

# ETHICS AND CONDUCT CODE

**W W METISA**

*"Remember upon the conduct of each  
depends on the fate of all. "*

*Alexander the Great*



# MESSAGE FROM MANAGEMENT

The sustainability of our Company is underpinned by strong basis: work, future vision exercises, well-being of employees and meeting customers' needs.

We focus our results on the collective interest of shareholders and employees and those who directly or indirectly affect the dynamics of our business.

Ethical conduct is one of METISA'S sustainability pillars and is consolidated on the Ethics and Conduct Code with the purpose of guiding our actions and the actions of future generations.

Our conduct is and an example to ensure the best working environment and reliability of our shareholders, costumers and suppliers.

The Administration



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# SHAREHOLDERS AND BOARD OF DIRECTORS



## SHAREHOLDERS AND BOARD OF DIRECTORS

**METISA** sustains transparency in attitudes and information, ensures sustainable growth and is committed with the generation of outcome with feedback for the shareholders.

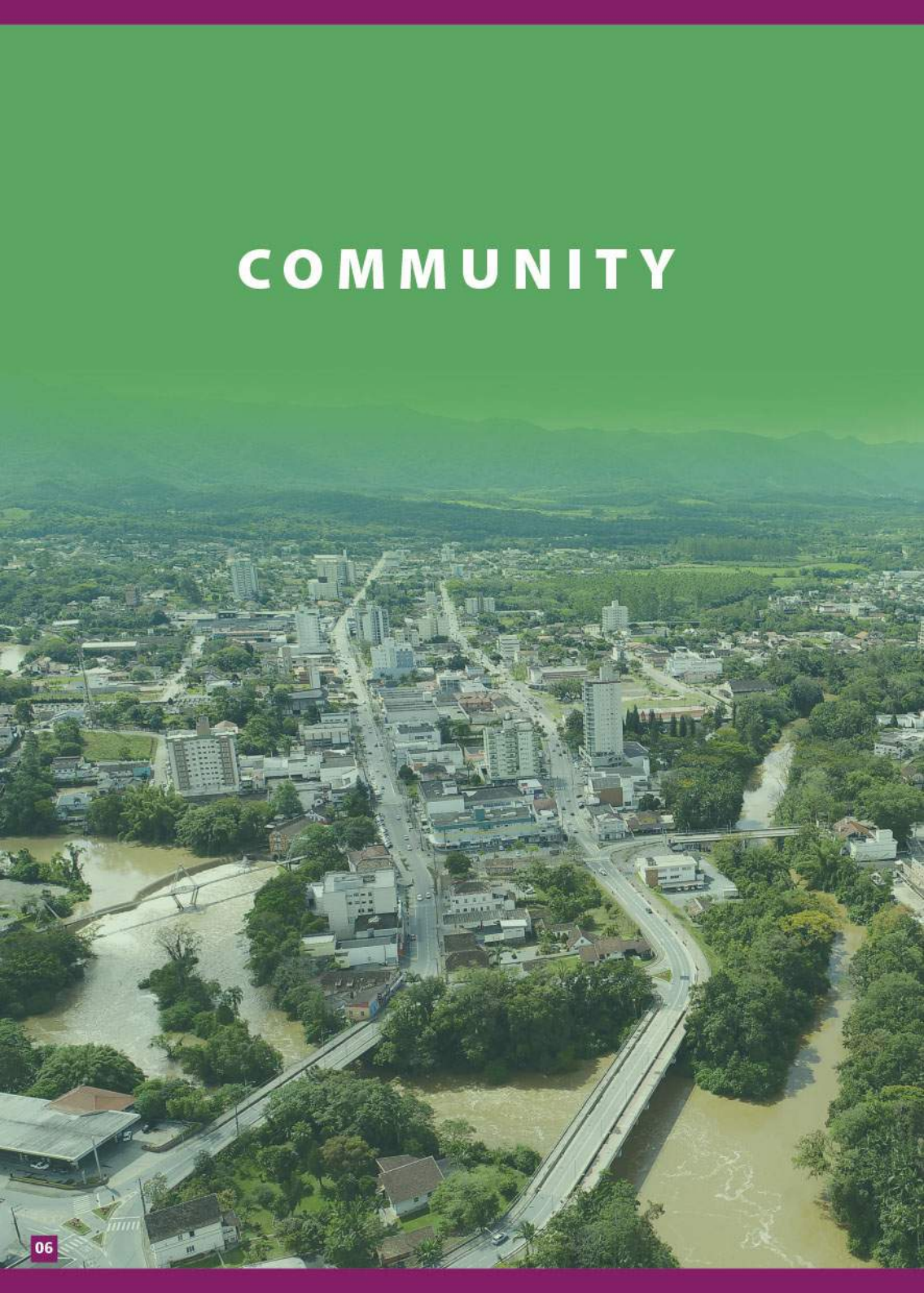
### CONDUCT GUIDELINES:

