



GELCO GELATINAS DO BRASIL LTDA.

CODE OF CONDUCT /
COMPLIANCE POLICY

Brazil, 2022
Rev. 4

SUMMARY

1.	Considerations.....	3
2.	Strategic Components	4
3.	Management System Policies	6
4.	Conduct in Relationships	7
5.	Confidential Information.....	9
6.	Company Equity.....	10
7.	Social Responsibility.....	10
8.	Environment.....	11
9.	Work Environment.....	11
10.	Prejudice / Discrimination.....	12
11.	Child or slave labour	12
12.	Equal Employment Opportunities.....	12
13.	Generating and Maintaining Accuracy of Financial Information	13
14.	Financial Management.....	13
15.	Other Standards You Should Know	14
16.	Freedom of speech	14
17.	Disciplinary Measures.....	15
18.	Disclosure and Procedures	16

CODE OF CONDUCT / COMPLIANCE POLICY

GELCO GELATINAS DO BRASIL LTDA.

1. Considerations

The purpose of this policy is to define the ethical values and standards of conduct that should guide Gelco Gelatinas do Brazil's internal and external relations and intensify the commitment between Gelco company x employee, suppliers, service providers, third parties, customers and partners. assume your responsibilities by doing what is right, complying with company law, policies and standards with integrity and an ethical stance.

It is essential that all GELCO service providers, third parties, representatives, customers and other partners act in accordance with this CODE.

The action of managers, employees and all those who perform activities on behalf of GELCO shall be guided by the principles of legality, impersonality, morality as defined by this Code of Conduct.

Those responsible for hiring employees, interns, service providers, third parties, representatives and agents in general should ensure knowledge and application of this policy.

The code involves:

- Respect people;
- Ethics and commitment;
- Respect for the environment;
- Integrity and Compliance;
- Compliance with legislation.

This Code embodies our commitment to the ten UNO Global Compact Principles <https://www.globalcompact.ca/about/ungc-10-principles/> in our strategies, policies and procedures, establishing a shared culture of integrity that enables us to maintain our responsibilities to people and the planet.

2. Strategic Components

Mission

Create value by manufacturing and marketing high quality gelatine and collagen peptides to meet the needs of our customers in the pharmaceutical, food and industrial markets, with a focus on continued growth of business and people, sustainability and accountability.

Vision:

To be internationally recognized as one of the leading manufacturers of gelatine and collagen and as models for generating economic and social value in the countries where we operate.

Values

Excellence

strive to always offer the best, focused on market trends.

Innovation

maintain a positive and proactive attitude toward change, learning and continuous improvement.

Respect

Seek partnerships based on the understanding, appreciation, and treatment of others as we would like to be treated.

Integrity

relate to others honestly, authentically, transparently and correctly.

Cooperation

value collaborative effort and shared interest in achieving goals.

Responsibility

Make our decisions consciously to fulfil our commitments.

Company Commitment:

Having relationships with employees based on trust, integrity, commitment, transparency and freedom of expression in work relationships, as well as respect and appreciation of the human being in their privacy, individuality and dignity.

Ensure that personal information, including medical and benefit information, is restricted to the employee himself and the personnel responsible for storing, maintaining and processing this information.

Empower and promote the entry into the labour market of young apprentices and people with special needs, ensuring the right to citizenship, quality of life and the development of their skills.

Ensure that all Human Resources processes are based on transparency, respect, free choice and full compliance with Brazilian labour laws, regulations and current conventions.

Fully comply with all tax, ethical and legal responsibilities.

Employee Commitments:

Use company assets only for work purposes and in the company's interest. Have responsibility and commitment to the mission, vision, values, goals and objectives of the company.

Use working hours only for work-related activities, such as machines, computers, emails, tools, phones, etc.,

Do not submit or accept situations of bullying (understood as the act of repeatedly disqualifying, through words, gestures or attitudes, self-esteem, security or image of the employee due to hierarchical bond).

Do not submit or accept sexual harassment situations.

Communicate and involve your superior in any fact, decision or situation that conflicts with this Code of Conduct.

3. Management System Policies

Food Quality and Safety Policy

Gelco Gelatinas do Brasil, a manufacturer of collagen gelatines and peptides, is committed to providing the highest quality and safe products to our customers, working in compliance with the laws and regulations governing the company's business and activities ensuring food safety information. available throughout the supply chain.

