

# CONDUCT MANUAL

TRAMONTINA

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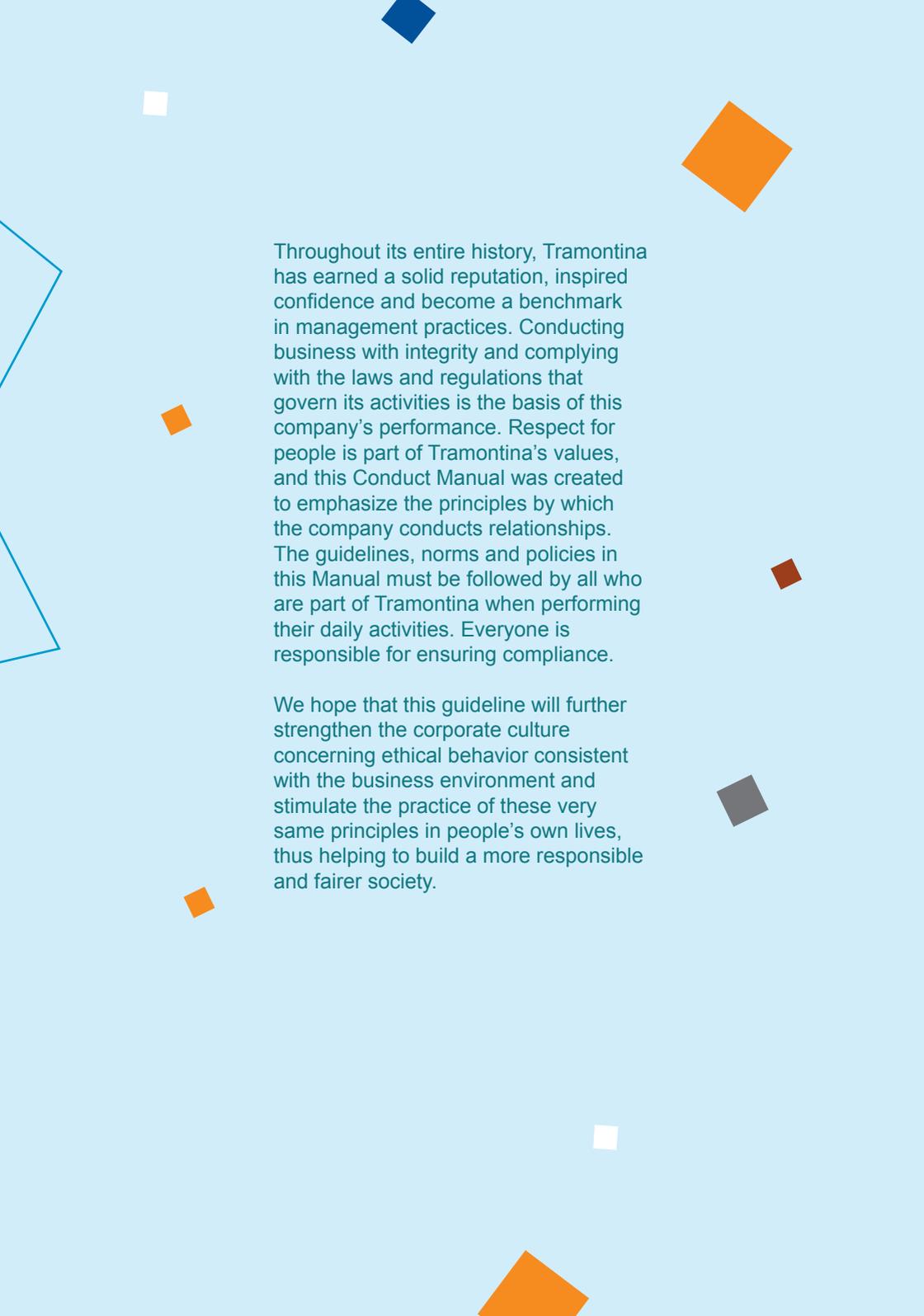
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Tramontina Conduct Manual  
Administration Center of Tramontina  
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Throughout its entire history, Tramontina has earned a solid reputation, inspired confidence and become a benchmark in management practices. Conducting business with integrity and complying with the laws and regulations that govern its activities is the basis of this company's performance. Respect for people is part of Tramontina's values, and this Conduct Manual was created to emphasize the principles by which the company conducts relationships. The guidelines, norms and policies in this Manual must be followed by all who are part of Tramontina when performing their daily activities. Everyone is responsible for ensuring compliance.

