



# **Code of conduct and Relationship with Suppliers**



## 1. OBJECTIVE

This procedure outlines Dynamox Company's expectations for its suppliers in the areas of integrity, ethical and legal standards, integrity due diligence, general sourcing criteria, compliance, confidentiality, information security, privacy of personal data, gifts, courtesy gifts, workers' rights and employment laws, health and safety, environment, anti-bribery and corruption, fair competition, auditing and materials supplied.

While Dynamox recognises that there are different legal and cultural environments in which suppliers work, this procedure establishes a framework that Dynamox considers important for the management of production, distribution and supply chain operations, including minimising adverse impact on the environment, for a healthy and safe workplace, for the maintenance of fair and reasonable working practices and for the content of materials supplied to the company.

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## 2. APPLICATION

It applies to the selection and retention of all suppliers supplying goods and/or services to Dynamox, including suppliers of raw materials, semi-finished goods or finished goods, packaging, contract and service suppliers. Suppliers are expected to comply with this procedure in the conduct of business with Dynamox and its partners.

A black and white photograph showing a hand holding a smartphone next to a laptop keyboard. The image is partially obscured by a dark vertical bar on the left side of the page.

## GENERAL PROVISIONS

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### 3.1 ETHICAL, LEGAL AND INTEGRITY STANDARDS

Dynamox is committed to upholding legal and ethical standards wherever and whenever we do business. Our Code of Conduct provides basic guidelines to assist in making good decisions on behalf of the company, performing our duties ethically and in accordance with the policies and laws of the countries in which we do business.

If at any time, this procedure appears to be compromised in any way, please contact the Dynamox Code of Conduct Hotline in good faith.

## 3.2 DUE DILIGENCE DE LA INTEGRIDAD

In accordance with the anti-corruption law ("Law 12.842/2013") and other applicable legislation, the company may be liable for the unlawful activities of its suppliers, service providers or intermediary agents, when they are providing services to the company, whether in the relationship with public organisations or public entities. In this sense, in order to verify the suitability and avoid being liable for acts carried out by its suppliers, third parties or business partners that do not share its values, the company may carry out a prior and periodic assessment of Compliance risks, in order to try to know and classify the risk between high, medium and low, verifying, but not limited to

- **Public history of involvement in cases of corruption, unethical and legal conduct.**
- **Managers who are public officials or politically exposed persons.**
- **Code of conduct, anti-corruption policy and whistleblowing channel;**
- **Non-CEIS registration (National Register of Disqualified and Suspended Companies).**
- **Registration with CNEP (National Register of Sanctioned Companies)**
- **Registration in the CEPIM (Register of Suspended Private Non-Profit Entities).**

In the event that at the end of the prior risk verification it is identified that the current or potential supplier is of medium or high risk, the Legal area may be called upon to carry out the Integrity Due Diligence.

### 3.3 GENERAL CRITERIA FOR PROCUREMENT

The company requires that its suppliers, service providers and intermediary agents go through a quotation process and pay attention to compliance with the legal requirements for supply:

- (i) Manufacture of products and provision of services in compliance with the legislation, standards and requirements of the public bodies in force, ensuring compliance and quality of materials, services and equipment; the practice of competitive prices.**
- (ii) Good service with safety, objectivity, transparency and punctuality;**
- (iii) Presentation of adequate hygiene and safety conditions in their own facilities;**
- (iv) Commitment to sustainability; e,**
- (v) Ethical and transparent business behaviour before and during the supply cycle with the company.**

The supplier shall always have available, upon request, the necessary documents for registration and verification of the general supply criteria described above.

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### 3.4 FAIR COMPETITION

Dynamox has an open and fair entry process that allows potential suppliers, regardless of nationality, size and experience, an equal chance to offer their products or services. We select business partners based on economic reasons such as quality, price, volume, capacity and delivery time. We believe in free competition and fair business practices. We do not permit business practices that seek unfair advantages or reflect incorrect facts about our business or products. In addition, we do not permit false or misleading statements about our competitors or their products. As such, suppliers must follow laws that preserve a fair and competitive marketplace, such as antitrust laws. Suppliers must apply fair business practices, including advertising that is truthful.

