

# **CODE OF ETHICS AND BUSINESS CONDUCT**

GLOBAL GUIDELINES FOR  
ETHICAL CONDUCT

## MESSAGE FROM THE MANAGEMENT

ELASTOMER SOLUTIONS is a group that works to be a sustainable partner in the provision of full service support to its customers.

Together with our employees and business partners, we do our best to deliver the top products in the best way possible.

The sustainability of ELASTOMER SOLUTIONS GROUP will only be reached through the assumption of long term commitments with all its stakeholders, assuming actions that provide a consistent payback with the interests of all parties but always demanding mutual respect and ethical attitude.

Our behavior towards integrity, responsibility and ethics shall be strong.

We count on the courage and strength of all people to accomplish high levels of ethics and integrity in all our actions.

The decisions and actions that we all make as managers and employees of the group will reflect us as a person and, ultimately, as a representative of ELASTOMER SOLUTIONS GROUP. So, every employee is required to guide his behavior under the highest level of compliance with ethical business standards.

This document aims to provide guidance regarding ethical standards that ELASTOMER SOLUTIONS employees are expected to follow in their relationship within themselves, with clients, suppliers and all the remaining stakeholders, in connection with the compliance with our institutional values.



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Federico Dominguez, CEO



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Jorge Barreiros, G-CFO

January 2<sup>nd</sup>, 2020

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*Moulding the change*

\_\_\_\_\_ **OBJECTIVES AND SCOPE**

## OBJECTIVES AND SCOPE

The Code of Ethics and Business Conduct is a document that accommodates the main principles that shall regulate business conduct, actions and behaviors of all employees of ELASTOMER SOLUTIONS GROUP (below referred as ELASTOMER) in their daily interaction with Clients, Suppliers and all other Stakeholders.

It is applicable to the employees of all ELASTOMER companies, independently of the labor contract and the geographical region where they are placed. As well, it is also applicable to the Board Members and to third parties hired directly or acting in the name of ELASTOMER..

The main goals that sustain the development of this document are:

- To define common guidelines regarding professional ethic that must lead all employees and management members in their business relations;
- To promote internal principles among our partners;
- To consolidate the external image of ELASTOMER as a company leaded by integrity and respect for human rights.

The principles set out in this document do not replace any laws and regulations in force in the countries where ELASTOMER does business nor other rules that can arise from internal procedures applicable inside each ELASTOMER company.

Also, these principles are not limitative – they shall be combined with our employees sense of responsibility as they must be understood as global guidelines for business conduct.

*«I believe fundamental honesty is the keystone of business»*

Harvey S. Firestone

*«The supreme quality of a Leader is unquestionably INTEGRITY»*

Dwight D. Eisenhower

*«There are 7 things that will destroy us: Wealth without Work;  
Pleasure without Conscience; Knowledge without Character; Religion  
without Sacrifice; Politics without Principles; Science without  
Humanity; BUSINESS WITHOUT ETHICS»*

Mahatma Gandhi

*«A work relationship should be freely chosen and free from threats»*

International Labour Organization

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## RELATIONSHIP WITH STAKEHOLDERS

# Our Principles of Behavior and Ethical Conduct

## OUR PRINCIPLES OF BEHAVIOR AND ETHICAL CONDUCT

### 1. RESPECT BY THE LAW

ELASTOMER companies and their employees shall comply with the national legislation of all the countries where they are based and where they do business. This legislation includes (but is not limited to):

- Labor legislation;
- Foreign trade legislation;
- Tax and customs duty regulations;
- Human rights, non-discrimination policies.

### 2. RESPECT BY HUMAN RIGHTS AND GUARANTEE OF LABOR CONDITIONS

ELASTOMER has business relations worldwide and for that reason the group is committed to the principles of the United Nations Global compact, focusing the following principles:

#### A. RESPECT FOR HUMAN RIGHTS

Any type of disrespect for the international acknowledged Human Rights is not accepted within ELASTOMER companies.

#### B. ENSURING LABOR CONDITIONS

##### - **Freedom of Association**

Freedom of Association is supported by ELASTOMER. Employees are free to join any union, association, representation or similar without any fear of reprisal. Communication with management in regard to working conditions or labor issues is encouraged.

##### - **Elimination of any type of Slavery, forced and Compulsory Labor**

###### Forced or compulsory work

Any work or service which is exacted from any person under the menace of any penalty and which he/she has not voluntarily accepted to do is condemned and not accepted by ELASTOMER. This includes (but does not limit to) all situations of human traffic, slavery and all types of forced work. All our work relationships should be freely chosen and free from threats. Same attitude and principle is expected from all our partners.

