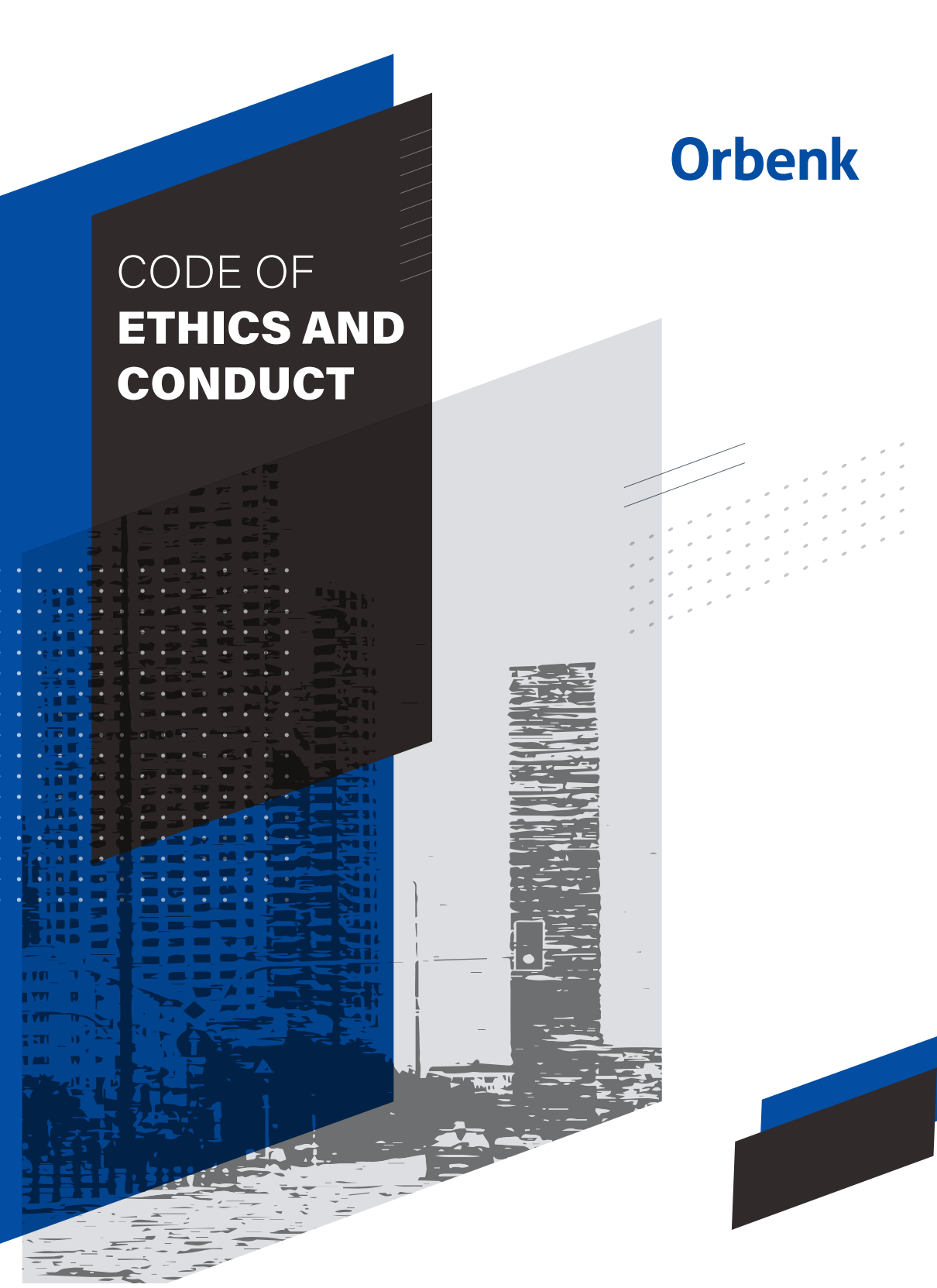




Orbenk

CODE OF
**ETHICS AND
CONDUCT**

MESSAGE FROM THE PRESIDENT

Dear Sirs/Madams,

I am very pleased to introduce you to the Orbenk Group Code of Ethics and Conduct. It contemplates our principles of action, present in relationships with our employees, customers, suppliers, service providers, government and community, as well as other partners.

