



USA



Austria



Argentina



India



Brazil (Campinas)



Brazil (Itatiba)

# CODE OF ETHICS AND CONDUCT



Sealing for a safer and greener tomorrow

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# PRINCIPLES



## MISSION

Sealing for a safer and greener tomorrow.

## VISION

To be the best reference in sealing solutions in the markets we have chosen.

## VALUES

### Customer Focus

Ensure the satisfaction of our customers, always anticipating their needs.

### Integrity

To be ethical and coherent in all internal and external relations.

### Reliability

Develop a relation of trust and partnership with our customers, while being a technical reference of high performance.

### Safety

Promote a culture of safety to all of our employees and customers, in a sustainable way, while respecting the environment.

*The continued success of our business crucially depends on people with an ethical, fair and honest conduct.*

*Our **Code of Ethics and Conduct** demonstrates the actions and behaviors expected from all TEADIT employees, from all business units, at all hierarchical levels, including executives, temporary and outsourcing workers, trainees, and apprentices.*

# 1. OBSERVATION AND COMPLIANCE WITH LAWS AND REGULATIONS



## Expected Employee Conduct

Employees are expected to learn and comply with all applicable laws and regulations in the jurisdiction in which they work. Any employee with questions about their obligations under applicable laws should seek advice from their supervisor.

We conduct our activities in full compliance with all applicable laws and regulations, in the markets we operate in throughout the world and consistent with the standards of ethical conduct that reinforce our principles.

TEADIT prohibits bribery and acts of corruption and is further committed to preventing the use of its operations for money laundering or otherwise facilitating both money laundering and the financing of terrorist actions or other criminal activities.

This Code represents the commitment to acting responsibly, ethically, transparently, sustainably and with mutual respect towards employees, shareholders, customers, suppliers, government and the general community.

# 2. INFORMATION



We guarantee the confidentiality, integrity, privacy, transparency, veracity and availability of the information under our responsibility in all its essence.

## Expected Employee Conduct

- Employees must not use company information in order to achieve personal goals or to favor third parties.
- Employees must only collect and process the personal information of other employees, customers, partners and suppliers that is strictly necessary to perform their activities.
- An employee shall not transmit or disclose TEADIT confidential information or information obtained from TEADIT's suppliers and customers, including personal data and sensitive personal data that are not essential to perform their activities, without proper authorization.
- Employees must only process, disclose or make available TEADIT information, as well as information of its employees, suppliers and customers by legal, legislative requests or with the authorization of their supervisor and, when the information involves personal data, with the authorization of the data owner, in order to comply with legal obligation, contract execution, health and life protection, for defense in legal or administrative proceedings, for credit protection and when there is a legitimate interest on the part of TEADIT.
- When requested and authorized, an employee shall transmit information in a cohesive, complete and objective manner.
- All employees who maintain contact with suppliers, service providers, customers or any other external contacts shall inform them that the confidentiality requirements described herein also apply to them.

# 3. WORK ENVIRONMENT



We respect people who are part of our work environment and those who interact with us on a daily basis. We acknowledge and recognize the potential of our employees through personal and professional development opportunities, training, benefits and compensation. We invest in a pleasant and respectful work environment that is safe and where everyone is treated respectfully and without being subjected to any kind of unlawful discrimination, which are based on factors such as race/ethnicity, culture, age, religion, politics, marital status, sexual orientation, gender, place of origin and physical condition.

## PROFESSIONAL DEVELOPMENT

We invest in the professional qualification of our employees through internal training programs, total or partial refunds of courses and trainings, in addition to having a scholarship program for training and/or complementary education and language courses, based on an assessment of personal skills and the specific needs of each function. We strive to always evaluate the performance of our employees in a fair and impartial manner.

## Expected Employee Conduct

- Employees must have access to their performance evaluation, and it is up to their immediate manager to evaluate them, providing guidance and information to encourage their professional development.
- Employees should seek the necessary knowledge, skills, competencies, and attitudes that will enable them to perform their duties well within the work environment.
- Employees benefiting from the corporate education policy offered by TEADIT should devote themselves to make the most of the benefit received under the program.



## DISCRIMINATION IN THE WORKPLACE

We seek to provide a work environment free of discrimination of any kind, whether ethno-racial, cultural, age, religious, political, marital status, sexual orientation, gender, place of origin, or physical condition.