We hope that this guideline will further strengthen the corporate culture concerning ethical behavior consistent with the business environment and stimulate the practice of these very same principles in people's own lives, thus helping to build a more responsible and fairer society.

**TRAMONTINA'S PHILOSOPHY IS SUMMARIZED IN THE MISSION, VISION AND CORPORATE VALUES WHICH ARE FUNDAMENTAL FOR THE COMPANY'S SUSTAINABILITY.**

## **ESSENCE**

### **MISSION**

Do things well to inspire people's daily lives and stimulate meaningful experiences, generating value and satisfaction for clients, consumers, employees, stakeholders and communities.

### **VISION**

Be the Brazilian industry leader in customer satisfaction for delivering the best everyday solutions. Remain a brand that is a reference of quality, innovation, ethical relationships and human values.



## VALUES

### **CUSTOMER SATISFACTION**

A high quality level to ensure customer satisfaction and permanence in the market.

### **TRANSPARENCY**

Ethics, clear purposes, wholesome relationships and dialog with all partners.



### **WORK**

Focus, discipline and results.

### **LEADERSHIP**

Qualified professionals, high technology and low costs to compete in the markets in which it is active.

### **VALUING PEOPLE**

Employees work for Tramontina because Tramontina works for its employees.



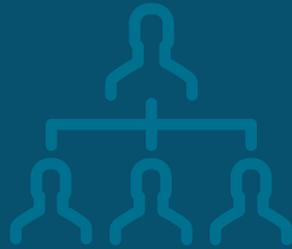
### **DEDICATION**

Dedicated and passionate about everything it does.

# FOR WHOM DOES THE CONDUCT MANUAL APPLY?



**SHAREHOLDERS**



**DIRECTORS**



**EMPLOYEES**



**TEMPORARY  
STAFF**



## TRAINEES



## APPRENTICES



## SUPPLIERS\*

(\*) Tramontina understands that suppliers and service providers have autonomy to determine their own rules as long as they are compatible with and fully comply with the Tramontina Conduct Manual.

# WORKPLACE ENVIRONMENT

Tramontina's commitment is to maintain a respectful, fair, safe, productive and inclusive working environment for all employees. Leaders should set the example in their teams and foster the progress of these practices. The organization aims at being transparent in its actions by communicating each and every relevant fact to its internal public, which will, in its turn, minimize hearsay and speculation and enhance relationships and trust.

## BENEFITS

Tramontina is always concerned with quality of life. Therefore, it provides its employees with benefits in the areas of health, education, culture and leisure.

## RECRUITMENT AND SELECTION

The structure for recruitment, selection and internal promotion of candidates will be defined according to the needs of the company. Candidates will always be selected according to principles of justice and equality, and taking into consideration the candidates' profile, their qualifications and the competencies required for the function.

## **PEOPLE'S IMAGE**

Employees and third parties' images should be preserved. The use of a person's image for commercial purposes must be formally authorized prior to its release. Authorized images must be authentic, professional, respectful and free of prejudice.

## **DIVERSITY AND DISCRIMINATION**

Tramontina respects diversity. Any kind of discrimination or prejudice concerning religion, culture, nationality, race, age, gender, sexual orientation, marital status, political party status, and physical and intellectual conditions will not be tolerated.

## **PERSONAL RELATIONSHIPS**

Tramontina is not opposed to personal relationships or kinship between employees as long as there are no conflicts of interest with respect to the Tramontina Conduct Manual and the company's policies. Private and intimate issues should not interfere with the work routine, be it public displays of affection or arguments.

