



**code** of conduct



# Summary

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## Condominery

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## About ConduMinery

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ConduMinery gathers ethical and professional values applying rules equally to all employees directly or indirectly linked to company's processes.

The purpose of this manual is to guide human behaviors, maintaining a professional stance, based on respect, transparency, freedom and commitment, minimizing problems and pursuing a fantastic working environment.

In case of non-compliance, all appropriate actions will be taken.

1 values



## 1.1 Values

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### Inovation

foremost

We have passion for a simple and incredible product.



### Prize

Who makes it

We lead by example, share the vision and the purpose.



### Responsibility

Socio-Enviromental

We are committed to the social economic development within all our decisions.



### Quality

at execution

With commitment and responsibility, we aim for results and to overcome challenges.



### Commitment

and Integrity

We deliver with focus and keep transparency with our clients.



### Evolve

and Grow

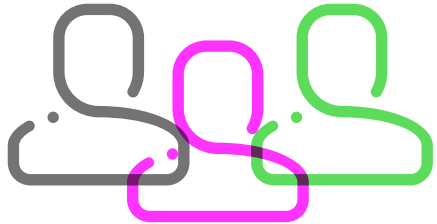
We pursue knowledge, we develop others, we are thrilled with others' success.

# 2 principles



## 2.1 Principles

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### Opportunity for all.

Minery depends on its ability to attract and retain the best professionals at all levels.

Therefore, we must ensure a work environment that values diversity and protects the right of fair and equal treatment for all employees.

We do **not tolerate** harassment and discrimination of any nature, to any employee, for any reason.



## 2.2 Principles

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### **Sustainability.**

We are committed to social and environmental responsibility, complying with best practices, laws and world's environmental guidelines.

We follow the internal standards governed by the Minery Environmental Policy.





## 2.3 Principles

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### **Competition, yes, no betrayal.**

We believe that free competition is the best way to promote a fair and healthy business environment.

With that in mind, we will not denigrate the image of any company's competitors.

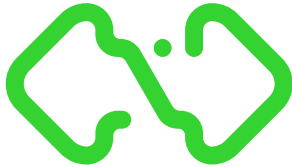
We are committed to the quality and truthfulness of all the information we provide, both internally and externally, ensuring relevant data is not omitted.

Market information is obtained through legal and ethical practices, always.



## 2.4 Principles

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### **Conflict of Interest.**

When we make decisions on behalf of Minery, we exclusively consider the interests of the company.

We will not influence or take decisions with undue benefits for us or anyone in our relationship, even though there would be no harm whatsoever to the company.



## 2.5 Principles

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### **Referrals.**

We rely on everyone's help for the growth and development of Minery, therefore:

Would you like to refer a provider with a family or friendship relationship? Talk to your director.

Would you like to refer a family member with Minery's profile? Make sure they go through the recruiting process. Keep in mind you can not have subordination relationship.



## 2.6 Principles

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### **We take information Seriously.**

We act proactively to protect Minery's digital, printed or intellectual information, as such information is an important competitive advantage.

We understand that all information created during our activities in the company is owned by Minery.

We ensure that company information is used properly by employees, suppliers, customers and partners.



## 2.7 Principles

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### **Gifts.**

We are committed to maintaining fair, ethical and mutually beneficial business relationships.

We may face situations where gifts or entertainment are offered, however, this practice should never be made to influence decisions or gain any undue advantage.

We only accept gifts and objects with no commercial value.



## 2.8 Principles

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### **Politics? Allowed?**

Minery is entirely non-partisan and each collaborator is individually free to have his own decisions and convictions.

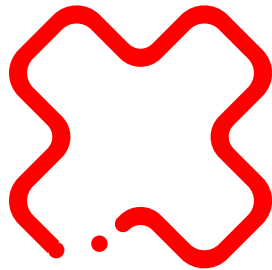
If they are involved in any political party activity, any expression or statement on behalf of Minery is expressly forbidden.

Neither Minery nor its representatives can make partisan contributions on behalf of the company.



## 2.9 Principles

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### **Corruption. Against it!**

We have zero tolerance for corruption and we believe the abuse of power for personal gain is not a fair way of doing business.

It is strictly forbidden to offer or receive any kind of gift, favor or anything of value, directly or indirectly, to influence a decision or obtain an undue advantage.

We respect and support national and international anti-corruption legislation.



## 2.10 Principles

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### **Miner Respect.**

We deal honestly and fairly with our suppliers and conduct business based on quality, service and competitive price.

In addition, we do not gain undue advantage through insider trading, abuse and unfair practices.

### **Customer Respect.**

Our clients' expectations must be considered and all agreements must be fulfilled.

We must only offer what we can deliver, respecting our customers' confidentiality and privacy.



# 5 final considerations



## Application

The Board of Executive Officers is responsible for ensuring the application of this Code and for proposing its improvement and updating to the Board of Directors, whenever necessary.

Questions about the interpretation, scope or procedures related to the Code should be addressed by the Ombudsman, who, when necessary, will direct the specific issues to the other areas of the company.



## Reporting

Whenever you witness or suspect a violation of the Code, it is your responsibility to report what happened to your manager, to the normative area of the process or to the Ombudsman's Office.

In this way, we will ensure that our company maintains the highest standards of ethics and integrity.



## Violation's Consequences

Violations of this Code, other policies, rules, procedures and guidelines of Minery subject violators to consequences, including verbal or written warnings, suspension or dismissal.

Disciplinary measures are applied considering the type of violation and its seriousness, subject to the guidelines of Minery's Board of Directors.



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## Contacts

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### Support

[marketing@minery.com.br](mailto:marketing@minery.com.br)

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### Site

[www.minery.com.br](http://www.minery.com.br)

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