



## GOALS

This Code defines how ALBASTEEL relates to its shareholders, customers, suppliers, society and the other parties involved and / or interested in its business, and what the Company expects from each of its employees, regardless of position or function. performed, with the following purposes:

- To serve as an individual and collective reference for attitudes and behaviors, so that everyone follows the same values and standards of conduct;
- To guide ALBASTEEL's activities in relation to the environment and the communities where they operate;
- Strengthen governance, internal and external image, based on its ethical, serious, fair and committed management with citizenship and the community;

## PRINCIPLES

### Integrity

The conduct required here must be guided by justice, loyalty, common sense, legality, respect for the Statute and general rules.

Acts of corruption, extortion, bribery and illegality, in any of its forms, or any disrespect for human rights, are not tolerated.

Fair, equal, cordial and respectful treatment should be given to everyone, regardless of their position or position.

We must not admit:

- Discrimination or prejudice of any kind, such as those related to ethnicity, sex, religion, age group, political conviction, nationality, marital status, sexual orientation or special condition;
- Moral, sexual harassment or situations that constitute pressure, intimidation or threats, regardless of the hierarchical level of those involved;
- The practice or support of any type of forced or child labor.

### Transparency

For ALBASTEEL, transparency is of paramount importance in the development of its activities, which is why it expects that, from the communication to the recipients of this Code, everyone should:

- Generate correct and updated information that allows knowledge of the relevant aspects of our Company in the economic-financial, operational, corporate, administrative, social and environmental fields;
- Communicate in a clear, simple, direct and accessible way to all interested parties;
- Disseminate authorized information to interested parties by the most efficient means available.

## INVOLVEMENT OF INTERESTED PARTIES

**Customers, Shareholders, employees, Suppliers, Unions and Commissions, Community and Public.**

### With Clients

Customer satisfaction is essential for ALBASTEEL.

Our primary objective is to serve with transparency, reliability, meeting deadlines and products developed in accordance with the required quality standards, seeking to continuously exceed your expectations.

Our negotiations are characterized by transparency, courtesy, mutual trust, loyalty and performance consistent with the Company's ethical principles.

### With Shareholders

ALBASTEEL maintains a transparent relationship with its investors, providing, in the form of the law, clear, accurate, accessible and equitable information, which reflects the reality and allows the monitoring of the Company's activities and performance, without prejudice to the interested parties. .

The same treatment is given to everyone, regardless of the nature and number of shares they hold, in compliance with the relevant legal provisions.

It is worth noting that the managers, members of technical bodies, the ALBASTEEL Fiscal Council, the majority shareholder, employees and service providers can trade with the Company's shares, provided that they do so in compliance with its Stock Trading Policy, especially in the that refers to the periods and conditions in which this negotiation is prohibited.

The investor relations director is responsible for communicating with shareholders and capital market analysts.

### With Collaborators

Relations with employees are conducted according to the following premises:

- Respect diversity, without discrimination of any kind (race, sex, religion, age, social class, sexual orientation, physical disabilities and nationality, among others); for all;
- Respect the employee's interest in participating in the internal recruitment processes, which should be understood by the leaders as a natural alternative for professional development, without any type of retaliation;
- Recruit and keep people prepared, efficient, motivated and talented; • encourage respect and collaboration in professional relationships and teamwork;
- Do not use child or slave labor;
- Veto nepotism;
- Respect free association, recognizing union entities as legal representatives of employees, seeking constant dialogue to resolve conflicts of a labor or union nature. Hierarchical levels are recognized as a form of work organization; regardless of hierarchy, respect for people must always be maintained.

### With Colleagues

We expect the relationship between colleagues to be based on the following principles:

- Acting in a courteous manner, with availability and attention, respecting individual differences;
- not damage the reputation of colleagues through prejudiced judgments, false testimonies, unfounded information or any other subterfuge;
- do not seek to obtain an exchange of favors that appear or may give rise to any type of personal commitment or obligation;
- not to use the power inherent in the position in obtaining personal favors or services from subordinates; work as a team and, whenever necessary, share.