## **EXPLOITATION OF LABOR**

Tramontina respects the Universal Declaration of Human Rights. Tramontina does not practice forced and/or child labor and does not maintain relations with companies and people who do this.

## **HEALTH AND SAFETY AT THE WORKPLACE**

Tramontina regularly promotes endeavors to minimize and eliminate possible health and safety related risks and offers training events so that everyone understands and complies with the adopted policies and procedures. Emergency situations must be conducted responsibly and immediately reported to managers. No behavior that endangers people's health and safety will be permitted. Everyone is ensured the right of refusal to work and may stop any task until corrective measures are taken should there be any serious or imminent risk (at the point of happening) to people's lives or their physical integrity. Adopting safe behavior and complying with safety standards and procedures is everybody's duty.

## **UNIFORMS**

Tramontina fosters the use of uniforms as a common practice for activities in the production departments, administrative departments and sale outlets. Employees are responsible for taking care of and maintaining their uniforms. Those who are exempt from wearing uniforms are expected to dress appropriately in business attire and avoid extremes that are inconsistent with professionalism. The use of common sense is always the best option.

## **VIOLENCE**

Tramontina does not tolerate any manifestations of violence, be it physical, verbal or otherwise, in both work and leisure environments.

## **MORAL OR SEXUAL HARASSMENT**

Tramontina does not tolerate any type of harassment or conduct that may have an impact on people's performance, affect dignity or create an intimidating, hostile or offensive work environment. Likewise, inappropriate attitudes such as verbal, gestural or physical sexual proposals or insinuations, as well as sexual harassment, are also prohibited and considered to be inappropriate behavior.

## **LICIT AND ILLICIT DRUGS**

It is prohibited to remain on the premises of Tramontina or to perform any activity related to the company under the influence of alcohol or the effect of any type of illicit drug. The consumption of alcoholic beverages is restricted to social events, provided that it is moderate and does not influence any behavior that may violate the company's guidelines and the Conduct Manual. Smoking is prohibited in all Tramontina's premises.

## **CARRYING OF A WEAPON**

It is utterly prohibited to carry or possess weapons in Tramontina's premises or in activities related to the company.

# TRAMONTINA'S UNITS

## ACCESS

- Only authorized persons can have access to the company's premises.
- Identification badges are for personal and non-transferable use only.

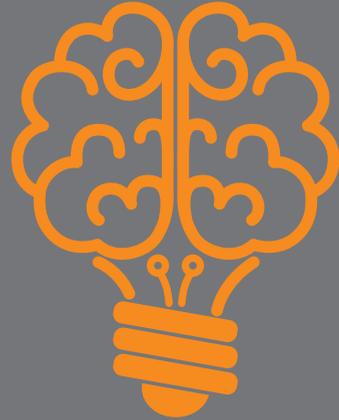


## PROTECTION OF ASSETS AND PHYSICAL RESOURCES

Tramontina takes care of the quality and permanent maintenance of its assets. Facilities, equipment, machinery, furniture, vehicles, money, among other assets, are exclusively for the operational use of the company and cannot be used for personal use or for the benefit of other people and / or organizations. Everyone engaged with the company is responsible for ensuring the good use and conservation of assets, as well as making sure resources are used efficiently and materials are not wasted.

## INTELLECTUAL PROPERTY

Intellectual Property includes a variety of assets: trademarks, industrial designs, domain names, copyrights, innovations, inventions, processes, products, projects, prototypes and ideas, as well as financial, commercial, market information or any other non-material activity developed or contracted by Tramontina. All property rights related to the intellectual property created directly or indirectly by Tramontina's employees, temporary staff, trainees and apprentices, even if their functions are not related to the research or invention development, are with no onus and exclusively owned by Tramontina, and this information may be used in full or in part, with or without modifications, and Tramontina may also apply for a patent to the relevant authorities both in Brazil and abroad.



## MEANS OF COMMUNICATION AND THE INTERNET

Access to landline and cell phones, the Internet, as well as the use of e-mails, software, hardware, any electronic equipment and other assets from Tramontina should be restricted to professional activities, complying with the guidelines established in the Regulation for Use of the Internet, Intranet and Electronic Mail. All data produced and stored in the electronic equipment and information systems belong exclusively to Tramontina. Employees, temporary staff, trainees and apprentices should be aware that the company has access to internet records, e-mails and information stored on computers as well as the use of landline and cell phones.

# INFORMATION, COMMUNICATION AND SOCIAL INTERACTIONS

In order to ensure competitiveness and to secure information, Tramontina recommends:

## WHEN DEALING WITH THE MEDIA



The relationship with the media occurs through Corporate Marketing, which defines the strategies, actions and initiatives, and can be publicized on the TV, in newspapers, magazines, websites, blogs, radios, among other means. This relationship is frank and has no interest other than disclosing information to journalists and providing information related to institutional demands, advertisements, product campaigns and innovations, services, practices or processes of the organization.

## IN PUBLIC PLACES

When discussing business issues one should always be neutral and discrete. The use of electronic equipment, when necessary, should be with great care in order to prevent theft and exposure of strategic company information.



## ON TRAMONTINA'S PREMISES

- Be careful when handling confidential documents and e-mails and do not leave them exposed; make sure they reach the recipient without deviations.
- Passwords and access codes to internal systems are individual and non-transferable. Sharing such information is not allowed and users are fully responsible for keeping such information safe.
- The media resources and other devices such as, cell phones, pendrives, CDs, notebooks and printers provided to perform business activities should be taken good care of.
- Installing media resources and using one's own and/or unauthorized devices to store, move or send work-related information is not permitted.
- Filming or taking photographs of the facilities, products or processes without prior authorization is not allowed.



 Username

 \* \* \* \* \*



## SOCIAL MEDIA PLATFORMS

Tramontina expects employees, temporary staff, trainees and apprentices to have an appropriate attitude towards existing social networks as well as communication and interaction technologies, by using them safely, ethically and complying with the law. Publicizing and disseminating images, comments, privileged and classified information related to Tramontina is not permitted. Employees who make improper use of these resources will be in breach of their employment contract.



## ACADEMIC PAPERS AND TRAINEE ARTICLES

Employees, temporary staff, trainees and apprentices must request authorization from the Human Resources department before using any information so that together they can define what can be disclosed without breaking confidentiality or impairing the company's image.



# RESPONSIBILITY WHEN CONDUCTING BUSINESS

## PRACTICES AGAINST ILLICITNESS, BRIBERY AND CORRUPTION

Tramontina rigorously observes and fulfills all current legislation and regulations which combat practices of illicitness, bribery and corruption. The company (either directly or indirectly) will not receive, offer, donate, pay, promise or authorize payments in cash or any other financial means which create conflict of interests, illegal conduct and corruption under the Brazilian law or any other country. Tramontina will also not agree to give or receive benefits from anybody from public or private entities, and will not endorse any kind of illicit advantage to its own business or to third parties. Likewise, Tramontina will not hire employees and will not maintain relations with professionals, be them individuals or corporations, involved in criminal activities, corruption, money laundering, drug trafficking and terrorism.



## **COURTESY GIFTS AND PRESENTS**

Special attention should be paid when receiving (free) gifts and presents as accepting personal benefits is unethical and discredits both Tramontina and its employees. Employees should be impartial when accepting gifts and this practice must not interfere in the relations and decision-making of the company with its customers and suppliers. It is crucial to use common sense whenever accepting a courtesy gift or a present'. Tramontina employees are prohibited from receiving cash gifts of any amount which might be offered by suppliers, third parties and service providers.



