

# CODE OF ETHICAL CONDUCT

**ST-DC-104.020-R00**

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**Sistema Integrado de Gestão da Qualidade, Ambiente e Segurança**  
*Quality, health, safety and environment integrated system*

## REVISION INDEX

Revision	Date	Elaborated by	Approved by
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Revision	Description
00	Translation from PT

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## 1. Purpose

The present code of ethics comprises the guidelines directed to all members of STRESSTEC, including directors, employees and stakeholders, service providers and associates, constituting the individual and collective commitment in all actions the production chain. Every company employee has a formal knowledge about this code of ethics, which is available electronically as well as physically. The non-compliance with principles and explicit commitments can imply the adoption of disciplinary measures according to the guidelines of companies that compose STRESSTEC system. The complaint channel, responsible for processing ethical transgressions, preserves the anonymity of the complainant to avoid retaliations against his/her. The adopted measures to mitigate the situation, will be shared with the complainant.

This document is submitted to an integrated system of QHSE; therefore, it is controlled like other documents.

## 2. STRESSTEC ethical principles

### I

Respect for life, the environment, and all human beings; the integrity, truth, honesty, justice, equity, institutional loyalty, responsibility, zeal, merit, transparency, legality, impersonality, and coherence between the speech and practice are the ethical principles that guide the actions of STRESSTEC system.

### II

Respect for life in all forms, manifestations and, situations are the fundamental ethical principles that guide the concern with life, health, environment, and safety in the STRESSTEC system.

### III

Honesty, integrity, justice, fairness, truth, and consistency between speech and practice are the principles that guide STRESSTEC's relationships with people and institutions, and are manifested through respect for diversities and differences in relation to ethnic, religious, social, cultural, linguistic, political, aesthetic, age, physical, mental and psychological conditions, gender, sexual orientation, and others.

### IV

The loyalty to the STRESSTEC System is manifested through responsibility, diligence, and discipline in work and in relations with all human beings, as well as with material and immaterial assets of the system, in fulfilling its mission, vision, and values, in conducts that are compatible with the implementation of its strategy, while maintaining an entrepreneurial spirit and committed to overcoming challenges.

### V

Transparency is manifested through respect for the public interest and stakeholders and is performed respecting the rights of personal privacy and the confidentiality agreement.

### VI

Merit is the decisive criterion for all forms of recognition, reward, evaluation, and investment in people. Therefore, favoritism and nepotism in senior management are unacceptable according to STRESSTEC system.

### VII

Legality and impersonality are constitutional principles that preserve the legal order and determine the distinction between personal and professional interests in the conduct of all STRESSTEC employees.

## VIII

The STRESSTEC system is committed to respect and value people in their diversity and dignity, fair working relationships, and a healthy environment, with mutual trust, cooperation, and solidarity.

## IX

The STRESSTEC system conducts its business activities by recognizing and valuing the interests and rights of all stakeholders.

## X

The STRESSTEC system proactively strives for increasing levels of competitiveness, excellence and profitability, with social, and environmental responsibility, contributing to the sustainable development of Brazil and the countries where it operates.

## XI

The STRESSTEC system strives for excellence in quality, safety, environment, health, and human resources. For this purpose, STRESSTEC promotes the education, training, and commitment of its employees, involving stakeholders.

## XII

The STRESSTEC system recognizes and respects legal, social, and cultural particularities, consistently adopting the criterion of maximum realization of rights and compliance with the law, guidelines, and internal procedures.

## 3. Commitments of conduct in relation to

### 3.1 Executive board exercise

The executive board of STRESSTEC is committed to:

- Conduct its business with transparency and integrity, cultivating credibility with its employees, suppliers, customers, consumers, government, media, communities where it operates, and society in general, seeking to achieve growth and profitability with social and environmental responsibility;
- Encourage all stakeholders, internal and external, to disseminate the ethical principles and commitments of conduct expressed in this code of ethics;
- Maintain a relationship with its competitors based on the principles of honesty and respect;
- Promote honest and fair negotiations, without gaining undue advantages through manipulation, neither use of privileged information nor other similar methods;
- Ensure transparent, truthful, and correct communication that is easily understandable and accessible to all stakeholders and advertisement based on the principles established in this code of ethics;
- Maintain channels for receiving, forwarding, and processing opinions, suggestions, complaints, criticisms, and reports on ethical transgressions from the various stakeholders of the system, respecting the laws of the places where it operates;
- Comply and promote compliance with this code of ethics through management and monitoring measures, by permanently disseminating it, being available to clarify doubts and receive suggestions, and subjecting this code and its practices to periodic evaluations.