The knowledge, information and data acquired in the exercise of their activities, with their own.

Peers and co-workers, in order to maintain the integrity and continuity of the processes and activities;

- respect the authorship of others' ideas.

### With Suppliers

In selecting and contracting suppliers or service providers, the Company prioritizes economic and financial capacity and suitability, technical, professional, financial, ethical criteria and compliance with legal requirements.

ALBASTEEL may terminate a business relationship with a supplier whenever there is a loss of interest and / or disregard for legal issues, especially those related to labor, tax, environmental, health and safety at work.

ALBASTEEL's relationship with its suppliers and service providers requires transparency in procedures related to purchasing activities, prices, quality of materials and services to be purchased.

Our employees must appreciate the good relationship with suppliers and professional service providers with regard to:

- share this code of conduct with suppliers

And service providers;

- be courteous, with availability and attention, respecting individual and professional differences;
- not damage the reputation of the outsourced professional through prejudiced judgments, unfounded information or any other subterfuge;
- do not seek to obtain an exchange of favors that appear or may give rise to any type of personal commitment or obligation.

#### **With Unions and Commissions**

We recognize union bodies and factory commissions as legitimate employee representatives.

With this in mind, we seek constant dialogue to resolve conflicts of a labor or union nature.

ALBASTEEL's relationship with unions and factory commissions is based on realistic and transparent information. Openness in dialogue and respect for the positions of each party characterize our responsible behavior during negotiations.

#### **With the Community**

The Company's relationship with the community must be guided by transparency, constructive attitude, courtesy, partnership, in addition to mutual benefit and respect, always seeking to preserve ALBASTEEL's image and good relations with its neighbors.

We are committed to the development of the surrounding communities, as well as, we maintain actions and incentives conducive to the improvement of living conditions.

#### **With the Public Power**

The use of the Company's resources, products or services is prohibited to obtain unlawful advantages with authorities and servants of public bodies, autarchies or companies in which the government participates, directly or indirectly, or to induce norms to be promulgated, revoked or violated.

## **SUSTAINABILITY**

### **Quality, Safety, Environment and Social Responsibility.**

#### **HEALTH, SAFETY AND ENVIRONMENT.**

Through the Integrated Health, Safety and Environment System, we develop permanent preventive programs. Everyone must be part of this system and are equally responsible for its zeal and compliance, paying attention to the following principles:

- strictly observe the health, safety and environment standards established by the Company;
- identify and communicate about any unsafe tasks or conditions;
- conserve the materials and equipment used, avoiding waste and unnecessary costs;
- contribute to the success of actions aimed at cleaning and organizing workplaces;
- maintain environmental sustainability, committing to the protection of the environment and strict compliance with relevant legislation;
- prevent the occurrence of environmental damage resulting from its activities, through the use of safe and environmentally appropriate technologies in the management of processes and in the design of new products;
- preserve the environment in which the Company carries out its activities aiming at its longevity, even after using the land;
- contribute to the development of environmental awareness, respect the environment inside and outside the Company, obtaining the commitment of suppliers of products and services for the correct destination of residues and industrial effluents;
- immediately report any accidents related to the environment to the responsible area in order to make the appropriate measures possible.

## **CONFLICTS OF INTEREST**

Conflicts of interest are any situations in which the fulfillment of the manager's or employee's wishes may represent, directly or indirectly, an adverse impact on the Company's interests. Below, we have identified, by way of example, some.

Conflicts of interest that are not admitted:

- improper use of the position to obtain advantages, for their own benefit or that of colleagues and family members, with financial or other entities that transact with ALBASTEEL;
- personal relationship with suppliers and customers, to the point of questioning their exemption as a representative of the Company;
- promotion of political party activities in the ALBASTEEL facilities or enticement for this purpose;
- conducting business on behalf of ALBASTEEL with people with whom family members maintain a close personal relationship, or with companies in which such people are partners, have participation or hold positions with decision-making power.