## **WITH GOVERNMENT AGENCIES AND OFFICIALS**

Tramontina complies with the current legislation in Brazil and in the countries where it operates, supporting open and constructive dialogue and promoting improvements in governmental spheres. When present in inspections and audits of any nature, the employees assigned to accompany the task are directed to cooperate with government officials. The attention given to this topic is also demonstrated by a strong ethical stance, preventing the granting of any advantage or privilege.

## **WITH UNIONS**

Tramontina respects free association, recognizes trade unions as legal representatives of employees and is always open to discuss issues related to labor or trade unions.

## **WITH CONSUMERS**

Tramontina's investments and the work performed by its teams is dedicated to creating and producing high quality products that generate value and satisfaction for customers and consumers. Tramontina hopes that the quality of relationships will be preserved by maintaining business relations based on integrity, honesty and mutual respect. The company spares no effort in complying with all consumer rights provided by law, seeking to exceed the expectations of those who get in contact with our brand.

## WITH MATERIAL AND SERVICE SUPPLIERS

The selection of suppliers should be made carefully and have the best cost / benefit ratio in mind. Any and all negotiations must take place through discussions based on trust and transparency and must comply with the principles with which Tramontina operates.

## WITH COMPETITORS

Fair competition makes free market development possible while creating social benefits. Tramontina strives to make its own business decisions, based on the principles of loyalty and fair market relations. It is vitally important that companies and employees adhere to all rules and comply with the legislation.



## ENGAGEMENT WITH THE COMMUNITY

### POLITICAL ACTIVITY

Choosing a political party is one's own decision and Tramontina recognizes that every citizen has the right to run for political office as long as this takes place in the personal sphere. The company gives itself the right to maintain a neutral position and encourages the same impartiality among employees in the work environment. This means that the working hours, as well as company resources, the name, the brand or any other property owned by Tramontina must not be used for this purpose.



## RESPONSIBILITY TO SOCIETY

Tramontina's commitment to society goes far beyond creating jobs and income. The company values the social and cultural development of the communities where it operates and is always attentive to any impact that may be produced by its operations. The company invests in developing and improving citizens' quality of life on a permanent basis by promoting events in schools, kindergartens, NGOs and vocational training centers, as well as providing financial support for social projects. Tramontina also promotes the planting of trees, urban planning, maintenance of squares and construction of more structured roads, thus demonstrating its concern for the well-being of the population. It is because we believe in the transforming and multiplying potential of initiatives that Tramontina encourages its employees to engage in voluntary activities of social responsibility and help to others.

## ENVIRONMENTAL RESPONSIBILITY

Socioenvironmental responsibility is one of main principles which have helped build this company. With Tramontina's Environmental Management Program, each step the company takes helps to consolidate a positive culture that is disseminated among employees and communities. Tramontina has an Environmental Committee which is composed of representatives of all the manufacturing units and was created with the aim of aligning positions, embracing experiences throughout all the units.



