

Code of Ethics and Conduct of Matera Group

matera

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INTRODUCTION

This Code of Ethics and Conduct is the set of ethical principles and standards, the objectives of which are to enhance the ethical culture and manage internal and external conflicts of interest of Matera and its companies that form part of the same economic group (hereinafter referred to as "Matera").

The principles that govern it are the company's values and purpose, and these are the basis for defining the guidelines that will guide the conduct of all employees, customers, suppliers, partners and the community in a transparent, respectful, and coherent way.

MATERA'S PURPOSE

To be a reference on the market in which it operates, committed to its clients, a source of pride for its employees and admired by the community.

VALUES

Matera has values that it considers essential for its relationship with its stakeholders, and defines them as: Ethics, Commitment, Trust, Cooperation, Innovation, Excellence and Pride. All the values in which the company believes and that define its Culture are expressed in its Manifesto.

MANIFEST

Our clients' satisfaction comes first. To meet their true needs, we maintain a close and personal relationship, respect their individuality, and establish bonds of trust and partnership. We consider their problems to be our problems, and we are committed to solving them. We deliver products and services with the best quality standards. We are flexible in adapting and improving what we supply. We act with agility to meet our customers' requirements on time.

We work in an objective and productive way. We relentlessly seek to evolve and we know that the best result can lie in finding different ways to do the same things. We understand the reason for what we do and the implications of our responsibilities as part of the whole. We make decisions with autonomy, delegating activities with the assurance that they will be carried out properly. We act with initiative, anticipating problems and proposing solutions. We are all responsible for the results of our work

We are proud of our environment and enjoy what we do. We work with competent employees, respect people's individuality and recognize their merits. We reward our work fairly and appropriately. We are cooperative, encourage the exchange of experiences and professional development. We act with empathy and communicate in a transparent way, listening to and understanding the motivations of others. We create bonds of trust with people.

We promote actions that contribute to improving education and environmental awareness in our country, especially in the regions where we operate. We are agents in the formation of citizens capable of participating in the development of society. We contribute to the preservation of the environment through rationalization and reuse of natural resources. We comply with legal obligations and reject any kind of illicit practice. We strive for ethics in our relationships with employees, customers, suppliers, partners and the State.

ORGANIZATIONAL CLIMATE

Matera values a work environment that is healthy, productive and that ensures motivation and satisfaction for its employees, where opinions are heard and respected, regardless of hierarchical level.

RESPECT

No form of disrespect in the work environment will be accepted, whether by acts of psychological harassment, sexual harassment, religious, political and party-political opinions, discrimination on the grounds of race, gender or disability, or by situations of intimidation, embarrassment, threat or violence.

EQUALITY

It is our understanding that equality is present when all people have the same conditions with regard to work, development and expression. We apply this philosophy to everyone involved with the company: employees, clients, partners and the community.

INTERNAL RELATIONS

DIVERSITY

We value diversity and cherish equality and respect for all people, since we believe that a heterogeneous environment contributes not only to better work relationships, but also to a fairer, more egalitarian, inclusive and ethical society. We do not tolerate discrimination under any pretext.

CONFLICT OF INTEREST

We take this topic into consideration to manage personal conflicts of interest involving stakeholders or employees that could cause any harm to the company.

Thus, situations or activities that represent an actual or potential conflict between private interests and Matera's interests must be avoided.

All stakeholders or employees shall obey the principle of not obtaining personal advantage or making improper use of any privileged information acquired in the course of their activities

HIRING OF RELATIVES

The hiring or transfer of employees up to the fourth degree of kinship is allowed, as long as they are not in the same line of leadership or subordination. This restriction will continue throughout the period that the employees remain with the company.

INTERNAL RELATIONS

CLOSE PERSONAL RELATIONSHIPS

Close personal relationships between employees are allowed as long as they are not in the same line of leadership or subordination.

If the relationship occurs between employees in this condition, they will be relocated, as far as possible, to avoid conflicts of interest. This restriction will continue throughout the period that the employees remain with the company.

GIFTS

Receipt of gifts is allowed as long as they are of an institutional marketing nature. However, in the case of non-institutional gifts worth more than US\$ 100.00, the item will be raffled and donated to social projects supported by the company or raffled between its employees.

Gifts and presents that generate expectations of something in return should not be accepted and/or offered.

Other situations not described above must be evaluated by the employee's direct leader and/or the Compliance Committee.

INTERNAL RELATIONS

PARALLEL ACTIVITIES

We consider parallel activities to be those that employees undertake outside of their working hours, whether or not they are paid for doing them. We respect this choice, but it is essential that it does not impact on their performance or their commitments to Matera and that they do not make an association between Matera and the activity they perform outside of Matera. Activities that compete in any way with Matera's core business or that use Matera's intellectual property or in any way interfere with or negatively affect their activities at Matera or create conflicts of interest will not be tolerated.

SOCIAL MEDIA

Posting Matera-related photos, videos and information on social media (Facebook, Twitter, LinkedIn, YouTube, among others) will be permitted, unless Matera does not permit such disclosure. Under no circumstances whatsoever may internal and confidential information and customer information be posted or disclosed.

It is every employee's duty to care for Matera's image and reputation. The use of social network media and communication therein involving Matera's name must obey the ethical principles provided for in this Code of Ethics and Conduct, as well as the secrecy and confidentiality required for the case in question.

INTERNAL RELATIONS

SUPPLIERS, SERVICE PROVIDERS AND THIRD PARTIES

Matera expects its suppliers to share its values and comply with all applicable laws according to the region in which they operate. It is essential to this relationship that they prohibit fraud and corruption and respect human rights wherever they operate. We do not favor supplier and partner selection processes, ensuring as a basis for choice aspects that guarantee the best cost-benefit and technicality of service provision, in accordance with Matera's Supplier Policy.

