



MODULAX[®]

ETHICS AND COMPLIANCE PROGRAM

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CHAPTER I

INTRODUCTION

The Modulax Group started its activities in 2006 and, since its foundation, has high values constantly applied in the scope of its governing of actions and behaviors.

The values of honesty, integrity, transparency and risk control were built throughout its history and, as a consequence of the search for development and application of sustainable values, the company consolidated its culture based on the concepts of equality, ethics, and sustainability.

All values are widely disseminated and applied at all levels of the company's internal and external organizational environment, passing through:

- Employees;
- Customers;
- Suppliers;
- Local communities where the company carries out an activity;
- Shareholders;
- Senior Management.

Expanding the scope of operations and entering into a global context, Modulax adopts, supports, and applies the set of core values in the areas of human rights, labor standards, environment, ethics, and the fight against corruption.

Our Ethics and Compliance Program was designed to illustrate how Modulax works and operates to highlight the specific requirements of each activity sector and to consolidate the positioning of Modulax as a group of ethical and sustainable values:

HONESTY AND INTEGRITY

The Ethics and Compliance Program establishes the rules of behavior always based on honesty and integrity of relationships for the company's actions, in all its variations and complexities. In its internal environment, all the interactions between its employees and leaders are considered. In the external context, interfaces with any third parties that exchange with Modulax, directly or indirectly, relationships or experiences, are considered.

RISK ASSESSMENT AND TRANSPARENCY

Modulax Group continuously maintains the management of risks that may compromise the future of its operation. Furthermore, the control monitors the entire risk of possible impacts to the external environment and applies, as appropriate, corrective or minimizing measures. Modulax has an open communication channel among its employees, managers, and third parties and fosters absolute transparency in their relationships, in addition to encouraging feedback and dialogue.

ETHICS OF BEHAVIOR

The maintenance of respectful relationships that seek the exchange of information and values, supported by trust and ethics, is the aim of Modulax. Modulax values the simplicity of internal and external contacts and promotes the integration of its values and culture.

Considering the complexity of all social scenarios, the Ethics and Compliance Program is constantly updated and, just as in human relations, is not a static activity and consists of a dynamic movement within an evolutionary cycle.

Therefore, all the information contained in this document cannot be considered comprehensive. The guidelines presented here consolidate a type of useful guide with the aim of helping its readers to manage concrete situations.

IMPORTANT: If you have any doubts about what action to take in a particular situation, do not hesitate to seek your hierarchical superior, the legal sector or use the Communication Channel (Ombudsman) available at www.modulax.com.br



CHAPTER II

WORKERS' RIGHTS

One of the pillars that support Modulax's culture is equality. The company, at all times, ensures the fulfillment of the workers' rights, having as a principle no discrimination, for any reason whatsoever, from their admission to employment relationships, respecting the dignity and privacy of each one.

The rights of all employees are discussed openly, through social dialogues with representative bodies of the personnel department and human resources.

To honor its global commitment, Modulax respects and promotes the core values of labor law, which are:

- Respect for freedom of association and recognition of the right to collective bargaining.
- The restraint of all forms of forced or compulsory labor.
- The effective abolition of child labor.
- Elimination of discrimination in employment, occupation, sex, race, sexual orientation, and religion



IMPORTANT: All employees of the company must ensure that their actions and behavior are not likely to affect the rights and dignity of their colleagues.

CHAPTER III

COMMERCIAL ETHICS

Modulax promotes the observance of national laws and international conventions and supervises their compliance. Respect for social ethical values is an imperative obligation for Modulax.

A. RESPECT FOR THE LAWS REGARDING CORRUPTION AND COMPLIANCE

Modulax adheres fully to the guidelines, pacts, and treaties, laws, international and national regulations that address and prohibit:

- Any action of bribery of public or private employees, national or foreign, to obtain, maintain a market or benefit from any advantage.
- Any action of corruption, illicit payments, or money laundering.

When it comes to the national scope, all norms and conventions that prohibit acts of corruption and other harmful acts against the public administration are fully applied, including the OECD Anti-Corruption Convention, the United Nations Convention against Corruption (Federal Decree nº 5,687/06), the Brazilian Penal Code (Decree-Law nº 2,848/1940), the Administrative Misconduct Law (Law nº 8,429/1992), Law nº 9,613/1998, and Law nº 12,846/2013, herein referred to as Anti-Corruption Laws.

B. RESPECT FOR COMPETITION RULES

Broad competition is a healthy market practice that feeds the engine of economic success as fuel. This is one of the essential conditions of an open economy in which Modulax believes.



In an environment of free competition, Modulax is committed to:

- Not carry out any anticompetitive consultation with your competitors in public or private tenders.
- Respect the importance of this commitment and spread it to all its employees who are susceptible to contact their competitors.

