



APPENDIX 4
Corporate Responsibility Policy

MQA/01/04

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1 – Introduction:

Being a good employer and a responsible corporate citizen is a concern and a goal for Tirreno Indústria e Comércio de Produtos Químicos. We are committed to run our activities with maximum respect for human rights and health, security and safety for people and for the environment, as well as abiding by every applicable law and standard ruling them and their consequences.

We believe our business behavior should be based on trust and truth and driven by respect, transparency and ethics to ensure a healthy working environment.

2 – Responsibilities:

All of Tirreno's Collaborators, Customers and Suppliers are responsible for abiding in behavior and action by the herein described Corporate Responsibility Policy along all interactions with the several constituencies the company engages with.

It is important to emphasize that the Human Resources department is out there to clarify and solve any potential practical queries not provisioned or seen under this Policy.

Tirreno's Collaborators, Customers and Suppliers are both responsible for abiding by the herein described Policy and stimulated/expected to report any noncompliance incidents. Said incident communications shall not entail retaliation or other negative consequences.

Pending on facts and circumstances, those collaborators in any role found in breach of this Policy may be subject to disciplinary action including up to dismissal.

All collaborators are bound to report any noncompliance incident pertaining to this Policy filling in, anonymously or not, the form within Annex 01 to this Corporate Responsibility Policy and placing it in any of those boxes provided close to the time clocks. Presidency will personally analyze said forms, treating all information as confidential throughout the verification process up to the final decision.

Customers and Suppliers are to send the form within Annex 01 to the following address: Rua Bandeirantes 610 - Vila Conceição – Diadema - CEP 09912230. Recipient: A/C Política de Responsabilidade Corporativa

Prepared by: Luana Alves de Oliveira Date: 02/16/2018 Role: Jr. Resources Analyst Area: HR	Approved by: Alessandra P. M. de Almeida Date: 02/16/2018 Role: Director Partner Area: DIR
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3 – Provisions:

➤ **Civil and Criminal Liabilities:**

Tirreno is fully aware of all civil and criminal liabilities it possesses in regard to its activities and to its direct and support processes pertaining to Product Development, Manufacture and Transportation.

➤ **Labor Relations:**

Tirreno's operations are fully compliant to every applicable law and standard, abiding by the applicable legislation ruling working hours.

➤ **Relationship with Customers and Suppliers:**

All of Tirreno suppliers are to agree on abiding by this Policy; those abiding by the herein described provisions are subject to supply contract discontinuation. Suppliers are responsible for having their own suppliers abiding by the provisions under this Policy.

Suppliers must ensure that no procurement process for any material or machine utilized for any product, package or raw-matter supplied to Tirreno plays a direct or indirect role on Human Rights violations.

➤ **Corruption, Bribery and Business Ethics:**

Tirreno does not condone any form of corruption, bribery or unethical business practices. Every Tirreno' collaborator is to refrain from offering, giving, demanding or receiving bribery or other undue advantages.

➤ **Child labor:**

We shall not employ any person under 15 years old, except within a Government Authorized Training or Learning Program which is clearly beneficial for attendees. Company is in charge of providing authorized underage personnel working conditions, working hours and wages appropriate for their age and compliant to applicable local law.

➤ **Forced Labor and Disciplinary Action:**

Tirreno does not condone forced labor under any guise. Disciplinary action is to be performed ensuring employees humane, fair treating. We do not admit physically abusive disciplinary practices. We will provide for our collaborators' material well-being with competitive wages and benefits in line with applicable law.

➤ **Safety and health:**

All employees should enjoy a safe, healthy working environment abiding by local law or better. The site is to take any necessary actions preventing and managing potential accidents and occupational diseases.



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➤ **Harassment, Exploitation and Discrimination:**

Tirreno respects diversity and cultural differences. We do not admit discrimination under any guise, be it sex, race, skin color, beliefs, religion, ethnicity/nationality, marital status / parenthood, disability or sexual preferences. No collaborator should be subject to harassment, intimidation or physical, sexual, psychological or verbal abuse.

➤ **Freedom of assembly and collective bargaining:**

We acknowledge and respect our collaborators' rights to freely assemble and collectively bargain. No collaborator is to be subject to intimidation or harassment for peacefully pursuing said rights.

➤ **Confidential Information:**

Tirreno extends to all collaborators, for the duration of their respective employment contracts and beyond, a full privacy and confidentiality commitment on each and every company information, particularly in what pertains to strategies, projects, manufacturing, customers, technologies, formulas and materials. It also does not condone inside information usage as a way of securing advantages, neither for oneself nor third parties. Collaborator personal information will be regarded as equally confidential, thus access to those will be granted for company authorized personnel only.

➤ **IT and Communications Resource Usage:**

IT and communication resources made available for collaborators are company property. All user collaborators, in turn, are responsible for using said tools (emails, the Internet etc.) in a proper, responsible fashion. Tirreno does not admit any illegal use of its communication tools, either for pornography, racist actions or any other entailing criminal or civil suits against the company.

➤ **Social and Environmental Management:**

Tirreno Activities are characterized by total compliance to the applicable Environmental Law and integrity in social relationships. Tirreno holds as a principle the duty to act with social responsibility and respect for the environment, making their collaborators' aware of the importance of saving natural resources and take part in actions aimed at improving quality of life for all human beings.

4 – Commitment:

With the herein provided Corporate Responsibility Policy, Tirreno intends to ensure and improve its relationships with Collaborators, Customers, Suppliers and the society at large. We thus hope everyone reads, understands and abides by it in a commitment to eagerly build a pleasant, happy, responsible and prosper work environment.

5 – Annex 1

