


May 2023  
version



# Code of Conduct





The Sindicato Nacional da Indústria de Componentes para Veículos Automotores (Sindipeças) and the Associação Brasileira da Indústria de Autoparts (Abipeças) are committed to ethical, honest, and transparent conduct in their relationships, guided by the values of ethics, transparency, excellence, commitment to results, economic, social and environmental responsibility, as well as the development and appreciation of people.

This Code applies to all our associates, administrators, employees, and service providers or suppliers of the Entities, who undertake to observe the guidelines contained herein and to increasingly contribute to the promotion of an ethical culture, which respects the fair competition laws and practices.

Cláudio Sahad

President of the Board  
and Administrative Council

Adilson Luis Sigarini

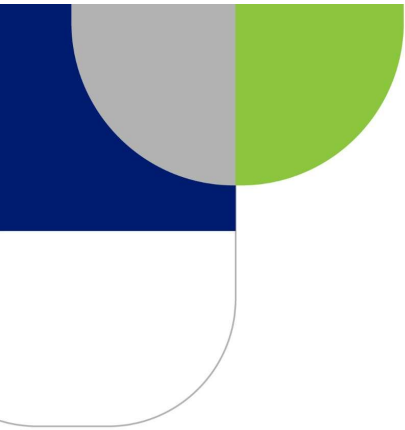
Executive Director

## OPENING MESSAGE



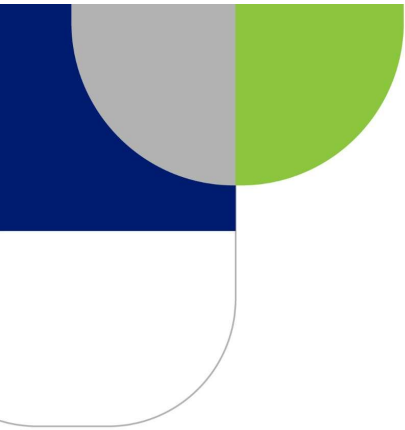
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## SUMMARY



The objective of this Code is to guide the ethical conduct in internal and external relations and actions undertaken by the Sindicato Nacional da Indústria de Componentes and e by Associação Brasileira da Indústria de Autopeças (Entities), discouraging any possibility of misuse of its resources and organizational structure for actions or situations that may be characterized as illegal.

## OBJECTIVE



The Code of Conduct involves the internal and external personnel referred to in this document, and it apply to all members, managers, employees, interns and third party service providers or Entities suppliers.

## SCOPE



### **Mission**

Unite; represent; stimulate; inform and empower companies in the auto parts sector.

### **Ethics**

- Act with integrity in relationships, respecting people, internal policies, and the current legislation.
- Promote fairness in its actions and discourage any act that violates the precepts established in internal and legal regulations.
- Acting and instructing to promote the strict observance of legal norms, the good practices of association and competition compliance, curbing acts, and actions, even if involuntary, that may represent or suggest anti-competitive conduct or violation of the Competition Defense Law.

### **Transparency**

Share the claims and the performance of auto parts sector with the business community and society in general.

Handle with care the resources of the Entities.

Secrecy of confidential and strategic information of the Entities and/or its associates will be imposed, revealing, in such cases, the data of social interest in aggregate form, preserving the right of secrecy of individual sources.

## **ENTITIES' BASIC GUIDELINES**



### **Excellence**

Commitment to excellence in internal governance and in processes, products and services, offering solutions with high added value to the public of interest of the Entities, attending to their needs and expectations.

### **Commitment to Results**

Constantly be in pursuit of achieving the stated objectives, as well to measure and disclose the performance through research and other appropriate ways.

### **Economic, Social and Environmental Responsibility**

To act contributing to the development of Brazilian society with justice and respect for legal requirements, for the sustainability of Entities and the respect and preservation of the environment.

### **Development and Staff Valorization**

To act contributing to the continued development of managers and employees, stimulating and enhancing skills in order to contribute to the achievement of organizational results.

## **ENTITIES' BASIC GUIDELINES**



## RELATIONSHIP EMPLOYEES AND CONTRACTORS

1. Recognize and respect diversity through equity practices, not discriminatory, making no distinction of race; color; ethnic origin; nationality; gender; sexual orientation; personal aesthetic; social position; age; religion; physical, mental or psychological condition; marital status; opinion or political belief;
2. Admit, train and promote based on transparent criteria and policies;
3. Develop programs and actions for the physical, mental and social well-being of the employees;
4. Encourage professional development and also to base hiring and promotions decisions on the performance; and
5. Not accept or condone practices that hurt the legal precepts, in the Entities or between its services providers and suppliers.

# RELATIONSHIPS

Employees and Contractors





## RELATIONSHIP EMPLOYEES AND CONTRACTORS

1. Recognize and respect diversity through equity practices, not discriminatory, making no distinction of race; color; ethnic origin; nationality; gender; sexual orientation; personal aesthetic; social position; age; religion; physical, mental or psychological condition; marital status; opinion or political belief;
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## RELATIONSHIPS