In preparing this material, we reaffirm our commitment to act responsibly to contribute to building a better country, with business based on ethics and transparency, and also providing an excellent working environment for all.

Ethical conduct implies working in a manner that is committed to integrity through transparent relationships that permeate all activities performed. Based on this, the Code of Ethics and Conduct seeks to make Orbenk Group's principles clear and public, so that we can use it in our daily lives as an instrument of conduct guidance.

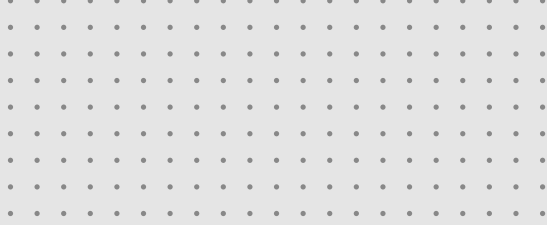
It is only through a strong culture and principles of ethical conduct that we will create lasting bonds of trust with the most different audiences. Good reading to all.



Ronaldo Benkendorf
CEO

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MISSION

Offer sustainable solutions that contribute to people's well-being, while promoting the development of our employees and the growth of the company, so that we may be recognized as a company of excellence, with economic, social, and environmental balance.

VISION

To be among the three largest companies in Brazil in our market, recognized as the best for the quality of the solutions we offer and for the pride of belonging.

VALUES

- Financial Strength
- Passion for the Customer
- Quality and Commitment
- Appreciation of People
- Competitiveness and Leadership





1. INTRODUCTION

The Orbenk Group values the ethics and integrity of its business and relationships with its employees, customers, suppliers, service providers and other business partners, in the several areas in which it operates.

Business perennity is the result of this relationship of transparency, trust and credibility, being part of Orbenk's way of being.

Engaged in preserving the high standard of relationships and providing an excellent working environment, the Orbenk Group launches its Code of Ethics and Conduct. A document that must be followed by all employees, as well as their executive officers and directors, in the most varied situations and topics listed below.

By virtue of this Code, the Orbenk Group also makes a formal commitment to respect and comply with all laws and regulations applicable

to its business, as well as to prevent and combat corruption, especially in compliance with Brazilian law (12.846/2013 and 8.429/1992) and other locations in which it operates and may operate.

Orbenk





2. SCOPE

This Code applies to all employees, interns, apprentices, service providers, executive officers, partners, and board and committee members of Orbenk Group.



3. RELATIONSHIP WITH THE COMMUNITY

The Orbenk Group has as one of its principles to contribute to the social, environmental and economic development of the communities in which it operates, ensuring, through direct or indirect activities, a higher quality of life and opportunity for all who live and contribute to a better society.





4. RELATIONSHIP WITH CLIENTS AND CONSUMERS

The Orbenk Group's professional activities are largely developed within the clients' physical structures. Therefore, the group is committed to building ethical relationships and safeguarding the privacy of its customers.

All relationships must be based on respectful, cordial attitudes, standards of loyalty and honesty, and the necessary clarifications must be provided with agility, precision and clarity, whenever necessary.

It will not be allowed to expose pertinent operational information to the Orbenk Group to the client without prior authorization from the company, as well as requests related to contractual matters, such as information about salary, benefits, working hours, among others.

The Orbenk Group ensures compliance with consumer rights laws in all locations where it operates.



5. RELATIONSHIP WITH SUPPLIERS, SERVICE PROVIDERS AND OTHER BUSINESS PARTNERS

The Orbenk Group's relations with its suppliers, service providers and other business partners are based on trust, transparency and ethics, and the hiring is defined by technical and objective criteria, without interference of personal wishes, discrimination or favoritism of any kind.

Through the dissemination of this Code to all its trading partners, the Orbenk Group encourages the adoption of integrity mechanisms, especially in the development of anti-corruption measures, unfair competition practices, fraud of any nature and other public administration illegal activities.



