



Barbanera



Code of Conduct and Ethics



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01. Director's Message

Integrity and credibility are not only qualities that distinguish Eletro Mecânica Barbanera within the universe of companies in its segment, especially due to its fruitful history of more than 60 years of pioneering spirit and entrepreneurial vocation in Brazil. They are also ethical principles that have enabled us to earn well-deserved recognition in the market and that, with absolute certainty, will continue to project us toward an extraordinary future of progress and achievements, in which we will continue to uphold the same principles of fairness, transparency, and commitment that have consolidated our brand as a synonym for quality, reliability, and punctuality.

This Code of Conduct and Ethics demonstrates our belief in the ideals of dedicated work, respect for rules and institutions, and professional development in its most humanistic sense. It is a document that formalizes our commitment to everyone who is part of our value chain: partners, suppliers, distributors, customers, employees, service providers, and communities with whom we interact on a daily basis.

Our proposal is to consolidate in this Code the commitment to loyalty and seriousness that we expect from everyone who is part of our relationships, with regard to their ethical and moral conduct, regardless of the operations carried out under the Barbanera brand, from the teams working in our units to the technicians in the product research and development area, from professionals with lower levels of specialization to the highest executive positions.

For Eletro Mecânica Barbanera, it is a matter of honor to keep all our employees strictly aligned with the principles of this Code of Conduct and Ethics, whose guidelines represent the essential values for which we strive and exist.

Pietro Barbanera.

Director.

02. The Barbanera Code of Conduct and Ethics

This Code of Conduct and Ethics brings together the main ethical guidelines and recommendations for conducting our business in a clear, consistent, and professional manner, applicable to all levels of operation of Eletro Mecânica Barbanera, including outsourced companies and representatives.



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02.1. The Code of Conduct and Ethics

It is, therefore, the set of fundamental ethical and moral principles and standards of conduct that guide the behavior of our organization and all partners who, directly or indirectly, participate in business and commercial relationships under the Barbanera brand, allowing our community to maintain fair and harmonious coexistence with all stakeholders with whom we interact.

Adherence to the guidelines established in this Code of Conduct and Ethics is mandatory and must be observed by everyone who is part of our production and value chain. However, as not all situations can be foreseen herein, in case of doubt, it is important to consult the members of the Code of Conduct and Ethics Committee, the Legal Department, or the Internal Audit Department, who may provide guidance to help define procedures that must be strictly followed regarding our conduct at work and in business.

03. Fundamental Ethical Principles of the Organization

The fundamental ethical principles are the foundation of this Code and must guide the conduct of all Barbanera employees. They are:

- The inalienable dignity of the human person, without discrimination based on social class, ethnicity, religion, political ideology, sexual orientation, etc.;
- The collective common good, prevailing over personal and individual interests;
- The appreciation of work as an inseparable part of human nature and achievements;
- The encouragement of creativity and respect for initiatives and entrepreneurial innovation;
- Solidarity and encouragement of personal development;
- The commitment to the communities in which we operate and to society, expressed through our social and environmental responsibility actions.

04. Compliance with Laws

All participants in Barbanera's business and commercial processes are expected to comply with all national and international laws and regulations applicable to the company's business.

Ignorance of the law is not considered a valid defense in the event of violations, even when they occur in a company operation established in a foreign country.



05. Antitrust

Barbanera is committed to strict compliance with competition laws in Brazil and in the countries where it operates, as well as to preventing any conduct that may be considered illegal or irregular from a legal perspective, under the regulatory instruments governing its activities, and in accordance with the social and cultural conventions of the communities in which it operates.

Contracts or agreements may be considered illegal regardless of whether or not they have been formalized in writing, as the conduct of the party involved may be sufficient to constitute a violation. Therefore, the following practices are not approved by the company's management:

- Participation in discussions, contracts, agreements, projects, or arrangements, whether formal or informal, with actual or potential competitors, regarding pricing, terms of sale or product offerings, market division, customer allocation, or any other activity that limits or may limit free competition;
- Ignorance of the law or the claim that there was insufficient time to seek guidance from the Legal Department will not be accepted as valid defenses. All matters that, in any way, involve competition law must be submitted to the Legal Department before any measure or decision is taken.

