



GRUPO MOURA

CODE OF ETHICS



MESSAGE FROM THE BOARD OF DIRECTORS

You are receiving the Code of Ethics Moura. You will find in it all the expectations from the organization aligned with the best practices of social interaction for preserving the common good.

This code establishes the ethical principals and conduct standards that must guide the internal and external relationships of all the collaborators of Grupo Moura, according to the Cultura Empresarial Moura [Corporate Culture Moura].

Our ethics results from joint attitudes of honesty in any situation, justice, transparency, coherence and integrity. Institutionalized behaviors in our organization.

Sérgio Moura
Chairman of the Acumuladores Moura Board

Paulo Sales
Chairman of the Rede Moura Board

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PREAMBLE

Founded in 1957, in Belo Jardim (PE), Moura is a reference company in the battery market and, today, its also works in other segments. Grupo Moura is made up by the companies **Acumuladores Moura, MBAI, Moura Construções, Moura Imobiliária, Instituto Conceição Moura (ICM), Transportadora Bitury, Instituto de Tecnologia Edson Mororó Moura (ITEMM)** and **Moura Argentina**, besides **RBM** and **RSM**. Driven by challenges, the group heads to increasingly bolder directions, always committed to do more and better, thus assuring the quality of its products, the power of its links and its relationships, the perpetuity and sustainability of the business, always hand in hand with the interests of all the society.

We are proud of our history. Our corporate culture is our greatest asset and takes us to higher levels.

To live together in an ethical environment is to have the principles and rules established and complied with. Therefore, **Grupo Moura** developed this code of ethics, in which all the desires of the organization, aligned with the **Corporate Culture Moura** and with the best practices of social interaction and preservation of the common good were observed.

In the following pages, you will see the guidelines that may help in your decisions.



- OUR BELIEF

To strengthen links guarantees a better future.

- OUR MISSION

Batteries

Produce and deliver the best solutions in batteries with a cohesive team, generating wealth, making the new, well done and with passion.

Civil Construction

Realize the dream of home ownership, constructing cozy and quality dwellings, generating wealth, with a team that makes it well done and with passion.

- OUR VALUES

Our code of ethics is in line with our values.

People: we believe in people.

Quality: we are committed to making it well done.

Innovation: we do the new to perpetuate our business.

Sustainability: we seek the sustainable growth and the longevity of our business.

Customers: we believe that our success depends on the success of our customers.

Integrity: we act according to our values and principles.

Persistence: we are tireless in overcoming the challenges.

WHO IS IT FOR

This code of ethics is for all the collaborators of Grupo Moura, regardless of the hierarchical level, geographic or functional capacity. For purposes of this code of ethics, the collaborators of Grupo Moura are its directors, advisors, managing partners, employees, trainees and service providers, when these are working in its facilities.

THE CODE OF ETHICS AND THE LAWS

All the collaborators must work in a transparent way abiding by the laws in force, the corporate bylaws, the guidelines, standards, policies and the procedures, always striving for the care as to the code of ethics. Our collaborators are obliged to strictly comply with the Brazilian laws, including the provisions of Law no. 12.846/2013 (Anti-corruption Law).

In addition, the Moura Group acts and manifests itself in favor of the defense and promotion of human rights, including individual rights and public freedoms, social, economic and cultural rights and the rights of humanity, based on the precepts of the Universal Declaration of Humans Rights of the United Nations (UN).

In case of conflicts between the standards defined in laws, standards, policies, etc., the collaborators must always follow this general guidance:

Whatever the most coherent standard is, this is the one that should be followed.

Thus, if a local law conflicts with our code, we follow the law. In contrast, if a local commercial practice conflicts with our code, we follow the code. Are you not sure yet? Do not hesitate in asking for guidance.



COMMITMENT TO ETHICS

It is expected that, after knowing this code of ethics, every collaborator commits to follow and disseminate it among the other collaborators, whether they are peers, superiors or subordinates, thus assuring the professionalism in the work environment and the integrity of **Grupo Moura**. The maintenance of our reputation is vital to our business and, therefore, we have a zero-tolerance approach as to any acts of corruption.

Any violation or disregard for the principles contained in this code of ethics must be informed to the Audit and Risk Committee of Grupo Moura through the means specified below.

✉ canaldeetica@grupomoura.com

🖱 www.grupomoura.com/canaldeetica

☎ 0800 721 1282

THE COMMITMENT TO REPORT

The omission facing the knowledge of possible violations by collaborators, customers, suppliers or partners will be considered an anti-ethical attitude.