CLIENTS

We value a good relationship with our clients in order to ensure their satisfaction in relation to the products, services and care offered by the Company, thus maintaining a long-lasting relationship. We act with transparency, respect, and ethics, esteeming the secrecy involving the content of the work we do for them and any mention of names of companies, people or information that can identify them, without prior and express authorization of the Company, obligatorily taking care to ensure the integrity and confidentiality of information.

We improve our products with quality, always seeking solutions for the client, with integrity, transparency, in accordance with the values and guidelines described in this code.

RELATIONS WITH COMPETITORS

We maintain a professional and ethical relationship with our competitors, based on loyal management guided by respect for legal standards. It is forbidden for any Matera Group employee to make verbal or written statements that may affect the image of competitors or contribute to spreading rumors about them.

COMMUNITY

We promote actions that contribute to the improvement of education, social inclusion and environmental awareness, especially in the regions where we operate. We are agents in the formation of citizens capable of participating in the development of society. We provide information on the actions we carry out with the community every year through our Social Responsibility Report.

DONATIONS AND SPONSORSHIPS

Matera is committed to social responsibility and supports the development of the environment in which it operates.

The Matera Group prohibits making any donations or sponsorships in its name to politicians, political parties, candidates for political office or public officials.

Our relationship with the community requires authorizations, transparency and accountability.

INFORMATION SECURITY

All employees are responsible for being familiar with, respecting and applying Matera's Information Security Policy and specific standards on the subject.

DATA PRIVACY AND PROTECTION

We are aware of the need to guarantee adequate protection to stakeholders in relation to personal data processing operations and we respect the right to privacy of all our employees, customers, suppliers and partners. We are committed to the correct and ethical use of data and information provided, especially in relation to the provisions of the General Law on Protection of Personal Data (Law No. 13709/2018), and we expect the same commitment with respect to personal data processed on behalf of, or for, the Matera Group.

CONFIDENTIALITY

We value the confidentiality of data and information of our customers, partners, employees and Matera itself. We detail and establish commitments and obligations in Confidentiality Agreements, which must be complied with by everyone.

FRAUD AND CORRUPTION

Employees and service providers are prohibited from offering bribes and engaging in any acts of fraud and corruption in the performance of their activities. All employees are responsible for being familiar with, complying with and implementing Matera's Anti-Fraud and Corruption Policy.

INTELLECTUAL PROPERTY

We consider Matera's intellectual property to be an intangible and strategic asset that must be respected, cared for and protected by its employees. Accordingly, its employees declare that they are aware that all products or artifacts developed during the course of their professional activities for Matera are Matera's full and exclusive property.

Moreover, Matera employees shall respect the intellectual property of any third party and assume direct liability for any infringement of these rights.

ASSETS AND PROPERTY

All employees are responsible for the integrity of the company's property, equipment and facilities and for using them in a responsible manner. Electronic resources in general, including the use of cell phones, notebooks and corporate emails, belong to Matera and its subsidiaries and are made available strictly for professional purposes, in accordance with specific terms regulating their use.

OCCUPATIONAL SAFETY AND OCCUPATIONAL HEALTH

We are committed to the safety and health of our employees, offering medical assistance, workplace exercises, and always keeping the environment clean and safe, seeking continuous improvement in working conditions.

PUBLIC OFFICIALS

Relations with government or public authorities must always be based on transparency and integrity, respecting the laws in force in Brazil and in the countries where we operate, always based on ethical behavior.

MANAGEMENT OF THIS CODE

It is the responsibility of all employees to respect, apply and ensure compliance with this Code of Ethics and Conduct. Possible cases of failure to comply with this Code should be reported to their immediate leader or directly to the Compliance Committee.

The Matera Compliance Committee should be consulted to resolve any questions or cases that are not covered by the provisions of this Code of Ethics and Conduct.

Matera encourages all employees to immediately report any suspected violations of this Code. The anonymity of the employee and the confidentiality of the case will be ensured.

The measures applied for misconduct may be educational or corrective disciplinary actions, warnings, suspension of activities and even dismissal, depending on the severity of the situation, subject to appropriate legal measures.

This Code of Ethics and Conduct shall be revised every two years by the areas involved in its preparation and shall be approved by the Compliance Committee and Top Management at a meeting of the Board of Directors.

REPORTING CHANNELS

The provisions of this Code shall be managed by the Company's Ethics Committee. Any doubts, questions, general communications or specific situations should be addressed to **Matera's Ethics and Conduct Channel**.

To ensure confidentiality, secrecy, transparency and agility in the activities pertaining to the Reporting Channel, the Ethics Committee will only proceed with the complaint investigation process when reports are formalized through Matera's official reporting channel.

This Code of Ethics and Conduct is a document that requires the collaboration, commitment and participation of all Matera Group stakeholders in order to be effective. To do so, concerns about conduct need to be communicated in good faith and anyone can report something they believe to be honest information so that the Ethics Committee can investigate and apply the appropriate measures, ensuring that the identity of the person reporting them is kept confidential and that no retaliation will occur.

DISCLOSURE AND ACCEPTANCE OF THIS CODE

All employees submit themselves to the provisions of this Code and must sign their agreement to it when joining Matera or when disclosing this Code.

The background is a solid blue color with abstract, curved shapes in a lighter shade of blue on the left and right sides, creating a modern, minimalist aesthetic.

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let's createthefuture.