We are focused on continually improving our processes and products, ensuring that Food Safety and Quality Management systems satisfy our customers and preserve the health of consumers.

Health and Safety Policy

At Gelco Gelatinas do Brasil, the physical integrity and health of employees is a fundamental factor for the success of your business.

In this sense, the company is committed to:

- Promote employee involvement by ensuring that they can do their work to prevent injury and illness.
- Meet all applicable health and safety legal requirements.
- Seek continuous improvement by creating and maintaining a culture of health and safety.
- Sharing health and safety responsibilities between the company and its employees, aiming at an accident-free work environment.

Environmental Policy

Gelco Gelatinas do Brasil believes that the protection of the environment is fundamental to its development, so it is committed to reducing the environmental impacts of its activities, preventing pollution and promoting the sustainability of natural resources. We

are committed to complying with applicable legal requirements and controlling the factors responsible for environmental impacts, always seeking continuous improvement of our environmental performance.

4. Conduct in Relationships

Relations with customers

It is the duty of all Employees to serve the Company's customers with courtesy, promptness and efficiency, in order to meet their needs, seek their satisfaction and promote a mutually beneficial and lasting relationship, always in accordance with the company's commercial policies and objectives;

The practice of offering any personal advantage to buyers who may act as a customer representative, or who may influence their purchase decision, directly or indirectly, such as kickbacks or tips, is not tolerated. Corporate promotional gifts may be offered, provided they are of small value and in accordance with applicable internal standards.

Corporate promotional gifts may be accepted if they are of small value, ethical and permitted by local law.

All business proposed or carried out with customers must be conducted ethically and strictly observe the laws and regulations applicable to the type of business in question.

In case of non-compliance with this Code you can help us through the Ethics Channel **0800 602 6911**, www.contatoseguro.com.br/gelco

Relations with Suppliers, Service Providers and Representatives

Relationships with any suppliers, service providers and representatives should be conducted in an ethical and respectful manner.

The hiring of suppliers, service providers and representatives must be based on transparent and technical criteria and must comply with GELCO policies and procedures, always aiming at the Company's interests.

Acceptance of any personal advantage to suppliers, service providers or representatives, or which may influence the Company's purchase decision, directly or indirectly, such as tuition fees, tips, travel, job offers to relatives, is not tolerated. etc.

Corporate promotional gifts may be accepted as long as they are of small value, ethical and permitted by local law.

All business conducted with suppliers of products or services must strictly comply with the laws and regulations applicable to the type of business in question.

In case of non-compliance with this Code you can help us through the Ethics Channel **0800 602 6911**, www.contatoseguro.com.br/gelco

Relations with Government Authorities and Agencies

No form of payment or any other personal benefit may be offered to a direct or indirect public administration authority or server, whether federal, state or municipal.

GELCO corporate promotional gifts may be offered, provided they are of small value and previously authorized by the General Management.

Relations with Shareholders and Investors

The Company's relationship with its shareholders and investors should be based on the accurate, transparent, isonomic and timely communication of material information that enables them to monitor the Company's activities and performance, in accordance with applicable legal procedures.

Relations with the press

The Company's relationship with press agencies should only be carried out by authorized employees, within the limits of the matters in which each employee was authorized to handle, and always ensuring the creation and maintenance of GELCO's positive image. All communication to the press must be previously authorized by the General Management.

Relationship between Company Professionals

Definition

Relatives are defined as spouse, partner, child, including foster or stepchildren, sibling, father, mother, grandfather, grandmother, grandchild.

GELCO does not hire relatives of any employee.

In accordance with GELCO policy the following situations are prohibited:

- Employees or temporary employees who are related, working together in the same department / production line and same shift, except in cases where employees become related as a result of union after joining the company.
- An employee cannot work under the supervision of a relative.
- Employees or temporary relatives working in positions or areas that when in association may generate conflict of interest or put the safety or interest of the company at risk. Examples of this situation: Human Resources, Security, Plant Manager Secretary.

