



# CODE OF ETHICS

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### CODE OF ETHICS:

4<sup>th</sup> Edition - Revised and Updated September 2020

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## MISSION

Metalock Brasil provides specialized maintenance service solutions for equipment in the Manufacturing, Marine and Offshore sectors, carried out always in the shortest possible time.

Metalock Brasil offers engineering solutions depending on the needs of the customer, meeting the regulatory requirements associated with the service provided, using the expertise of its professionals, strategic alliances with original equipment manufacturers and associations with companies that have the same international profile.

## VISION

To maintain the Metalock Brasil brand as a national and international benchmark, in the area of providing specialized maintenance services, to serve the Marine, Manufacturing and Offshore markets.

## VALUES

- Ethics, credibility, integrity and reliability in all relationships
- Safety first
- Commitment to quality
- Economic, social and environmental sustainability

## PRESENTATION

Ethics is a branch of psychology that studies people's way of being. Both in a group and individually. It is directly related to virtues such as character, honesty and respect.

We can define it as a set of values and principles that guide an individual's behaviour within society.

In the professional environment, working in the best manner possible is the duty of every employee committed to society, colleagues and the employer. To always do the right thing, even when that employee is not being monitored.

There is no table to look up to find out if a particular action is ethical or not. This condition can change for different societies and groups, according to factors such as culture, for example.

The purpose of this Code is to bring together the main guidelines for ethical conduct at Metalock Brasil workplace and establish rules that should guide employee relations, regardless of their duties and responsibilities.

In order to promote full knowledge of the current Code of Ethics, periodic training will be offered and its contents will be available on the Intranet and at the website [www.metalock.com.br](http://www.metalock.com.br).

## DEFINITIONS AND CONCEPTS

### **What is the Code of Ethics and what are its objectives?**

The Code of Ethics is a guide of principles, created to help Metalock Brasil employees conduct business with honesty, integrity and value.

The Code of Ethics is a document that establishes guidelines and guides people as to their stance and attitude, which are morally acceptable, and in line with the ethical relationships that Metalock Brasil wishes to establish with the different audiences with which it has relationships.

It is expected that all employees, regardless of position, follow the guidelines contained herein, along with all public with whom they maintain contact. The purpose of this code is also to convey and ensure that the rules established here are practiced, standardizing the conduct of the company's business.

Reputation and credibility are Metalock Brasil's most important assets. Operations are geared towards the preservation of ethical assets that contribute to continuously consolidating the company as a solid and reliable entity for its customers, suppliers, partners, controlling agencies and employees in general.

For this reason, the company expects that all employees are aware of this document and observe its terms in all the negotiations held with or on behalf of Metalock Brasil.

Note that the guidelines in this Code always comply with the current Brazilian legislation. There may be cases where the guidelines contained herein vary according to local law or the customs of a particular country. In cases where the law or local customs impose different standards than those established in the Code, more restrictive conduct will be applied.

## GENERAL GUIDELINES

### Respect for human and labour rights

Metalock Brasil is committed to respecting and promoting human rights, in accordance with the United Nations Guiding Principles on Business and Human Rights.

The company does not tolerate discrimination by religion, philosophical or political belief, nationality, origin, sex, age, colour, sexual orientation, marital status or any physical or mental difficulty.

Metalock Brasil condemns any use of child or forced labour, as well as all forms of slavery and human trafficking. The guidelines related to labour standards will always be respected by Metalock Brasil.

Every employee will receive updates on their rights and duties, through notices from the Human Resources department.



## **PUBLIC AND EMPLOYEE RELATIONS**

Labour relations must be cordial, disciplined, show empathy, respect and trust, regardless of the position or function performed. Everyone must respect and ensure the dignity of people.

## **RELATIONSHIP WITH COMPETITORS**

Metalock Brasil believes that fair competition is beneficial to customers and indispensable for the market to function properly.

Competitors must be treated with respect. Comments should not be made that may affect your image or contribute to spreading of rumours.

It is forbidden to disclose technical, financial or other information owned by Metalock Brasil without prior authorization from the board.