**The commitments of Shareholders and the Board of Directors are:**

- To provide guidance always seeking the interest of all shareholders.
- To provide accurate and precise information to ensure future planning.
- To exercise long-term vision of businesses and areas of activity.
- To monitor results and guide resources towards sustainability and company growth.
- To defend, comply with and promote compliance with the company's bylaws, Brazilian Corporate Law and the instructions of the Securities and Exchange Commission.
- To protect and keep strategic information confidential and disclose them according to legal requirements.



# COMMUNITY





## COMMUNITY

**METISA** understands that its activity has a significant impact on the community where it operates. In this sense, it seeks to maintain seriousness, respect and transparency in the relationship with the surrounding community.

### CONDUCT GUIDELINES:

- Voluntarily or whenever requested by the community, **METISA** makes information publicly available and in according to legal requirements.
- Contributes with the Institutions, reserving limiting rights, according to the company's annual Budget Plan.



# GOVERNMENT AND SOCIETY





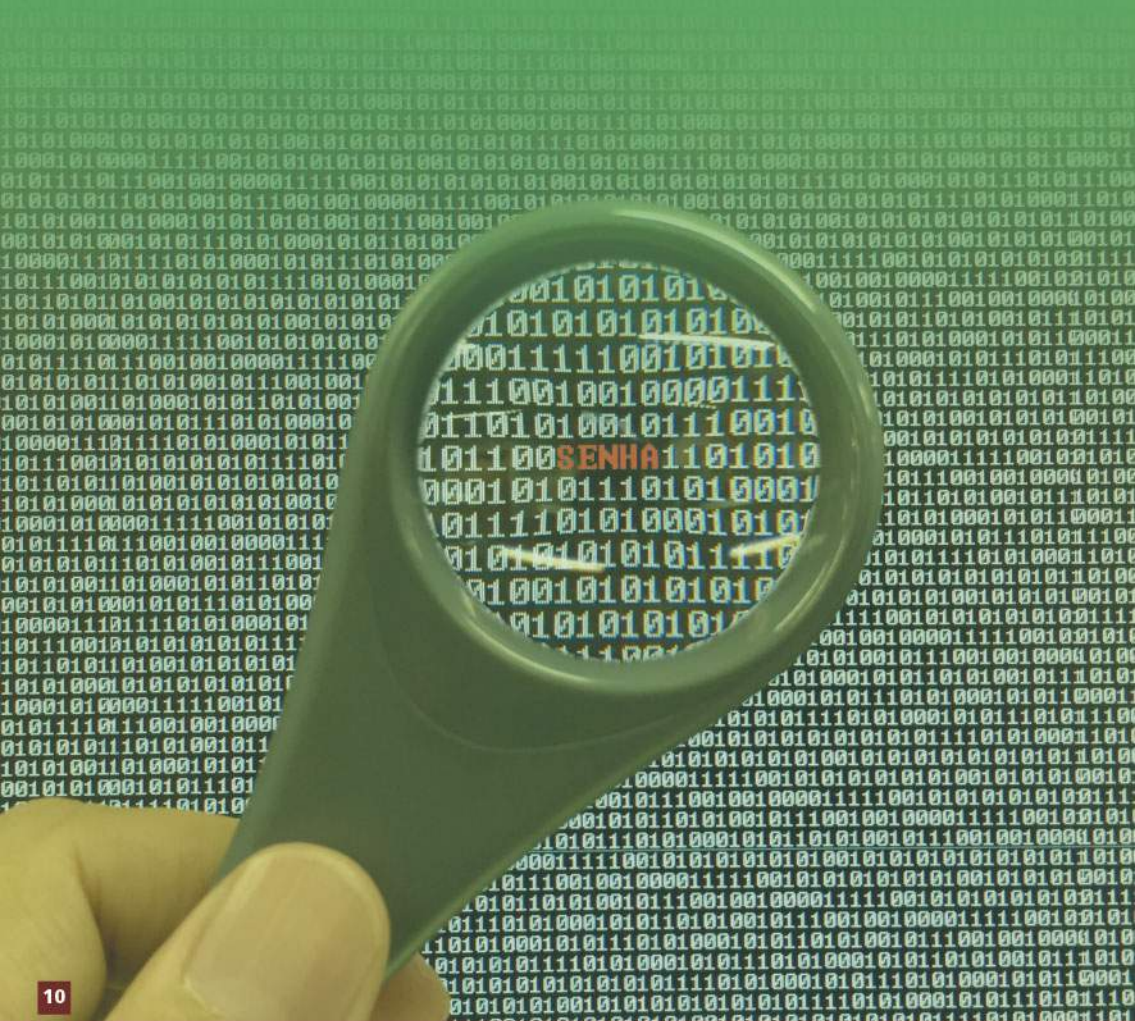
**METISA** is committed to seek and maintain constructive relationships with governments and society, recognizing the need to contribute for an increasingly better country.