5. Confidential Information

Strict confidentiality must be maintained about any confidential or strategic Company information, and such information should not be disclosed to third parties except in the strict business interest of GELCO or in compliance with legal rules, and only through persons authorized by General Management;

Confidential information is considered as technical and commercial data on products, objectives, tactics and business and marketing strategies, budgets, short and long term planning, volume and sales conditions, research results, statistical, financial, accounting and as well as any other information or data that is linked to or related to the Company's business interest;

GELCO employees must ensure that confidential or restricted information from third parties, which is made available to the Company, is treated with due confidentiality;

GELCO employees have an ethical and legal responsibility to safeguard confidential information in their possession, even after their departure from the Company.

6. Company Equity

Employees must, in their actions inside and outside the corporate environment, protect the Company's physical and intellectual assets, including its brand and other intangible assets, movable and immovable assets, technology, business and marketing strategies, information, research, and data;

Such assets may not be used for personal gain or provided to third parties for any purpose, except in the contractual arrangements entered in accordance with the Company's internal rules.

7. Social Responsibility

GELCO's principle is always to act with social responsibility towards the community in which it operates, and its employees must respect the interests of these communities and the country;

GELCO's employees should strive to establish a good relationship with the communities in which the Company operates, contributing, whenever possible and observing GELCO's values, to their development.

8. Environment

All employees must, in the exercise of their duties, be committed to the preservation of the environment and the adoption of actions that seek to improve the quality of life of human beings;

All GELCO businesses must be conducted in full compliance with environmental legislation, seeking improvements in their operational processes, within the concept of sustainable development.

9. Work Environment

GELCO considers its employees to be an essential part of the company's continued success, so GELCO strives to provide a safe, dignified, respectful work environment without discrimination or harassment, and is committed to providing facilities and structures that are adequate to the performance of its employees. attributions. GELCO is committed to:

Safety and Health

At each workplace, employees are required to know the applicable safety rules and regulations and must continually strive to meet such standards.

Gelco has an occupational health medical control program (PCMSO), which monitors and annually monitors the health of its employees, so it is the employee's duty to participate in the program, according to established rules.

Safety

Implicit or explicit threats, intimidation and violence will never be allowed. Similarly, firearms, melee weapons or even those used for sporting purposes are not allowed in the workplace without authorization. The use of illicit drugs or alcohol at work is strictly prohibited.

10. Prejudice / Discrimination

GELCO values diversity in work relationships. Therefore, everyone should be given respectful, cordial and fair treatment, regardless of their position or function.

The Company does not accept discrimination or prejudice of any kind, whether of race, religion, age, gender, political belief, nationality, marital status, sexual orientation, physical condition or any other.

11. Child or slave labour

GELCO does not accept, either within its companies or with suppliers and business partners, slave labour or similar conditions, or use of child labour. If under-16s are employed as apprentices Following the laws in force in the country, the Company ensures that the work will not prevent their studies.

12. Equal Employment Opportunities

GELCO recruits, hires, develops, promotes discipline and provides employment conditions, regardless of race, colour, religion, gender, age, sexual orientation, disability, citizenship, marital status or any other situation supported by law.

In recruitment, selection and promotion processes, candidates should be evaluated solely for their ability to meet and meet job expectations.

Work environment without harassment

Discriminatory conduct, jokes, insults or other remarks or forms of harassment that create an offensive or hostile work environment are strictly prohibited.

13. Generating and Maintaining Accuracy of Financial Information

GELCO has the principle of providing accurate financial information and records, which includes cost, sales, shipping, schedule, voucher, account, payroll and benefit data.

All employees have a duty to ensure that the creation and disclosure of any business-financial or other information is accurate, complete and timely. Company records should never be falsified.

14. Financial Management

GELCO neither accepts nor endorses any “money laundering” initiative, which is understood as a process designed to conceal or legitimize illicit financial resources. It is important that everyone be aware of the following behaviours:

- Unusual forms or complex payment patterns
- Unusual transfers to / from non-transaction countries
- Customers with operations that appear to have poor integrity
- Customers who are eager to avoid the registration requirements of
- Information.

Transactions involving locations previously associated with “money laundering” or tax evasion.

Any evidence mentioned above must be reported to the direct superior or Human Recruitment area or must be reported on the non-compliance form present in the

administrative area and in the Green Room or through the Ethics Channel 0800 602 6911, www.contatoseguro.com.br/gelco

15. Other Standards You Should Know

➤ Collection of Competitive Information:

Use only fair and accountable methods to gather competitive information.