### Expected Employee Conduct

- Employees are expected to interact with other co-workers in a respectful manner and avoid making comments or jokes that might damage the image of the other, regardless of their position or role.
- In the selection and internal promotion processes, candidates and employees must be evaluated considering only their skills and competences required for the position in question.

## VIOLENCE

We do not tolerate any form of violence on the part of our employees, whether in the workplace, in activities sponsored or promoted by TEADIT or outside of office work hours.

### Expected Employee Conduct

- Employees must not physically or verbally assault a co-worker.
- Employees are not allowed to bring or carry weapons of any kind on TEADIT premises.

## FAMILY RELATIONSHIPS

We do not hire family members related by blood or marriage to work in direct reporting relationships.

### Expected Employee Conduct

- Employees should not hire a relative of another co-worker under the pretext of returning a favor or receiving a future favor from their co-worker.
- Employees must report, if applicable, any family relationship with any candidate applying for a job opening with the company.
- If employees have any extra-professional relationships within the company, whether financial, social, family, or romantic, they must report them.
- Employees shall not review or approve work that involves family members or people with whom they have a romantic relationship; nor shall they make or influence decisions that could benefit family members or people with whom they have a romantic relationship.





## BULLYING OR SEXUAL HARASSMENT

We repudiate and restrain moral and sexual harassment situations, such as: abuse of power by any employee regardless of their professional position in the company, malicious comments, attitudes that exclude or expose individuals to ridicule, threats and provocations.

### Expected Employee Conduct

- Employees must not use their position or role to obtain personal or professional favors or to harass other employees.
- Employees must treat everyone respectfully, and should not engage in behaviors that might embarrass anyone.
- The employee in a leadership position must curb situations of moral or sexual harassment among employees.

## USE OF ALCOHOL AND DRUGS

We prohibit the use of alcohol and drugs within the company premises, as they may damage the health of the employees, interfering with their professional performance, in addition to compromising the safety of this work environment.

## Expected Employee Conduct

- Employees must not carry or encourage the consumption of alcoholic beverages on TEADIT premises.
- Employees must not possess or consume illegal drugs on TEADIT premises and we also recommend that they do not do so in other places outside the company.
- Employees may smoke cigarettes only in designated areas on TEADIT premises as defined by the occupational safety department.
- Employees shall not come to work under the influence of alcohol and/or illicit drugs.

## CONFLICT OF INTERESTS

We highlight that employees must comply with their responsibilities with the Company, ensuring that any participation in other activities outside the Company does not jeopardize their good performance at TEADIT.

### Expected Employee Conduct

- Employees shall not engage in external activities that may compete with TEADIT business interests or may impair the good performance of their professional duties.
- Employees are forbidden to sell products or services on TEADIT premises, both during and outside working hours.

## EXPLOITATION OF ADULT OR CHILD LABOR

We prohibit the practice of forced adult or child labor under any circumstances, as provided for by the legislation in force, and we have no relationship with companies, whether customers, suppliers or service providers, which engage in this practice.

### Expected Employee Conduct

- It is the employees' duty to report to their supervisors any knowledge that they may have regarding the use of forced adult or child labor practices by companies and/or institutions that have any relationship with TEADIT.

## PARTISAN POLITICAL ACTIVITIES

We respect the right of our employees to participate in partisan political activities.

### Expected Employee Conduct

- Employees, if they so desire, may participate in partisan political activities outside of working hours and without involving TEADIT's name and resources.



# 4. COMPANY ASSETS



Our assets are made available for the development and evolution of our business, as well as to make viable the job performance of our employees.

## Expected Employee Conduct

- Employees shall not use TEADIT resources for personal or third-party purposes.
- Employees must properly and consciously operate support materials during the performance of their job positions.
- Employees shall not use or disclose TEADIT's intangible assets or that of other stakeholders', such as: projects, spreadsheets, procedures, etc.



# 5. SUPPLIERS



Our suppliers and service providers are essential business partners, we believe that they add value to our relationships, and we treat them with respect, in a fair and favor-free manner.