### CONDUCT GUIDELINES:

- **METISA** complies with the laws and regulations applicable to its activities and working markets.
- Has transparent, ethical and impartial relationship with governments and public and private agencies.
- Supports the employer and labor representative bodies in actions based on the compliance with laws, good conduct and improvement of life quality.
- It seeks to contribute with representative bodies of the society according to the company's bylaws and with ethical principles.
- It committed to complying with legislation related to the prevention and combat of all forms of corruption.



# COMPETITORS



## COMPETITORS

**METISA** is committed to maintaining a respectful relationship with competitors and contributing to the market, acting fairly and competitively.

### CONDUCT GUIDELINES:

- **METISA** does not use information that may denigrate the image of competitors.
- It avoids agreements that may affect ethics in market negotiations.





# PRESS



**METISA** values the work of the press and believes in the power of communication in the development of society and the promotion of ethics.

### CONDUCT GUIDELINES:

- **METISA** collaborates in the disclosure of information, provided that it complies with the company's guidelines and legal requirements.
- Communication requests on behalf of the company must be directed to marketing department to be forwarded to specific areas.
- Official statements of the company in the media may only be made by the Board of Directors, by the Management or people appointed by them.



# CLIENTS



**METISA**

*De Timbó para o Mundo*

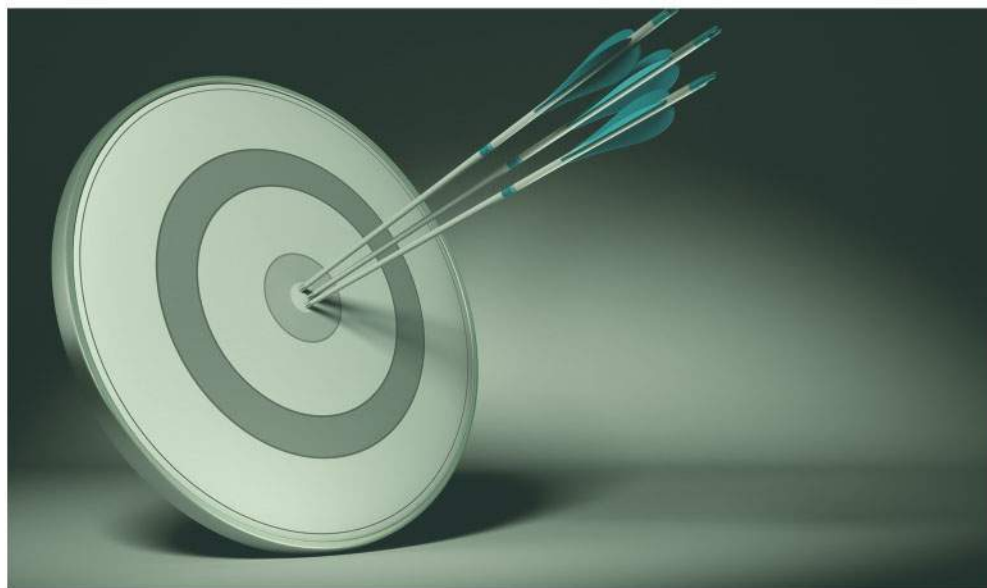




**METISA** is committed to meeting the expectations of its customers, maintaining a respectful relationship and considering the interests of both parties. This guideline extends to Sales Representatives and Agents (Exportation) in customer service.