## 3.5 COMPLIANCE

Dynamox suppliers must comply with all laws, codes and regulations that apply in the countries, states and localities in which they operate. In addition, they shall comply with all points contained in this procedure and, as applicable, in the Dynamox Code of Conduct. Suppliers shall maintain systems capable of demonstrating a satisfactory record of compliance with the law and regulations in the conduct of their business.

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## 3.6 CONFIDENTIALITY

We value information, therefore Dynamox employees must respect and protect the confidentiality of our Suppliers by not disclosing their business information, be it partner/owner or confidential.

In the event that you wish to share confidential information, it is the responsibility of both Dynamox and the Supplier to ensure the necessary confidentiality/non-disclosure agreements are in place and to limit the disclosure of proprietary information to only those who have a legitimate need to know about it.

We recommend that Suppliers read the Dynamox Privacy Policy. By using our site or otherwise submitting their personal data to Dynamox, Suppliers represent that they understand and agree that they are bound by the "Adherence Term", attached to this Code, and agree that Dynamox may collect, process, transfer, use and disclose Suppliers' personal data as described in the Dynamox Privacy Policy".



## 3.7 INFORMATION SECURITY AND DATA PRIVACY

Suppliers must comply with all applicable Brazilian law requirements, and must undertake to fully comply with the following points:

- **Protect information and personal data against unauthorised access, modification, destruction or disclosure, maintaining its confidentiality.**
- **Ensure that the resources placed at their disposal are used only for the purpose informed and approved by Dynamox.**
- **Guarantee the continuity of the processing of critical business information;**
- **Comply with laws regulating intellectual property issues;**
- **Comply with the laws that regulate Dynamox's activities and its market;**
- **Select information security mechanisms, balancing risk, technology and cost factors;**
- **Immediately inform Dynamox of any breach of PO-TI-002: Information Security Policy.**
- **In the case of processing personal data of customers, employees, suppliers and/or third parties providing cloud services for Dynamox, this processing must be in accordance with PO-TI-002: Information Security Policy.**

## 3.8 INTELLECTUAL PROPERTY

The Dynamox Supplier undertakes to:

- **Respect the intellectual property rights, especially the rights over patents, industrial designs, trademarks and copyrights, of Dynamox and/or third parties.**
- **Take the necessary measures to ensure that the supply of goods and/or services to Dynamox does not lead to infringement of the intellectual property rights of third parties.**
- **Not to advertise or market by associating the supply of goods and/or services to Dynamox, nor to use the company name, registered or registered trademarks, domain name, or any other distinctive sign owned by Dynamox, without express written authorisation to do so.**





## 3.9 WORKERS' RIGHTS AND LABOUR LAW

Suppliers are expected to comply with the country's labour and employment laws and regulations, including those related to wages, hours of work, working conditions and child labour. Suppliers are expected to adopt lawful labour and employment practices and treat their employees fairly. Specifically:

**Employment Practices:** Suppliers must hire and employ workers in accordance with applicable laws. Wages, benefits and hours of work must be fair and reasonable for the local labour market.

**Child labour:** Suppliers must comply with applicable local laws regarding the minimum age of employment of employees.

**Forced labour:** Suppliers may not use labour that is the result of psychological or physical coercion, physical punishment, slavery or other oppressive working conditions. Suppliers and their employees may not engage in any form of human trafficking.

**Discrimination:** Suppliers must respect the right of all persons to participate in any aspect of work, regardless of their personal characteristics or beliefs (e.g. race, colour, religion, age, disability, marital status, military veteran status, gender, sexual identity, sexual orientation, ethnicity or country of origin).

