



STRESSTEC
ENGENHARIA

COMPLIANCE PROGRAM

OUR COMPLIANCE PROGRAM

The Compliance Program of STRESSTEC is the main management instrument that it is available to employees, our partners and clients with the purpose of guarantee integrity in operations and relationship, and prevent the embodiment of compliance risks, allowing the maintenance of a reliable environment for business according with values that govern our corporative conduct:

Ethics, Commitment and Sustainability.

This way can prevent misconduct, promoting dissemination of orientations and educational activities, as well as monitoring and treating deviations, with no damage of application and applicable disciplinary measures when detected.

The executive board (directors and managers) is responsible to take care and ensure the compliance with guidelines established in the code of ethics and conduct, guaranteeing monitoring and control of the guidelines and actions that comprise the integrity system, ensuring continuous improvement and disseminating its application to the team under their management.

All individuals subject to our Compliance Program are responsible for observing and complying with its guidelines and reporting possible cases of non-compliance through the channels available on our home page:

<https://stresstec.com/>

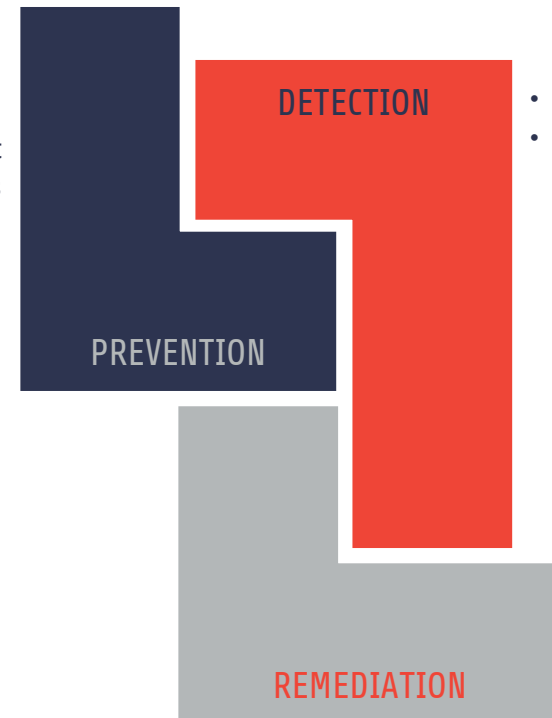
All of allegiance with the present training is fundamental for STRESSTEC to outreach yours targets and objectives, with ethics and transparency.

OUR PILLARS

Our Compliance Program is supported by three fundamental pillars. There are:

- PILLAR OF **PREVENTION**
- PILLAR OF **DETECTION**
- PILLAR OF **REMEDIATION**

- Training and communication
 - Internal control
 - Risk management
- Policies and procedures



- Compliant channel
- Monitoring

- Investigations
- Sanctions

OUR PILLARS

PREVENTION

It represents the set of mechanisms that seek to identify, assess and mitigate compliance risks including those related to fraud and corruption, money laundering, trade sanctions, conflict of interest and antitrust violations.

It contemplates mechanisms capable of, in a timely manner, identifying and interrupting any misconduct that may not have been avoided by preventive actions, making it possible to hold those involved accountable.

DETECTION

REMEDIATION

It establishes accountability and provides for sanctions, where applicable, for each case of proven misconduct, acts in recovering possible losses, and enables the mitigation of the weaknesses that contributed to the occurrence of the misconduct.

PILLAR OF PREVENTION

OUR RISK MANAGEMENT

Compliance risks are those related to the STRESSTEC Integrity System, covering compliance with the internal policies and procedures, ethical principles and conduct guidelines.

The risk management areas are responsible for defining, monitoring, controlling and reporting actions carried out in response to these risks.

The QHSE management system supervision is responsible for identifying and handling compliance risks present in all management areas (executive areas).

The executive board is responsible for monitoring and guarantee the continuous improvement of means for prevention of compliance risks.

Among the compliance risks that are under the direct management of executive board, highlight: relation with stakeholders, fraud and corruption, conflicts of interest, asset protection, personal data and corporate information, quality, health, security and environment (QHSE) and human rights.

PILLAR OF PREVENTION

OUR TRAININGS, COMUNICATION AND AWARENESS

The training about our compliance program is carried out in mandatory basis of all collaborators during the integration process, which occurs on the first working day. Is realized in person, conducted by a member of executive board, who guarantees the reading and the detailed approach of every point belonging the program.

Furthermore, Compliance Program training is periodically provided to employees to reinforce awareness and knowledge of the content.

In case of outsourced collaborators, service providers and other partners who will execute any type of activities related with our scope, the systematic is the same.

All collaborators, outsourced, service providers, suppliers and other partners who have or may have access to sensitive information that represents risks to compliance are requested to firm a confidentiality agreement prior into beginning the execution of activities.

PILLAR OF PREVENTION

OUR INTERNAL CONTROLS

Our internal system control is constantly growing to further the continuous improvement of existent detections tools, to diminish compliance risks and provide assurance for that authorizations and registrations of internal and external transactions are properly carried out.

We have the constant presence and monitoring of members of our senior management in all areas and branches of compliance risk management at STRESSTEC, with hands-on involvement and direct approach in any situation that represents or may represent misconduct by any employees or partners involved in any transactions within our internal environment.

PILLAR OF PREVENTION

OUR POLICIES AND PROCEEDINGS

Our activities are covered for guidelines and procedures established, aligned directly with the company's policy.

The policies are high-level strategic guidelines, prepared with the purpose of formalizing a corporate stance before stakeholders, to reinforce fundamentals aspects, as well as being in fully agreement with quality management and company values.

These documents are easy to access and be available to the employees through our internal management software LABSYSTEM.

PILLAR OF PREVENTION

OUR RELATIONSHIP WITH PARTNERS

Relationship with partners may represent business opportunities, aligned with the company's strategic and operational objectives, and it also may result in risk of non-compliance with rules or misconduct, including possible financial losses or damage to our image and reputation.

Therefore, in the relationship with suppliers, STRESSTEC has prevention mechanisms, for example non-authorization to receive gifts, hospitality or any benefits by any employees without prior and express analysis and authorization by members of executive board.

PILLAR OF PREVENTION

OUR RELATIONSHIP WITH PARTNERS

All suppliers are previously registered via LABSYSTEM, our internal management software. In the purchase orders sent to suppliers, there is the access link to our compliance program, as a way to let them be aware of our guidelines.

We perform by each purchase order issued, a technical and commercial evaluation of each supplier, with the purpose of monitoring the performance and ensuring the integrity of our partners in providing solutions applicable to our scope.

Aiming the smoothness of the commercial process and in order to encourage previously the maintenance of the financial health of our partners, STRESSTEC does not make payments to financial agents that own or maintain direct relationship with such supplier, neither makes payment directed to companies with a different CNPJ than contained in our supplier register and in the purchase order issued.

PILLAR OF DETECTION

OUR MONITORING AND RISKS CONTROLS

The mechanisms and monitoring above activities performed and scenario of compliance risks are implemented on company routine manner. Besides making it possible to treat and mitigate conduct deviation, also we have actions that promote improvement on activities, process and company control, aiming the prevention of future occurrences.

Our QHSE management system includes internal and external audits that ensure adequate risk control and the maintenance of compliance with our proceedings.

PILLAR OF DETECTION

OUR COMPLIANT CHANNEL

We continuously encourage all of our employees and partners to report any situation that indicates a violation or potential transgression of ethical principles, policies, norms, laws, regulations, or any other improper and/or illegal conduct.

The compliant channel is an independent, confidential and impartial tool, and it is available to the external and internal audiences of STRESSTEC through the link:

<https://stresstec.com/CanalDenuncia.html>

We have internal systematic of use and access about received information, which are exclusive to members of executive board, intended to administrate the treatment of complaints received through the compliance channel.

PILLAR OF REMEDIATION

OUR METHOD OF VERIFICATION AND APPLICATION OF SANCTIONS

Members of our executive board are responsible for preliminary reporting of complaints that prove irregularities related to compliance incidents, such as fraud, corruption, relationships, conflict of interest, corporate security, health, environment and human rights violations, arising from both our internal or external ambient.