# CONDUCT MANUAL MANAGEMENT



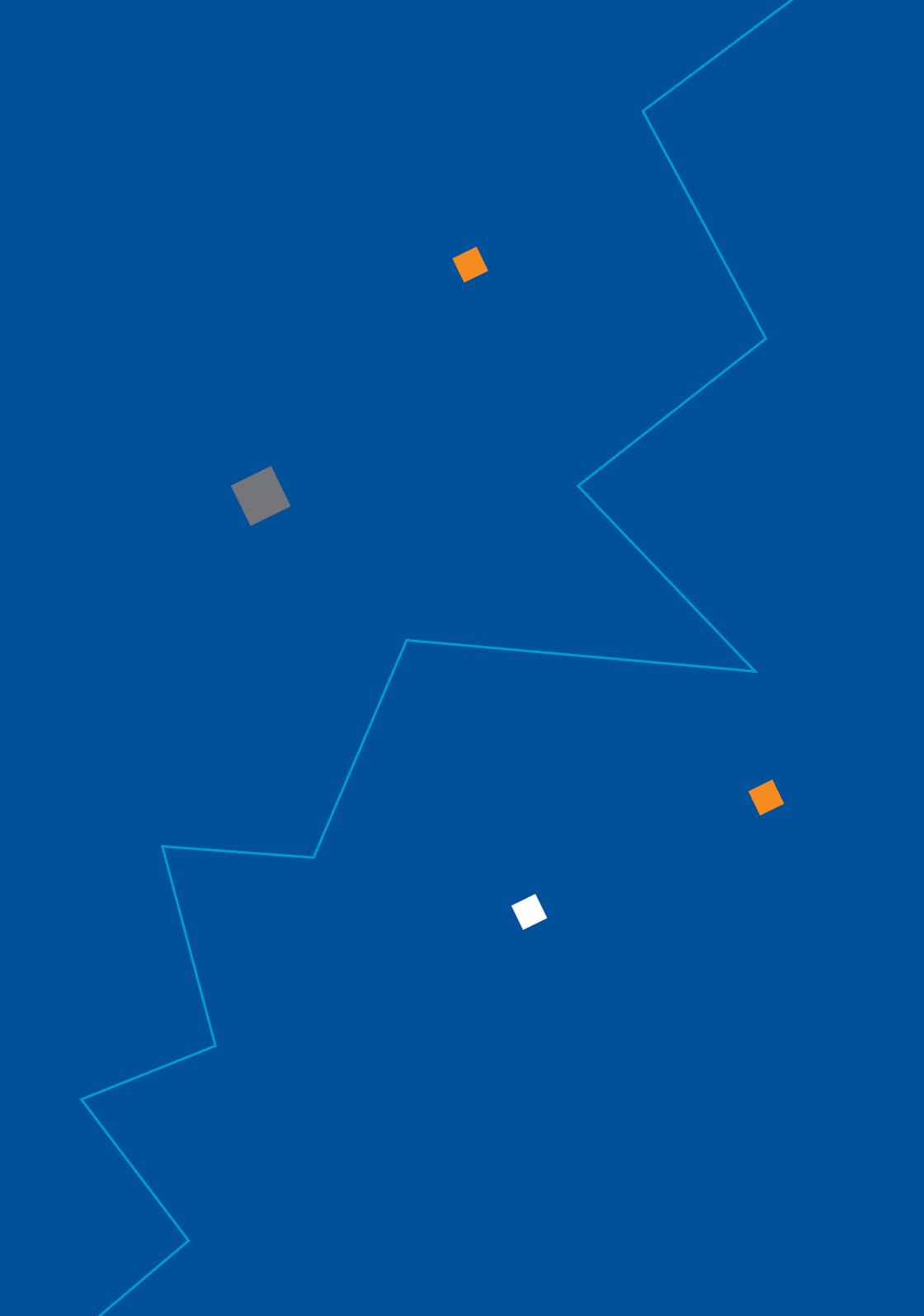
Leaders have the responsibility of ensuring the information in this Conduct Manual is understood and to manage any noncompliance, taking into account the principles and values of this organization.