### CONDUCT GUIDELINES:

- **METISA** serves customers with equality, respect, proactivity and promptness.
- It conducts negotiations with seriousness and transparency, ensuring compliance with the conditions agreed in the contract.
- In customer relations, **METISA** only authorizes the delivery and/or receipt of institutional gifts (those bearing the company's logo).
- The use of the **METISA'S** logo must be previously authorized by the company's marketing department.
- The instructions in the **METISA** Visitor's Guide must be followed when visiting the company's facilities.



# SUPPLIERS

(of products and services)



## SUPPLIERS (of products and services)

**METISA** is committed to building and maintaining sustainable business relationships with its suppliers and to answer them with respect.

### CONDUCT GUIDELINES:

- In relations with suppliers, a conflict-free business relationship shall prevail. If such occurs, the employee involved must report the situation to his Manager before proceeding with any negotiation.
- All strategic information discussed in business relationships by suppliers and **METISA** must be kept confidential and used only for its intended purpose.
- The use of the **METISA'S** logo must be previously authorized by the company's marketing department.
- In relationships with suppliers, **METISA** only authorizes the receipt and/or delivery of institutional gifts (those bearing the company's logo).
- **METISA** complies with the current legislation and expects the same attitude from suppliers.
- The decision to use a specific supplier is based only and exclusively on technical criteria according to **METISA'S** internal procedures.
- The instructions in the **METISA** Visitor's Guide must be followed when visiting the company's facilities.
- The suppliers of regular services (e.g., restaurant, surveillance, construction) must follow the conduct guidelines for internal public of this Ethics and Conduct Code, where it is applicable.



# ENVIRONMENT



**METISA'S** environmental commitment is demonstrated through the adoption of several actions that always aim at sustainability, the preservation of natural resources and the reduction of the impacts of its activity on the environment.

### CONDUCT GUIDELINES:

- Preservation of environment must be ensured in all processes, activities, products and services.
- **METISA** always seeks to comply with environmental laws, internal standards and other applicable requirements.
- It encourages its employees to be propagators of environmental preservation in the company and in society.



# INTERNAL PUBLIC





## **INTERNAL PUBLIC (Directors, Employees, Minor Apprentices, Trainees)**

**METISA** recognizes the importance of people and good organizational environment for the success of our business and guided for ethical and collaborative relationships.

### **JOB OPPORTUNITIES AND PROFESSIONAL GROWTH**

**METISA** offers job opportunities and professional growth, according to criteria established in the Careers and Salaries Policy.

#### **CONDUCT GUIDELINES:**

- The recruitment and selection processes (internal and external) considers the compliance with the requirements established for the job without any personal discrimination or influence, prioritizing growth opportunities for employees.
- The indication of an employee to fill a job opening is a prerogative of the company as long as it is based on technical and competence criteria related to the available job.
- Kinship is not permitted in cases of hierarchical subordination and administrative occupations.

### **CHILD LABOR AND/OR SLAVE-LIKE WORK**

**METISA** rejects the exploitation of human condition characterized by child labor and slave-like labor, acting according to the current legislation.

#### **CONDUCT GUIDELINES:**

- The company does not hire persons under 16 of age, except as a minor apprentice.
- It does not expose people to slave-like work and/or degrading work, respecting the human being.

## HEALTH AND SAFETY

**METISA** is committed to the occupational health and safety of its employees by providing adequate work environments and structured health monitoring programs to ensure compliance with the current legislation.

### CONDUCT GUIDELINES:

#### • **METISA'S commitments are:**

- To adopt workplace management programs, keeping all risks monitored and controlled.
- To implement occupational health monitoring programs adopting systematic follow-up procedures of employees.
- To promote the qualification of employees, developing training programs and educational actions in order to enable safe operations and conduct.
- To keep Emergency Fire Brigade and Abandonment Plan suitable to its demands.