Our investigations are carried out on a case-by-case basis, with respect to the principles of objectivity, confidentiality, and impartiality.

We have legal advice in the conduct of the investigation of any complaints, as a specialized technical tool to ensure the impartiality and smoothness of the investigation process based on the resolutions and sanctions provided by the laws.

PILLAR OF REMEDIATION

OUR METHOD OF VERIFICATION AND APPLICATION OF SANCTIONS

In cases of proven and established non-compliance with our Compliance Program by managers, employees, third parties, service providers, and other partners who perform or are performing activities and business within STRESSTEC's scope of action, the offenders and co-offenders will be subject to fines and sanctions provided by the legislation, in accordance with Law 12.846/13 and related applicable legislation.

Furthermore, as a result of proof such misconduct, it will be up to the executive board to discuss the appropriate sanctions, from the application of fines and warnings to the termination of any existing employment relationship or partnership between STRESSTEC and the infringing party, which may result, including, in express breach of employment contract and any other existing relationship between the parties.

In cases of poor performance or proof of non-compliance by suppliers and third parties in relation to our compliance policy, the registration of such partners is immediately blocked in the internal management system, LABSYSTEM, that no purchase or commercial transaction can be made from the moment of registration blockage.

In cases where remediation cannot be carried out internally due to legal aspects, STRESSTEC, through the executive board, undertakes to actively collaborate in the resolution of any civil and criminal public-legal proceedings.

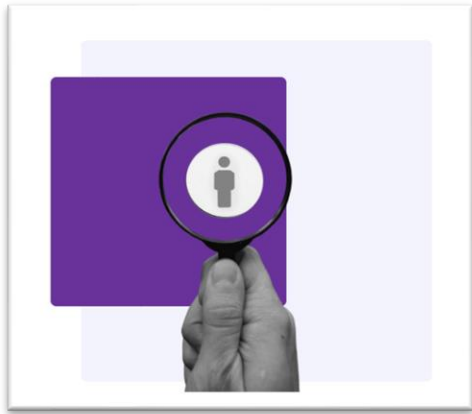
OUR CODE OF ETHICAL CONDUCT

Is responsibility of STRESSTEC to keep the appropriate practice, diversified, proactive and continuous communication regarding relationship with different stakeholders, fraud prevention and corruption, prevention of conflicting interests, assets protection, privacy and protection of personal data, protection of corporative information, human rights, nepotism, health, security, and environment, equality and diversity, as well any type of violence.

The STRESSTEC's code of ethical conduct is available through the link:

https://stresstec.com/Documento/Codigo_de_Conduta_e_Etica.pdf

Among the previously subject mentioned, we are going to see some of topics that are duties of our employees and partners



RELATIONSHIP WITH STAKEHOLDERS

- Develop activities related to your functions with integrity and loyalty.
- Do not permit or engage in anticompetitive conduct, and always complying with the competition legislation and the specific guidelines of the applicable internal rules.
- Do not make public statements on behalf of the company without express authorization.
- Do not use digital channels and external social networks to express aggressive, disrespectful opinions that violate STRESSTEC's values and that may damage the company's image and reputation.
- Ensure that the confidentiality of the information will be preserved and that its disclosure will only occur in a timely manner and in accordance with the legal provisions and the company's rules.
- Not to accept, offer or give gifts, to a natural or legal person, except on the basis of relationship or friendship and provided that its cost is borne by the offeror himself, or when offered by foreign authorities, in the protocol cases.
- Obtain prior authorization from executive board to receive any hospitality from third parties who maintain any commercial or institutional relationship with the company.



RELATIONSHIP WITH STAKEHOLDERS

Formally report to executive board about misconduct or inappropriate behavior by stakeholders.

Establish strategic and business partnerships that seek to contribute effectively to mutual growth and the development of the company.

Act honestly and fairly, without offering, giving, obtaining, claiming or accepting undue advantages, through manipulation, use of information, privileged or not, and other devices of this nature.

Do not speak on behalf of STRESSTEC without the express and formal authorization of the executive board.

Forward to the executive board any demands of the press that it may receive.

