

Conduct Code

Chemyunion | January 2016



CHEMYUNION

Inspired by innovation

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Vision, Mission and Values – What drives us

The VISION that inspires us

To be recognized as an innovative high technology company that accepts challenges and acts on the solution of the Customers' needs, seeking to be their first choice.

Perception is our MISSION

Through our technological expertise and constant investment in innovation, we seek to provide our Customers of the beauty, hygiene and health sectors with high performance ingredients globally, aligned to the market trends and adding perceived value to the finished product, generating well-being to the final consumer.

Our BELIEFS and VALUES are our way of:

- Being ethical and clear in our relationships;
- Respecting the environment;
- Being socially responsible;
- Seeking the continuous improvement of our operations, quality and processes;
- Attracting the best people and making them better people;
- Being enthusiastic about learning and solving;
- Sharing success.

Code of Conduct

The purpose of a code of conduct is to commit partners, managers and employees to the principles and policies established by the company for its legal and ethical operation. Herein the practices and values are shown regarding what is considered right or wrong.

The code of conduct indicates the attitudes and responsibilities of the company and its employees in their relationships with each other, its customers, suppliers, government agencies and the society in general.

Reputation and credibility are the most important attributes of Chemyunion's image. This is what conveys solidity and confidence to all people the company has relationship with, and what the company considers essential to ensure its continuity. The code of conduct must be the basic instrument for these relationships.

Chemyunion encourages dialogue and good sense as a form of personal appropriation of the guidelines listed here.

I. Compliance

Compliance is the set of disciplines to ensure obedience to the legal and regulatory norms, the policies and the guidelines established for the business and for the company's activities as well as preventing, detecting and treating any deviation or nonconformity that may occur.

Compliance is a word that comes from the verb in English "to comply", which means "to agree, to commit, to be obliged to do something".

Organizational excellence depends fundamentally on the company's ability to pursue its purposes in full harmony with its ecosystem. Today, companies must deal not only with legal risks, i.e. those related to non-compliance with applicable laws or norms, but also with the risks associated with image and reputation. The company's reputation is strongly linked to the level of public confidence it enjoys amid growing pressure of customers and society in general for a more ethical posture.

The adoption of compliance practices has become an extremely important tool that helps companies to minimize the legal risks and the risks to their business reputation as well as demonstrating their commitment not only to the law, but also to a clear and responsible management, leading their businesses with excellence, ethics and integrity.

Compliance is the conformity of the employees' behaviors with the standards of conduct, but that is not all! It must also encompass the conformity regarding conduct of suppliers, customers and managers in order to protect interests of all parties concerned (customers, employees, partners, government agencies and society) against eventual fraudulent practices and misuse of information.

Chemyunion's employees can never bribe or improperly influence an official, or even a private company employee of any nature, which has maintained or will maintain any relationship with Chemyunion, directly or indirectly, and even eventually, in order to take any kind of advantage and/or satisfaction of direct or indirect interest, being this conduct prohibited by the company in full force and emphasis.

Even though in the absence of criminal action by eventual conduct of employees that belong to Chemyunion in this sense, in case the latter is held civilly or administratively liable for a fact connected with this matter, even if indirectly, civil actions of recourse may be filed for full reimbursement for damages of any nature, including attorneys' fees and expenses related to legal proceedings and/or administrative proceedings in addition to the penalty for dismissal with good cause to be applied to the violator of this rule, without the possibility of being in relief.

2. Relationship between company and employee and among employees

2.1 Professional attitude

It is a duty for all to understand and comply with the internal rules and management practices in the workplace. Everyone must respect the guidelines of management policies established by Chemyunion.

It is a duty for all to follow guidelines, rules and instructions provided in accordance with the roles and responsibilities given in the processes and the chain of command for the preservation of order and a good atmosphere in the workplace.

Professional activities must be carried out with safety, competence and diligence, continuously seeking technical improvement and professional development.

Everybody must be aware of the risks involved in the activities within the workplace and predict situations leading to errors or delays.

It is a duty for all to preserve and maintain the organization of all the instruments and documents related to their professional activity.

One should always respect the intellectual property in the execution of his/her activities.

It is a duty for all to contribute to the disposal of waste and to work always for the best use of material and financial resources and working time.

Everyone should wear discreet clothing or the uniform indicated within the hygiene and cleanliness standards.

It is a duty for all to care about the company name and image inside and outside the workplace. Each employee is a representative of the company before the community.

Chemyunion values transparency in working relationships and freedom of expression. Manifestations of criticism and suggestions contribute to our constant development.

2.2 Interpersonal relationship, communication and organizational atmosphere

Regarding interpersonal relationships, one should always maintain a professional and responsible treatment, with due cordiality, dignity, discretion and attention to all peo-

ple related to, respecting individual differences.

Chemunion encourages sharing knowledge, data and information among its employees as necessary and maintaining the integrity and continuity of processes and activities.

It is a duty for all to promote actions that may improve the quality and effectiveness of the internal communication, eliminating the spreading of unproven information (gossip and rumors spread by word of mouth from the company people along the corridors, as if advertised by a radio station, or “heard through the grapevine”).

The damage to the reputation of colleagues through prejudiced judgments, false testimony or unsubstantiated information will not be tolerated.

The use of power inherent in the position or role in order to receive favors or personal services from subordinates as well as obtaining exchange of favors that appear to or may give rise to any kind of commitment or personal obligation will not be tolerated.