The reporting of unreal situations with the purpose of harming other people or companies for personal interests will be equally considered as anti-ethical.

GUARANTEE OF NON-RETALIATION

Grupo Moura believes in the importance of a healthy work environment where everybody can talk about their concerns about ethical issues without fearing to be harmed or to suffer punishments.

The group shall not dismiss, retaliate or discriminate in any other way the collaborators for communicating ethical nature issues.

Collaborators who believe to have been exposed to retaliation after approaching ethical nature issues must take this subject to the Audit and Risk Committee.



AUDIT AND RISK COMMITTEE

The Audit and Risk Committee is comprised by representatives of the Executive Board and of the Board of Directors of the Company, who perform the management of the code of ethics. The committee is responsible for disclosing and assuring the understanding of the document, assessing on a regular basis its applicability, performing any updates or rectifications, judge the cases of non-compliance with its principles and assuring the application of the appropriate measures.

ANONYMITY AND CONFIDENTIALITY

Grupo Moura assures the anonymity of all the collaborators who wish to make a report of violation to the code of ethics. Such reports will be received by the Audit and Risk Committee, which will take the actions necessary to deal with the complaints according to our business practices, policies and applicable laws. The confidentiality about the identity of those who report or participate in the investigation of the violation of this code of ethics will be maintained by the company.

VIOLATIONS TO THE CODE OF ETHICS

Grupo Moura will investigate promptly and strictly all the facts that involve suspected fraud, theft, robbery, damage to property, misappropriation, manipulation of information or any other crime. It shall also work in cases of misdemeanor or tort and acts that deviate from the guidelines and from the corporate procedures, which are an integral part of the present code.

The violation to the code, with the failure to comply with our policies or with any law may result in the following punishments.

- Disciplinary actions, including the termination of the contract or employment relationship, depending on the nature and severity of the violation to the code.
- In case of violating a law, civil and/or criminal penalties may be imposed by a government body or by a court.



CONDUCT OF COLLABORATORS

Grupo Moura, based on the strategic goals of people management, presents its collaborators with the attitudes and the behaviors necessary for the performance of their functions.

During the working hours, the collaborator must dedicate itself to the performance of its duties, complying with the commitments, the applicable laws and hours established. The policies, the standards and the internal procedures of the company must be complied with.

Simplicity, humbleness, mutual and absolute respect to the work colleagues are expected from the collaborators, and any manifestation of discrimination and prejudice related to the gender, race, color, origin, nationality, religion, age, sexual option, physical or mental disability, political and ideological conviction, as well as any other type of discrimination that may constrain the dignity of the person is inadmissible. Physical or verbal assault and psychological and/or sexual harassment will also not be tolerated.

We do not allow the practice of child, forced or compulsory labor.

All the collaborators must work in partnership, aiming at reaching the guidelines and the targets of the organization, preserving the belief, the values and the principles of Moura.

Any act that may make another individual feel threatened or unsafe is prohibited. This includes attacks, verbal threats or any expression of hostility, intimidation, assaults or hazing.

WORK ENVIRONMENT

All employees are responsible for maintaining their relations with cordiality and respect in the workplace, insinuations of any kind are not tolerated, having to act in line with the **Moura Business Culture**. To ensure an environment free of restrictions, the company guarantees the protection of free movement, with no impediment for its employees to transit through the circulation areas. We have an environment that encourages teamwork and decisions.

The **Grupo Moura** presents zero tolerance for sexual violence in the workplace. To guarantee the integrity of the work environment and safety of all collaborators, the permanence of the collaborator who is under the influence of alcohol, illegal drugs or carrying any type of weapon will not be allowed, except, in the latter case, when in the use of your weapon's legal allocations. In the terms allowed by local law, this prohibition extends to company parking lots.

Any act that could make another individual feel threatened or unsafe is prohibited. This includes attacks, verbal threats, or any expression of hostility, intimidation, aggression, or lack of truth and good faith.

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HEALTH AND SAFETY

We seek the sustainable growth and the longevity of our business. Therefore, our actions are based on a long-term sustainable vision. The health, the safety and the integrity of the people are part of the responsibility of everyone and must be assured at any cost.

Grupo Moura works in the promotion of a healthy, safe, organized and harmonious work environment, aiming at the valuation of its collaborators. The company undertakes to make available both collective and personal protection equipment, as well as to train the collaborators to use the same.

