

Metalúrgica Hassmann S.A., a company operating in the market since 1955 and governed by a Financial, Ethical and Social Administration, focused on Environmental Sustainability, in which the appreciation of the human being, respect and preservation of the environment, the relationship of commitment and responsibility between the company and its employees, establishes a Code of Ethical Conduct to guide the Organization's moral behavior.

The Management and Employees, familiarized with this Code of Ethical Conduct, establish practices, in the work environment, and with their customers, suppliers and subcontractors, ensuring compliance with these ethical precepts.

CHILD LABOR / SLAVE / HUMAN TRAFFIC

Metalúrgica Hassmann S.A. complies with the laws in force in all spheres, does not use and recriminates the use of child, slave or involuntary labor and human trafficking.

HEALTH AND SAFETY

Metalúrgica Hassmann S.A. is committed to the safety and health of its employees, carrying out its operations in accordance with the laws and regulations in force, as well as providing a safe working environment, supporting the prevention of accidents and minimizing the risks of health.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Metalúrgica Hassmann S.A. supports and respects the freedom of union association of its employees, so that each one can choose whether or not to join a union. Collective bargaining is carried out following collective bargaining and in compliance with applicable legislation.

DISCRIMINATION

Metalúrgica Hassmann S.A. supports diversity and equal employment opportunities for all and repudiates any type of discrimination. At Hassmann:

- **Recruitment is carried out ethically.**
- **Women's rights** are respected, in accordance with the United Nations Convention.
- **Diversity, equity and inclusion** are supported.

MINORITY RIGHTS, SOCIAL RIGHTS AND USE OF FORCE

Metalúrgica Hassmann S.A. supports disadvantaged minorities and social rights over environmental resources:

- **Rights of minorities and indigenous peoples.**
- **Rights to land, forest and water.**
- **Forced evictions must be avoided**, through negotiation between the parties, seeking consensus among the interested parties.
- **Security forces**, both private and public, used to protect business facilities or projects, must have proper training and control in order to avoid human rights violations.

DISCIPLINARY PRACTICES

Metalúrgica Hassmann S.A. treats everyone with dignity and respect. Disciplinary practices must not be rude or inhumane, must not involve or condone the use of corporal punishment, mental or physical coercion and verbal abuse.

REMUNERATION AND WORKING HOURS

Metalúrgica Hassmann S.A. complies with all labor laws and regulations in force regarding remuneration and working hours.

FINANCIAL RESPONSIBILITY

Metalúrgica Hassmann S.A. Consciously uses its resources, considering ethical conduct, to support and improve its processes, committing itself to financial recording, focusing on transparency and accuracy of information. Hassmann preserves its physical and electronic files, in order to prove compliance with government regulations, customer requirements and established conduct.

GIFTS AND PREMIUMS

Metalúrgica Hassmann S.A. and its employees may not accept or offer gifts and premiums from its suppliers, customers or subcontractors.

UNDUE PAYMENTS

Metalúrgica Hassmann S.A. and its employees carry out business with a high standard of integrity and within the limits of the law, ensuring the non-acceptance of bribes and kickbacks, as well as not offering bribes, kickbacks and similar payments to third parties with or without ties to our company.

FAIR COMPETITION

Metalúrgica Hassmann S.A. it only conducts business based on merit, principles of market economy and free competition, thus respecting the laws and ethical principles.

CONFLICT OF INTEREST

Metalúrgica Hassmann S.A. respects the particular interests of employees, we make it clear what is and what is not accepted or allowed, in order to avoid any type of conflict of interest between the parties.

FAKE PARTS

Metalúrgica Hassmann S.A. is aware of the impact of counterfeit parts on the market, so the use of parts or software that are false or from illegal or dubious sources is prohibited.

INTELLECTUAL PROPERTY

Metalúrgica Hassmann S.A. it preserves our company's physical, intellectual and material assets and the health and safety of itself and others who work at the company's facilities are priorities, which is why we respect and value the intellect of our employees, business partners and competitors.