Respect all groups and individuals, as well their values and cultural heritage, material and immaterial, directly or indirectly involved with the units and undertakings of STRESSTEC.

Not to produce or disseminate fake news or unverified facts, which should always be checked by the employee through the company's official channels, reliable media and responsible institutions.



RELATIONSHIP WITH STAKEHOLDERS

- Collaborate with the appropriate conditions for suppliers to perform their activities appropriately.
- When visiting any units of customers or suppliers for technical or commercial reasons, do so with the proper authorization of the hierarchical superior.
- Seek guidance from the executive board before responding to any request for information from the government.
- Inform the government or regulatory bodies of the reserved nature of the information provided, when necessary.
- Do not hide, alter or destroy company documents, information or records that are under official investigation.
- Guide customers and suppliers in relation to the company's code of ethical conduct, about this training and other internal proceedings.

FRAUD AND CORRUPTION PREVENTION

FRAUD

Fraud is any intentional action or omission, with the purpose of harming or deceiving another person, capable of resulting in loss to the victim and/or undue advantage, patrimonial or not, to the author or third parties. It is also characterized by false declaration or omission of material circumstances in order to lead or mislead third parties.

Corruption is any action, direct or indirect, consistent in authorization, offering, promise, solicitation, acceptance, delivery or receipt of undue advantage, of an economic or non-economic nature, involving individuals or legal entities, public agents or not, with the purpose of practicing or not practicing a particular act.

CORRUPTION

We reject any form of fraud and corruption at all hierarchical levels, in the public and private sectors.



PREVENTION OF FRAUD AND CORRUPTION

- Reject and report situations of fraud and corruption, in any event, directly or indirectly, active or passive, that involves or not monetary values.
- Do not imply, promise, request, accept, offer neither receive bribery, kickback or any undue advantage.
- Do not induce or persuade the co-workers to act by improper manner on behalf of the company.
- Do not finance, fund, sponsor or, in any way, subsidize the practice of unlawful acts.
- Do not omit yourself in the face of situations of fraud and corruption, in any form, directly or indirectly, actively or passively, involving or not involving monetary values.
- Not to adopt in relation to the public sector, national or foreign, any initiative that can be interpreted as influence peddling and as an act harmful to the public administration.



PREVENTION OF CONFLICTS AND INTERESTS

Do not appoint, designate or hire, for positions of the executive board, spouse, partner or relative straight or collateral, by inbreeding or affinity, up to the third degree.

Act with honesty, impersonality, respect, and in a transparent manner in its activities, without obtaining undue advantages, in order to ensure the construction of healthy, contributory and lasting relationships between STRESSTEC and its stakeholders.

Do not engage in an activity involving the provision of services or the maintenance of a business relationship with a natural or legal person who has an interest in the decision of the agent and/or the collegiate to which he belongs.

Seek impartiality, performing its activities in an exempt manner, without using the condition of employee to obtain undue advantages for STRESSTEC, for itself or for third parties.

Not to disclose or make use of privileged information, for the benefit of oneself or of a third party, obtained due to the activities carried out.

Report the occurrence of conflict of interest situations if you know through the compliant channel.

Do not use the position, mandate, function, employment or activity performed in the company, as well as facilities, friendships, time, position and influences, to obtain any favor for yourself or for third parties.



ASSET PROTECTION

- Do not use them for private or other purposes that do not directly relate to the company's activities and business.
- Preserv them against losses, damages and abuse, always avoiding waste and inappropriate use.
- Do not make particular use for commercial activities of buying and selling, offering services or advertising.
- Do not obtain, store, use or pass on material that violates copyright or intellectual property laws, causes moral harm or is offensive to people, or that contravenes the interests of the company.
- Do not provide or use third-party passwords for systems or computers.
- Properly use, according to industry good practice, the company's assets for purposes directly related to STRESSTEC's activities and businesses, including intervening or reporting cases of improper use, appropriation or donation identification or evident waste.
- Do not use the name of STRESSTEC for personal or private activities or associate with the trademarks of other companies or entities, without prior authorization.