#### Child Labor

ELASTOMER follows the national legislation and regulations of each country regarding child labor. Also, it is also in compliance with the recommendations of the International Labour Organization (ILO).

#### Wages, Benefits and Working Hours

Compensation, benefits and working hours must comply with local applicable regulations, respecting ILO conventions and industrial standards. Minimum wages, working hour's breaks and other rights must be respected. Overtime must be accomplished in accordance with legal regulations.

### **C. EQUALITY AND DIVERSITY AT WORK**

ELASTOMER provides a work environment where everyone must be treated equally, with fairness, dignity and respect. Equal opportunities shall be given to all employees and candidates in recruitment processes, considering their qualifications, skills and merit. ELASTOMER undertakes not to make any discrimination on the basis of age, gender, skin color, nationality, religion, health or disability, sexual orientation, political or ideological convictions, trade union affiliations or any other situation protected by legislation or regulations in force.

All employees have the right to work in a healthy environment, free from any type of discrimination, including not only the referred factors but also all types of hostility like sexual and moral harassment. Any type of harsh behavior<sup>1</sup> committed by a supervisor, manager or co-worker in ELASTOMER towards a colleague is strictly forbidden and punished according to the labor legislation in force regarding this matter.

## **3. INTEGRITY IN RELATIONS**

### **A. RELATIONSHIP BETWEEN EMPLOYEES AND EXTERNAL PEOPLE / INSTITUTIONS**

ELASTOMER establishes its relationship with other organizations or individuals upon strong ethical principles. It is expected from all employees an irreproachable ethical behavior promoting mutual trust, in order to correspond to our clients' expectations and to our commitment with quality of our products and services. Our employees shall:

- Respect internal rules and procedures;
- Be able to learn, correct and be corrected;
- Regulate its conduct by integrity and honesty;

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<sup>1</sup>E.g.: Unwanted sexual proposals, requests with sexual nature and behavior situations whether visual, verbal or physical of sexual nature that have an inappropriate impact in work development of an employee or that may cause an intimidating, hostile or offensive work environment; pressure to do not demand their rights, systematically induce a colleague to errors; criticize the work unfairly.



- Apply among each other courtesy and good manners in order to keep up a positive work environment;
- Give response to our partners in a timely manner and with high standards of professionalism;
- Maintain and promote ELASTOMER good reputation.

#### **B. CONFLICT OF INTERESTS**

A conflict of interests happens when the particular interest of the employee interferes by any mean in the interest of the company. Employees shall not intervene in decision processes that involve (directly or not) organizations or people with whom they have been connected or are still connected in the present by any reason that is not related to his/her work at ELASTOMER. In the case where employees are not able to abstain of taking a position in the decision process, the hierarchical supervisor must be informed in advance.

Employees must refrain their participation in companies whose purpose may collide with ELASTOMER activities.

#### **C. CONFIDENTIALITY AND PROTECTION OF INFORMATION**

All employees and board members are obliged to maintain the confidentiality of the information to which they have access when performing their functions in ELASTOMER.

No employee can reveal to third-parties or use at his/her own individual interest any confidential information related with the company. The referred confidential information includes (but not limits): knowledge or information about ELASTOMER commercial agreements and projects, legal issues and contingencies, products, production methods, formulas, investigation and development processes and products, loans or engineering.

The confidential information belongs exclusively to the group and cannot be used in an inappropriate manner by anyone. The reserve of information shall also be considered even after the termination of the work bound between the employee and ELASTOMER.

This is also applicable to confidential information of our clients and suppliers. ELASTOMER preserves the confidentiality of the information of our partners with the same discipline and care as its own.

Any infringement of this rule may result in legal action under the applicable provisions in employment, civil and penal law.

**D. PROTECTION OF GROUP ASSETS**

ELASTOMER provides to all employees the necessary equipment to the performance of the function.

All work instruments (financial, electronic, IT equipments...) are ELASTOMER's property and are destined to professional purposes even when the use for personal reasons is allowed. Personal use, when allowed, must be done with reasonability and responsibility.

All employees are expected to preserve and promote the good maintenance of all equipments.

**E. PRIVACY AND PROTECTION OF PERSONAL DATA**

The security and respect for privacy regarding personal data is very important for us. This is extensive to information regarding employees, clients, suppliers, other partner companies and general population.

In order to keep privacy, all personal data that are gathered cannot be communicated or used in a way that may damage the privacy and trust of the owners.

Rules regarding data protection of each country shall be applied regarding this matter.

**4. TRANSPARENCY AND COMPETITIVENESS****A. ANTI-CORRUPTION LAWS**

ELASTOMER is strongly against to the collection by any of its employees of any kind of benefit or advantage to the company, to themselves or to third-parties through unethical ways or through practices that do not respect the duties of the job, specifically corruption practices, improper receipts or influence peddling.