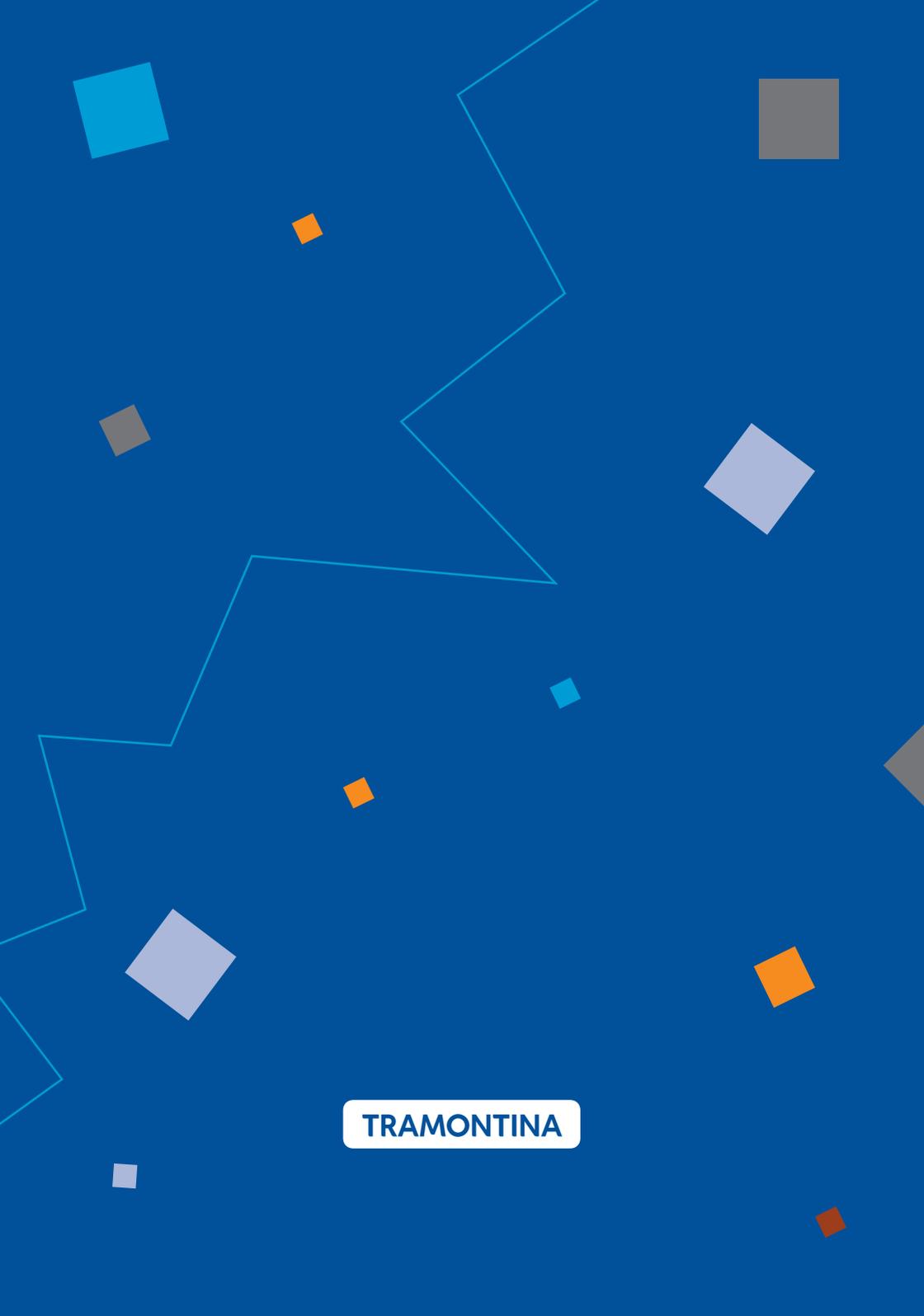


Any case of noncompliance with the guidelines described in this Manual should be reported to the Human Resources Department to be appropriately addressed. Conduct deviations may result in educational or corrective actions, in a warning or even in employment termination, depending on the severity of the situation. Decisions will be taken by the Human Resources department, which will ensure an ethical approach and privacy of information, thus preserving people's identity.



Each and every one of us is responsible for supporting Tramontina's principles. We have published the Conduct Manual to reiterate our commitment to preserving this responsibility and also to provide guidelines to all those involved. As we move forward, our conduct will help ensure that Tramontina Values continue to be present in all areas of activity.



The image features a solid blue background with several abstract geometric elements. There are several squares in various colors: a large cyan square in the top left, a medium brown square in the top right, a small orange square in the upper middle, a medium brown square on the left side, a large light blue square on the right side, a small cyan square in the middle right, a small orange square in the lower middle, a large light blue square in the bottom left, a small orange square in the bottom right, and a small light blue square in the bottom left. Additionally, there are several thin, light blue lines forming irregular, jagged shapes across the page.

TRAMONTINA