



# CODE OF CONDUCT, ETHICS, AND COMPLIANCE

Review 03 - 12/17/2020



**AQia**  
QUÍMICA INOVATIVA

## **CODE OF CONDUCT, ETHICS, AND COMPLIANCE**

Review 03, of 02/11/2021

AQIA aims to overcome present and future challenges, adopting ethical and legal conduct applied to each of us, from members of senior management / administration to each individual employee. In this way, we present the Code of Conduct, Ethics, and Compliance, in which we provide guidance so that each staff member/employee can understand and adopt our principles and values.

AQIA expects its team, at all levels, to commit to these basic principles, thus allowing each employee to understand that the success and development of the company depends on everyone, always with optimism and especially with ethics.

We know that respecting and expressing the Company's solid values and principles is a way of adding value. We have updated our Code of Conduct, Ethics, and Compliance to ensure that this ethical culture can be maintained over time.

Although we know that it is impossible to anticipate every situation that may arise, we use this Code of Conduct, Ethics, and Compliance as a guide to make the best decisions related to our work.

This quick Conduct guide serves as a consultation tool for all employees and third parties, in order to assist them in making ethical decisions.

## PRACTICAL CONDUCT GUIDE

- 01 Treat employees, customers, and partners with respect and politeness.
- 02 Be honest, honorable, and dignified in any situation. Act with honesty and integrity at all times.
- 03 Comply with all rules, policies, and procedures according to your responsibilities, role/activity.
- 04 Participate in training, either in person or online.
- 05 Avoid any kind of conflict of interest. A conflict of interest arises when social, financial or personal interests are placed ahead of AQIA's interests.
- 06 Report inappropriate conduct through the available channels.
- 07 Check, document, and archive. Always ensure that the necessary controls are in place in order to maintain the accuracy and correctness of the information.
- 08 Maintain the confidentiality of information that may cause harm to the organization.
- 09 Do not store, disclose or operate personal data that does not comply with the Brazilian General Data Protection Law (LGPD).

## **OUR PRINCIPLES:**

AQIA shares the commitment to act with integrity and ethics in its way of doing business. It always aims for the well-being and quality of life of its employees, partners, and customers. Our main priority is to create an environment of transparency in conducting our activities. The corporate Code of Conduct, Ethics, and Compliance is our commitment to act with sincerity and authenticity in our work relationships. We expect everyone to operate in accordance with the principles defined herein, always bearing them in mind in order to achieve the highest standards of excellence.

## **PURPOSE**

Develop the science of well-being for society.

## **MISSION**

Research, innovate, produce, and sell technological inputs and products that sustainably benefit the beauty and well-being industries, for the cosmetic, pharmaceutical, nutritional, veterinary, industrial, and agrochemical markets.

## **VISION**

We believe in the power of work, in technological evolution, in developing human, individual and societal values, in preserving the environment and respecting the laws and regulations in force.

## **VALUES**

We believe in the power of work, in technological evolution, in developing human, individual and societal values, in preserving the environment and respecting the laws and regulations in force.

## **COMPLIANCE**

Each employee, regardless of position in the hierarchy, is responsible for defending the values of AQIA and preventing any non-compliant and risky conduct for the business. To be compliant means to follow the rules, laws, specifications, in short, norms of any nature, established for a given action. A company's Compliance is built through ethics.

Employees aware of any apparently inappropriate conduct, regarding the Rules and Procedures and wish to communicate this to company, must use the form available on the AQIA website - [www.aqia.net](http://www.aqia.net), and complaints can be either identified or anonymous.

## **MANAGEMENT POLICY**

Our purpose is to meet the needs of customers, serve the chemical products market for the Cosmetics, Food, Veterinary, Agro Chemical, and Pharmaceutical industries, with technological updating and training, provide the structure and continuous improvement of management systems, with an ethical commitment and sustainable environmental partner, meeting legal requirements.

