

**OXY QUÍMICA E METALÚRGICA  
LTDA**

**Code of Ethics and Conduct**

## **Message from the executive board**

Oxy Química e Metalúrgica Ltda, is a leading national company in producing and selling antimony trioxide. Established in the 70s and always focused in continuous improvement of all its processes, it believes that for a company to be long-lasting it must be driven by a purpose having trustworthiness as its foundation. Trust among customers, partners, employees, shareholders and the community.

Throughout 45 years we have built a reputation of integrity based on established ethical principles and values supported by the organization. Transparency and ethics are values that guide Oxy Química since its establishment and the relationship with its customers, employees, suppliers, shareholders and the community where we operate.

Decisions made by Oxy Química are guided by our Code of Conduct and each one has a role and responsibility, as it takes a collective effort for our journey to be perpetuated for the next generations.

Ethical conduct will guide any and all move, both personally and professionally, so we remain firm and faithful to the values that brought us here throughout these decades.

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## **1. Introduction**

The purpose of Oxy Quimica's code of conduct is to bring together fundamental principles and values supporting the purpose of our business. This code must be applied throughout the organization and every employee is responsible to comply with it, contributing to put the principles of this code into practice both in simple and big decisions.

This code, together with legislation, regulations and internal policies, will guide our business. Our integrity makes us worthy of our customers, business partners, associates and all other stakeholders trust.

To practice ethics in its essence is to work with excellence bringing collective welfare and being able to improve both people's lives and our own lives. Our priority throughout these decades has always been to combine a quality product with the highest level of ethics, reliability and transparency.

To understand and follow these values and principles means to always learn and practice behaviors such as: safety as a priority, continuous improvement in a sustainable way, respecting the planet and the community, having an open dialogue, responsibility towards the whole, and act with integrity.

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## **2. Intended Users**

Oxy Química e Metalurgica Ltda Code of ethics is based on the fundamental idea of complying with the laws and the legal system. Oxy Química cares about building an ethical organizational environment so everyone may perform their tasks based on respect, transparency, honesty and integrity. Oxy Química Code of Ethics and Conduct must be applied and respected by all of our managers, employees and third parties who keep a relationship with our company, strengthening our commitment to the entire community.

## **3. Our Values and Principles**

### **3.1 Principles**

#### **3.1.1 Life as a priority:**

- **Safety**

Every worker has the right to a safe and healthy environment. The safety and health of every employee is non-negotiable, thus, training and information about the correct use of PPEs, health care and periodic medical exams are part of the routine in Oxy Química. We are always trying to promote a healthy and safe workplace. We continuously monitor our environment through measurements and documentation such as PPRA, PCMSO, ASO and PGR. We are always seeking for solutions to manage, reduce and eliminate the exposure of our employees to occupational safety and health risks. In addition, we seek to develop skills through training programs. For us, valuing who is part of our company means to always work to reach zero accidents, supporting the development of our employees and being a good company to work for, with a pleasant and favorable environment for professional growth. We are committed to assure the safety and health of our employees. The safety of our employees during their work hours is crucial for a responsible operation, to provide well-being, health care and appropriate results for their tasks. See Occupational Safety and Health Policy Rev.0 from 11/04/22.

#### **3.1.2 Environmental and Social Responsibility:**

We are committed to seek growth in a sustainable way respecting the environment and mitigating the impacts from our products and operations to the society. Thus

we are committed to comply with the pillars of Environmental, Social and Corporate Governance (ESG).

We are located in a preservation area (springs area) and we respect the environment. The risks and impacts of our operations are managed in a responsible way. We are aware of the importance and the global context of conservation of nature's resource sources. Therefore, we assume clear commitments to our operational practices, compensating for our environmental impacts with control measures, always in search of sustainable growth through:

- Complying with city, state and Federal requirements;
- continuously improving our processes and products seeking higher efficiency in the use of natural resources;
- Managing risks and impacts through mitigation and monitoring measures;
- Providing a healthy, safe and respectful workplace;
- Acting with responsibility, ethics and transparency;
- Engaging stakeholders and meet our commitments;

### **3.1.3 Human Rights**

- **Valuing people respecting diversity**

Respect is one of our core values, so we seek to promote an environment in which people may express their opinions. Oxy Química cares about good coexistence, and healthy, safe and respectful work for everyone.

Every human being must be respected and given the opportunity to develop their potential, regardless of their cultural or ideological differences, disabilities, gender, color, ethnicity, nationality, origin, political beliefs, religious beliefs, age, marital status, union status, socioeconomic status, sexual orientation, gender identity or any other condition.

### **3.1.4 Good relationship**

Our relationship with Suppliers, who are part of our value chain, is based on good faith, honesty, ethics, impartiality and transparency. The selection of our suppliers and partners must comply with objective, technical and economical criteria such as: experience,

commercial terms and conditions, price, reputation and quality of products and services offered, without any kind of favoritism during negotiations.

Our relationship will be based on the following premises:

- **Governance:** Every transaction is registered according to the current legislation and accounting principles in an honest manner allowing for transparent and reliable financial reports.
- **Zero tolerance to corruption** Oxy Química does not tolerate any type of Bribery or corruption and does not protect anyone who apply this practice, whether an employee, administrator or Supplier.

### 3.1.5 Preserving the Legacy

Oxy Química has been in the market for 45 years, being the only Brazilian manufacturer of Antimony Trioxide. Consequently, preserving our image and our legacy is a constant commitment. To pass on our legacy from generation to generation is our dream.