06. Code of Conduct - General Guidelines

Barbanera considers the standards of conduct to be behavioral patterns that directly influence procedures essential to the organization's activities and interests in relation to the market, the national and international legal and regulatory environment, established institutions, and society as a whole.

07. What We Expect from Our Employees

- The exercise of their responsibilities in a legal and ethical manner;
- Maintain a permanent awareness of the implications of their actions in relation to the global environment;
- Adhere to fundamental ethical values and principles;
- Interact with various stakeholders based on respect, civility, solidarity, responsibility, transparency, honesty, and tolerance;
- Respect professional confidentiality, laws, standards, and regulations, as well as everyone's safety;
- Respect the company's image and Barbanera's industrial, commercial, and logistics operations, properly performing their duties in accordance with the applicable standards, procedures, and guidelines.



7.1. Human and Labor Rights

- Recognize, support, and respect internationally and nationally recognized human rights, and ensure that they are not violated;
- Reject all forms of child labor and the exploitation of child and adolescent labor, in accordance with legal requirements;
- Not be included in the “Dirty List” established under the legal instruments of the Ministry of Labor regarding the use of labor under conditions analogous to slavery;
- Keep all employees registered with the Work and Social Security Card (CTPS), both in the industrial, commercial, and logistics areas, as well as in any other ancillary or complementary activity;
- Respect the provisions of collective labor agreements or collective bargaining agreements that regulate employee compensation at all stages of the production/distribution process;
- Ensure quality accommodation for migrant employees hired in other locations, with easy access for their return to their places of origin after the workday;
- Maintain the Internal Commission for the Prevention of Accidents at Work and value good management practices in occupational health and safety;
- Freely provide Personal Protective Equipment (PPE) to all employees, with awareness and communication programs emphasizing the importance of its use throughout the entire work process;
- Provide safe transportation for employees at all work fronts;
- Provide an appropriate location that ensures hygienic conditions and temperature control for meals consumed at the work fronts;
- Develop plans or projects to promote and support actions in the areas of education, health, culture, sports, and leisure aimed at the communities in which employees are located.

08. Unacceptable Conduct at Barbanera

8.1. At the Workplace

- Any form of discrimination against individuals based on their ethnicity, creed, gender, age, sexual orientation, regional origin, appearance, nationality, marital status, or physical disability;
- Use official documents, working time, the Barbanera image, as well as vehicles, equipment, and uniforms for private business unrelated to the company's interests;
- Transfer to third parties material resources provided exclusively to the company's employees for the performance of their professional activities;
- Give preferential treatment to company employees based on personal interest or sentiment;
- Neglect workplace safety practices and procedures, failing to comply with applicable legal and internal standards and best practices for preventing workplace accidents;
- Disclose Barbanera's proprietary information to third parties without proper hierarchical authorization;
- Consume alcoholic beverages or illicit drugs on company premises (including tobacco in areas where its use is restricted), or carry weapons of any kind;



- Be complicit, through action or omission, in the conduct of employees or third parties that may compromise the safety and integrity of the company's business activities;
- Improperly use, or use for personal purposes, the technology and information resources provided by the company, in violation of information security standards.

8.2. Benefits

- Offer, directly or indirectly, advantages, privileges, gifts, and/or favors that may influence any type of decision;
- Accept gifts of significant value, other than those customarily offered, such as pens, keychains, calendars, etc.;
- Accept any gratuity in cash or equivalent;
- Receive gifts, money, or any rewards from customers or suppliers that could be interpreted as a bribe;
- Request or receive any gift, favor, invitation, or advantage, for oneself or another person, from individuals or legal entities with which Barbanera maintains or may establish business relationships. Exceptions are invitations to institutional events of a technical or institutional nature related to business of interest to the company. In case of any doubt as to whether an invitation may be accepted, the employee must consult the Ethics Committee;
- Fail to notify the immediate supervisor upon receiving any benefit or gift, as well as return it to the sender, when applicable.