2.3 Answer to phone call

Guidelines on answering to corporate phone calls:

External calls: Chemunion + person's name + greetings (good morning / good afternoon)

Internal calls: Department + name

2.4 Visits to Customers

We should always seek to be harmonious, nice and focused on customer service excellence in order to meet our mission, vision and values.

2.5 Discrimination in the workplace

No person – employees, customers, third parties or any other interested party – with whom the company maintains relationships, including the surrounding community, can be discriminated on the grounds of sex, claim of race, age, origin, sexual orientation or gender identity, religion, physical condition, health conditions, etc.

2.6 Moral or sexual harassment

Any behavior that sets up moral or sexual harassment will not be tolerated. Any attitude that sets up moral or sexual harassment must be immediately reported to the CEO.

2.7 Exploitation of adult or child labor

The work must always be carried out under safe, healthy and contractual conditions. Any form of forced, compulsory or child labor will not be tolerated.

2.8 Use of alcohol, tobacco and other drugs

Any behavior that sets up the use of alcohol or other drugs in the workplace, including legislation relevant to smoking, will not be tolerated. The company delimits a specific smoking area. Employees must indicate this area to smoker visitors.

2.9 Occupational safety

Chemyunion has a commitment to provide a safe working environment under suitable conditions to professional practice.

The work must always be carried out ensuring that the Occupational Health and Safety guidelines and standards are followed.

Chemyunion is committed to providing Personal Protective Equipment (PPE) pro-

2.10 Use of organizational assets

Chemyunion's patrimony must be protected, preserving materials, working instruments, the safety of facilities, furniture and equipment available for use.

Similarly, social media and information technology resources – hardware and software – should be used exclusively for carrying out the work according to the internal rules.

Special attention should be given to the use of Chemyunion's equipment and the media (such as telephone, email, access to Internet, etc.) despite their flexibility in use, because they are considered labor means or instruments, therefore owned by the company and susceptible of being audited and tracked. Electronic media must not be used for transmission or reception of offensive, aggressive, pornographic or discriminatory information.

Careless manipulation or disclosure of information on interested parties (customers, suppliers, etc.) with which the company has relationships is prohibited.

3. Conflicts of interest

There is a conflict of interests when someone is not independent of a particular issue and can influence or make decisions motivated by interests different from those of the company.

Everyone in this situation should speak-up, explaining his/her conflict of interests or private interest, and even another person can manifest it in case the interested party does not do so.

Involvement or influence of personal relationships on hiring decisions about third parties is prohibited.

The business dealings unrelated to the company's activities are prohibited as well as product commercialization or providing services among employees on its premises. Also, the exercise of parallel activities by the company employees in conflict with Chemyunion's objective is prohibited.

In order to obtain authorization, everyone is obliged to notify the immediate manager of eventual requests from interested parties as a matter of urgency, being the mentioned parties those with which Chemyunion maintains relationship by providing

4. Receipt of gifts and favoritism

Everyone is obliged to notify the local Board of Directors about the receipt of freebies, gifts or any other benefit offered by suppliers, service providers and customers that exceed R\$ 100.00.

When it exceeds, the Board of Directors of the respective area must be notified in order to assess the action to be taken.

5. Confidentiality

Strict confidentiality must be kept concerning any secret or strategic information on Chemyunion and our customers. Only duly authorized persons can provide information relevant to third parties.

Regarding information on customers, no Chemyunion employee must transfer data or information from customer A to customer B. Any action of this nature is considered a serious fault. It is important to remember that many Confidentiality agreements have been and will still be signed, often with those directly involved as witnesses; however, it is impossible for all to have the knowledge of the existence of such agreements, hence our forcefulness in this orientation.

The following is considered confidential information: commercial and technical data on our products, goals, business and marketing strategies and tactics, annual budgets, short- and long-term planning, sales volume and conditions, research results, financial and accounting data as well as any other information or data linked or related to Chemyunion's business interest.

Privileged information is understood to be the knowledge of acts, facts or events that can influence the market and the strategic implementation of sales, marketing, trade negotiations or any nature of negotiation that may cause losses or risks to Chemyunion.

6. Compliance with the law and tax payments

The work must be carried out continuously ensuring compliance with the laws, conventions and collective agreements. It is a duty for all to understand and comply with the laws to which they are subject in their professional activities.

7. Fraud prevention and conduct

All employees must endeavor to prevent money laundering, which is the process of disguising the nature and source of money associated with a criminal activity by integrating the “dirty money” into the trade flow until it appears legitimate or it is not possible to identify its true source.

Everyone should be alert and notify suspicious behaviors of customers and business partners towards the compliance with all accounting requirements, maintenance of financial records and reports applicable to receipts and payments associated with transactions and agreements.

8. Relationship with the community

All Chemyunion people have responsibility for handling in a strictly professional and impartial manner when dealing with external public. The use of position, function, role or influence in order to receive any favoritism will not be tolerated.

9. Researches, interviews and the press

Everyone should refrain from answering the demands of information from social media outlets (for example, magazines, newspapers, etc.) concerning Chemyunion’s business activities without having received prior authorization for this by the Board of Directors of their area.

Similarly, researches or other surveys of information by any entities (for example, educational institutions, professional bodies, etc.) should also be notified and authorized by the Board of Directors responsible for the area of respondents.

10. Disciplinary sanctions

Once identified any conduct incompatible with the provisions of this Code of Conduct or applicable laws, Chemyunion’s Board of Directors will evaluate the case at issue and recommend actions according to appropriate disciplinary measures.

11. Validity

This Code of Conduct will be reviewed annually or at any time a situation herein is not predicted, whose importance is relevant and demands the need for advance update.



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