### **Inside Information**

Privileged information is understood as the knowledge of acts, facts or events capable of influencing the market, other interested parties and causing interference in sales, marketing, commercial negotiations or of any nature, causing losses and / or risks to the Company or to its shareholders, until such information has been officially disclosed.

No information can be considered public until it is officially disseminated by the appropriate means.

It is prohibited to disclose information without proper authorization from the board responsible for the matter.

## **COMMITMENTS**

### **Confidentiality**

Confidential information is technical and commercial data about products, objectives, tactics and business and marketing strategies, as well as any other information that is linked to the interests of the Company.

Strict confidentiality about ALBASTEEL's confidential or strategic information must be maintained.

It is the obligation of any employee to be cautious when making comments regarding the Company's business and information in public places: restaurants, transportation, elevators, etc.

The presentation of information, results and strategies of the Company in lectures, conferences, presentations, publications, interviews or any other form of communication can only be carried out with the consent of the board.

Only persons authorized by senior management can provide relevant information to third parties or the press.

The use or unauthorized disclosure of confidential information is a crime and may result in labor, civil and criminal penalties.

### **Gifts**

The following guidelines must be observed in negotiations and in the relationship with customers, suppliers, government agencies, communities and others:

- not accepting gifts that characterize your professional situation;
- do not offer payments, perks, favors, gifts (except small promotional gifts). Value or no commercial value), special discounts or other benefits not included in the marketing policies;
- not accept cash offers, financial compensation, benefits or advantages of any kind;
- inform the hierarchical superior about receiving invitations to events, the expenses of which are borne by customers or suppliers.

## Company Assets

All assets destined to the maintenance of its activities are assets of the Company. The use of these assets is subject to the following provisions:

- they must be used exclusively within the objectives of the Company's Bylaws;
  - it is not allowed to use ALBASTEEL equipment and other goods for private use;
  - all employees must ensure the Company's equipment, machinery and vehicles;
  - computer systems, which include the use of e-mail and the internet, must be used in an appropriate manner, within the professional practice and in accordance with our objectives;
  - the password provided to access equipment and / or systems owned by ALBASTEEL is personal and non-transferable; because of that, it is also personal and non-transferable.
- The inherent responsibility for its use, as well as for the accesses, authorizations and approvals carried out;
- it is strictly forbidden to install or transmit software or copies of software, this being the exclusive responsibility of the technicians of the Information Technology Management (IT);
  - our equipment must not be used to display inappropriate content, suggestive of incitement to racism, xenophobia, pornography, pedophilia, religious intolerance or violence;
  - they constitute property crimes: alteration or omission of records, values or documents; the preparation, preparation or reception of false records and documents; evasion of goods and documents; irregular handling of money or valuables, etc.

## Code Management

The management of this Code is the responsibility of the directors and employees, who must ensure compliance with it and adapt it to the reality of ALBASTEEL's business environment.

The Ethical Conduct Committee is responsible for judging the most serious violations of this Code and recommending the appropriate measures.

The Ethical Conduct Committee is composed of three permanent members (one from HR, one from Legal Management and one from Internal Audit), in addition to a transitional representative, from the area of the person involved. Eventually, members of the board may participate in the work, at the request of the Committee or recommendation of the HR representative.

The forwarding of communications related to the Code of Conduct (suggestions, doubts, complaints, etc.) can be done freely, by anyone, through the channels below:

- **HR:** quality email@ [albasteel.com.br](mailto:albasteel.com.br), extensions in the area or in person
- **Immediate superior.**
- **Ethical Conduct Committee**, via email [eduardowetter@albasteel.com.br](mailto:eduardowetter@albasteel.com.br).

We emphasize that denunciations should only occur when there is knowledge of data and concrete facts related to the violation of the principles established by this Code of Conduct.

