cab services, parking, and mobile telephones, except upon prior consent by the boss.

TECHNOS shall not make contributions, payments, or offer any direct or indirect support to political parties, committees, or individual politicians. No political donation in TECHNOS' name, or using the company's funds or resources is allowed.

10. ACCURACY OF TECHNOS' BOOKS AND RECORDS

It is mandatory that the documents are kept for the time required by law. We must assure the non-violation of documents being administratively and judicially investigated, among other investigations as well. No collaborator may destroy, alter, falsify, or prepare documents that may cover possible irregularities. Only authorized persons may have access to confidential documents. We must assure that the management of documents is always updated, so as to suit to the laws in force.

11. COMPLIANCE WITH THE CODE

All collaborators, regardless of their hierarchic position, interns, and contractors must refer and follow this Code, as well as comply with all applicable laws and TECHNOS' directive policies.

The noncompliance with this Conduct Code shall give rise to the opening of administrative inquiry for ascertaining possible irregularities, and may subject the Collaborators to disciplinary measures, including the dismissal for gross cause and other penalties provided for in the labor laws, regardless of other actions TECHNOS may take. Collaborators deliberately failing to give notice of breaches of this Conduct Code, or who omit outstanding information shall also be subject to disciplinary measures.

Cases not provided for therein shall be treated as exception, and took to the Human Resource Department ("DRH"), which shall analyze and decide according to the principles in this Code.

12. DIRECT CHANNEL ON ETHICS:

If you know of any deviation from the rules of conduct manual is for conflict of interest, harassment, disrespect, please report your direct leader or if you prefer look for the Technos Group Legal Department. They shall cooperate to clarify the facts and make a decision about the case impartially fair and transparent, guaranteeing the anonymity.

You can also use the e-mail etica@grupotechnos.com.br to make complaints or juridico@grupotechnos.com.br to ask questions about the topic, your message will be received and handled with care, preserving the sender.



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