8.3. External Activities

- Participate in external activities unrelated to the employee's professional activities during working hours, unless authorized by the company;
- Provide services of any nature to other organizations that may benefit a competitor, during or outside working hours;
- Engage in activities outside the workplace and/or working hours that may put their personal safety and/or the safety of other employees at risk.

8.4. Financial Losses

- Participate, directly or indirectly, using confidential information, in any investment that may be detrimental to the company, regardless of whether such investments are made by the employee in the performance of their duties or in a personal capacity;
- Disclose information regarding projected results, without the prior authorization of the director to whom the employee reports, which may cause fluctuations in the company's securities;



8.5. Hiring, Promotion and Termination Processes

- Interfere with the hiring, promotion, and termination processes of employees, except when this is part of their professional duties;
- Dismiss an employee without complying with the company's human resources policies and regulations;
- Hire or promote employees without observing the requirements of the position;
- Give preferential treatment to relatives and related persons, to the detriment of merit-based criteria, in hiring or promotions;
- Fail to return documents and information belonging to the company, or use such information for personal or third-party benefit, upon leaving the company's workforce.

8.6. Privileged Information

- Disclose inventions, innovations, trade secrets, and assets that constitute the company's property and/or are protected by confidentiality and non-disclosure clauses;
- Omit facts or information that they are required to disclose, or distort such information;
- Omit information regarding any unlawful act by a customer, supplier, or employee;
- Disclose any information relating to suppliers, employees, or customers, as well as any other strategic or confidential information of the company;
- Violate emails and telephone conversations.

8.7. Barbanera's Image

- Use the Barbanera brand without authorization or outside the established visual standards;

8.8. Political Activities

- Engage in political party activities at the workplace and during working hours;
- Maintain a position favoring a political group during working hours;
- Carry, distribute, or disseminate, during working hours, any political-party-related material, including, among others, gifts, ballots, and leaflets;
- Take or express a political position on behalf of the company.



09. Barbanera's Ethical Commitments

9.1. In Relation to Customers and Society

- Permanent pursuit of excellence in service, resulting from effective and proactive business management, oriented toward achieving success;
- Courteous and equal treatment, seeking to provide clear and accurate information, respecting the quality and safety standards legally established under Brazilian law;
- Strict compliance with contracts and commitments of any nature;
- Guidance on the correct and safe use of energy sources, observing the principles of environmental preservation and sustainability;
- Maximum confidentiality regarding customer data and information;
- Maintenance of permanent communication and negotiation channels with Barbanera's stakeholders, with the objective of evaluating, prospecting, controlling, and monitoring business opportunities, as well as strengthening and fostering lasting relationships;
- Transparency, honesty, and integrity with all customers and other members of society;
- Respect for the principles of the democratic system and the right to organize and associate freely, refraining from taking any political-party position in the performance of professional duties.

9.2. In Relation to Employees

- Due attention to employees, with a permanent incentive for professional development;
- Transparency, integrity, honesty, well-being, dialogue, loyalty, cooperation, and mutual respect;
- Encouragement of freedom of opinion and expression of ideas;
- Encouragement of safety in the workplace, recognizing the employee's right to refuse to perform any activity whose risks exceed those inherent to their role and for which the employee is duly trained and equipped.

9.3. In Relation to Competitors

- Rejection of the use of unethical means to obtain information about competitors;
- Fair competition as a basic element in all operations.

9.4. In Relation to Society

- Social responsibility structured through planned actions, in harmony with the legitimate interests or needs of the communities, which will be carried out within a strategic plan monitored by the Company's Ethics Committee.



9.5. In Relation to the Environment

- Preservation of the environment to prevent pollution and promote continuous improvement in environmental performance across all activities;
- Commitment to sustainable development, acting as a responsible company, optimizing the use of natural resources and limiting impacts on the environment, as well as promoting the development of renewable energy.