**Freedom of Association:** We encourage open communication and direct engagement with employees to resolve workplace and compensation issues. Suppliers must respect the rights of workers, as defined by local laws, to associate freely, to join or not join trade unions, to seek representation and to participate in workers' councils.

The Providers must respect the rights of workers, agree with the rules defined by local laws, associate freely, be members or unions, seek representation and participate in workers' councils.

## 3.10 HEALTH AND SAFETY

Suppliers must comply with all applicable health and safety laws and regulations to provide a safe and healthy working environment. Elements of health and safety include:

**Risk identification and safety process:** Suppliers must identify both occupational and external hazards and have programmes in place, appropriate to the risks, to actively avoid or lessen such risks (e.g. catastrophic releases of chemicals, smoke, dust, etc.).

**Worker Protection:** Suppliers shall protect workers from exposure to chemical, biological and physical hazards and from physically demanding tasks or work in the workplace.

**Hazard Information:** Suppliers must provide safety information on hazardous materials (including raw materials), isolated intermediates, products, solvents, cleaning agents and wastes for the knowledge of workers and train and protect workers from potential risk.

**Emergency Preparedness and Response:** Suppliers must identify and assess emergency plans at all facilities and minimize the impact of any emergency by implementing adequate emergency plans and response procedures.

**Workplace accident reporting:** All accidents must be reported immediately after they occur. The record must be made by telephone to the contract manager and to the Safety Technician responsible for the premises and must be formalised by email, in both cases.

## 3.11 ENVIRONMENT

Suppliers must operate in an environmentally responsible and efficient manner and minimise adverse impacts on the environment. We encourage Suppliers to conserve natural resources, avoid the use of hazardous materials whenever possible and engage in reuse and recycling activities. Environmental elements include:

**Environmental Authorisations:** Suppliers must comply with all applicable environmental laws and regulations. All necessary permits, licences, information records and restrictions must be obtained and their requirements and information must be complied with and followed.

**Waste and emissions:** Suppliers must have active systems in place to ensure the safe handling, storage, movement, recycling, reuse or management of waste.

**Spills:** Suppliers must have active systems in place to prevent and minimise spills and accidents affecting the environment.

**Sustainability and resource efficiency:** Suppliers should have active systems in place to optimise the use of all relevant resources, such as energy, water and materials, in a sustainable manner.

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## 3.12 ANTI-BRIBERY AND CORRUPTION

All corruption, extortion and fraud is prohibited. Suppliers must comply with all applicable laws and regulations and all industry standards related to the act of avoiding corruption. Suppliers must not pay or accept bribes or engage in other illegal inducements in business or government relations, nor make any other inducements (including facilitating payments, gifts and hospitality, concessions or donations) in connection with their business with Dynamox.

### **3.13 COMPLIMENTARY GIFTS**

Dynamox does not allow undue influence, even apparent undue influence, in our decision making of Suppliers. With that in mind, supply chain officers may not offer or receive gifts or any kind of courtesy from Suppliers. Suppliers are expected to adhere to this standard in the conduct of business with company officials.

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### **3.14 AUDITING**

Dynamox has the right to request documents, make site visits or other means to verify that the Suppliers are complying with the principles and commitments set out in this Code of Conduct, with at least 15 days' prior notice and also by means of audits.

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## **4. COMPLIANCE RESPONSIBILITY**

It is the supplier's responsibility to ensure that its officers, agents and subcontractors working with Dynamox understand and comply with this Code of Conduct. Failure to adhere to this Code of Conduct or any applicable legislation is sufficient grounds for termination of the business relationship by Dynamox.

Dynamox expects its Suppliers to have reasonable and appropriate systems in place to investigate and correct all allegations of bad faith, to the extent permitted by law. You must inform Dynamox immediately if you become aware of any possible violation of applicable law or this Code of Conduct, or any other allegations of wrongdoing in connection with Dynamox business.

The Supplier must immediately notify Dynamox when it becomes aware of any negative publicity or any event or circumstance relating to you or your company that may cause negative publicity or harm to Dynamox.