



CODE OF CONDUCT

fontana

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CONTACT:

(51) 3751-9060 

Colonel Sobral, 415 - Nossa Senhora. Aparecida 
Encantado/RS - Brazil

THE FONTANA

Fontana S/A, headquartered at Rua Coronel Sobral, 415, in the city of Encantado/RS, is a company committed to the social and economic development of its shareholders, employees and community, assuming full responsibility with the competent bodies and the community where it operates regarding the environment and the social impacts resulting from the exercise of its activities. Furthermore, Fontana considers sustainability to be an essential element for conducting its business and the consequent development of its activities, with the commitment to operate in accordance with business strategies, developing its activities with ethics, transparency and good practices, in compliance with this Code of Conduct.

The company also aspires to good competitiveness in business in a sustainable way to maintain performance in accordance with ethical standards, including the tradition of a company that preserves its reputation, transparency and full compliance with the legislation in force in the country.

Furthermore, Fontana seeks to improve its processes in a sustainable way that guarantees a greater balance to the environment, complying with the legal parameters set forth in current environmental legislation.

OUR COMPROMISE

The company, in view of its obligations and responsibilities, seeks to keep its employees trained and qualified, and also to share with suppliers, contractors and customers regarding the company's commitments to legal, ethical and moral standards, following the rules of conduct in this code, as well as , maintain good behavior in the areas of conflicts of interest, corruption, competition law and confidentiality.

In view of these commitments, Fontana has established some basic sustainable

strategies: • Innovation projects with the main suppliers, contractors and customers to follow sustainable standards in its production; • Maintain sustainable standards in our strategies, policies, general terms and conditions of purchases; • Prioritize the development of initiatives related to resource efficiency, especially in water consumption, electricity and waste control; • Increased purchases of raw materials from suppliers committed to sustainability.

PREGNANT AND BREASTFEEDING WOMEN

The company Fontana S/A encourages and assists its pregnant employees to undergo prenatal care and advises them on the importance of this measure. Prohibits the work of pregnant and lactating women in dangerous activities. It encourages breastfeeding, providing conditions for employees to breastfeed their children until they are at least 6 months old.



CHILD OR SLAVE LABOR

Fontana S/A does not accept, either within its company or at its suppliers (including their subcontractors) and business partners, forced or slave labor, or in similar conditions, nor the use of child labor or even, any form of sexual exploitation of children or adolescents.

The company believes that all young people have the right to the opportunity of social inclusion with their first job and to develop skills for the world of work, as long as this does not prevent or interfere with their studies. In view of this, it clarifies and informs that minors, between 14 and 18 years old, may be hired for a specified period, as an apprentice, through legally accepted and recognized entities. As well as young people between 16 and 18 years old, they may be admitted as a trainee or employee, not being able to carry out activities in places and services that are dangerous, unhealthy or harmful to their morality. Fontana S/A respects and obeys the internationally recognized standards and the laws in force in the country.

PREJUDICE AND DISCRIMINATION

The company values diversity in all its relationships. Therefore, everyone must be given respectful, cordial and fair treatment by employees, third parties, administrators, suppliers and service providers or even by those who represent it. The company does not tolerate discrimination or prejudice of any nature, whether in terms of gender, race, religion, age group, sex, political conviction, nationality, marital status, sexual orientation, physical condition or any other in its relationships.

In the recruitment, selection and promotion processes, candidates must be evaluated solely for their skills and conditions to meet and adapt to the expectations of the position, decisions based on prejudice, favoritism or even privileges of any natures.

LEADERSHIP POSTURE

A subordinate's demonstration of interest in participating in an internal recruitment process must be understood by their leadership as a natural alternative for career development, and cannot give rise to any type of retaliation.

It is up to the leadership to inform, guide and prepare their teams for the correct application of the policies and rules of the organization, being an example to be followed. Eventual errors committed by employees must be pointed out by the leaders, and such events must be accompanied by the necessary information and guidelines to avoid their recurrence.

Repetition of errors resulting from carelessness, negligence or lack of interest must be rigorously corrected.

Faced with reports of possible irregularities submitted by employees, third parties, customers, suppliers, service providers, the community, commercial partners or other publics directly to the leaders, these must never be omitted. In these cases, it is the duty of the manager to follow up with the measures that are deemed appropriate, ensuring that the irregularity is analyzed and dealt with properly and that the guidelines of this Code are complied with. Everyone is expected to hear and consider new ideas, different opinions, questions and arguments that represent a way of learning and improving processes.

It is also expected behavior from leaders to clarify doubts regarding the Code, as well as to reinforce the rules and guidelines expressed in this document to employees, third parties, suppliers, service providers and commercial partners of the company.

HARASSMENT AND ABUSE OF POWER

The company Fontana S/A does not tolerate abuse of power or harassment, such as sexual, economic, moral or any other nature, nor situations that configure disrespect, intimidation, physical violence or threat in relationships, internal or external, established by the company.

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(51) 3751-9060

conduct@fontana.ind.br



EXPECTATION

Fontana emphasizes the commitment to sustainability as a main source in business strategies, which is the purpose of this Code of Conduct with our customers, suppliers, contractors, service providers and employees, considering that these are the most important partners in development from the company.