10. Personal Data Protection, Confidentiality and Information Security

Barbanera's activities are based on good practices regarding the use of personal data and privacy, and employees must ensure that their conduct is aligned with full compliance with the provisions established by Law No. 13,709/18 (General Data Protection Law - LGPD) and other applicable rules and legislation, including full compliance with the guidelines contained in the privacy policies provided by the Company. The use of documents and information containing personal data, regardless of their volume and/or nature, is intended exclusively to achieve purposes directly related to the performance and fulfillment of contractual obligations, and the processing of personal data for any other purposes that go beyond professional activities is prohibited. Therefore, it is everyone's duty to become familiar with Barbanera's internal rules and ensure compliance with the applicable specific data protection and privacy regulations. Thus, all those who have a relationship with Barbanera and have access to personal data undertake to always observe the principles of purpose, adequacy, necessity, free access, data quality, transparency, security, prevention, non-discrimination, responsibility and accountability, as provided for in the LGPD.



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11. Ethics Committee

11.1. Ethics Committee Objectives

The management of Barbanera's Code of Conduct and Ethics will be the responsibility of the Ethics Committee, whose objective is:

- Promote the legitimacy, respect, and continuous improvement of the Code of Conduct and Ethics;
- Ensure compliance with the Code of Conduct and Ethics, as well as its alignment with the company's reality;
- Maintain the company's ethical culture and analyze suggestions, complaints, and reports concerning violations of the Code of Conduct and Ethics and/or the internal regulations;
- Analyze violations of the Code of Conduct and Ethics and determine the adoption of disciplinary measures according to their severity, using the company's internal rules as a reference;
- Ensure that consultations and reports are always handled confidentially during the group's meetings.

11.2. Access Channels for Criticism, Suggestions, Reports and Complaints

Barbanera has a specific channel for receiving internal and external requests related to the topics addressed in the Code of Conduct and Ethics. The requests are analyzed by Barbanera's Ethics Committee.

11.3. Access Channels

Telephone: +55 11 2024.6430

E-mail: comite.eticabarbanera@gmail.com



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Barbanera rejects the practice of unfounded, irresponsible, conspiratorial, or retaliatory reports, but values reports when the reporting person has knowledge of facts, data, or irregular situations involving the company's business.

Barbanera values reports made by duly identified individuals, who, whenever possible, will receive feedback regarding the investigation of the facts. Anonymous reports, although undesirable, may be investigated at the company's discretion, but without any commitment.

The company will make every effort to investigate the report submitted in the best possible manner, within the limits of its competence and responsibility.





Barbanera



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Policy Regarding Conflict Minerals



Barbanera

On August 22, 2012, the United States Securities and Exchange Commission (SEC) announced the adoption of the final rules concerning "conflict minerals" under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rules").

The purpose of the Conflict Minerals Rules is to discourage the use of minerals that may finance violent conflict in Central Africa.

"Conflict minerals" are defined as gold, columbite-tantalite, cassiterite, wolframite, or their derivatives, which are currently limited to tantalum, tin, and tungsten, regardless of their source. The conflict minerals that may result in adverse consequences under the Conflict Minerals Rules are those that originate from, or are extracted in, the Democratic Republic of the Congo (DRC) and/or adjoining countries, namely Angola, Burundi, the Central African Republic, the Republic of the Congo, Rwanda, Sudan, Tanzania, Uganda, and Zambia (the "DRC Conflict Minerals").

Eletro Mecânica Barbanera Ltda. is committed to conducting its business in a socially responsible manner. It is our policy to refrain from purchasing DRC Conflict Minerals that may finance or benefit armed groups in the Democratic Republic of the Congo or an adjoining country, whether directly or indirectly, regardless of their source. We require our suppliers not to provide Eletro Mecânica Barbanera Ltda. with any products for which the supplier cannot certify that such products are "DRC Conflict-Free" within the meaning of the Conflict Minerals Rules.

Eletro Mecânica Barbanera Ltda. requires its suppliers to establish their own audit program to ensure a supply chain that results in products being "DRC Conflict-Free." Suppliers must provide Eletro Mecânica Barbanera Ltda. with assurance that all products supplied to Eletro Mecânica Barbanera Ltda. are "DRC Conflict-Free" in compliance with the Conflict Minerals Rules.

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