The health and safety management system is performed with discipline and must be standardized. Everyone has the responsibility to assure its application, dissemination, search for continuous improvement, as well as compliance with the guidelines, with the standards and with the safety procedures and the Regulatory Standards (NR's).

CONFIDENTIAL AND PRIVILEGED INFORMATION

It is banned that any collaborator uses the privileged and/or confidential information obtained in the use of its functions inside and outside the company, in its own benefit or of the third parties, as well as the transfer, without the prior authorization in writing, of guidelines, policies, standards, drawings, maps, pictures, videos and procedures of **Grupo Moura**.

The disclosure of information about **Grupo Moura** to the press, the government entities, the investors, the customers, among others, must be previously authorized by the board and must be made exclusively by the marketing and/or communication departments.

The passwords and the badges provided by the company are individual and non-transferable, and it is strictly prohibited to share it at any level.

The collaborators must follow the guidelines and practices established in the **Standard of Use of the Computer Resources**. It is prohibited to use the electronic means of the company (e-mail, telephone, voice mail, etc.) to send or receive (consciously) jokes, currents, e-mails with pornographic content, attached files with pictures, videos or any other file with a particular content.

The resources and equipment used in the professional activity are the property of Grupo Moura and must be used for exclusive use of its interest. Thus, Grupo Moura reserves the right to access, record or monitor any of its electronic means.

Everything that is produced by the collaborators in the exercise of its functions and is the property of the company, and it is not allowed to erase, destroy or make available to others. All the discoveries and developments that may generate industrial patents, performed by the professionals in the exercise of its activity compensated by the company shall belong to **Grupo Moura**.

PRIVACY AND DATA PROTECTION

Grupo Moura takes privacy issues seriously, adopting strict measures in the segments of Information Security and the Protection of Fundamental rights of Freedom and Privacy.

Based on the General Data Protection Law (GDPL), Grupo Moura employees must respect technical and administrative guidelines, in order to ensure that personal data is processed only by authorized persons, in the performance of their activities, observing whether these data are adequate, pertinent and limited to their purpose, that is, the purpose of processing, especially when they are classified as sensitive data by the GDPL. Therefore, in conducting the activities of Grupo Moura, if sharing personal data with third parties is necessary and indispensable, the employee must ensure that the respective data holder has consented to the collection and treatment, by signing a consent form. Also ensuring that this information sharing is confidential.



In other cases, the disclosure of any personal data collected and maintained by Grupo Moura is strictly prohibited, especially those considered sensitive by the GDPR.

SOCIAL NETWORKS

The collaborators are responsible for the good reputation of **Grupo Moura** and the content produced by them has the capacity to impact its own image and also the image of the organization. Thus, it is necessary that, first, each collaborator understands its role in this context.

The fact of having an employment bond with the company establishes automatically a relation between the content that is produced in the digital environments and the image of **Grupo Moura**.

Thus, the collaborators must feel part of the communication of Grupo Moura, besides jointly responsible for the success of the business. To preserve the image and the interests of Grupo Moura, as well as the brands and of the products of the group, the participation of the collaborators in social networks and web sites may not jeopardize the values preserved by the company.

All the principles, all the guidance and the conducts established in the Code of Ethics Moura are applicable in its participation in the social networks.

Therefore, the following guidance is established.

- Collaborators may identify, in their profiles, their relation with Grupo Moura; but, the most appropriate, in these cases, is no to side with issues that may bring any risk to the reputation of the company, to its brands or to its products.
- Criticism to professionals of Grupo Moura, the suppliers or customers are not acceptable in public web sites and social networks.
- When making own publications or commenting on contents of third parties, be polite and pertinent. It is possible to disagree or argument respectfully, maintaining the good manners.
- It is prohibited to share confidential information of Grupo Moura in public or private networks, as well as comments on internal subjects, dealt with in meetings or in conversations with work colleagues.
- It is strictly prohibited to disclose information of Grupo Moura on the social networks, except for cases of sharing posts made by Moura itself on social networks maintained by the company.
- Take care and pay attention before posting any content, since everything you publish is widely exposed.
- Besides, the Internet has a high power of dissemination. Remember that, after publishing it, the content gets out of control. It is necessary to pay attention to the restrictions as regards the capture of photos in the work environment.

The commons sense of each one is the key to guarantee the good manners on the social networks. If you feel insecure or have any doubt on the information that you want to publish, the marketing department is available for more guidance.

GOODS

The collaborators must zeal for the conservation of the company's assets, such as installations, machines, equipment, furniture, vehicles, computer resources, values and others, always following the **Property Control Standard**. The use of goods of **Grupo Moura** must be restricted to the professional activity of the collaborator, inside and outside the company, and its use is not accepted for private purposes.



The use of the Internet, telephone, software, hardware and other computer resources is controlled by The Standard for the Use of Computer Resources and the collaborators must follow the guidelines and practices established in it. It is prohibited to remove from the work site equipment or documents without the previous authorization of its immediate superior.

All and any handling of material, whether it is the transfer, sale or acquisition, must be performed according to the Property Control Standard.

PRESENTS AND ENTERTAINING

The collaborators and their family members must not give or accept presents, gifts, gratuities, donations or favors, of customers, suppliers, competitors or other stakeholders, that correspond to values above 1/5 of the minimum wage in force.

Values above those established above must be immediately returned to the sender accompanied of the standard letter of thank you and return letter.

In order to avoid the impression of inappropriate relations with anyone, whether an employee or not, Grupo Moura has prepared guidelines that must be followed by our collaborators.

Presents

The collaborators may accept presents and gifts of suppliers, customers and business partners, who have a value corresponding to up to 1/5 of the minimum wage in force, provided that:

- They are not in cash or equivalent (such as gift certificates or tickets).
- They are nor prohibited by the legislation.
- They do not create the impression or an implicit obligation that the present giver has the right to preferred treatment, to get a contract, to better prices, or to any kind of advantage.
- Nor cause an embarrassment to Grupo Moura or to the present giver, in case it become public.
- Do not prevent the present receiver to provide a contract of Grupo Moura to one of the competitors of the present giver.
- Are not provided as bribery, reward or undeclared commission (for example, to obtain or retain business or raise undue advantages, such as various favors).
- Are not provided as a form of services or other non-pecuniary benefits (for example, promise of employment, loan of goods or resolution of acts against or in favor of Grupo Moura).



Invitations

The collaborator must use the common sense to accept invitations of suppliers, customers and other business partners. If in doubt as to what is acceptable, the collaborator must consult its manager or the **Audit and Risk Committee**.

Invitations for actions or activities of corporate relationship may have an important role. Therefore, the collaborators may accept certain invitations offered with legitimate business purposes, such as, for example, to strengthen the relationship with customers and suppliers, given that everything is in accordance with the guidelines of this code. It is only allowed to accept an invitation offered by business partners, provided that:

- It is reasonably related to a legitimate business purpose.
- It is not seen as bribery, a reward or undeclared commission.
- Do not create the impression (nor an implicit obligation) that the present giver has the right to preferred treatment, to get a contract, to better prices, or to better terms of sale.
- It is reasonable and justifiable in the context of the commercial occasion and of good taste, in a place appropriate for the business.
- Do no influence or seem to influence the capacity of the collaborators to act in the best interest of Grupo Moura.
- It is within the specific limits established in this policy.

It is not allowed to accept invitations offered by business partners of Grupo Moura for “adult entertainment” or any type of event that involves pornography or obscene behavior. It is important to note that these guidelines refer to situations in which the host is present. Invitations to cultural or sports events without the presence of the host are, in reality, presents, and not entertainment, and must follow the guidelines of presents specified in this code.

Travel

Exceptionally, it may be justifiable that customers, suppliers or other business partners pay for the travel expenses of collaborators.

Offers of third parties to pay for trips and/or related expenses must be necessarily communicated, examined and approved by the Audit and Risk Committee.

When examining the travel request, the following factors must be considered:

- The primary purpose of the trip is for business?
- The route and the duration are pertinent?
- The itinerary minimizes parallel tours and avoids tourist or holiday destinations?
- The travel class is appropriate to the business context?
- Which other professionals and companies participate?
- Does the trip includes relatives going?
- The travel costs are coherent with the reality and the professional purposes of those involved?



The collaborator must use common sense when accepting gifts, invitations, or travel from suppliers, customers, and other business partners. If in doubt as to whether it is acceptable, the collaborator must formally consult his manager and / or the Audit and Risk Committee.

DEVELOPMENT OF COLLABORATORS

The development of people is the basis of our success. We are obsessive in the formation of people and we are in a constant process of learning. It is a priority of **Grupo Moura** to promote equal opportunities for the professional development and growth of all of its employees and trainees, based on the meritocracy. The high performance is essential for our recognition and our reward.

Grupo Moura values the synergy between the areas, the cooperation between the collaborators of all the units and the sharing of knowledge as a way to learn and disseminate the best practices, subject to confidentiality criteria.

The interaction between the various areas of the company is basic. We are all a single team.

CONFLICTS OF INTERESTS

It is primordial that the professional decisions of all the collaborators are based on the defense of the interests of **Grupo Moura**. It is not allowed that the collaborators of the group perform professional activities or participate of a society of competitor companies, customers or suppliers of products and/or services. No collaborators must be involved in any activity that compromises its professional integrity or the reputation of **Grupo Moura**.

The collaborator must not contract or negotiate with relatives (parents, children, siblings, daughters-in-law, sons-in-law, brothers-in-law and nephews) and spouse, or with a company managed or controlled by them, for the supply of goods and services.

Examine carefully the possible conflicts between its interests and those of Grupo Moura, including not only commercial relations, but also relations with public agents. Decisions that have a personal, family nature or another interest in particular, will not be admitted. Those who identify or suspect on any conflict of interest, real or potential, with the company must immediately inform the **Audit and Risk Committee** through the **Ethics Channel**.



RELATIONS BETWEEN COLLABORATORS

At the companies of **Grupo Moura** that have more than 200 collaborators, it is allowed that relatives and spouse work in the same, but it will not be allowed to contract or keep relatives (sons-in-law, brothers-in-law, uncles, nephews, spouse, parents, sons, brothers, daughters-in-law) in a function where there is a direct hierarchical relation or that perform their activities in the same department.

Any affective relation between collaborators must be communicated to the immediate manager of both. If there is doubt on the existence or not of a conflict of interests, the managers involved must submit it to the assessment of the **Audit and Risk Committee**.

Decisions that have a personal, family nature or another interest in particular will not be admitted. We recognize people for meritocratic criteria, and we do not adopt nepotism.

EXCLUSIVE DEDICATION

During the working hours, the collaborators must dedicate its time fully to the activities inherent to their job, and the execution of particular activities are not accepted, such as commercialization of any kind of personal product or service in the premises of **Grupo Moura**.

The collaborators who have parallel professional activities, such as commercial enterprises, academic activities of teaching and research, provision of consultancy, etc., are stimulated to report their condition to their manager, who will assess possible conflicts of interest and any situations of competition with the working hours.

POLITICAL ACTIVITY

Grupo Moura respects the right of its collaborators to participate in the political life of the country. However, manifestations of political-party activities are prohibited in the work environment. The collaborator may not use its position or the name of Grupo Moura in the particular activities it takes part of.

No collaborator may use **Grupo Moura** or private resources to make donations to political parties, political campaigns and/or candidates to public offices on behalf of the company without the prior approval of the **Executive Board**.



RESPONSIBILITY OF MANAGERS

We believe that the leadership is a key for obtaining our results. It is the responsibility of managers, by means of their example, to comply with, as well as to disclose, guide and have their collaborators fully comply with this code of ethics, the guidelines, standards and related procedures.

The work of our managers is essential in the maintenance of the organizational ambiance of respect and trust, equally treating each of its collaborators and serving as example in the practice of the ethical guidelines for these and for third parties.



RELATIONSHIP WITH CUSTOMERS

Our customers are our reason to be. We are obsessive in the search of their satisfaction. **Grupo Moura** commits to provide quality products and services, with advanced technology and a high standard of service, aiming at the full satisfaction of its customers. We work focused on the focus of our customers.



RELATIONSHIP WITH CUSTOMERS

All the contracts and commitments must be respected and monitored as to the obligations assumed with customers and may only be complied with by people legally authorized by **Grupo Moura**.

The requirements and expectations of the customers must be considered, reminding that all those that are agreed upon must be strictly complied with. We are ready to serve. Our success is conditioned to the full satisfaction of our customers.

Grupo Moura does not discriminate customers, whether by origin, economic size or location. However, it reserves the right to terminate any commercial relation whenever its interests are not being met or, yet, when the relationship poses a legal, social or environmental risk.

The information on our products must always be clear and true. Technical data, especially safety, health and environment requirements, will obligatorily be informed to the customers.

It is inadmissible, to any collaborator of **Grupo Moura**, to put their personal interests above the interests of customers or, on the contrary, privilege some at the expense others, circumventing legal provisions or internal regulations to benefit specific customers.

We do not consent to illegal, dishonest or corruption-related practices executed by the customers. We shall meet the legal requirements associated to the controls of prevention to the money laundering and we shall not consent to such practices.

Brands, patents and property identification signs of our customers will only be used and/or mentioned by **Grupo Moura** in their promotional materials and marketing campaigns with the prior authorization, in writing, of the customers. All of our collaborators are responsible for keeping the due confidentiality of the information received from the customers.



RELATIONSHIP WITH SUPPLIERS

The relations with suppliers must be based on technical and ethical criteria, as per the standards and procedures of purchases and contracting of third parties, formally disclosed, that assure the best cost effectiveness for both parties.

The contracting of the suppliers must be in accordance with the standards and policies of the area of supplies and with the Anti-corruption Policy.



RELATIONSHIP WITH SUPPLIERS

Please find below the precepts that must guide the behavior with suppliers and service providers.

- Look for partners who are in alignment with the ethical standards of **Grupo Moura**. All the suppliers of the group must respect the Brazilian legislation or that of the place where the business is conducted. **Grupo Moura** shall not keep a relationship with suppliers or service providers that:
 - Practice acts of corruption for obtainment of advantages — we do not admit, in no way, that any third party, acting on behalf of **Grupo Moura**, exerts any kind of undue influence on any person, whether it is a public servant or not.
 - Use child labor or in a condition similar to that of slavery for the performance of its activities.
- Follow the standards of the area of supplies for contracting suppliers.
- In the negotiations with suppliers and service providers, it is not allowed to obtain personal gain or any kind of direct or indirect advantage.
- Search and stimulate the constant improvement in the quality of the work of the suppliers and the continuous enhancement of its relationship with us.
- Provide equal opportunities to all the partners, regardless of their geographic location.
- All the contracts and commitments must be respected and monitored as to the obligations and may only be assumed by people legally authorized by **Grupo Moura**.
- Our suppliers need to meet the environmental legislation. **Grupo Moura** promotes and privileges, with them, the issues of social, environmental and financial sustainability in their commercial relationship.

The service provider companies must, on a monthly basis, account for their tax and social security obligations of the contingent of people at the service of **Grupo Moura**.

- Any collaborator who has the power to influence a negotiation of purchase or contracting of services must declare itself barred in case there is in the other end a close person (friend, relative or acquaintance), aiming at avoiding any conflicts of interest.
- Unjustified delays in the payments of our obligations with suppliers shall not be admitted. The conduction of business with companies belonging or managed by former collaborators must be previously assessed by the **Audit and Risk Committee**.

Brands, patents and property identification signs of its suppliers of products services and technology will only be used and/or mentioned by **Grupo Moura** in their promotional materials and marketing campaigns with the prior authorization, in writing, of the suppliers. Likewise, **Grupo Moura** does not authorize the use of their information or their image/brand without its prior authorization.

Be an example! Stimulate the suppliers to adopt management practices that respect the human dignity, the ethics and the preservation of the environment.



RELATIONSHIP WITH COMPETITORS

Grupo Moura is based on the free and loyal competition for its products and services.

It is expressly forbidden to the collaborators of **Grupo Moura** to provide strategic, confidential information or under any other form that is or will be harmful to the business of the company to any third parties, including to competitors.

The collaborator who has a relationship with another collaborator of direct competitors must urgently communicate such fact to its immediate superior, who will report such situation to the **Audit and Risk Committee** for assessment of the existence or not of conflict of interests.



RELATIONSHIP WITH THE COMMUNITY AND SOCIETY

Our actions are based on a long-term sustainable vision. We are committed to the well-being and the prosperity of our people and of the communities where we operate.

Grupo Moura commits to keep permanent communication channels and dialog with the communities where it operates, aiming at an integration and evaluation of its participation in the growth thereof. It works in the development and in the implementation of social projects and stimulates the volunteering of its collaborators in the social inclusion projects.

Donations must be made only for legitimate philanthropic reasons, such as to serve the humanitarian interests and those of support to the cultural and educational institutions.



RELATIONSHIP WITH THE ENVIRONMENT

We seek to be a reference and cutting-edge company in the preservation of the environment.

By means of **Programa Ambiental Moura (PAM - the Environmental Program of Moura)**, we articulate the industrial assets and the power of distribution to fully meet the legislations in force and the environmental obligations.

Along the years of performance, we actively contribute to the neutralization of 100% of the industrial waste we discharge in nature. We strongly work with the **Reverse Logistics Program** and the **Zero Carbon Program**, neutralizing the gases emitted in the manufacture of our products.

The social, economic and environmental aspects are our sources of inspiration to make more with less and better.



RELATIONSHIP WITH PUBLIC AGENTS

It is part of the policy of **Grupo Moura** to conduct its businesses with honesty and integrity. The maintenance of this reputation is vital and, therefore, we have a zero-tolerance approach to any acts of corruption. We expect that everyone keeps the concern with this theme.

The collaborators and representatives who work on behalf of **Grupo Moura** are prohibited to offer, promise, make, authorize or provide (directly or indirectly through third parties) any undue advantage, payments, presents or the transfer of anything of value to any person, whether it is a public agent or not, to influence or reward for any official action or decision of such person to the benefit of **Grupo Moura**.



RELATIONSHIP WITH PUBLIC AGENTS

The institutional relationship with the public administration must occur with the greatest level of formalization and internal documentation of the conversations, communications and meetings.

In moments of inspection of the Public Authority, **Grupo Moura** provides the information requested in a complete, objective and timely way.

All the collaborators and representatives must follow the programs and the Anti-Corruption Law against the practice of bribery.

The Anti-corruption Law does not apply only to the individual who pays the bribes, but also the individuals who act so as to stimulate the payment, i.e., it is applied to any individual who works as we detail below.

- Approve the payment of bribery.
- Provide or accept fake invoices.
- Retransmit instructions for the payment of bribery.
- Cover up the payment of bribery.
- Cooperate consciously with the payment of bribery.

No collaborator will be penalized for delay or loss of business resulting from its refusal to pay bribes.

Contributions in exchange of favors with any public servant must not be made, even if the beneficiary is a genuine charity. Donations made to institutions where the employee or the member of its family has a public function or is made by order of a public servant must be formally approved by the **Audit and Risk Committee**.

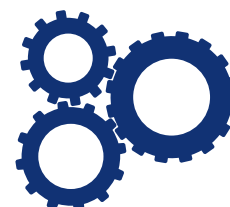
The payments to facilitate or accelerate actions of public servants may constitute a corruption crime. Therefore, **Grupo Moura** prohibits the performance of these types of payment.



RELATIONSHIP WITH PARTNERS AND SHAREHOLDERS

The relationship with partners, shareholders and investors must be based on the precise, transparent and timely communication of information which allow them to follow up the activities and performance of the company.

The treatment to the partners and shareholders does not depend on the quantity of quotas and/or shares they are holders of, meeting the legal restrictions, and will be based on the formal agreements signed between the parties, if any.



RELATIONSHIP WITH PROFESSIONAL ASSOCIATIONS

Grupo Moura maintains a relationship with the entities that represent the category, such as unions, professional boards, associations, federations and confederations, so as to promote the debate of questions that have a possible impact on the interests of the company, directly or indirectly.

It is allowed, to collaborators of **Grupo Moura**, to take part in professional associations, such as chambers of commerce, unions, professional and sector entities. The collaborator must request the prior authorization to its immediate superior, when it represents **Grupo Moura** in a professional association. All the contributions or donations made to unions, members of unions or an entity controlled by a union must follow the strictest legal and ethical standards, and must, necessarily, be in accordance with the requirements and the limits established by the applicable legislation.



RELATIONSHIP WITH THE PRESS

All the collaborators are responsible to zeal for the image and reputation of **Grupo Moura**. However, the mediator of the relationship with the press or communication means must be the professionals of the communication or marketing area.

The interviews (verbal or written), the declarations, the communications, the clarifications or other forms of direct or indirect provision of information may only be given to any type of media by the collaborators of **Grupo Moura** previously included in the Policy of Spokespersons and/or people authorized by the board of directors. The content to be disclosed must be previously revised and approved by the source and by the communication or marketing department before making the information available to the press, so as to assure the soundness of the content.

Our spokespersons, when authorized to manifest themselves on behalf of **Grupo Moura**, may express, solely and exclusively, the institutional point of view of the company, and should not provide personal opinions about the subjects approached.



MARKETING AND ADVERTISING

The contact with the external media must be treated carefully and by authorized and capable people, to guarantee the integrity of the information to be transmitted, valuing the good image of **Grupo Moura**.

All and any information, fact or event, such as articles, advertisements, catalogs, leaflets, inserts, advertising films or a marketing action, must meet the principles and standards established and must not, under no circumstance, take defamatory, discriminatory, false and/or incorrect information or that may denigrate the image of **Grupo Moura**.

The collaborators must protect and safeguard the ideas, the projects, the programs and the expansion plans developed by the company or by themselves.

The use of image and the disclosure of photos of our installations, as well as of collaborators of the group, may be made, provided that there is the prior authorization of the board or of the communication or marketing department.

The representation in external events where the name of **Grupo Moura** is somehow associated, must be preceded of authorization. All the sponsorships must be based on contracts formalized between **Grupo Moura** and the institutions that will receive the sponsorship.



ACCOUNTING AND FINANCIAL RECORDS

La autenticidad y transparencia de la contabilidad del **Grupo Moura** son fundamentales. Para garantizar dichos atributos, el **Grupo Moura** contrata anualmente una auditoría externa.

La legislación, normas y principios contables, comúnmente aceptados, son rigurosamente observados, de forma tal de generar registros e informes conscientes, que posibiliten la divulgación y evaluación de las operaciones y de los resultados del **Grupo Moura**.

Si tuviera conocimiento o sospechara que cualquier persona está directamente o indirectamente falsificando los libros y registros o tratando de cualquier otra forma retacear o camuflar pagos, usted deberá comunicar su inquietud de inmediato al **Canal de Ética**.

ACCOUNTING AND FINANCIAL RECORDS

It is our obligation to keep the books, records and accounts, reflecting, in a detailed, precise and correct way, all the transactions of **Grupo Moura**. To fight corruption, it is important that the transactions are transparent, totally documented and coded for accounts that reflect in a precise manner its nature.

Ensure that all the transactions/operations are totally documented, correctly approved and coded for the description of the correct expense. In no way, false or misleading documents must be included in the books and records of **Grupo Moura**.

Grupo Moura maintains internal controls that offer reasonable security.

- So that all the operations executed are approved as per the authorities and the limits established by **Grupo Moura**.
- So that all the operations are recorded as necessary, allowing the preparation of financial statements according to the generally accepted accounting principles, or any criterion applicable to these statements and to keep the control of the assets and liabilities.
- With the purpose that the access to the assets is allowed only according to the general or specific approval of the board.
- In the sense that the records are compared with the existing assets and liabilities, at reasonable intervals, and that the appropriate measures are taken as regards any differences.



WHAT IF THE RIGHT CHOICE IS NOT CLEAR?

El código de ética no tiene cómo describir todas las situaciones posibles que usted puede encontrar en su trabajo diario. Si usted se encuentra en una situación no tratada aquí, realice una reflexión en base a las preguntas presentadas a continuación y tenga certeza de que cuenta con el acceso a ayuda a través de nuestros líderes, de nuestro **Comité de Auditoría y Riesgos** o de nuestro **Canal de Ética**. Responder estas preguntas de forma honesta lo ayudará a mantener su integridad personal y los mejores intereses del **Grupo Moura**.

Responder a estas preguntas honestamente le ayudará a mantener su integridad personal y los mejores intereses del Grupo Moura antes de las preguntas de investigación final.

Is the action consistent with the culture, the values and the principles of **Grupo Moura**?

Yes No

Is this action legal and ethical?

Yes No

Are the image of **Grupo Moura** and my personal reputation preserved?

Yes No

May I be proud of these actions when I tell them to my family?

Yes No

If you answer no to one of these questions or in case of doubts, stop and look for guidance.



TERM OF RECEIPT AND KNOWLEDGE OF THE CODE OF ETHICS OF GRUPO MOURA AND DECLARATION ON CONFLICT OF INTERESTS

I declare that I have received the **Code of Ethics of Grupo Moura**, that I am aware of its content, which will be applied in the exercise of my functions, and that I will be subject to the administrative, civil, labor and criminal responsibilities applicable arising out of its nonperformance.

Furthermore, by the present term, I declare that I have, **directly or indirectly** people (spouse or relative) with participations and/or interests of any nature in corporations, companies or organizations that have a commercial relationship with **Grupo Moura**.

() YES () NO

If yes, inform the name of the legal entity at issue, the corporate interest (in %) and/or the name, the position and the relationship with employees or shareholders of the company (as applicable):

Detain people with relationship of spouse, parents, children, siblings and/or grandparents with employees of **Grupo Moura**.

() YES () NO

If yes, please inform the relationship, the name and the position held by the spouse or relative at **Grupo Moura**:

Likewise, I accept, whenever requested, to meet and comply with the additional precepts disclosed by Grupo Moura that may be an integral part of this code of ethics, without the need of signing a new term.

Full Name: _____

Position: _____

Enrollment: _____

CPF: _____

Date: _____