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## 3.2 Relationship with employees

STRESSTEC system is committed to:

- Promote working conditions that foster balance between the professional, personal, and family life of employees;
- Ensure safety and health at work, providing every necessary condition and equipment for it;
- Provide channels to welcome and process their suggestions, aiming at improvements in internal management processes;
- Ensure the availability and transparency of information that affects its employees, preserving their privacy rights when handling medical, functional, and personal information relevant to them;
- Recognize the right of free association of its employees, respect and value their participation in unions and not practice any kind of discrimination against its unionized employees;
- Seek to achieve a permanent reconciliation of interests and the realization of rights when dealing with representative union entities of employees;
- Ensure the right of refusal of its employees, accepting the suspension of their activities in case there is a possibility of serious and imminent risk to their own life and physical integrity and/or their colleagues, after having taken corrective measures and immediately communicated the fact to their hierarchical superior;
- Respect and promote diversity and combat all forms of prejudice and discrimination through a transparent policy of hiring, training, career development, promotion, and dismissal. No employee or potential employee will be subjected to discriminatory treatment based on their race, skin color, ethnic origin, nationality, social position, age, religion, gender, sexual orientation, personal appearance, physical, mental or

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psychological condition, marital status, opinion, political conviction or any other individual differentiation factor;

- Promote equal opportunities for all employees, in all policies, practices, and procedures, using individual merit based on performance assessment as the exclusive criterion for career development and guarantee their right to know the requisites for evaluation and career progression;
- Develop a corporate culture that values the exchange and dissemination of knowledge, promotes continuous training for its employees, and avoids dismissals whenever possible by seeking alternative options for technical and scientific retraining and repositioning in an area that is more appropriate to the situation at any hierarchical level;
- Provide institutional guarantees and protect the confidentiality of all those involved in ethical complaints, aiming to preserve rights and protect the neutrality of decisions;
- Prepare its employees for retirement as a way to invest in the continuation of their quality of life, developing systematic activities of guidance and counseling, involving family members in discussions of psychological and financial planning aspects and promoting internal dissemination of knowledge to preserve the reminiscence of the system.

### **3.3 Commitment with employees**

STRESSTEC employees are committed to:

- Fulfill their job duties with the utmost effort, technical quality, and assiduity as stipulated in their employment contract, taking advantage of opportunities for training, evaluating themselves systematically, and learning from their own mistakes or those of others;
- Act with honesty, fairness, dignity, courtesy, availability, and attention to all people they relate to, internally and externally, respecting any

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individual differences;

- Properly use the channels to express opinions, suggestions, complaints, criticism, and reports, engaging in the continuous improvement of the system proceedings and procedures;
- Respect professional confidentiality, except when authorized or required by law, preserve the interests of the company whenever they manifest themselves, in public or private environments, and ensure that everyone does the same;
- Maintain confidentiality of strategic information and information about acts or relevant facts not yet disclosed to the market, to which they have access, as well as ensure that others also do so, except when authorized or required by law;
- Ensure the proper use of STRESSTEC system material and immaterial assets, serving their legitimate purpose, including preserving the image and reputation and not using them to obtain any kind of personal advantage;
- Do not obtain undue advantages arising from the position or position they hold in the company;
- Do not engage in or submit to acts of prejudice, discrimination, threat, blackmail, false testimony, moral harassment, sexual harassment, or any other action against the principles and commitments of this code of ethics and immediately report any transgressors;
- Respect intellectual property and acknowledge the merit of work developed by colleagues, regardless of their hierarchical position;
- In exercising the right to strike, ensure the defense of life, physical integrity, and safety of people and facilities, as well as the preservation of the environment;
- Do not demand, insinuate, accept or offer any kind of favor, advantage, benefit, donation, gratification, to oneself or any other person, as a counterpart to their professional activities, being able to accept or offer

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only promotional, public, non-exclusive gifts, without commercial value, in their relationships with the external public to the system and colleagues of the system.