We ensure that the identity of the author of any report will be preserved, as well as retaliation or punishment against the employees or third parties who report it will not be tolerated.

## Term of Commitment and Confidentiality

ALBASTEEL and I assume the commitment to fulfill it and respect it, fully, watching over their faithful. Application, aware that its non-compliance will be subject to the appropriate measures.

Date \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_

Registration \_\_\_\_\_

Full name

\_\_\_\_\_  
Signature

## GLOSSARY

### Bullying

Attitudes that generate humiliation, intimidation and higher than expected demands for a healthy work environment, during the day or outside.

### Sexual harassment

Embarrassing someone in order to obtain sexual advantage or favoring, the agent prevailing in his / her condition of superior hierarchy, ancestry or even abusing the trust relationship between peers, during the workday or outside of it.

### Contributors

The term covers counselors, directors, employees, interns, apprentices and other people who work at ALBASTEEL.

### Conflicts of interest

Situations in which the individual may be tempted to favor his own interests (or those of third parties with whom he has a relationship) to the detriment of the interests of the company.

### Discrimination

Differentiated treatment given to people, in hiring, remuneration, access to training and promotion, based on race, color, nationality, religion, disability, gender, age, sexual orientation, union or political affiliation.

### Favoring

It is the act of benefiting someone only out of friendship, kinship and / or money, without considering professional and behavioral aspects.

### Forced (or slave-like) labor

In general terms, it is characterized by the way of making the person perform certain jobs, in improper conditions and by threatening an unfair penalty if that job is not done.

### Child labor

It is work performed by people under the age allowed by law. In Brazil, the Federal Constitution of 1988 (art. 7, XXXIII) admits work, in general, from the age of 16, except in cases of night work, dangerous or unhealthy, for which the minimum age is 18 years. The Constitution also admits work from the age of 14 (art. 227, § 3, I), as an apprentice (art. 7, XXXIII). The CLT (Consolidation of Labor Laws), in addition, guarantees the adolescent worker between 14 and 18 years of age a series of special protections, detailed in its Chapter IV (articles. 402 to 441).

### Valuing diversity

It aims to recognize, respect and value the differences between individuals and ensure the conditions for them to have equal opportunities and conditions for the full development of their talents and potential.

Diversity can be understood

As a set of visible or invisible differences that include factors such as gender, race, ethnicity, disability, age, sexual orientation, religion, nationality, lifestyle, among others.

### Xenophobia

It is commonly associated with aversion to other races and cultures; fear in relation to different people or groups, with which the individual usually does not come into contact or avoids doing so.

The company follows admission and dismissal exams as required by labor law.

The company has a first aid kit to attend small emergencies with accidents at work, this must be communicated to the person in charge of the sector. In case of more serious occurrences, the company is responsible for taking the employee to the hospital and for medication costs due to the work accident.

“With this manual, we want you to know a little about Albasteel and the relationship with our employees”. We would like to point out that our main goal is the quality of our services and the quality of life for each one.

If there is still any doubt, we ask you to contact the person in charge of the sector for clarification.

“Welcome, to collaborate with the growth of the company and to collaborate for your personal growth.”



### **DECLARATION**

I declare that I have received from Albasteel a copy of its Integration Manual, guidance on its content and the company's Quality Policy, as well as the Description of the position that I will hold.

<b>Issues Addressed at the Meeting</b>	<b>Status</b>
Presentation of the Code of Conduct	
Skills Review	
Company presentation	
Chart	
Quality Policy / QMS	
Main products	
Rights and duties	
The benefits	
Workplace safety	

Name: \_\_\_\_\_

RG: \_\_\_\_\_

Sector: \_\_\_\_\_ Position: \_\_\_\_\_

São Paulo, \_\_\_\_ from \_\_\_\_\_ from \_\_\_\_\_.

\_\_\_\_\_  
Signature