## 3.2 Values

**Ethics and integrity** To do what is right, complying with governance best practices based on transparency and integrity;

**Respect:** To treat everyone fairly and equally respecting diversity;

**Honesty:** To act based on the truth;

**Responsibility:** To comply with every commitment prioritizing safety;

**Operational Excellence:** To operate efficiently optimizing resources;

**Profit with sustainability:** Profit is the foundation for generating jobs and wealthy in order to benefit the entire community.

**Healthy and positive relationships:** Our work environment is based on mutual respect, ethics and integrity. Each person is unique and singular, as well as the context in which he/she carries out his/her daily activities.

## **4. General rules**

### **4.1 Relationship with suppliers**

Supplier is any company that directly or indirectly supply goods, raw material, supplies, equipment, material or render services. All negotiations with our suppliers will take place in a honest and fair way, as this partnership is critical to the success of both parties.

The contact with suppliers and partners must be based on transparency and impartiality, reflecting our daily ethical attitude. The selection of suppliers and partners must comply with objective, technical and economic criteria: experience, commercial terms and conditions, price, reputation and quality of the products and services offered without any kind of favoritism during negotiations.

Benefits related to purchase volume, negotiations or special terms must be documented and reported to senior management, who will make the decision on the best use of such benefits.

It is not allowed for employees in charge of negotiations to receive any kind of advantage when exercising this function, even indirectly. It is prohibited to give, promise or offer gifts or promotional gifts in exchange for favorable treatment, seeking any kind of benefit. We are expected to use our best judgment to make good decisions every day.

### **4.2 Relationship with Costumers**

In our 45 years journey in the market, Oxy Química has built a solid relationship with customers, who are our reason for existing. Thus, we spare no effort to ensure that the shopping experience always exceeds expectations. Courtesy, diligence and respect are premises in all negotiations. Every marketed product comply with the current legislation and with our customers specifications.

### **4.3 Relationship with Competitors**

Oxy Química is committed to a professional, loyal and ethical attitude towards competitors. Under no circumstances will it be allowed to make arrangements on prices or market strategies with



competitors. Every negotiation will be free of manipulation or any kind of fraud and our competitors will be treated with respect.

No employee is authorized to disclose internal information, by any means, without the prior consent and authorization of senior management. To us, competition must be faced through our expertise and that is what we work for. Free competition is the best way to do business in a fair and healthy manner. We act with integrity and promote a business environment free of frauds and manipulations of any kind.

#### **4.4 Compliance with the law**

Oxy Química must comply with local, state or federal laws and regulations in which it operates commercially. There is no tolerance for informal, concealed or hidden activities in Oxy Química. All our activities are registered and organized under formal records complying with principles and standards, facilitating audits and supervision. We are committed to transparency and clarity regarding our values, principles, policies and governance.

#### **4.5 Relationship with Authorities**

Oxy Química employees, when performing their activities, must always cooperate with competent authorities for the full employment of their powers and act in compliance with the law, defending the legitimate interest of the company. All documents of public nature are at the disposal of the authorities and will be presented by Oxy Química to the public servants that duly identify themselves, as required by law. Requests from inspectors, auditors, delegates or public officials of any nature, must be carried out through the executive board, which will designate an employee able to provide the relevant information, documents or records.

#### **4.6 Anticorruption**

Our reputation in negotiating with total integrity is essential. Therefore, we are committed to fight any type of corruption or bribery. We are committed to conducting each and every business with ethics, integrity, transparency, and in compliance with applicable laws. Oxy Química does not tolerate any kind of bribery or corruption. In order to protect our reputation and avoid any possible criminal liability, we need to watch over our partners' commercial activities, so that we know who we are dealing with before signing agreements or making transactions as well as being aware of irregularities

in payments or suspicious behaviors by customers or others. See Anti-Corruption Policy Rev. 0 from 11/04/22.

#### **4.7 Promotional Gifts and Gifts**

We are all for doing business in a way that builds good relationships. However, gifts and offers must be carefully analyzed. And when in doubt, we ask questions, talk to each other, act carefully and make our actions transparent.

#### **4.8 Human rights and social and labor standards**

People must be treated impartially, with consideration and respect. Human rights and labor standards must be fully complied with. People's safety and health is our priority and the goal is to assure that each individual feels valued and totally supported to give their best. Our partners must also respect human rights and labor and social standards. It is very important that every worker feels valued and respected. Consequently, we do not tolerate discrimination or harassment due to age, race, color, sex, sexual orientation, gender identity, origin, disabilities.

Every employee must be recognized and valued because of his/her individuality. It is necessary to ensure a fair work environment where everyone has equal opportunities to develop their potential.

Everyone must be treated fairly and equally, with no discrimination due to race, ethnics, gender, sexual orientation, age, socioeconomic status, disabilities, beliefs, nationality or political opinions, including in internal processes and standards for recruitment, dismissal, promotion, rewards and benefits, training or retirement, which must be based on merit. We do not tolerate any type of prejudice, discrimination and harassment .

Oxy Química recognizes the human rights for everyone as described in the Universal Declaration of Human Rights and supports all internationally recognized human rights, including:

- Right to dignity and privacy;
- Right to life and liberty;
- Freedom of opinion and expression;

- Freedom of association;
- Right to work and education;

#### **4.9 Information and safety protection**

Personal data of employees, customers, suppliers or any other person, under our possession will be preserved with the utmost care. We do not share sensitive information by any means.

#### **5. Term of acknowledgment and commitment**

I declare that I have read and understood the content of the Code of Oxy Química e Metalúrgica Ltda

By signing below, I hereby commit to fully comply with the aforementioned Code of Conduct.

Company: \_\_\_\_\_

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

Date: \_\_/\_\_/\_\_\_\_ Signature: \_\_\_\_\_

*Note. The Term of Acknowledgment and Commitment can be physically or electronically signed.*