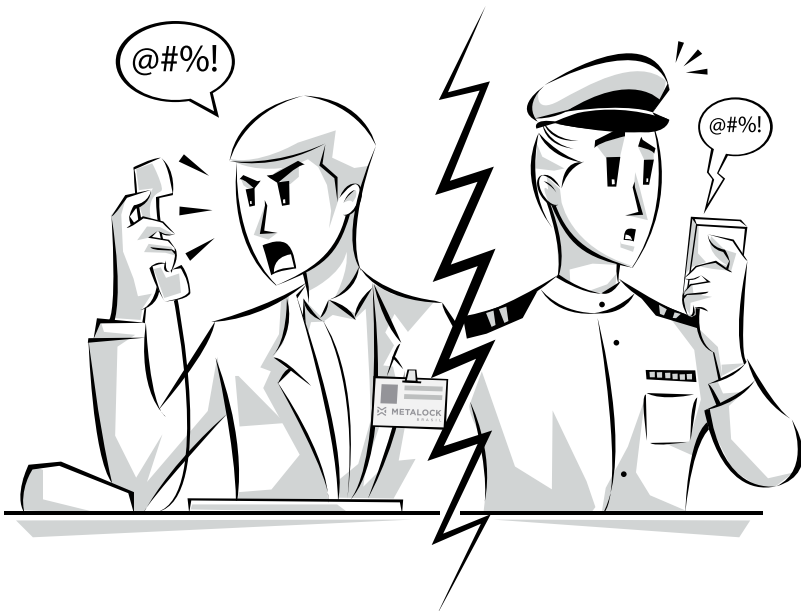


## RELATIONSHIP WITH CLIENTS

Metalock Brasil highlights, as its main Mission, winning over and satisfying customers in the provision of services and supply of products and equipment with quality, costs and deadlines. The company respects the laws in force in Brazil and in the countries in which it operates, as well as the company's QMS (Quality Management System) policy.

To win over clients and remain the best option for them, it is essential to have an ethical stance at all times in this relationship. All employees must use service standards such as respect, responsibility, efficiency and transparency. In addition to never offering or announcing something that, knowingly, cannot be fulfilled.

It is expressly forbidden for any Metalock Brasil employee to offer services and products on their own or from third parties.





## RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

Relationships with suppliers and service providers must be driven by respect between the parties, transparency, integrity, professionalism and honesty.

Managers and administrators must act with care in selecting, contracting and maintaining suppliers and service providers. Reputation, expertise, ethical conduct, quality of service, technological innovation and compliance with deadlines are also expected, subject to the interests of Metalock Brasil.

It is also the Metalock Brasil's policy that all information about its partners is treated with confidentiality and full respect for the rights of privacy.



## COMMITMENT TO THE COMPANY AND CONFLICTS OF INTEREST

Metalock Brasil expects that all employees are committed to the continuous improvement of the company. By generating a good income, the institution maintains and strengthens its capacity to generate jobs, fulfil commitments and keep abreast of technological advances. Progress is everyone's goal.

### **Every Metalock Brasil employee must:**

- Adapt to established corporate procedures, with honest and dignified conduct, in accordance with the laws and ethical standards of society, in addition to those established in this code. This implies knowing, practicing and disseminating the principles and rules contained herein;
- Commit to combating illicit and unethical acts of any kind;
- Treat all company matters, without exception, with secrecy and confidentiality;
- Actively contribute to improving the company's economic and financial results, either by increasing revenues or reducing costs;
- Practice actions that strengthen Metalock Brasil's credibility, reputation and good image;
- Not obtaining a personal advantage from business opportunities that arise within the work environment, unless expressly authorized by the company, which must be given full priority when carrying out such duties;
- Do not participate in any business opportunities that arise within the work environment.

The set of these commitments is called **loyalty**, an attitude that Metalock Brasil expects from all employees.