## Expected Employee Conduct

- Purchasing and procurement decisions must always be based on need, price, quality, service and supply capacity. It is not appropriate to make a purchasing decision that is motivated by personal interest; to solicit personal favors from a supplier or to pressure another employee to make a purchasing decision motivated by personal interest.
- Under no circumstances shall an employee accept or request gifts, meals, lodging, courses, conferences, benefits or financial bonuses from the supplier and service providers, except corporate gifts such as pens, diaries, calendars, paper notebooks or similar up to the amount of \$ 100.00 (one hundred dollars).
- Employees must ensure that the selection of a supplier or service provider is free from any conflicts of interest, by having no family members as key employees or owners who have direct influence on the negotiations.
- Suppliers must comply with what applies in Law 12,846/2013 (Anti-Corruption Law), according to the "Terms and Conditions" present in the Purchase orders.
- Suppliers must comply with Law 13,709/2018 (General Data Protection Law), according to the "Terms and Conditions" present in the Purchase orders.
- Employees must report to the Company's Board of Directors any evidence of foul practices between any employee and suppliers and/or service providers.

# 6. CUSTOMERS



Our customers are the very reason for our existence, and the main goal to make our mission, vision, and values come true.

## Expected Employee Conduct

- Employees must serve customers efficiently, focusing on their needs to promote a mutually continuous and productive relationship.
- It is not tolerated the practice of offering any personal advantage to buyers who act as representatives of the customer, or who may have an influence on the customer's purchasing decision, directly or indirectly.
- Employees may offer corporate promotional gifts officially distributed by the marketing department and approved by the Board, which highlight our products and market solutions.
- Tying sales cannot be carried out (sell a product under the condition that the customer buys a second unwanted product).
- The collection and processing of customers' personal data must be carried out with transparency, and restricted to what is necessary for the performance of their activities, and cannot be used or shared for any purpose other than that for which it was obtained without customers' prior consent.

# 7. COMMUNICATION



We seek to use the appropriate channels of communication with our business partners in a direct, fair, clear manner and whenever required.

## Expected Employee Conduct

- Employees may only disclose TEADIT information to anyone outside the company upon prior analysis and authorization by the Board of Directors.
- Sending commercial information to suppliers and customers must be carried out through the supply and commercial sectors respectively, as they are able and authorized to determine how and what information can be disclosed.
- Employees must redirect to the controller or human resources sectors all demands for information required by authorities and government agencies.
- Whenever information is required from an employee and is outside the usual work flow, the employee should seek help from their supervisor in order to minimize risks.
- Employees shall not disclose company information outside the professional environment without prior authorization.

# 8. SHAREHOLDERS, FINANCE AND ACCOUNTING



We constantly strive to improve our corporate governance practices, operating in a reliable and fair way in the relationships with our stakeholders, and respecting all legal provisions.

## Expected Employee Conduct

- Employees must record all financial transactions in a way that reflects the operation carried out, with zeal, diligence, honesty and technical skills, in accordance with all applicable laws, in particular the Accounting Principles and the Brazilian Accounting Standards, without prejudice to professional dignity and autonomy.
- Employees shall maintain and protect confidentiality, including in their relationship with colleagues and family members, regarding Company financial information, sales, profitability, new products or any other information that has, or could have, an impact on the performance of Company's business activities.
- Employees must fully cooperate with internal and external audits, including inspections conducted by Public Agencies, providing them with all records and controls requested, in a transparent manner, without any omissions or data manipulations.

# 9. RELATIONSHIPS WITH GOVERNMENT AUTHORITIES AND AGENCIES



We maintain relationships with government authorities, public agents and bodies to comply with the legislation in force and good corporate governance practices.

For the purposes of these definitions of conduct, a “public agent” is any person who holds a public or parastatal position, job or function, including:

- Public Servant at the Federal, State and Municipal levels, from the three branches of government (Executive, Legislative and Judiciary).

- Employees/servants of government-controlled companies (state sanitation companies, Petrobras, Eletrobras, Banco do Brasil, Caixa Econômica Federal, BNDES, Aneel, etc.).
- Anyone who works for a service provider company hired to perform a typical activity of the Public Administration sector.