C. ETHICS OF PROCUREMENT (PURCHASES)

The procurement sector is an integral part of the company's implementation strategy and, as an area of extreme relevance, requires an efficient organization that must follow the organization's ethical standards.

IMPORTANT: The refusal of acts of corruption and business ethics always guided the activities of Modulax. Good results should originate exclusively from the conduct of all employees, regardless of their hierarchical level.



BEHAVIOR RULES AND THE BUYER'S RESPONSIBILITIES

The employer of the procurement sector represents the Group in the external environment. Thus, his personal ethics, integrity, and professionalism are the guarantees of Modulax's efficiency.

Modulax attaches great importance to professional and moral qualities of its employees who are in touch with suppliers, subcontractors, and third parties in general.

The adoption of singular behavior never authorizes transgressing the following principles, which are imposed as permanent to the sector:

- Loyalty, integrity, impartiality in relations with suppliers.
- Reliability, discretion, protection of information exchanged.
- Search for the best sustainable conducts and follow up the sustainability of suppliers and third parties.
- Fairness in the treatment of all suppliers.
- Observation of national and international rules, especially those related to competition and corruption.
- Respect for signed contracts, agreements and commitments.

The goal of committing to a responsible and sustainable ethics policy is to establish ethical and trustworthy relationships with suppliers that are compatible with the organization's culture.

Modulax expects its suppliers to absorb, reflect on, and share the principles discussed here. All suppliers will have to provide evidence of the application of principles governing business ethics, anti-corruption rules, preservation of human rights, compliance with labor standards, and their environmental commitment.

CHAPTER IV

PREVENTION OF CONFLICTS OF INTERESTS

The market and social relations are interactions that have a high degree of complexity. In order to avoid a situation of conflict of interest among the organization, employees, and their actors, all should be aware of practices that may compromise Modulax's values which have been translated into this Ethics and Compliance Program.

Considering specific situations, the existence of a conflict of interest can be identified if, as a consequence of the act to be practiced in the specific case, the organization's ethical values are violated.

The company, its employees, representatives, and third parties are liable to civil and criminal penalties in case of violation of the commercial corruption legislation and other similar laws. In case of doubt about the legal or non-legal nature of conduct to be performed, great prudence and reflection should be exercised.

Remember: Modulax keeps the channel open for dialog.

A. CUSTOMERS, SUPPLIERS, AND COMPETITORS

Modulax strongly restrains and condemns the prevalence of personal interest or any kind of favor in relations with customers, suppliers, and competitors.

B. PRESENTS, PAYMENTS, AND OTHER BENEFITS

Even if gifts or other benefits are offered as a simple demonstration of courtesy, even if of low value, no type of payment or benefit is acceptable, unless they are justifiable actions (collaboration in social actions, among others, as long as discussed and previously approved by the organization).

In accordance with its commitment to ethics, Modulax undertakes to act against corruption in all its forms, including against extortion and bribery.

C. PUBLIC ACTIVITY

Modulax respects the individual commitment of its employees in public, political, or associative activities. However, such commitments should not be detrimental to the company's activities or image, knowing that discretion has always been the rule of Modulax.

No employee has the right to directly or indirectly commit Modulax in any kind of activity, whether for support of a political party, association, or any other political institution.

CHAPTER V

PROTECTION OF INFORMATION

Modulax also promotes in its culture the transparency of information. Communication with all its employees and third parties is open and made directly.

In the strategic scope, confidentiality of the organizational information must be preserved and can only be divulged after previous and express authorization of Modulax.

A. CONFIDENTIALITY

Any employee or third party who holds strategic information which are identified as confidential by the organization, must take care that they remain confidential insofar as their dissemination or disclosure may be detrimental to the interests of the company.

Employees are under an obligation not to disclose to third parties or even to other persons employed in the company, who are not qualified to have this specific knowledge, confidential business information to which they have access.

It is up to all to guarantee and ensure respect for the rules of identification, distribution, reproduction, preservation, and destruction of documents or any other means of information.

Everyone should have the responsibility to be particularly attentive when Modulax intervenes in the framework of its commitments and obligations towards clients and activities abroad. The confidentiality obligation requires a cautious attitude to prevent unauthorized disclosure and protection of confidential internal and external information

that are in our possession.

B. PROTECTION OF MODULAX'S ASSETS AND RESOURCES

Each employee is responsible for the proper use and protection of the group's assets and resources.

These assets must be used according to their professional purpose or as established. Each employee must protect these assets from any degradation, alteration, fraud, loss, or theft.



CHAPTER VI: RESPECT FOR THE ENVIRONMENT, SAFETY, AND QUALITY

MODULAX is committed to equitable, sustainable, and social development, with the permanent resolution to reconcile economic logic, respect for the person, guarantee of safety, and high standards of quality.

A. RESPECT FOR THE ENVIRONMENT

In order to implement sustainable development and preservation of respect for the environment, an annual action plan accompanied by a report of means and results is organized, analyzed, discussed, and conducted by the general management that encourages the actions of all employees of the company.

In order to maintain sustainability and environmental preservation, Modulax is committed to:

- Take a precautionary approach to issues that affect the environment.
- Encourage and promote actions that seek greater environmental responsibility.
- Favor and encourage the development and diffusion of technologies that respect the environment.

The operation of Modulax places its activities at the heart of energy challenges, so the group naturally seeks advice and disseminates information on energy saving, reuse of waste, and optimization for the use of natural resources.

B. SAFETY

The safety of Modulax's employees is a priority issue. Its approach in organizational culture is made in simple and pragmatic ways: information, responsibility, and prevention.

In order to preserve the high level of safety demanded in all of the company's premises, whether in internal environments or allocated at customers and/or suppliers, a high level of professionalism and supervision is required, which consequently induces prevention that is passed on to all employees, thus preventing and avoiding accidents.

C. QUALITY POLICY

Modulax is committed to adopting all necessary measures to provide its customers with products and services that comply with the highest quality standards.

Through its Management and Quality system, the continuous improvement of services with optimization of resources and full satisfaction of the clients are guaranteed.

In addition to strict ISO standards, Modulax counts on great importance to qualification and resources of its personnel to deliver its product and fulfill its objectives.

CHAPTER VII

INTERNAL CONTROL

In order to guarantee correct compliance with the internal standards required and guaranteed by Modulax, it is essential that an internal control be promoted through audits that preserve all the procedures that must be observed.

Internal or external auditing services should be aware of non-compliance with the rules of conduct and possible risk of deviating to inappropriate or unapplied procedures.

All employees should collaborate in the process of internal control or external audit. Proof of diligence and transparency must be provided in response to requests for information. Everyone must act against corruption in all its forms, including extortion and bribery.

CHAPTER VIII

SUSTAINABILITY

Modulax, in order to fulfill its sustainable commitment, adopts a responsible growth strategy with a focus on environmental, social, and governance leadership.

Combining all these efforts drives growth, which in turn is conducive to the success of our employees, helping to create jobs, new opportunities, developing communities, and increasing economic mobility.

The challenges of life in society are best addressed when they are related to sustainable commitment. In order to guarantee the sustainability of its development, Modulax is committed to:

- Develop its business and all aspects of the company responsibly, with a focus on environmental, social, and governance leadership.
- Manage risks in a disciplined manner, with the objective of ensuring the maintenance of sustainable resources environmentally, financially, and socially.
- Maintain a focus on people: investing in the training and development of its employees.

CHAPTER IX

CODE OF CONDUCT

The rules and principles contained in Modulax's Ethics and Compliance Program must be respected by all its employees.

To guarantee the application of organizational values, Modulax links to the Ethics and Compliance Program this Code of Conduct that is applicable to its employees regardless of their hierarchical level.

The group maintains a multidisciplinary integration policy for its employees with the objective of ensuring adherence to the Ethics and Compliance Program and an understanding of the Code of Conduct.

Periodically, meetings and awareness-raising and training courses are held. For new employees, integration is done at the first moment soon after their hiring, with constant refreshing of information.

A. PRINCIPLES

Modulax's Code of Conduct has as fundamental principles:

FOCUS AND CONFIDENCE ON THE TEAM

Modulax believes in the importance of integrating all employees for the formation of a team where everyone seeks the best results in a shared way. The success of the company is only achieved by the creation of teams that have mutual trust, prosperity, and shared responsibility.

RESPONSIBILITY

The success of managing team integration is due to the disciplined management of risks and people. All employees should be fully aware of the responsibility of their role and function within organizational governance.

SIMPLICITY & EFFICIENCY

Simplifying the method of communication and interaction does not mean that relationships are less complex or require less commitment. Regardless of the degree of complexity of the relationships established between employees, suppliers, or customers, the focus on simplicity of information exchange and practical objectivity end up creating a great competitive advantage: speed and efficiency.

B. SURVEILLANCE AND INTEGRITY

Employees, besides being members of the organizational team, are also the representatives of Modulax's values. It is up to all the surveillance in the application of the rules concerning themselves, the professional delegation, and the Ethics and Compliance Program and Code of Conduct.

Practicing surveillance is not an easy task, but when we communicate concerns related to integrity, contribute so that the values represented in each one strengthens, in addition to protecting the colleague against damages.



It is not necessary to be sure that a violation has occurred. In parallel, if it is perceived in good faith that one or more of the Ethics and Compliance Program and Code of Conduct rules have been violated or are about to be, do not hesitate to talk to your hierarchical supervisor or call the Communication Channel (Ombudsman) available at www.modulax.com.br.

An employee who, in good faith, reports his concerns regarding possible illegal or unethical practices does not, under any circumstances, incur any sanction in this regard.



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