## ANTI-CORRUPTION POLICY

Metalock Brasil reserves the right and assumes the obligation to promptly and rigorously investigate all facts involving suspected fraud, theft, manipulated accounting records, misappropriation, unfair competition or any other unlawful act in which it may be involved, as well as acts that deviate from the corporate procedures established by Metalock Brasil in this Code.

Metalock Brasil considers the preservation of its reputation as its most important mission. As such, it adopts the policy of not promoting nor accepting the participation in any deal that aims to generate illicit gains, whether monetary or not, for itself or for third parties.

Employees, managers, suppliers and customers must assume the responsibility and commitment to fight against and not tolerate corruption, in any form and context. Metalock Brasil insists that everyone resolutely refuses opportunities that may conflict with this commitment.

**The following situations are considered unacceptable practices, for example:**

- Remunerate employees, customer organizations or potential customers, to facilitate obtaining business;
- Offering valuable gifts to people who are in a position to decide or influence purchasing decisions;
- Accept benefits to approve the good working conditions of any piece of equipment that has been contracted to perform a safety inspection;
- Accept any type of benefit, in their own favour or that of employee organizations, to favour a particular supplier over the others;
- In customer service, propose the execution of any additional services on their own behalf or on behalf of third parties;
- Fail to report, in Technical Reports, incidents in the execution of services;

- Participate in simulated or fraudulent bids;
- Propose or accept agreements with inspectors from any government agency, with the objective of suspending notices of violation and imposing fines;
- Promising, offering, paying, soliciting or accepting bribes or kickbacks of any origin and form, whether in cash, benefits, services, exchange of favours or any item of value. Attitudes like these are classified as bribery and violate Metalock Brasil's values, as well as local legislation and globally recognized principles in the fight against corruption.

In case of doubt as to the type of gift that can be offered or received, the employee must consult his or her line manager and clarify any question, so that later they will not be penalized for attitudes based on doubt or ignorance.

## **POLICY ON PREVENTING AND COMBATING MONEY LAUNDERING**

The expression “money laundering” consists of the practice of criminal activities aimed at turning illicit money into lawful money, that is, it is the process by which funds earned through illegal activities are transformed into funds that are apparently legal by hiding or concealing the nature, origin, location, disposal, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.

Metalock Brasil does not accept any work where the purpose is an illegal practice. Every employee or service provider must refuse to perform any work when there is a suspicion as to its legitimacy and legality. Suspicions should be reported to the direct Line Manager or through the reporting channel on the Metalock Brasil website.

## **PRIVACY AND PROTECTION OF PERSONAL DATA**

To respect and protect the privacy of everyone when entrusted with their personal information, be it a customer, partner, supplier, service provider or employee, - this is a concern of Metalock Brasil. Protecting this data is more than a legal obligation, it is a matter of trust, the basis of every relationship.

Metalock Brasil is committed to protecting the personal data entrusted to it and processing it within the applicable law.

The company is aware that there are special regulations to protect privacy when dealing with the third-party personal data. The collection, storage, processing and other uses of this information, require the approval of the person or company involved, a contractual regulation or some other corresponding legal basis.

Therefore, it is essential that partners, suppliers, customers and employees know that the inappropriate use or disclosure of this information can cause serious and irreversible damage to Metalock Brasil, weakening competitiveness and damaging the company's reputation.

## **THE WORKPLACE**

Metalock Brasil expects cordiality in dealings, the use of respectful language and dignified and honest conduct in the relations between its employees, regardless of any hierarchical title, position or function.

Bullying and sexual harassment is unacceptable, inside or outside the workplace. They do not need to occur, necessarily, within the environment and working hours;

- **Bullying** - It is important to emphasize that bullying or psychological harassment are composed of abusive, humiliating, embarrassing and repeated behaviour, whether through gestures or words.

- **Sexual harassment** - It can happen through acts, insinuations, forced physical contact, nuisance invitations. Attitudes such as requests for sexual favours, exposure of inappropriate material or any other unwanted verbal or physical conduct of a sexual nature in the workplace is also classified as sexual harassment.

Each Metalock Brasil employee must ensure that others have a work environment that is free from any insinuation of any kind, avoiding possible discomfort.