- Cultivate a personal posture and attire that are compatible with the institutional environment in which they operate.

### **3.4 Relationship with stakeholders, suppliers, service providers and employees**

The STRESSTEC system, regarding its suppliers, service providers, and interns, is committed to:

- Provide to the employees of service provider companies and interns of the company, when working at its premises, with the same healthy and safe working conditions offered to STRESSTEC employees, while reserving the right to manage knowledge and information about the security of the system;
- Require service providers' employees to disclose and respect the ethical principles and conduct commitments defined in this code, while the contracts with the system companies persist;
- Select and hire suppliers and service providers based on legal and technical criteria of quality, cost, and assiduity; and demand an ethical profile in their management practices, social and environmental responsibility, rejecting practices of unfair competition, child labor, forced or compulsory labor, and other practices contrary to the principles of this code, including in the supply chain of such suppliers;
- Require interns to respect the ethical principles and conduct commitments defined in this code, for the duration of their contracts with STRESSTEC.

### 3.5 Relationship with clients

Regarding its clients, STRESSTEC system is committed to:

- Provide high-quality products and services with advanced technology, in a standard of transparent, efficient, effective and respectful customer service, aiming for the full satisfaction of its clients and consumers, for the maintenance of long-lasting relationships;
- Repair any possible losses or damages caused under its responsibility to its consumers and customers, with maximum agility, within feasible deadlines.

### 3.6 Relationship with environment

STRESSTEC system is committed, regarding the environment, to:

- Conduct its business and activities with social and environmental responsibility, contributing to sustainable development;
- Maintain standards of excellence towards the environment to ensure that products and services meet the expectations of its customers and environmental legislation valid in Brazil and in all countries where it operates;
- Contribute to the preservation and recovery of biodiversity through the management of potential impacts of its activities and projects for protecting threatened areas and species;
- Invest in the sustainability of its projects, products, and services, maximizing their benefits in the economic, social, and environmental dimensions while minimizing their adverse impacts;

- Promote sustainable use of water and energy, reduce consumption, recycle materials, reduce the generation of solid waste and the emission of polluting gases;
- Maintain an environmental management system for continuous improvement of its processes and promote eco-friendly awareness actions;
- Identify, evaluate, and manage its environmental liabilities, acting preventively and correctively in solving the problems that caused them;
- Promptly communicate to its consumers, clients, community, and society about any environmental damage in case of accidents;
- Provide information to its consumers, clients, community, and society about possible environmental damages resulting from misuse and the final destination of its products.

### 3.7 Relationship with communities

STRESSTEC system, in relation to communities, is committed to:

- Maintain permanent channels of communication and dialogue with the communities where it operates, with the aim of preventing, monitoring, evaluating, and controlling the impacts of its activities;
- Promote employee volunteering initiatives, with the objective of mobilizing and leveraging their resources and competences in an integrated and systemic way for the benefit of the communities where it operates;
- Repair possible losses or damages resulting from damages caused under its responsibility to the affected people or communities, with the utmost agility.

### 3.8 Relationship with society, govern and state

STRESSTEC system is committed to:

- Act in a way that decisively contributes to the economic, technological, environmental, social, political, and cultural development of Brazil and the countries where it operates.;
- Encourage and sponsor research and technology development projects for sustainable development, actively interacting with the academic and scientific community;
- Interact in partnership with educational institutions to improve the qualification of the workforce in the oil, natural gas, and energy sectors;
- Refuse any practices of corruption and bribery, maintaining formal procedures for controlling and penalizing transgressions;
- Refuse support and contributions to political parties or political campaigns of candidates running for elective positions;
- Comply with and contribute to public oversight and controls.