6. RELATIONSHIP WITH THE GOVERNMENT

The Orbenk Group does not tolerate any form of corruption, bribery or even facilitation payments, national or transnational, dealing with their relations with the absolute zeal.

In order to avoid any damage to the public property, as well as to its companies, in full compliance with anti-corruption laws, the Orbenk Group has developed a specific internal standard to parameterize all relations with the Government, the "Relationship Policy with the Government".

6.1 Bids

Any employee or representative of the Orbenk Group is not allowed to act in the preparation of call of notices or to contribute to its specifications, except for the technical consultations carried out by the Government, by legal means.

The Compliance department carries out follow-up work to monitor the regularity of the performance of Orbenk Group companies, in the participation of bidding processes, where any direct contracting, by means of the dismissal or unenforceability of the bidding process, will have preference in the work plan.

6.2 Licenses and Permits

The Orbenk Group appreciates ethics, integrity and legality in conducting its business. Thus, the activity of obtaining or revalidating licenses, permits or any authorization to operate, must always take place through official channels, without any personal involvement, promise or improper advantage exchange between the parties.



7. RELATIONSHIP WITH COMPETITORS

The Orbenk Group's relations with its competitors are absolutely transparent and objective, ensuring fair competition and non-engagement in business that is harmful to the consumer, public administration or society.

The Orbenk Group does not tolerate any kind of agreement with competitors seeking fraud in bidding processes or the presentation of fictitious bids, pricing of products or services, market sharing or division, customer sharing or division, or any other

actions that eliminate or aim to eliminate fair competition.

The Orbenk Group condemns the obtaining and use of confidential information from its competitors for any purpose. As well as the practice of slander, libel, mudslinging and misleading advertising to its competitors.



8. RESPECT TO DIVERSITY

The Orbenk Group respects the individualities and diversity of its employees, not tolerating any form of prejudice or discrimination of any kind (race, gender, religion, physical characteristics, political opinion, among others), abusive and embarrassing conduct, threats, intimidation, bullying or sexual harassment, as well as any vexatious conduct against its employees.

Nor will any retaliation against any bona fide reporting employee be tolerated.



8.1 Slavery and Child Labor

The Orbenk Group does not use slave or child labor in its operations, nor does it tolerate this practice from its suppliers, service providers and other business partners.

8.2 Alcoholic beverages, drugs and gun bearing

Employees may not consume or be under the influence of alcohol, illegal drugs or narcotic substances on the premises of the companies in the Group Orbenk, or perform external activities related to them, in such conditions.

It is also not allowed to bear or keep any weapons on the premises of Orbenk Group's companies or in related external activities, except for security professionals authorized by law and contract.



9. CONFLICT OF INTERESTS

Employees must not use their ties with the Orbenk Group to pursue private or third party interests contrary to the interests of the company. Any conflict of interest, whether potential or actual, must be avoided in order for the employee not to violate this Code or other internal company rules.

Situations in which the conflict of interest, among others, may occur are highlighted below.

9.1 Parallel Activities

Orbenk Group supports the entrepreneurship and freedom of each employee in wanting to supplement their income, however, some situations should be avoided, so that the interests of the company are not harmed:

A - The employee may not perform any other parallel activity during his or her working hours or that impairs his or her income at work;

B - Even outside working hours, parallel activity may not conflict with business, interests or business sector of the Orbenk Group;

C - The sale of products within the premises of Orbenk Group companies is not permitted;

D - Employees or their spouses will not be able to provide services or be suppliers of the Orbenk Group, even outside working hours or through companies where they are listed as partners. Exceptions to this rule shall be approved by the Executive Board, upon acknowledgment of the Compliance department;

Important: In case you perform any parallel activities, you must inform us through a specific form of the Human Resources area.

9.2 Relationship and Affective Relationship

The good relationship between Orbenk Group employees is due to an inclusive environment and appreciation of the professional. Moreover, kinship and affective relationships within group companies are respected, with some care that must be observed, so that there is no kind of privilege or undue advantage:

A - For administrative vacancies, the Orbenk Group will not hire spouses, partners or relatives of first-degree kinship. Exceptions to this rule may be applied when both professionals are not subordinated to the same board.

