

Sumidense Group's Code of Business Conduct

Preface

The companies of the Sumidense group, within the scope of guiding their relationship with collaborators, suppliers, service providers, customers, the government, politics, society and the environment, constitute a corporate instrument that sets out the necessary conduct to establish ethical behavior consistent with economic, social and environmental progress.

Sumidense's Code of Conduct is in line with good social responsibility practices and committed to fair labor practices and working conditions that are in compliance with national labor laws and the principles of international instruments, in addition to compliance with civil, criminal, tax, social security, fiscal and environment legislation and the guarantees of citizens ensured in the Constitution of the Federative Republic of Brazil and in the Constitution of the Republic of Paraguay.

Administration and Application

- It is each collaborator's responsibility to understand and comply with the policies, practices and rules of Sumidense's Code of Conduct, emphasizing that violation will result in appropriate disciplinary measures, which may even lead to contractual rescission;
- Failure by suppliers and service providers to comply with Sumidense's Code of Conduct may result in administrative sanctions or suspension of the contract, according to legal analysis, and due process is appropriate.

Principles

- Prohibit the exploitation of child labor, forced labor, moral harassment, sexual harassment and any forms of intimidation or discrimination;
- Comply with applicable laws on work hours, remuneration and freedom of association;
- Provide a safe, healthy work environment and take measures that meet regulatory standards for the prevention of accidents and occupational diseases;
- Respect personal identity, privacy and individuality;
- Recruit and retain the best human resources, contributing to professional qualification and providing quality services;
- Apply good business management practices, in line with the goals and guidelines of Sumitomo's Wiring Systems Group and the expectations of shareholders.

Collaborator relations

- Keep confidentiality regarding privileged and confidential information, whether technical or administrative;
- Use technological resources, including computers, electronic mail and internet access in a manner consistent with the Code of Conduct and Information Security Policy;
- Do not use position or rank to receive or provide special benefits or treatments, for personal gain or for others;
- Do not directly or indirectly become involved in activities that violate ethics or human dignity and that, in any way, can damage the company's image;
- Acquire, control and store productive and unproductive materials for the manufacture of products;
- Understand the Quality, Environmental, Safety and Occupational Health Policies, Internal Rules and Regulations, ensuring effective compliance.

Commercial relations

- Adopt commercial practices that do not constitute a violation of the national or international economic order, in a fair, transparent, free, complete and honest manner;
- Hinder agreements with competitors that aim to suppress free competition and manipulate the market;
- Avoid discussing or exchanging sensitive matters of the company with collaborators of competitors, even in informal meetings;
- Make independent decisions without collusion with competitors;
- Under no circumstances, make business decisions based on the promise or receiving of gifts, hospitality, donations or even in your absence;
- Enter into contracts with suppliers and service providers that comply with legal obligations to their collaborators and are committed to contractual obligations, total quality of products or services provided and social responsibility;
- Adopt initiatives to evoke environmental and social responsibility in our productive chain;
- Respect the rights of consumers, based on objective good faith;
- Develop innovative products with quality, safety, fair prices and that meet the total satisfaction of customers.

Relations with the government, politics, society and the environment

- Comply with tax obligations at the federal, state, municipal and union levels, established by labor, social security, tax and environmental legislation, among others;
- Do not offer or accept kickbacks or bribes, either directly or indirectly;
- Respect the exercise of citizenship, as long as political activities cannot be traced back to the name of the company;
- Support the Compliance and Ethics Program;
- Maintain communication channels in order to disseminate information about the company in a timely manner and receive suggestions, complaints and reports about suspicions or effective violations of the Code of Conduct, the law or the Company's Policies;
- Respect national and regional legislation, customs and culture;
- Preserve the environment, in order to minimize and/or eliminate the environmental impacts generated;
- Contribute to actions aimed at sustainable development and social responsibility.

Akifumi Urata
Managing Director
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**NON-COMPLIANCE WITH THE CODE OF BUSINESS CONDUCT OF THE SUMIDENSE GROUP
MUST BE COMMUNICATED TO THE SUMIDENSE OMBUDSMAN, THROUGH ITS CHANNELS:**
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