This definition also includes agents of Foreign Public Administration:

- Diplomatic representations of foreign countries or state agencies and entities.
- Legal entities controlled by the government of a foreign country.
- International public organizations.
- Anyone who holds, even if temporarily or without remuneration, a public position, job or function in agencies, state entities or diplomatic representations in a foreign country.

Politically exposed persons are understood as public agents or former public agents who hold or have held, in the last five years, in Brazil or abroad, relevant public positions, jobs or functions, as well as their close collaborators, representatives or relatives up to the 2nd degree. Hiring – The hiring of anyone who is politically exposed or a supplier or service provider who has a politically exposed person in their staff must be preceded by a background check whenever TEADIT is aware of such exposure.





## Expected Employee Conduct

- Employees must maintain a good relationship with Government Authorities and Agencies as part of their duties, by being cooperative, in accordance with all applicable legislation, always considering TEADIT's best interests.
- No employee may speak on behalf of the Company, unless duly authorized as TEADIT's legal representative, and/or by power of attorney (when required) and duly authorized by the partners or the Board of Directors.
- Employees shall not hold face-to-face meetings with public agents alone. At least one more TEADIT employee must be present and it shall be recorded in the minutes of the meeting.
- Employees shall not offer any form of payment or any other personal benefit or undue advantage (money, entertainment, trips, gifts, donations, or anything of value) to an authority or public servant of the direct or indirect public administration, in any governmental sphere, or to a third person related to them (wife, husband, children, uncles, business partners, etc).



# 10. CLASS ENTITIES



We maintain relationships with all Class Entities that may directly or indirectly influence and/or affect the interests of the Company, aiming at the debate and negotiation of matters that involve our interests, in order to prevent any kind of litigation and/or future matters that may affect the interests of the Company.

## Expected Employee Conduct

- Employees may participate in class entities, whether of professional, industry or any other nature. The Company does not restrict the participation of employees and/or collaborators, always respecting their rights of coming and going, of choice and of citizenship.
- Employees who wish to enroll in any class entity as a Company representative must obtain prior authorization from TEADIT before doing so.

# 11. SOCIAL RESPONSIBILITY



We have considered and built throughout our history, a sustainable practice of social responsibility in the community, following ethical values, contributing effectively to find solutions to the challenges of sustainability.

We encourage projects and initiatives with the purpose of contributing to the economic, social, and sustainable development and growth of the communities where we are present.

To this end, we collaborate with non-profit organizations that work directly in the community, through the establishment of partnerships and/or donations. The main lines of social action are: education, disease prevention, quality of life, art, culture, and sustainable development.

## Expected Employee Conduct

- It is strongly recommended that employees participate in social action initiatives, providing them with opportunities to collaborate on projects that promote social welfare.

# 12. COMPETITORS



We respect the needs of our customers and we promote a healthy trading environment that fosters free, fair and just competition.

## Expected Employee Conduct

- Employees shall be fair and respectful towards competitors and shall not use illegal or false information of derogatory character.
- Employees should not expose or disclose Company information, as well as market information that may violate the practice of free trade.



# 13. INTERNET AND SOCIAL NETWORKS



TEADIT considers reputation and credibility as valuable assets for building a solid image and strengthening the bond of trust of the organization.

TEADIT employees are free to express their opinion and register moments of their private life on social networks, but they cannot neglect the fact that some attitudes can directly affect the brand, so some precautions are essential:

## Expected Employee Conduct

- Do not share images (photos or videos) of TEADIT, employees or customers on public social networks, or any form of communication other than Interface, without formal authorization from TEADIT's Marketing area, except in promotional cases and/or encouraged by the organization itself.
- If you notice something on the internet that is detrimental to the Company, send an e-mail to [ouvidoria@teadit.com.br](mailto:ouvidoria@teadit.com.br).
- When you post your profile as a TEADIT collaborator, you must pay attention to whether what you publish goes against the brand guidelines, because we care for others, respect the individual, without any kind of discrimination. Our brand values must be observed in each particular publication.
- It is not allowed to disclose information of internal or confidential use, as well as work routines, with special attention to personal data that must be protected.
- Do not spread, by any means, including electronic mail and internet, any messages that deal with illegal, pornographic, and discriminatory matters.
- Sign up for social media with your personal e-mail only. Your corporate e-mail must be used for business purposes only.