If any such act is proven to occur, appropriate disciplinary measures will be taken against those responsible.



## CONSEQUENCES OF HOSTILE CONDUCT OCCURRING

- Fall in productivity and lower efficiency;
- Negative image of the company held by consumers, customers, suppliers and the labour market;
- Change in the quality of the service and low rate of creativity;
- Constant replacement of employees, resulting in expenses with employment terminations, selection and training of personnel.

## SELF-LEARNING AND IMPROVEMENT

Employees must ensure that they are aware of the law, regulations, internal instructions and market practices in force, relevant to their positions, developing a permanent and systematic activity in updating this knowledge.

Equally, employees with management responsibility must provide personnel on their premises together with promulgation of knowledge, information and training needed.



## DRESS AND PUBLIC IMAGE

Employees in the administrative area need to wear a polo shirt, with the company's logo. All employees working in the Electronics and Warehouse sector must wear a polo shirt and lab coat, both with the Metalock Brasil logo.

As for the operational team, overalls and the correct PPE (Personal Protective Equipment) must be used, as appropriate to the tasks to be performed. An employee using PPE shall keep his personal protective equipment in good condition. An operational employee is also responsible for maintaining the company's good image when working outside its premises.

All employees receive their respective uniforms or PPE and must use them when they are contracted.

In special events, such as the participation in exhibitions and conventions, the company may specify details related to the presentation of its employees, such as, for example, the use of a specific shirt/uniform with a logo, tie, jacket, skirt length, colour of clothes and proper makeup.





## ALCOHOL AND DRUGS

The consumption, possession, distribution, transport and sale of drugs or alcohol on Metalock Brasil premises, or in any type of client installation, whether on land or on board vessels, in service or not, will always be strictly prohibited.

To avoid risks to their safety and that of third parties, as well as the quality of services, employees under the influence of alcohol or drugs, they will be immediately removed from their activity, until they have sobered up, as determined by any manager or team leader.

The direct line manager should send that person to Medicine and Safety Engineering Services for medical treatment.

To verify the state of chemical dependency, Metalock Brasil may suggest the use of legal means.

Illicit activities (distribution, transport, sale and use) will be dealt with in accordance with current legislation.

## WEAPONS

With a view to the well-being and safety of employees, carrying weapons is not permitted, except by expressly authorized persons, responsible for the safety of other employees and the company's assets. Even in those places where the law is more lenient, Metalock Brasil requires the same stance.

## **PROPER USE OF INFORMATION TECHNOLOGY (IT) AND TELEPHONES**

Information Technology (IT) is understood to be all resources such as the Internet, E-mails, Computers and Smartphones.

### **Internet**

- The use of the internet should be limited to professional activities;
- Employees must not access Sites with pornographic, racist content or that promotes illegal activities and that could compromise information security;
- Access to any video streaming site is prohibited, except in cases where there is a need for work purposes and with authorization from their superior.

### **E-mails**

- The use of our corporate e-mail @metalock.com.br is restricted to only those activities that are in interests of the company;
- No employee should send or access any e-mail that has files attached that threaten the security of the information. Never open e-mails from unknown sources and with strange content, discard them.

### **Computers**

- All Metalock Brasil employees, must access the files and information stored on Metalock Brasil's internal server, only in the company's interest;
- It is not permitted, under any circumstances, to circumvent the security restrictions of the network;

- All electronic documents must be saved in network folders, corresponding to that person`s sector;
- It is not permitted to use private IT resources, such as pen drives or external HDs, attached to Metalock Brasil computers;
- Never leave confidential information exposed on the computer screen or other electronic means;
- Before leaving the workstation, you must lock the computer using a personal password.

### **Telephones and Smartphones**

- Employees must use the telephone service provider indicated by Metalock Brasil. The cost of private calls will be discounted from the employee, according to the justification submitted to the HR department;
- The use of smartphones, as provided by the company, must be for work purposes only;
- Mobile data on the device must be used only for exchanging messages, e-mails and files, of interest to Metalock Brasil;
- Playing videos via streaming, as well as the use of the mobile data on the device, is allowed whenever in the interest of service of Metalock Brasil.