## **PURPOSES OF OUR CODE:**

- To serve as an individual and collective reference for the attitudes and behavior of each employee.
- To consolidate AQIA's values through their permanent, daily practice.
- To strengthen the internal and external image of AQIA and its professionals, characterizing their attitudes as correct, fair, appropriate, and aimed at the common good.
- To define the guidelines for relations between AQIA and all its stakeholders, human beings and preserving the environment.

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## **Article one: ESSENTIAL DUTIES**

### **The duties of our employees are:**

1. Read, understand, comply with and enforce this Code of Conduct, Ethics, and Compliance, as well as circulars, notices, communications, and other supplementary provisions that govern the services, the good order of the work and the functioning of the organization;
2. Dedicate yourself entirely to the interests of the company, refraining from any activity that may hinder the smooth running of the service. Apply your knowledge and talent to the benefit of the development and strengthening of the company;
3. Respect the relations and acts regulated by Brazilian law, and improper conduct related to illegal activities is unacceptable;
4. Be honest and respectful to colleagues. These fundamental principles for a good relationship, regardless of the position occupied by the professional;
5. Treat all staff members, customers and anyone else with courtesy, education, and respect;
6. Ensure the economy, conservation of facilities, and cleanliness of the material and the company in general;
7. Perform tasks that may not be strictly inherent in your job to minimize, neutralize or overcome difficulties that arise in extraordinary situations;



8. Use the personal and uniform protective equipment provided by the company;
9. Treat all employees with respect, in order to avoid practices that may offend, harass, or cause animosity.

## **Article two: PROHIBITIONS**

### **All company employees are prohibited from:**

1. Abandoning the workplace during working hours, for any reason, without notifying the immediate superior or HR department;
2. Breaking the confidentiality of private or privileged information of the company, suppliers and customers or using it for their own benefit or that of third parties;
3. Inciting or taking part in games, discussions, and chatter within the company's premises;
4. Allow strangers onto the premises without proper awareness and permission from the Occupational Safety, Management, or Board;
5. Entering any company premises outside working hours, without being duly authorized;
6. Taking food and beverages to production areas;
7. Eliminating documents that do not comply with the rules for their preservation and temporality tables;

8. Promoting discord, misunderstanding, discrimination, and the breach of ethical principles established in this Code, in the work environment and during the working day, to the detriment of other employees, managers, and the external public;
9. Removing or taking any material from the company's premises without the proper authorization of the Management or Board;
10. Using a cell phone or radio with a headset on the premises of the Factory sectors: Production and Logistics;
11. Taking photographs and posting photos of the company's manufacturing areas and premises on social networks.

### **Article three: ETHICAL VALUES**

1. AQIA does not accept any discrimination against sex, race, color, sexual orientation, language, creed, marital status, disability, ethnic or social origin, place of birth, age, belief, politics, or other nature;
2. AQIA encourages freedom of opinion and expression of ideas. It encourages communication between its professionals, even if this is in the form of criticism and/or disagreement. However, it requires that such attitudes be exercised in peaceful conditions and in an environment of respect, without incurring verbal violence, always observing the basic principles of politeness and the good customs of any society;

3. AQIA is responsible for offering opportunities for all in order to reward professionals who exceed expectations, punish without arbitrariness, according to the law, wrongdoing professionals, in addition to maintaining the “open doors” policy to listen to everyone;
4. AQIA will go to great lengths to pay fair remuneration to its professionals and offer a safe and healthy work environment.

#### **Article four: PROFESSIONAL ATTITUDE TOWARDS CUSTOMER RELATIONS**

1. The customer is an essential part of the company and employees must be aware of this importance and committed to seeking solutions that meet and satisfy their interests, in line with the company’s objectives;
2. The customer must always be treated politely, enforcing the rules of “Good morning! Good afternoon! How are you?”, etc.; these rules should also apply to relationships with colleagues;
3. Any and all information about our customers is the exclusive property of AQIA, and its use is prohibited without prior authorization;
4. Speaking using slang can be fun and bring some colleagues together (or not). However, with customers, slang is completely inappropriate because it is too informal. Speaking Portuguese well, besides being more elegant, has the advantage of avoiding misinterpretations;
5. Swear words are absolutely forbidden, even if the customer uses them. The use of swear words may indicate that the professional is communicating badly, and

therefore has lost common sense and violated this code;

6. Unfinished or dubious phrases in general make a bad impression and should be avoided;
7. When dealing with customers, the professional is expected to observe a higher degree of tolerance than would be expected of an ordinary citizen. Professionals should keep in mind that the perception of their actions by others influences the concept and image of AQIA, therefore, everyone must always be careful when preserving them.