Furthermore, the company wishes a subsidiary commitment from suppliers, contractors, customers, service providers and employees, for the development of ethical and sustainable business practices, taking into account, as a priority, human rights, labor standards, the fight against corruption and the social good.

In view of these considerations, we expect our suppliers, contractors, customers, service providers and employees to be, globally or locally, in compliance with this Code, so that all of them have achieved their objectives, and that they can succeed in future challenges. In this way, all suppliers, contractors, customers, service providers and employees are expected to cooperate to improve and develop innovative solutions for a sustainable future.



CONFORMITY

Fontana expects that all suppliers, contractors, customers, service providers and employees will comply with this Code of Conduct, thus being able to jointly reduce environmental and social impacts and achieve the desired objectives and goals in the supply chain. sustainable supplies, respecting current legislation.

Also, all employees directly or indirectly involved have a duty to ensure good procedure, informing Supervisors, Management and the company's Board of any practices related to business partners that may violate this Code, where measures will be taken necessary, and the contract may even be terminated.

Fontana's commercial relationship with its suppliers and customers, who must obey the principles of ethics, transparency and good conduct in negotiations, in accordance with current legislation and the culture disseminated in the company.

HUMAN SCOPE

Fontana has a very high commitment in relation to the health, safety and life of the worker, therefore, it expects suppliers, contractors, customers and service providers to implement strict policies in this area. Suppliers, contractors and customers must follow international standards relating to ISO Standards on Occupational Health and Safety and seek to identify and correct unsafe conditions.

Suppliers, contractors and customers must provide a healthy and safe work environment in order to avoid the conditions and/or discrimination set out below: •

Child Labor - Suppliers, contractors, customers and service providers cannot use child labor as provided for in ILO Conventions 136 and 182; •

Forced Labor - Suppliers,

contractors, customers and service providers cannot force involuntary overtime work, under threat or punishment, slave labor, and servitude, mainly due to debts; • Remuneration - Suppliers, contractors, customers and service providers must apply fair remuneration policies, which at least comply with current legislation, adequate working hours and compatible with labor standards, overtime correctly paid when performed under the terms legal and the benefits determined by law; • Freedom of Association

- Suppliers, contractors, customers and service providers must respect the right of their employees with regard to freedom of association, participation, collective bargaining and any complaints to the competent bodies when legal norms are violated and without discriminating against employees' representatives with the Unions and/or CIPA. • Discrimination - Suppliers, contractors, customers and service providers and employees cannot tolerate or practice acts of discrimination based on race, color, social or ethical origin, nationality, age, religion, sex, sexual orientation, political opinion and by inability.

ECONOMIC SCOPE

Fontana determines that its suppliers, contractors and customers must carry out their economic activities under the following conditions:

- Confidentiality - Suppliers, contractors and customers will be committed to protecting all confidential information of the Fontana relating to business;

- Laws and Regulations - Suppliers, contractors and customers must operate in full compliance with international, national, state and local laws and regulations, as well as the necessary licenses;
- Trade Laws - Suppliers, contractors and customers will be required to abide by applicable trade laws and restrictions, and implement strict policies to ensure compliance with these laws;
- Competition - Suppliers, contractors and customers will have to respect the laws of free and fair competition, inside and outside the national territory, as well as implement strict policies for the maintenance of same;

- Conflict of Interests - Suppliers, contractors and customers will have the obligation to inform Fontana of any situation that may lead to a conflict of interest, related to professional, personal and/or financial advantages in any business;

- Accounting - Suppliers, contractors, customers and service providers are committed to transparent, fair and true accounting entries, without any indication of money laundering or tax fraud.

ENVIRONMENTAL SCOPE

Fontana determines that suppliers, contractors, customers, service providers and employees must carry out their activities in accordance with environmental standards, under the following conditions:

- Environment

- Fontana considers that its suppliers, contractors, customers, service providers and employees, carry out their activities in compliance with environmental laws and regulations, ensuring the protection of the health and safety of nearby communities, due to the facilities and locations of operations;
- Risk Reduction - Suppliers, contractors, customers, service providers and employees must constantly seek to reduce environmental risks and inform the

Fontana in a transparent and proactive manner, on the safety aspects of products and services;

- Resource

Efficiency - Suppliers, contractors, customers, service providers and employees are committed to following the determinations of environmental laws and regulations regarding climate and environmental protection, reducing waste, air, land and water pollution, with technologies efficient and environmentally friendly and in a sustainable manner;

- Product Management - Suppliers, contractors, customers, service providers and employees must identify the environmental risks and impacts related to their products and services, including in the development, production, distribution, use and disposal stages.

- Continuous Improvement - Suppliers, contractors, customers, service providers and employees must continuously improve their products and/or services, work methods and production processes to ensure customer acceptance and satisfaction.

Being ethical is a personal and collective responsibility, and with this Code of Conduct we express to all our audiences the standards of conduct established here, valid for all hierarchical levels of the company Fontana S/A.

The company's top management is committed, supports and reinforces the importance of everyone knowing and adopting the parameters identified in this Code of Conduct.



Maurício Ecker Fontana



Ricardo Fontana

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