Only offers that can be considered as socially adequate, according to local practices and that fully respect the legal rules of each country can be accepted.

A similar commitment is demanded from our business partners.

**B. COMPETITION PRACTICES**

ELASTOMER respects the legal rules and market criteria, promoting a loyal and healthy competition.

When in contact with competitors, ELASTOMER employees must not give or receive information or do any type of agreement regarding prices, sales conditions, production capacity, market quotas or any type of business condition, unless authorized by board members. In the same line, our employees shall not participate in any type of informal meetings with the competition.

**C. RELATION WITH SUPPLIERS**

ELASTOMER selects the suppliers and service providers having in mind clear criteria namely quality, need, performance, cost and the fulfillment of conduct rules that are not conflicting with the present document. It is responsibility of each employee to promote ELASTOMER's best interests within legal limits, looking for the best opportunities and business conditions through a transparent and fair corporate practice. It will not be tolerated any type of abuse or bribery, corruption or money laundering.

The principles of this document are also applicable to our suppliers.

**D. RELATION WITH PUBLIC AUTHORITIES AND INSTITUTIONS**

ELASTOMER has a cooperative attitude towards public authorities and local communities, driven by an independent position without prejudice of the professional relationship that may exist.

Any type of payments or services to political parties, elected officials or candidates for office is completely forbidden.

National and international legislation in force is applicable in the different geographies where ELASTOMER acts. All information that may be required by public authorities, in line with the legislation principles in force will be submitted in a rigorous and transparent way.

**5. SOCIAL RESPONSIBILITY AND RESPECT FOR COMMUNITY****A. ENVIRONMENTAL PROTECTION**

The environmental protection must be a concern for all, at ELASTOMER. ELASTOMER encourages the responsible use of natural resources and the preservation of the environment, by promoting an efficient management of resources that shall minimize the environmental impacts of the internal activities. This comprises not only the commercial activities, but also the operations, the supplied products and the interaction with local interested parts.

Legal requirements must be accomplished wherein the company acts, in order to provide environmental sustainability. Also, management system focused on the environment matter must be present in order to ensure the satisfaction of all stakeholders and pollution prevention.

**B. HEALTH AND SAFETY AT WORK**

A health and safe work environment is provided to all employees. ELASTOMER fulfills with all rules regarding this subject in all geographical regions where the group operates, through the implementation of preventive measures and the provision of equipment to safeguard the interests of all employees. Organization must provide all necessary protection to employees in the scope of periodical risk assessments.

In turn, all ELASTOMER employees are requested to strictly follow all the security rules that are in force. The disrespect of any of the internal instruction may have serious consequences for the employee, for the company and also for the direct co-workers. Security must be considered as a priority for each one of us.

\_\_\_\_\_ **REPORTING INFRINGEMENTS TO THE  
CODE OF ETHICS AND BUSINESS  
CONDUCT**

## REPORTING INFRINGEMENTS TO THE CODE OF ETHICS AND BUSINESS CONDUCT

All employees are required to fulfill with the principles of this document.

**In case of acknowledging one or more infringements to the principles defined in this code, any employee may bring the subject to the attention of his/her superior or to the HR Manager of the plant in a verbal or written form.**

The confidentiality of the identity of the person that makes the report is guaranteed.

No employee may be discriminated or punished for having reported in good faith infractions to this Code.

On the other hand, the wrongful use of this procedure exposes this person to disciplinary action.

Depending on the relevance and nature of the facts, additional internal investigations may be launched. Considering the result of these investigations, an internal or external audit procedure may be implemented, depending on the seriousness of the facts.

The implicated person must be informed about the procedures concerning him/her.

Any infringement of the present Code may be sanctioned by ELASTOMER using several measures such as written warning issued to the employee, dismissal or criminal penalties, depending on the seriousness of the events as well as the regulations and legislation applicable to the concrete situation.

All employees are encouraged to contact their direct supervisors or Human Capital Management in order to obtain more detailed information about the Code of Ethics and Business Conduct.

### DISCLOSURE

This document is published at ELASTOMER website - <http://elastomer-solutions.com/> - as well as in our corporate Intranet. It is also disclosed internally through other communication means.

Each new employee from ELASTOMER must sign a declaration certifying that took knowledge of the Code and assuming his/her individual commitment to the respect and fulfillment of the principles presented in this document.

Any doubt related to the interpretation of the document shall be addressed to Human Capital area.

This document revokes and replaces the previous Code of Conduct.



## **Code of Ethics and Business Conduct**

Elastomer Solutions Group

Approved by: F. Dominguez – CEO; J. Barreiros – G-CFO;

<http://elastomer-solutions.com>