# 14. GENERAL DATA PROTECTION REGULATION



TEADIT is committed to privacy and works to responsibly protect its information and data, whether related to people or to business processes, with due respect for their confidentiality, integrity and availability and employing organizational, technical and administrative measures to safeguard them. TEADIT requires the same commitment from all its employees, associates, administrators, third parties, suppliers and partners.

TEADIT points out that the personal data from employees, service providers and customers are used in line with the purpose for which they were collected. Therefore, measures were implemented to safeguard TEADIT operations related to Information Security and the protection of the fundamental rights of freedom and privacy of each user.

Sensitive personal data means personal data that reveals racial or ethnic origin, political opinions, affiliation to a trade union or to a religious, philosophical or political organization; data relating to health or sexual life; genetic or biometric data, when related to a natural person and data on minors.

The processing of personal data by TEADIT and its employees may be carried out only:

- With the consent of the personal data owner;
- For compliance with a legal or regulatory obligation;
- By a research organization for study purposes;
- When necessary for the execution of a contract or of preliminary procedures related to a contract to which the data owner is a party;
- For the regular exercise of rights in judicial, administrative or arbitral proceedings;
- For the protection of the life or physical safety of the personal data owner or third parties;
- For the exclusive protection of health in a procedure performed by health professionals, health services or health/sanitary authorities;
- When necessary to meet the legitimate interests of TEADIT or third parties;
- For the protection of credit.

The records of personal data processing operations may be consulted by the personal data owner, as well as by competent public authorities for data access and retention on their behalf, safeguarding the rights of the personal data owner.

# 15. BREACH OF THE CODE OF ETHICS AND CONDUCT

The guidelines described in this Code should be carried out by each employee and we are committed to provide all necessary resources for this Code of Ethics and Conduct to be understood and complied with throughout the Company

Any employee who fails to comply with this code, or hinders and withholds information in an investigation process, may be subject to disciplinary measures, including termination of employment contract for just cause and without prior notice.

All employees must report any noncompliance or suspected noncompliance with the Code, in a discreet and confidential manner, without fear of harassment or retaliation. All information and names will be kept confidential, unless TEADIT is legally required to disclose such information to government agencies and authorities.

Breach of this code may also correspond to violation of some applicable laws. If TEADIT discovers a violation of such Laws, including the Anti-Corruption Law, Money Laundering and the LGPD, it may forward the matter to the competent authorities, which may result in fines, penalties, imprisonment, and other liabilities.



# 16. REPORTING CHANNELS



## REPORTING

Reports must occur when a person has concrete information that falls under some of the hypotheses prohibited by this Code. Confidentiality is guaranteed to all allegations sent to the Reporting Channel below:

- Report it via the appropriate channel  
[ouvidoria@teadit.com.br](mailto:ouvidoria@teadit.com.br)

## DISCRIMINATION IN THE WORKPLACE

- Human Resources Department/Sector
- Your immediate management (Supervisor, Manager, Director)
- Reporting through the e-mail [ouvidoria@teadit.com.br](mailto:ouvidoria@teadit.com.br)



# 17. SITUATIONS NOT COVERED IN THE CODE



Ethics is the set of rules and principles of the value system and moral order of an individual, a social group, or a society. That is to say, it is the set of principles that governs human social coexistence, inside and outside the company.

This Code is intended to guide our employees to make decisions and act in accordance with the good moral practices we advocate.

Human society is an infinite set of daily interactions and therefore impossible to list in its entirety, so there will be situations in everyday life that are not addressed in this document, which may generate doubt or temptation. Thus, the fact that an occurrence is not covered in this document does not mean that it is correct, nor does it mean that the Company agrees with the conduct.

When you face a situation where it may be unclear how the Code applies, you are encouraged to reflect and discuss with other coworkers, and ask yourself the following questions:

- Does the law allow me to do it this way?
- Do I feel my actions are honest and impartial?
- Could I do it and tell my family, colleagues and superiors at work without feeling bad about it?
- Will this maintain the integrity of the company, my colleagues and all others involved?

If the answer is “**NO**” to any of the above questions, we recommend that you do not do it and seek guidance from your supervisor.

*“Greatness does not consist in receiving honors, but in deserving them”*

*Aristotle, Greek Philosopher*



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