#### **Article five: PROFESSIONAL ATTITUDE TOWARDS COMPETITOR RELATIONS**

1. Fair competition must always govern relations with competing companies;
2. In the case of criticism of competitors, we must use the principle of tolerance and refrain from comments, especially in non-verbal communications;
3. AQIA seeks to stand out in relation to the competition, due to its technical qualities and competence;
4. Honesty and observance of our ethical principles is our duty and not a competitive advantage.

#### **Article six: CONFLICT OF INTERESTS**

Employees must avoid conflicts of interest by not engaging in activity, investment or negotiation that could harm the integrity and image of the company. For AQIA, a

conflict of interest can occur when an employee:

1. Has a personal interest that could affect business judgment;
2. Becomes rich through confidential information;
3. Engages in external activity that impairs their performance in the organization;
4. Has a business or activity competing with the services and products developed by AQIA.

#### **Article seven: EXCLUSIVE PROPERTY AND CONFIDENTIALITY**

1. Maintaining the confidentiality of technological information:

Employees must maintain the confidentiality of information that, if disseminated, could cause harm to the company. Equally important is respect for the intellectual property of customers, suppliers, and competitors;

2. Confidentiality:

Confidential information is a company's asset. No professional should disclose this type of information outside the organization under any circumstances, except in the case of legal requirements. For that, there will always be a prior authorization. Avoid comments on figures, gains, and losses with people not related to the subject.

## **Article eight: Electronic Ethics (telephone and Internet)**

### 1. Telephones

In the principles of honesty, it is expected that professionals do not have or use this company resource for purposes other than work. For principles of justice of observance of human rights and common sense, professionals who make use of the telephone for particular relevant situations will not be censored, it being duly proven to their direct superior. When using the telephone to solve a personal problem, professionals are expected to observe discretion so that the work environment is not obliged to participate in intimate, delicate, or purely personal situations;

### 2. Computerized data processing

The company internally maintains servers and its own structure. Therefore, it is essential to be as careful as possible with the information on our servers. It is the responsibility of all employees who use electronic information, to maintain it, as well as keeping it totally up to date and secure. Unlike verbal communication, emails generate a permanent file. Any email you send can be forwarded by the recipient to other people, in addition to allowing it to remain in the company's system for a certain period. Therefore, as written communications do not have the same resources as verbal communications (such as tone of voice, physical posture, physiognomy), great care and politeness must be exercised when sending an email.

It is suggested that, in the case of disagreements between any professionals, in any hierarchical positions, to avoid problems that the few written language resources offer, conversations should be verbal and in person.

The professional must be absolutely sure that the message sent is not considered abusive, obscene, offensive, rude, or prejudiced. AQIA expects employees to make appropriate use of the Internet, without access to websites contrary to the law and morals. The company's system allows periodic review of the occurrence of abuse by any professional;

## **2.1 Personal Data Protection**

Regarding personal information, the activities developed by AQIA are made possible through access to digital platforms and information, which include personal data collected and maintained by the company. Thus, it is essential to implement measures to safeguard AQIA's operations, related to Information Security, as well as to protect fundamental rights of freedom and privacy of each user. Therefore, in accordance with Law No. 13.709/18 - Brazilian General Data Protection Law (LGPD) - AQIA employees must take appropriate measures to ensure that personal data is accessed and/or processed only by persons who need this information, in carrying out their tasks, and that only data strictly necessary to carry out AQIA's activities be collected, especially in relation to data classified as sensitive by the LGPD.