#### • **Employees' commitments:**

- To seriously perform safety routines and rules established by the company, including the corresponding records, striving for their veracity and accuracy.
- To guide external people, on the premises of the company, to comply with the established safety routines and rules and ensure their safety.
- To report immediately any situation that may pose a health and safety risk to the immediate superior, to security (SESMT) or CIPA (Accident Prevention Committee).
- To perform professional activities aiming their safety and of co-workers, permanently adopting safe and preventive behaviors.
- To adopt respectful and safe conduct on the way home/work and vice versa, regardless of the transportation means used.
- **METISA** instructs and expects its employees to also adopt safe and responsible behaviors in leisure activities, hobbies, dislocation, domestic activities, among others.



EQUIPAMENTO DE TRABALHO  
ROBOTE PERE  
AUTOMATIZADO



## SPORTS AND LEISURE

**METISA** understands that sports and leisure activities promoted for its employees and their families are fundamental for the construction of an integrated and harmonious team.

### CONDUCT GUIDELINES:

- **METISA'S commitments are:**

- To encourage voluntary participation in internal and external events.
- To support the Board of Directors of the **METISA** Athletic Association (AAM) in maintaining a respectful and harmonic environment at the association's premises.
- To repudiate conducts that may harm **METISA'S** image and reputation at AAM'S premises.

- **Employee commitments:**

- To ensure the patrimony of AAM (METISA Athletic Association) and the company's image and reputation at the association's premises and at internal and external events.
- To respect AAM (METISA Athletic Association) regulations.

## INTERPERSONAL RELATIONSHIP

**METISA** understands that a harmonious, collaborative, productive and results-generating work environment is directly related to the way its members interact.

### CONDUCT GUIDELINES:

- To encourage team spirit, respect, collaboration and integration.
- Not allow personal opinions or preferences related to any matters to interfere with the good relationship.



## RESPECT FOR DIVERSITY

**METISA** recognizes diversity as inherent in society and establishes its commitment with full respect for the human being.

### CONDUCT GUIDELINES:

- **METISA** rejects any kind of discrimination practiced by leaders and other employees.
- Treatment by nickname must be avoided and restrained if offensive, pejorative or rejected by the employee.

## LEADERSHIP POSITION

**METISA** understands that leadership must be based on exemplary conduct and commitment with the company's results.

### CONDUCT GUIDELINES:

- Leadership must lead its team, striving for the example of ethics, integrity and consistency, giving everyone fair, dignified and respectful treatment.
- To be a guardian of established internal laws, rules and procedures, including this Ethics and Conduct Code.
- To act with discretion and treat company's and employee's information in a reserved and appropriate manner, using it only for its intended purpose.
- Not to use one's position or influence to harass or gain benefits or favor for themselves or for others.
- Not allow situations of conflict between employees to interfere with company's activities and results.
- To act immediately in harassment situations.
- To adopt decent conduct, both indoors and outdoors, so as not to compromise the company's image and reputation.





## HARASSMENT IN THE WORKPLACE

**METISA** disapproves all forms of harassment and its practice.

### CONDUCT GUIDELINES:

- Harassment by employees is not permitted, regardless of any hierarchical relationship between them.
- The collection of contractual obligations by the leadership must be done professionally, objectively and respectfully.

## COMMITMENT WITH QUALITY

**METISA** understands that the quality system is one of the pillars of the company's sustainability.

### CONDUCT GUIDELINES:

- It is a commitment of the leadership to act systematically in the implementation and maintenance of the processes under their responsibility to meet the customer's requirements, legal and statutory.
- It is the commitment of everyone to respect and comply with the requirements defined for their processes and or activities, ensuring the veracity and accuracy of the records and acting responsibly to achieve the expected results.

## USE OF COMPANY'S PATRIMONY AND RESOURCES

The company's patrimony and resources must be used properly and for their intended purpose.