PRIVACY AND PROTECTION OF PERSONAL DATA

Respect professional secrecy, as well as keep secret the personal information of any other member of STRESSTEC who has access due to position, function and / or activity developed, except the situations provided by law.

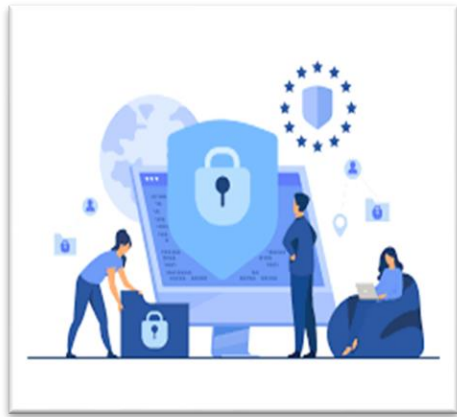
Immediately report to the executive board any disappearance or suspicion of loss of information and/or equipment containing personal or privileged information.

Treat personal data only for specific, necessary, defined and legal objectives.

Observe and comply the guidelines, privacy directives and protect personal data.

Ensure that personal data are proportionate, not excessive, limited to the minimum necessary for the development of your activity and compatible with the purposes, before collecting, accessing, using, storing, disclosing them or performing any other type of processing.

Be aware that in the use of the company's equipment and resources there shall be no expectation of privacy, and it may have access to the content produced or carried over there.



PROTECTION OF CORPORATIVE INFORMATION

Do not disseminate, repost or comment internal information, strategic and regarding a fact or relevant fact with economic-financial effects, even related to relevant acts or facts with economic or financial repercussions, not yet made public.

Do not share passwords neither allow the unauthorized access to the systems used by the company.

Do not practice attempted intrusion, breach of security systems or controls, search for vulnerabilities, monitoring, breaking, or obtaining passwords from systems or computers

Do not share corporative information of STRESSTEC without prior authorization.

Comply with the company's information security standards and guidelines for the preparation, handling, reproduction, disclosure, storage, transportation, transmission and disposal of information and business documents, obeying the levels of protection and classification of information established in internal documents.

Use and share corporate information exclusively within the scope necessary for the performance of their respective professional activities and in accordance with information security standards and guidelines.

Ensure secrecy and not disclose or share credentials for access to corporate technology services and resources with third parties or use third-party credentials to access information or services in corporate technology resources.



PROTECTION OF CORPORATIVE INFORMATION

Do not send, transmit, distribute, make available or store internal e-mail addresses, data, trade, technological or financial secrets, neither any other information belonging to the company, unless expressly authorized by the manager of the respective information.

Take care that the information contained in documents and communications is true and accurate and compatible with the company's confidentiality guidelines.

Report immediately, in the appropriate corporate channels or to its hierarchical superior, any incident, breach, non-compliance of information security, disappearance or suspicion of loss of information, personal data or equipment containing information whose disclosure or undue access may cause harm to the company or to the holders of personal data.



SAFETY, ENVIRONMENT AND HEALTH

- Ensure the defense of life, the physical integrity and the security of oneself, of the people around, and of the facilities, as well as the preservation of the environment.
- Do not consume, distribute, buy or sell illicit drugs on STRESSTEC premises, neither be under the effect of these substances during the working day.
- Do not consume, distribute, buy or sell alcoholic beverages on the company's premises during the workday, including intra-day breaks, neither be under the influence of alcohol during the working day.
- Do not smoke in the workplace.
- Perform work activities only when you have the necessary knowledge, consider yourself fit and capable, duly authorized and using the necessary and appropriate procedures and equipment.
- Know and be able to proceed in emergency situations and immediately communicating any and all unsafe acts or conditions, guaranteed the right of refusal if you identify a situation of serious and imminent risk to life or physical integrity, of yours or your co-workers.
- Identify, inform and control any risks and impacts of environmental, climatic, and the health and safety of people, taking into account the applicable legislation, common standards as well as standards of STRESSTEC.



HUMAN RIGHTS

Guarantee a respectful workplace, which hosts and promotes the cultural diversity, race, skin colour, ethnic origin, citizenship, social standing, age, religion, gender, sexual orientation, personal aesthetics or any different individual fact.