In conducting AQIA's activities, if it is essential to disclose personal data to third parties, the employee must ensure that the respective data subject has consented to its collection and treatment, if necessary by signing a consent form, and on care with the preservation of confidentiality. In other cases, the disclosure of personal data collected and maintained by AQIA is strictly prohibited, as well as its collection, especially in relation to data classified as sensitive by the LGPD.

In case of doubts, suggestions and other matters related to LGPD, the communication email used is [lgpd@aqia.net](mailto:lgpd@aqia.net)

## **Article nine: COMPLIANCE AND ENFORCEMENT OF THE CODE**

AQIA expects everyone to whom this Code applies to adopt ethical conduct compatible with the company's values and beliefs, being responsible for its full compliance.

Violation of the Code of Conduct, Ethics, and Compliance:

Violations of the Code of Conduct, Ethics, and Compliance are considered serious faults, all of which are subject to disciplinary measures that can culminate in dismissal with cause (subject to current legislation and company rules).

When there is a report of an infraction committed by someone else, care will be taken with respect to confidentiality and no retaliation will be accepted. However, employees who conceal violations may be co-responsible, being also subject to disciplinary sanctions.

## **Article ten: INCLUSION OF SOCIAL RESPONSIBILITY REQUIREMENTS**

AQIA ensures through this manual that internal social requirements are understood and implemented at all levels of the organization with the purpose of establishing, structuring and ensuring that the Social Responsibility System is properly implemented and maintained so that social aspects are met and fulfilled, constantly concerned with continuous improvement and developing its activities clearly with its employees and partners. AQIA's Social Responsibility is based on International Labor Organization (ILO) Conventions, Brazilian Consolidation of Labor Laws (CLT), United Nations Convention on the Rights of the Child, on the Universal Declaration of Human Rights and deals with working conditions, which are:



## **1. Child Labor - Child Reparation Policy**

AQIA does not employ or use child labor, nor does it support a system that directly or indirectly uses child labor, and does not purchase products or services from suppliers and service providers who do not assume the Corporate Social Responsibility Commitment or support the use of child labor. Young Workers will only be hired by AQIA if they are studying or commit to enrolling in elementary education, if applicable; the hours between school, commute and work do not exceed 10 hours per day. It is the responsibility of management and human resources to meet these requirements when hiring a young worker;

## **2. Forced Labor**

AQIA does not use or in any way support forced labor. Upon the employee's admission, no deposit or documents are required as a way to keep the employee in the company against their will. Every employee is guaranteed the right to leave the company freely, respecting the rules of Human Resources;

## **3. Health and Safety**

AQIA's basic principle is to establish a safe and healthy environment for all its employees. Therefore, the following actions are developed within Occupational Health and Safety Aspects: establishment of Internal Commission of Accident Prevention (CIPA), with employee and AQIA representatives, with the basic objective of identifying potential risk situations and proposing appropriate solutions. CIPA meetings are minuted and kept with the Occupational Safety area. The formation of a fire brigade and first responders through specific training - the names of the members of the fire brigade are posted in visible places. PPE is provided free of charge to all employees, as

required, Regulatory standards of the Ministry of Labor;

#### **4. Freedom of Association and Right to Collective Bargaining**

AQIA respects the rights of all its employees to join unions for collective bargaining. For union representatives, there is no discriminatory practice, with access to AQIA employees in the workplace respected. The collective agreement is respected by AQIA in its scope, and it is the responsibility of the Management Social Representative to analyze and implement the respective agreements defined in the agreement;

#### **5. Discrimination**

AQIA does not use discriminatory practices of any kind in its relations with its employees and does not permit the use of discrimination based on race, color, social class, place of birth, religion, disability, sex, age, sexual orientation, association with union, or affiliation policy. In accordance with its principles, AQIA does not interfere with the rights of its employees to observe the precepts and practices, or to meet the needs related to the discrimination mentioned above;

Thus, practices that permit behavior that is morally or sexually coercive, threatening, abusive, or exploitative of any nature are not used. The right to any employee who feels discriminated against in relation to any abusive practice is preserved, to formally complain and to obtain the appropriate treatment for their complaint, preserving their total physical and moral integrity, as well as keeping the situation confidential, in case it is desired by the employee;

#### **6. Diversity and Inclusion**

AQIA believes in the diversity and freedom of people to be who they are.