## **SOCIAL MEDIA POSTS**

Employees can post Metalock Brasil services on social networks.

For this, posts need to be made, through sharing publications, on the company's social media.



## **HEALTH, SAFETY AND ENVIRONMENT POLICY - HSE**

Metalock Brasil's policy in relation to health, safety and the environment aims to fulfil its commitments by working efficiently, preserving the environment and acting in a manner to avoid accidents and occupational diseases.

Metalock Brasil continuously improves its Integrated Management System (SGI), always encouraging and seeking the commitment, training and continuous awareness of its employees and senior management.

## **OCCUPATIONAL SAFETY AND PROTECTION OF HEALTH**

In valuing the health and safety of everyone, Metalock Brasil complies with the regulations related to its Occupational Safety Policy.

Every employee must receive, read and respect the Occupational Safety Manual. It contains the technical knowledge about Personal Protective Equipment (PPE), required in work environments.



According to Regulatory Standard No. 6, PPE is any device for individual use used by the employee, intended to protect against risks likely to threaten safety and health at work.

In addition, the purpose of the Occupational Safety Manual is to enable implementation of good and standardized practices that improve safety and reduce health risks for all employees.

Employees who, for some reason, do not have a copy of the Safety Manual, should ask the HR Department.

## **ENVIRONMENTAL RESPONSIBILITY**

Metalock Brasil seeks to promote measures for the rational use of natural resources, encourage the preservation of the environment, the reduction of waste generated and through recycling.

## REPORTING VIOLATIONS OF THE CODE OF ETHICS

Metalock Brasil encourages all its employees to report any activity that may violate this Code of Ethics.

Immediate action, in case of suspected violation, can help prevent possible damage to the company, employees, as well as the society in general.

The channel to report this is on the Site  
*[www.metalock.com.br/codigo-de-etica/](http://www.metalock.com.br/codigo-de-etica/)*

**To implement this policy, Metalock Brasil adopts the following procedures:**

1. Periodic training for all employees with clarifications on this policy;
2. Having a specific channel for receiving complaints - Site;
3. Commitment to investigate each incident;
4. Punish those responsible depending on the seriousness of the situation, which may result in a Just Cause for their dismissal;
5. After investigating each incident, prepare a detailed report.

## APPLICATION OF THE CODE OF ETHICS

Some situations are not easy to manage. Making ethical decisions can sometimes seem difficult, as it goes beyond simply acting on a set of rules.

The Code of Ethics is a help tool for those moments. It seeks to help decision making in business situations and actions.

**If you have any questions about your attitude and ethics, ask yourself:**

- Am I violating any law?
- Am I acting against Metalock Brasil's Code of Ethics, policies or values?
- Am I treating others in the same way that I would like to be treated?

**If the answer to any of these questions is of concern, do not keep it to yourself - report it to your superior or the Human Resources Department.**

The employee will be instructed, guided and made aware of the definition, concept and commitment that must be devoted to this document (Metalock Brasil Code of Ethics).

A copy of it will be given to the employee and he/she will sign an agreement certifying to be aware of the procedures of the Metalock Brasil Code of Ethics and agree with the obligations contained therein.

This procedure will be incorporated into the Integration Program for new employees.

## DOCUMENTS

Metalock Brasil Code of Ethics Manual delivered to the employee.  
Agreement that must be signed by the employee and delivered to the Human Resources department.



“The effort made by each of us will provide for a better world.”



**AGREEMENT**

(Please print personal details)

I, \_\_\_\_\_, an employee  
at Metalock Brasil, working in the position of \_\_\_\_\_  
\_\_\_\_\_, holder of RG n° \_\_\_\_\_

hereby declare that I have received the third updated and revised edition of the Code of Ethics and being aware of its content according to the guidelines therein, I am committed to practicing and following the provisions as contained therein.

\_\_\_\_\_, \_\_\_\_\_ of \_\_\_\_\_ de 20 \_\_\_\_\_

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Metalock Brasil



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