### CONDUCT GUIDELINES:

- The company's patrimony and resources are strictly for professional use.
- They must be used with care and rationally, in order to ensure its maintenance, conservation and greater efficiency.
- Working hours must be used rationally and directed to the execution of professional activities
- Theft, robbery and fraud are unacceptable and strictly dealt with according to the law.
- The use of the METISA'S logo must be previously authorized by the company's marketing department.

## CONFIDENTIALITY AND USE OF INFORMATION

**METISA** believes that the information used in conducting its business must be protected and properly used by everyone.

### CONDUCT GUIDELINES:

- All information not publicly disclosed by METISA is considered confidential and its use is restricted to professional performance.
- Verbal, written, electronic or other information such as: formulas, processes, designs, sketches, images, plans, drawings, product concept, specifications, samples, customers, resellers and/or distributors, prices, costs, inventions, ideas and marketing information may not be disclosed to third parties except when previously authorized by Management or the Board of Directors.
- The capture and dissemination of images of installations, equipment, processes, among others, which may expose or be used for the detriment of the company are not allowed.
- Information, requested by any entity and not required by law, must be previously authorized by Management or the Board of Directors.
- The employee, who works in external entities as a teacher or lecturer, must communicate this activity to the immediate superior and maintain confidentiality of strategic information, protecting the image and reputation of the company.
- Academic papers and internship reports, containing company's information, must be previously approved by the Manager of the area to which they refer.
- **METISA** does not authorize the disclosure of information of persons with whom it has or maintains relationship, except when legally required.
- Official statements of the company in the media may only be made by the Board of Directors, by the Management or by persons appointed by them.
- Each employee is responsible for the information and records generated and/or provided in their professional activity, as well as their accuracy and veracity.



## USE OF SOCIAL NETWORKS

**METISA** recognizes the existence and importance of social networks in people's lives.

### CONDUCT GUIDELINES:

- The use of social networks to denigrate or jeopardize the image and reputation of **METISA** and its members is not allowed.

## PROFESSIONAL ATTITUDE

**METISA** expects a professional attitude from its employees, extensive to external environments when representing the company and or wearing uniform.

### CONDUCT GUIDELINES:

- A professional attitude must prevail over personal or other interests. Cases of conflict of interest must be reported to the hierarchical superior.
- Act with the concept of "internal customer supplier" and seek integration between diverse shifts and sectors, having as greatest objective the best result.
- The use of uniform must be avoided outside work activities, but when worn, care must be taken to preserve the image and reputation of the company.
- Employees may only receive and/or deliver institutional gifts (those bearing the company's logo).
- Request or accept sponsorship from clients or suppliers is not allowed for events of any kind.
- Invitations from suppliers for business lunches and dinners may only be accepted if previously authorized by the area Manager responsible for the purchase.
- Products or services may not be marketed on company's premises, on or off workhours.
- It is everyone's responsibility to honor professional commitments undertaken, to comply with work hours, deadlines and providing feedback in case of difficulty.
- Parallel activities may not be performed during workhours, interfere with professional performance, or compete with company's activity.

## USE OF ALCOHOL, DRUGS AND WEAPONS

**METISA** disapproves the use of alcohol, drugs, weapons and anything that may endanger the health, safety and physical integrity of people and impair their ability to work.

### CONDUCT GUIDELINES:

- The use of licit drugs (cigarettes and alcohol) or illicit drugs is prohibited on company's premises.
- It is forbidden the access and or permanence, at the company's premises, of people with altered behavior due to the use of any type of drug, including alcohol.
- The entry into the company's premises of any type of weapon is prohibited, and non-compliance with this prohibition is subject to communication to the competent authority.



## **COMPLIANCE WITH THE ETHICS AND CONDUCT CODE**

The practice of the ethical principles and conducts described in the METISA'S Ethics and Conduct Code and the efforts for their compliance are the commitments of all.

Everyone who observes or becomes aware of violations to the code, or has questions about its meaning, intent, or application, will have channels at their disposal to register and forward their manifestation.