B - Relationship is not permitted between kinship or professionals between professionals who have any level of organizational subordination among themselves or, in cases where the position of one exerts influence over the other;

C - Nor is kinship or affective relationships between professionals in the same sector who are under the same hierarchical leadership;

D - Employees who maintain an affective relationship with each other must adopt a strictly professional posture within the Orbenk Group companies.

Important: In case you have relatives

in the company or have an affective relationship with another Orbenk Group employee, you must inform us through a specific form in the Human Resources area.

9.3 Freebies, Gifts and Hospitalities

The exchange of freebies, gifts and hospitality is common practice in the Brazilian business environment and in other countries of the world, however, this practice must be regulated and exercised with caution in order to avoid any undue advantage to the parties involved or the represented companies by them:

A - Orbenk Group employees may accept freebies and gifts in the amount of up to BRL 150,00, from business partners with whom they maintain relationships;

B - Freebies and gifts in kind of any value will not be tolerated;

C - Invitations to cultural and sporting events of any value may be accepted, provided they are offered institutionally (not nominally) and approved by the Board of Executive Officers of the group;

D - Invitations to technical events of

any value may be accepted, provided they are offered institutionally (not nominally) and approved by the Executive Board of the group;

E - Employees may not request freebies, gifts, hospitalities or any personal discount from Orbenk Group's business partners;

F - The offering of freebies, gifts or hospitalities by the Orbenk Group must be previously approved by the Orbenk Group's Executive Board.

The Compliance department must be consulted if there are questions regarding this matter.

9.4 Recommendations and referrals from professionals

For the excellent transparency relations that Orbenk Group maintains with its employees, customers and business partners, the appointment of professionals for hiring will always be welcome. However, this process must take place clearly and objectively so that there is no harm or privilege to any aspiring internal position.

Thus, the Orbenk Group has a procedure for the selection of professionals, provided for in the "Recruitment and

Selection Process", which may be requested from the Human Resources department.

All candidates will compete equally and will undergo the same technical assessments applied by the company, whether or not received any appointment or recommendation of such professional.

9.5 Social Media

Social media are increasingly part of the daily life of organizations, whether through news dissemination, promotion of products and services, social actions or even recognition of professionals.

However, in order for these tools to remain important business allies, employees must be careful not to engage in any action contrary to Orbenk Group's interests:

A - Employees may use their private accounts to freely express personal opinions, as long as they do not harm the image of the Orbenk Group, its employees or the public with whom they relate.

9.6 Political Activities

The Orbenk Group supports and encourages actions aimed at building public policies, especially aimed at combating corruption and improving the lives of citizens.

However, the Orbenk Group does not contribute directly or indirectly to political parties, candidates and their representatives, trade unions or any political organizations, pursuant to national law and as set out in its Relations Policy with the Government.

Employees have freedom of political affiliation as well as political candidates, but may not use any information, assets or funds of the Orbenk Group for political activities. When applying for political office, employees must inform the Human Resources area for analysis of the existence of conflict of interest.

Employees are also not allowed to wear any clothing or objects with political connotations on the premises of Orbenk Group's companies or externally while representing them, and employees may not use Orbenk Group's electronic media to disseminate political news and be engaged into campaigns.



10. ASSETS AND FUNDS OF THE COMPANY

The use of Orbenk Group assets and funds, such as computers, mobile phones, printers, automobiles, equipment and software, is subject to the work and performance of each employee's role and may not be used for personal purposes.

All assets and funds made available by the Company as described in the paragraph above belong exclusively to the Orbenk Group, unless expressly provided otherwise.