CONFIDENTIAL INFORMATION

Metalúrgica Hassmann S.A. complies with current laws and regulations regarding personal, proprietary and confidential information, as well as with regard to the protection, use and disclosure of information from its employees, suppliers, customers and subcontractors.

EXPORTS AND ECONOMIC SANCTIONS

Metalúrgica Hassmann S.A. instructs all its employees to follow and respect the export control policy and economic sanctions, as well as all laws in force in the country in which they are operating. This includes laws and regulations relating to trade embargoes and economic sanctions, export controls, anti-boycott laws, cargo security, import classification and evaluation, product/country of origin marking, and free trade agreements.

SOURCE OF MINERALS - CONFLICT MINERALS

Metalúrgica Hassmann S.A. complies with the Conflict Minerals Policy of its Clients, whose requirements include information regarding the source and origin of the Conflict Minerals, which eventually make up and are provided in the parts / materials.

ENVIRONMENT

Metalúrgica Hassmann S.A. respects and protects the environment, carrying out its operations in accordance with the requirements of its clients, laws and regulations in force, at the municipal, state, federal and other countries with which it works. Within this context, in order to mitigate any type of pollution, Hassmann also considers the **emission of noise**, which is controlled, so that it remains within legal limits, in order to avoid disturbing the surroundings, considering the neighborhood and the ecosystem as a whole.

ANIMAL WELFARE

Metalúrgica Hassmann S.A., within the ethical and environmental context, respects and supports animal welfare, considering the habitat of wild animals, the proper treatment of pets, as well as the proper handling of animals raised for slaughter. Everyone must be treated, according to ethical precepts, taking into account humanitarian conditions, avoiding unnecessary suffering as much as possible.

BIODIVERSITY, LAND USE AND DEFORESTATION

Metalúrgica Hassmann S.A. respects, protects and supports the protection of biodiversity, as a legacy for the next generations, being against indiscriminate deforestation and the improper use of the land.

ENERGY EFFICIENCY AND GREENHOUSE GAS EMISSIONS

Metalúrgica Hassmann S.A. incessantly seeks energy efficiency through various internal and external actions and awareness of its entire team, with this Hassmann directly influences the decarbonization and reduction of Greenhouse Gases, thus improving the company's energy efficiency.

AIR QUALITY

Metalúrgica Hassmann S.A. maintains constant controls on atmospheric emissions. Periodic analyzes are carried out on various aspects related to air quality, both indoors and outdoors, thus ensuring the prevention, combat and reduction of pollutant emissions and the effects of degradation of the atmospheric environment.

WATER QUALITY AND CONSUMPTION

Metalúrgica Hassmann S.A. works continuously on the conscious and efficient consumption of water resources used in its process, either in the internal reuse of resources for less noble purposes, in more efficient systems and processes that demand less natural resources, or in the capture and use of rainwater instead of use potable water in their processes.

SUSTAINABLE RESOURCE MANAGEMENT AND WASTE REDUCTION

Metalúrgica Hassmann S.A. maintains constant control over the use and consumption of resources, through robust procedures, always focusing on reuse and recycling, aiming at the continuous improvement of processes and, consequently, the reduction of waste and the reduction of waste generation.

RESPONSIBLE CHEMICAL MANAGEMENT

Metalúrgica Hassmann S.A. maintains internal controls and procedures that ensure responsible and safe chemical management at all stages of its process.

ANONYMOUS COMPLAINT REGARDING IMPROPER CONDUCT

Metalúrgica Hassmann S.A., in view of its Corporate Responsibility (Item 5.1.1.1 - IATF 16949:2016), encourages all employees, who may have witnessed an improper act, to report the fact, anonymously, by calling **+55 51 3754 1135**, so that the necessary actions are taken to eliminate any improper practices.