Respect for individuality is essential for developing creative solutions, innovation, and problem solving. The Diversity and Inclusion group works to make leadership more inclusive, teams more diverse and the environment one of respect and with equal opportunities for development and recognition. We invest in attracting diverse talents, with a focus on underprivileged groups, allowing everyone to have equal opportunities and aiming to increase their participation at all hierarchical levels;

## **7. Disciplinary Practices**

AQIA's senior management does not admit, use or encourage any type of disciplinary practice based on corporal, mental punishment, physical coercion, or verbal abuse. All supervisory and management personnel must follow and deploy this policy in any and all relationships with their subordinates. The right of any employee to register their position/complaint in the event of non-compliance with any disciplinary practice is guaranteed.

Every employee has the right to appeal against an established disciplinary practice against them. In that case, they should send a document to Human Resources explaining their reasons. The appeal must be analyzed by at least two directors not involved with the area/sector in which the employee is located. The response to the appeal must be made in writing to the employee and signed by those involved in the analysis and the position/complaint. The actions taken must be informed to the applicant who registered the complaint advising them of the referral that will be carried out;

## **8. Working Hours**

AQIA respects the laws related to the work hours of its employees.

- No employee is required to work more than 44 hours a week;
- Employees will work overtime in case of exceptional circumstances due to short-term needs;
- If the collective agreement allows, compensatory time may be established, respecting all the requirements of the collective agreement;
- Overtime will be paid as additional, respecting the minimum of current legislation and collective agreements.

AQIA's senior management does not encourage voluntary overtime. All employees must be aware of their responsibilities and the correct balance between their professional and personal activities, as a way to maintain their quality of life;

## **9. Compensation**

AQIA guarantees the payment of the minimum wage floor in order to meet what is determined by the union agreement of the respective category that defines an amount to meet basic needs and also allow an extra income that can be invested freely by employees. Deductions from employee compensation are made exclusively in accordance with those provided for by law and referring to the benefits that AQIA makes available to its employees.

No deduction is made as a result of disciplinary practice. The salary composition is

detailed in the pay slip employees receive each month. All employees are guaranteed access to the Human Resources Department if there are doubts about the breakdown of the compensation and any deductions made. The benefits are:

- Childcare Allowance;
- Cafeteria;
- Transportation Voucher (VT) or Charter Transport;
- Health Care;
- Life Insurance;
- Dental Care;
- Private Pension;
- Profit Sharing Program

Benefits deducted from remuneration are previously agreed and approved by the employees before they are charged. Fortnightly forms of payment, 40% advance payment on the 15th day of each month and payment of salary on the last working day of the month, in bank deposit.

AQIA can have young workers and interns on its staff, with the purpose of learning and improving theoretical knowledge, putting it in practice. The other specific responsibilities in the development of each activity and authorities in the proper

implementation and continuous adaptation of the Social Management System are defined and referenced in the respective procedures;

#### **10. Access to verification and external communication.**

Whenever requested by any interested party (customers, suppliers, unions, etc.), AQIA provides access to its premises for possible verifications of compliance with Social Responsibility requirements. AQIA provides an email address for any type of communication regarding Social Responsibility (criticism, complaints, suggestions): [compliance@aqia.net](mailto:compliance@aqia.net)

#### **Article eleven: FINAL CONSIDERATIONS**

For disclosure and control of the Code of Conduct, Ethics, and Compliance, the Committee appoints the Compliance Department. If more detailed guidance or explanation of the Code or any ethical issue is required, please contact [compliance@aqia.net](mailto:compliance@aqia.net). AQIA reserves the right to change the Code and the guidelines, in part or in whole, at any time, always guaranteeing the disclosure of the changes to its employees and to anyone else who may be interested.



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