### **Registration and forwarding manifestations:**

- If you are an employee of METISA, use one of the channels:
  - Hierarchical superior;
  - Member of the Ethics Committee;
  - Form available in physical ballot boxes in the company;
  - Website [www.metisa.com.br/code-de-etica-e-conduta](http://www.metisa.com.br/code-de-etica-e-conduta) or
  - Email: [eticametisa@ouvidoriasegura.com.br](mailto:eticametisa@ouvidoriasegura.com.br)
- If you are not an employee of METISA:
  - Website [www.metisa.com.br/code-de-etica-e-conduta](http://www.metisa.com.br/code-de-etica-e-conduta) or
  - E-mail: [eticametisa@ouvidoriasegura.com.br](mailto:eticametisa@ouvidoriasegura.com.br)

### **It is important to know:**

Manifestations must be complete and detailed to enable analysis. METISA encourages the protester to identify himself. However, anonymous statements will be accepted, but will not allow return to the issuer. Anonymous and insufficiently informed demonstrations will need to be ended.



Manifestations sent through the Leadership, Committee Member or form (ballot box) will be dealt with directly by the Ethics Committee.

Manifestations sent through the website or e-mail will be received by an outsourced company, which, in an exempt and impartial manner, will forward them to the Ethics Committee.

All information received will be treated confidentially and the identity of the protester will be protected, except when legally required to inform government authorities.

METISA will not tolerate any retaliation against the person who, in good faith, has manifested a situation of code violation.

### **Code Violations:**

Code violations or withholding information during the progress of an investigation will be subject to disciplinary measures.

“Everything that must be done, deserves to be done well.”

*Cora Coralina*

## GLOSSARY

This glossary is intended to clarify words and or terms used in the Ethics and Conduct Code.

**Shareholder:** person who invests in the company.

**Slave-like labor:** similar, comparable to slave.

**Harassment:** Negative attitudes and behavior towards subordinates, peers, or their own leadership during or outside a workday. Harassment is characterized when there is continuity repeatedly and prolonged, becoming a daily habit. There are several types of harassment: moral (embarrassment to humiliate, intimidate, offend, harass, demand above the bearable), sexual (constraints to gain sexual advantage or favor), religious (imposition of one's own religious belief), political (constraints to gain political favor).

**Administrative positions:** those comprised by jobs classified as monthly.

**To restrain:** prevent, cease.

**Ethics Committee:** Independent staff that is responsible for the implementation, dissemination, training, review and updating the Ethics and Conduct Code and the channel of manifestations, as well as the conduct of investigations and the presentation of proposals for corrective measures related to violations of the code.

**"Internal customer/supplier" concept:** These are all those who are part of our daily work environment. The internal customer is the one for whom we provide our services in the company. In this case, we are the internal suppliers. The internal customer-supplier relationship is a helping and offering relationship of works with quality to ensure external customer service and a good result for the company.

**Dignified conduct:** behavior according to decorum, decent, honest, correct.

**Conflicts of interests:** when personal interests are opposed to the company's interests.

**Sustainable growth:** self-directed growth.

**Discrimination:** Differential treatment given to persons when hiring, remuneration, access to training, promotion, task assignment, among others, based on social class, ethnicity, color, gender, sexual orientation, religion, political belief, age, disability, origin and/or marital status.

**Systematic form:** that respects and uses the methodologies adopted by the company for organization, management and decision making.

**Usual service providers:** those who frequently provide services on company's premises such as: property security, construction, food (restaurant), and self-employed professionals.

**Contractual obligations:** those established in a contract (example: employment contract, service provision contract).

**Patrimony:** everything the company possess (assets and rights) and what it owes (obligations) destined for the company's activities and maintenance, such as: land, civil constructions, facilities, machines, apparatus, tools and equipment, furniture and utensils, vehicles, computer and communication equipment and systems, and trademark.

**Prerogative:** award or advantage that distinguishes a person or a corporation, privilege, benefit.

**Appeals:** Any elements used to achieve a specific purpose, such as: raw material, inputs, supplies, manpower, machines.

**Statutory requirements:** those established by statute (code or regulation that has the effects of law or rule).

**Occupational health:** destined for prevention of diseases and other problems that may be originated in the workplace.

**Conflict situations:** disagreements, divergence of ideas without consensus, among others.

**Family Relationship:** parents, spouses, partners, brothers-in-law, children (legitimate or adoptive), stepchildren, siblings, uncles, grandparents, grandchildren, cousins (sibling parents), nephews, sons-in-law, daughters-in-law and in-laws.



**METISA**