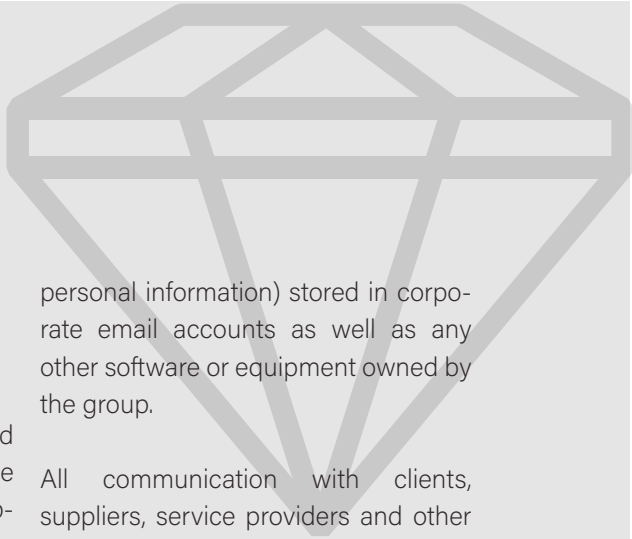
Orbenk Group advises its employees not to store any personal data in the company's software and equipment.

The Orbenk Group may request and remotely access all assets and funds made available to employees without their acknowledgment or consent. In this regard, with due respect to applicable laws, Orbenk Group may access, review, copy, collect, export, transfer, capture images of any data (including

personal information) stored in corporate email accounts as well as any other software or equipment owned by the group.

All communication with clients, suppliers, service providers and other commercial partners of the Orbenk Group must be done through the official means provided by the company, and no other communication tool or platform not approved and expressly authorized by the company must be used.

The use of other tools, whether paid or free, must always be expressly authorized by the Executive Board of Orbenk Group.





10.1 Information Security

Information regarding the Orbenk Group's business, whether related to the Orbenk Group's companies, employees, clients, suppliers, service providers or other business partners and which is not in the public domain, must be treated in confidence.

Confidential information must not be disclosed to the outside public except when the nature of the business requires it. It must also not be shared with other employees who are unaware and are not part of or supporting a particular project and need it.

Employees may not make use of confidential information for personal benefits.

The credentials of each employee, whether they are badges, logins or passwords, are individual and may not be shared with third parties under any circumstances, including other company's employees.



11. PUBLIC RELATIONS

In order to avoid inaccurate information that may affect the business of the Orbenk Group as well as its employees and business partners, the Group's relationship with the press should only be conducted through a person seconded by the through a person seconded by the Executive Board.



12. ACCOUNTING RECORDS

The Orbenk Group ensures that the accounting records of its companies, as well as supporting documentation, are complete and accurate, in full compliance with the laws and accounting principles of Brazil and other countries in which it has or may build business relationships.

The practice of money laundering is not tolerated by the company, as well as other financial and accounting illegal activities which are likely to harm the public administration.



13. SECURITY, HEALTH AND ENVIROMENT

Employee safety and health are priorities for the Orbenk Group, which operates all businesses with strict quality standards and compliance with occupational health and safety laws and regulations, providing adequately all PPE (Personal Protection Equipment) required for the proper performance of each activity.

In the same way, care for the protection of the environment and the preservation of its resources are part of the Orbenk Group's culture, reflected in its values: "Sustainable Growth and Respect for the Environment."



14. RESPONSIBILITIES AND INFRINGEMENTS TO THE CODE OF ETHICS AND CONDUCT

It is the duty of each employee to follow the guidelines of this Code, adopting a full stance and in accordance with the principles and values of the Orbenk Group.

Infringements of the Code of Ethics and Conduct, as well as other internal policies of the Orbenk Group, will be subject to disciplinary action, based on internal regulations and in compliance with labor law.

Attitudes suspected or contrary to the Code of Ethics and Conduct or other internal rules of the Orbenk Group must be reported through the company's official channels:

By e-mail: compliance@orbenk.com.br

Through our Ethics Channel:
compliance.orbenk.com.br

All reports will be received and handled by the Orbenk Group Ethics and Compliance Committee, subject to absolute confidentiality and respect for the rights of the involved parties.

The Orbenk Group does not tolerate retaliation against any complainant in good faith.



Orbenk Sua empresa
bem cuidada