➤ Bribery and corruption

Never offer or accept a bribe

➤ Dishonest Business Practices

Never adopt dishonest methods of closing deals, such as making false claims about the competitor. Never discuss sales plans with competitors, share customer information, or make agreements about how we compete.

➤ Theft

Stealing the Company in any way - money, products, time, services, ideas, etc., is a crime.

➤ Fraud

Never take measures that could defraud processes or products.

16. Freedom of speech

Every GELCO employee has freedom of expression to express their opinion and to suggest improvements including association and union participation.

17. Disciplinary Measures

The existence of rules, policies and procedures is an essential condition for a successful company. It is up to the leadership to ensure that they are followed for the harmonious and efficient functioning of the Organization.

It is up to the leadership to inform, guide and prepare their staff for the correct application of the organization's policies and norms, being an example to be followed. Failure to comply with GELCO standards and rules cannot be tolerated and may be punishable. Possible punishments are:

- Verbal Warning
- Written Warning
- Suspension
- Dismissal without cause
- Termination for cause

Penalties should be applied as soon as possible immediately following the offense, otherwise the tacit pardon will be characterized. A longer period is allowed for the application of the penalty when the lack requires investigation of facts and due responsibilities. Sanctions must be fair, reasonable and proportionate to the offense committed. Similar faults should receive similar penalties.

When an employee deems a malfunction in a standard, he or she should go to his or her immediate superior and request a review of that standard. It will be reviewed by the relevant department and may be reviewed.

Employees should seek guidance from their immediate superior in cases where, due to lack of adequate infrastructure or resources, they are unable to comply with the standard. In turn, this should take the case to an appropriate level of the organization to seek a definitive solution.

All applicable disciplinary measures must be previously authorized by the Area Management and the Human Resources area.

18. Disclosure and Procedures

Managers should transmit to their respective teams the rules contained in this Code of Conduct, so that it has wide dissemination in the workplace, as well as ensure compliance with the General Management recommendations for its update and improvement.

Employees who hire suppliers, representatives, consultants, temporary professionals, and other contractors should monitor their work to make sure they act in accordance with the principles of the Code and company policies and should report when this does not occur.

Specific questions regarding specific situations regarding the application or interpretation of the rules contained in this Code, should be referred to the immediate superior who, in turn, will direct the Human Resources area and, if necessary, will bring the matter to the attention of the Management. General.

Employees or any GELCO business partner who is aware of any acts, facts or practices that violate this Code should report them to their immediate superior or the Human Resources area or use the Non-Compliance Form or the Channel. of Ethics **0800 602 6911** or **www.contatoseguro.com.br/gelco**

The company will handle all reports with complete discretion. Obviously, for the investigation and its follow-up to be effective, some people must be aware of the report and the details of the claim.

In addition, there may be cases in which GELCO has a legal obligation to make available to third parties' certain information about reported compliance issues.

We also rely on the professionalism of a specialized third-party company to assist Gelco' Ethics Committee in finding the best way and best solutions.

All reports made by the Ethics Channel must be reviewed by Genco's Ethics Committee, which will take appropriate action.

The Ethics Channel is also available and may be used by third parties, service providers, sales representatives, customers and other business partners through 0800 602 6911 or www.contatoseguro.com.br/gelco.

All employees must follow the GELCO Code of Conduct. If an employee seeks clarification and raises an issue or reports suspicious conduct, they are doing the right thing. GELCO will not tolerate retaliation against any employee. Any employee who participates in retaliation will be punished and may even be dismissed.

When an employee is being retaliated against for raising a compliance or integrity issue, they should contact their immediate superior or the Human Resources or Security area of the company or fill out the non-compliance form available at administrative area and in the green room or by the Ethics Channel **0800 602 6911** **www.contatoseguro.com.br/gelco** or by the **Mobile Contact Secure** application.

Reports of infringements of theft, fraud, harassment or other situations that cause financial harm to a person or property will be treated confidentially without prejudice to the report. GELCO will investigate the facts to objectively determine what happened, and it is based on them that the company will decide what actions will be taken, based on impartiality, honesty, fairness, and confidentiality.

Validity

GELCO's Code of Conduct has been approved by General Management, effective as of the date of its publication.

Brazil, may 2022.

COMMITMENT TERM

I declare that have received the Code of Conduct GELCO GELATINAS DO BRASIL and vow to stick to it and ensure its observance.

Date:

Full name:

Signature: