



## CODE OF ETHICS

## **1.0 Purpose**

The purpose of this Code of Ethics is to clearly define the ethical principles that guide the actions and conduct of its directors and employees in various situations, based on integrity and moral, determining what is and what is not ethical or permitted.

## **2.0 Application**

This Code of Ethics applies to all employees, directors, service providers and business partners.

## **3.0 Disclosure**

Turbimaq Europe's Code of Ethics is published through the website ([www.turbimageurope.com](http://www.turbimageurope.com)), in tables, banners, integration, managers, suppliers, etc.

The Human Resources area is responsible for communicating the Code of Ethics to new employees, keeping records of them.

The managers are responsible for maintaining the disclosure of the Code of Ethics for employees, clarifying doubts and evaluating the understanding of the content and application.

The principles of Turbimaq Europe's Code of Ethics may also be disclosed in contracts or purchase orders issued to suppliers.

## **4.0 Rules and Recommendations of our Code of Ethics**

### **4.1 Regarding the external environment**

Maintain the confidentiality of the company's strategic information. Only authorized persons can pass them on to third parties.

Do not publicly criticize Turbimaq Europe's clients, competitors, suppliers or employees.

Do not perform acts of liberality at the expense of Turbimaq Europe, not offering or receiving any kind of direct or indirect personal advantage because of the exercise of their position.

In short

- We act with integrity and moral.

### **4.2 Regarding clients**

Serve clients with transparency, courtesy, efficiency and respect for a lasting relationship. Compete in the market based on the merits of our products and services. Provide products and services of quality and value, at fair prices through honest negotiations.

In short

- We serve our clients with honesty.

### **4.3 Regarding suppliers**

Treat suppliers and partners fairly. Evaluate and qualify according to procedures based on criteria of quality, cost and punctuality. Comply with social and environmental responsibility management practices.

In short

- We treat our suppliers with honesty and respect.

#### **4.4 Regarding employees and the work environment**

Treat everyone fairly and maintain work practices based on equal opportunities for all employees. Respect privacy and treat each of them with dignity and respect. Provide safe and healthy working conditions in an environment of open communication to everyone.

Keep our employees always informed about the evolution of commercial results, product performance, customer relationships, etc.

Promote self-development by surveying the training needs and training plans developed by Turbimaq Europe's Human Resources department.

Seek to attract and retain competent and dedicated staff with the development of remuneration programs and competitive benefits in relation to the market.

The workplace environment should be respectful and orderly, and acts such as sexual or moral harassment and discrimination based on race, color, religion, sexual orientation, social status, nationality, age, political party or any kind of mental or physical disability are expressly prohibited.

All employees should contribute to the creation and preservation of a healthy environment and should not collaborate for the propagation of information without proof (rumors). The doubts must be resolved with the area managers.

In short

- We treat each other with honesty and respect;
- We draw attention to the problems;
- We continuously improve safety in the workplace.

#### **4.5 Regarding the community and the environment**

Respect and seek to improve the community's well-being by protecting natural resources, encouraging employees to participate in civic activities and volunteer actions by the company.

In addition to complying with applicable environmental legislation, Turbimaq Europe promotes the rational use of natural resources, preservation of the environment and reduction of waste generated in production processes.

In short

- We preserve the environment;
- We seek to improve the quality of life in our community.

#### **4.6 Regarding social responsibility**

Turbimaq Europe shares the philosophy of practicing and disseminating social responsibility requirements based on the SA8000 standard as follows:

- Do not engage in and/or use child labor. Do not purchase products or services from suppliers that knowingly make use of this type of resource;
- Do not engage in and/or use forced labor. Do not purchase products or services from suppliers that keep workers in inhumane working conditions;
- Provide a safe and healthy working environment by taking appropriate measures to prevent accidents and damage to health;
- Respect the right of employees to form or join trade unions, ensuring that there is no reprisal;
- Curb discriminatory attitudes by race, social class, nationality, religion, disability, gender, sexual orientation, trade union or political association;
- Restrain the use of punishment, psychological, physical coercion or verbal abuse;
- Respect the working hours according to union legislation and agreements;
- Ensure adequate salaries by guaranteeing the basic needs of its employees;
- Promote social and environmental actions as the use of labor of special people, young apprentices, recycling, volunteering, etc.;
- Implement social responsibility procedures;

- Ensure that its employees are aware of and comply with this Code of Ethics.

In short

- We do not use child labor and/or forced labor;
- We guarantee an adequate work environment;
- We guarantee the right to trade union membership;
- We do not discriminate;
- We prohibit punishment or abuse of power;
- We respect the working hours according to legislation;
- We ensure market compatible wages;
- We encourage social and environmental actions;
- We implemented a management system based on social responsibility;
- We provide access to this Code of Ethics to all interested parties.

#### **4.7 Regarding company's assets**

Turbimaq Europe's assets, including tangible assets (such as facilities and equipment) and intangible assets (such as trademarks, intellectual property, business, technical and manufacturing information) are used correctly and as authorized by company's management.

The intellectual property of all projects developed and owned by Turbimaq Europe cannot be used by third parties, even after the employee has left the company.

Turbimaq Europe's resources should not be used for purposes other than those defined by the company. It is not allowed to use properties, equipment, business opportunities and information systems of the company or, also, the position of the employee, for their own benefit or for third party benefit, to the detriment of the company interests.

In short

- We protect Turbimaq Europe's assets;
- We use equity appropriately and protect the information.

#### **4.8 Regarding compliance with laws**

Compliance with the laws and regulations applicable to Turbimaq Europe's activities at all levels of public administration (federal, state and municipal), as well as other countries where it conducts business, must be observed.

Third party intellectual property, including copyrights, patents and original documents, must be respected.

In short

- We obey the law.

#### **4.9 Regarding transgression (violation) and penalties**

Turbimaq Europe's management is responsible for ensuring compliance with this Code of Ethics, together with the managers.

Upon becoming aware of acts that are contrary to this Code of Ethics, the employee must immediately inform the area manager and/or the management representative and/or the Human Resources area.

The employee who is aware of acts contrary to this Code may also pass such information through the available Communication Channel via the HR box next to the cafeteria. Absolute secrecy shall be ensured as to their identity, ensuring that they do not suffer any type of reprisal.

The employee who, having become aware of any transgression, does not inform it, will be considered

an accomplice of the offender.

The penalties applicable to noncompliance with this Code of Ethics will be defined by the management according to the severity of the occurrence, and may involve warning, suspension, contractual termination for just cause or other appropriate measures in accordance with current legislation.

In short

- We act in good faith;
- We communicate with transparency;
- We look for satisfactory results.