Report any compliance risk of people and environment, for business, images, reputation and company heritage to our executive board, who must take the applicable measures for review and decision-making around the issue.

Conduct a interpersonal relationship based on respect regarding people and its differences.

Cultivate looks and clothing consistent with the institutional and cultural environment.

Preserv cordiality and do not commit any act that can be interpreted such as injury, slander or defamation.

Keep a respectful relationship with the internal and external public, considering both human and cultural diversity.

Work in a cooperative way and stimulate the constructive debate and diversity of opinion.



HUMAN RIGHTS

Do not practice neither be conniving with any type of aggressive behavior or physical and psychological violence, including moral or sexual harassment, besides welcoming the person who reports being the victim of such practices.

Do not practice neither engage in any form of child, forced, slave or degrading labor.

Do not obtain, store, use or pass on pornographic material or that contains inappropriate or offensive content.

Immediately denounce any attitude of violation of human rights, of a prejudiced, discriminatory or violent nature that you have witnessed.

Respect the belief, opinion and political conviction of all employees, as well as the right to free worker's union association.

Respect all groups and individuals, as well as their cultural, material and immaterial values and assets, directly or indirectly involved with STRESSTEC units and enterprises.

Comply with the current legislation, policies, standards and guidelines of the STRESSTEC and the code of ethical conduct of the company.



HUMAN RIGHTS

- Keep permanent channels of communications and dialogues with communities where we act, promoting a properly approach that possibly can be affected in their human rights.
- Act with transparency with communities potentially affected by our activities, through public dialogue processes.
- Combat, together with our supply chain, degrading or similar work practices to the slave, human trafficking and child labor, establishing punitive measures such as the application of a fine and contractual termination in case of violation.
- Ensure that our businesses are assessed in risk and human rights impacts of our businesses, including the perspective of groups and populations at greater risk of vulnerability or marginalization.



EQUALITY AND DIVERSITY

Respect both human and cultural diversity on relationships and work environment.

Reject anyway of prejudice or discrimination, communicating the events lived or witnessed.

Do not promote neither participate of election activities during working hours neither use STRESSTEC resources for this purpose, although associate their brands.

Do not promote neither participate of religious activities during working hours neither use STRESSTEC resources for this purpose, although associate their brands.

Do not perform any type of election or religious advertising at company premises.

OUR REJECTION OF VIOLENCE

PSYCHOLOGICAL VIOLENCE

Psychological violence is characterized by offensive, explicit or subtle gestures, words, attitudes, or actions that disqualify, discriminate, humiliate, and embarrass individuals in the workplace. This type of behavior undermines human dignity, and has the potential to compromise one's professional career, causes physical and psychological harm, and leads to a deterioration of the work environment.

Psychological harassment is characterized by repeated and long-term occurrences of psychological violence in the workplace. This can compromise one's professional career, causes physical and psychological harm, leads to a deterioration of the work environment, illness, and even death.

PSYCHOLOGICAL HARASSMENT

SEXUAL HARASSMENT

Sexual harassment is a criminal behavior characterized by the harassment of someone in order to obtain sexual advantage or favor, taking advantage of the agent's superior hierarchical position or influence inherent to the exercise of employment, position, or function.

ADVERTISING, TRANSPARENCY AND CONTINUOUS IMPROVEMENT

Transparency and integrity in information disclosure are fundamental tools for strengthening the workplace and the integrity of work environment. Therefore, it is necessary maintaining a transparent, respectful and proactive dialogue with all stakeholders, paying attention to the legal guidelines.

The improvement of our Compliance Program occurs through the periodic monitoring of indicators related to the results of company.

PLEASE LET US KNOW!

When experiencing, witnessing or becoming aware of conduct that constitutes non-compliance with the guidelines of this compliance program, we shall communicate or report the fact to the hierarchical superiors, the executive board or using the STRESSTEC compliant channel available on our home page, with absolute confidentiality guarantee.

STRESSTEC respects and welcomes the communication or denounce of conduct deviation, even indication of conduct deviation and not allow retaliations or punishments against any people or entities which represents this communication or denounce.

REPORT!