Employees and Contractors

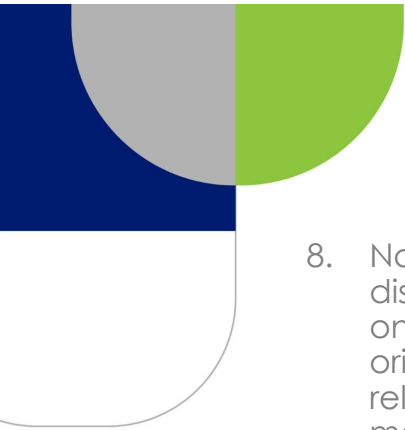


## RELATIONSHIP ASSOCIATES, MANAGERS, EMPLOYEES AND CONTRACTORS

1. Observe and comply with the provisions of the Code of Conduct;
2. Do not engage in activities which conflict with the interests of the Entities and those that can generate professional and/or image losses for the Entities;
3. To care for the image and reputation of the Entities, acting with integrity, respect and honesty;
4. To care for the Entities' assets, protecting property, furniture, real estate and resources against loss, damage, theft, inappropriate or unlawful purposes;
5. Maintain confidentiality of personal information of employees and of the Entities, as well of the service providers, suppliers and associates, revealing only that information where there is explicit determination in this sense and in accordance with internal policies of the Entities;
6. Do not use the Entities' name to deal with particular affairs;
7. Not promote the dissemination of confidential or untrue information in media communication by any means;

## RELATIONSHIPS

Associates, Managers, Employees and Contractors

- 
8. Not practice abuse of power or any kind of discrimination, disqualification, intimidation and embarrassment, based on race; color; ethnic origin; nationality; gender; sexual orientation; personal aesthetic; social position; age; religion; physical, mental or psychological condition; marital status; opinion or political belief;
  9. To use the facilities, equipment, vehicles, machinery, materials and information of Entities' property observing the existing policies;
  10. Respect the rights of intellectual property, paying attention to the regulatory instruments on the subject, always recognizing the credits and merits of others; this recognition covers, but is not limited to, the need to insert in the materials, reference to the author and/or source used and not misappropriate the ownership of third-party work;
  11. Not solicit, receive or offer gifts or money that may characterize any advantage and/or favor on professional relationships, especially in the acquisition process and/or contract services; and
  12. Do not use the position to offer, solicit or accept favors, benefits or personal services.

## RELATIONSHIPS

Associates, Managers, Employees and Contractors



## RELATIONSHIP ASSOCIATES AND EXTERNAL STAKEHOLDERS

1. Commitment with transparency in relations with the public, providing as needed and in accordance with internal policies, clear and accurate information;
2. Available when needed and in accordance with internal policies, channel communication to meet their demands;
3. Ensuring the quality and confidentiality of the requested and received information;
4. Serve the public with courtesy, speed and excellence, contemplating the service appropriate to their needs and expectations; and
5. Report and recommend the proper compliance with the legal requirements and standards internal in any relationship or been kept in or entities.

## RELATIONSHIPS

Associates and External Stakeholders



## RELATIONSHIP SERVICE PROVIDERS AND SUPPLIERS

1. Hiring and select according to the constitutional principles and current legislation, observing ethics, regulations and policies of the Entities, based on criteria clear and objective;
2. To relate only with service providers and suppliers that endorse this Code, that follow it and the current legislation;
3. Ensure the quality of these relationships, developing actions for share and/or complementary responsibility, for a better service of the internal and external public; and
4. Respect the contracts and conduct with transparency the relationship.

## RELATIONSHIPS

Service Providers and Suppliers



## RELATIONSHIP COMMUNITY, DIVERSITY AND ENVIRONMENT

1. Contribute to the promotion of the sustainability of the communities where they operate;
2. Keep communication channels to facilitate dialogue with the community;
3. In relations, hiring and managing people, not distinction as to race; color; ethnic background; nationality; gender; sexual orientation; personal aesthetic; social position; age; religion; physical, mental or psychological condition; marital status; opinion or political belief;
4. Adopt practices that reduce negative impacts, direct or indirect, in the environment;
5. Practice, encourage and promote environmental conservation; and
6. Optimize the use of natural resources in a sustainable manner.

## RELATIONSHIPS

Community, Diversity and Environment



## RELATIONSHIP GOVERNMENT AND SUPERVISORY BODIES

1. Comply with the requests of information by the Government, its agencies of regulation and inspection, promptly and with transparency, when such requests are reasonable and based on the common good, respecting the internal policies and current legislation; and
2. Do not offer benefits of any kind to public employees, agents or governmental authorities.

## RELATIONSHIPS

Government and Supervisory Bodies



## RELATIONSHIP MEDIA

1. Respect freedom of expression and the right to information;
2. Provide information, when appropriate, in accordance with the internal rules and based on facts and reliable sources; and
3. Comply with current legislation, ethics and local and international reference standards in all advertising and marketing activities.

# RELATIONSHIPS

Media





### Reporting Channel:

The complaints for violations of this Code of Conduct should be directed through the following channels:

**Website:** <https://www.sindipecas.org.br/canaldenuncia>;

**E-mail:** [canal.denuncia.sindipecas@missaocompliance.com.br](mailto:canal.denuncia.sindipecas@missaocompliance.com.br);

**Phone:** +55 11 4580-4514, from 9 am to 6 pm, with electronic service at other times.

The reporting channel will be managed by an external company, with impartiality and independence, with the report being sent to the Ethics and Compliance Committee of the entity, which will deliberate on the need to adopt applicable measures.

The complaints will be treated confidentially and the identity of those who formulate will be protected, whenever they use the appropriate channel for it.

The full text of this Code is available at Entities' site [www.sindipecas.org.br](http://www.sindipecas.org.br), and all implicated undertake its terms, in accordance with the respective instruments of subscription.

### Doubts:

For any questions about the Code of Conduct, contact [compliance@sindipecas.org.br](mailto:compliance@sindipecas.org.br).

## FINAL PROVISIONS

By presenting this term, I declare that I know and understand the principles of ethics and conduct that govern all labor relations and the conduct of business at Sindipeças and Abipeças described in the Code of Conduct, committing myself to follow all the rules established herein.

I promise to act respectfully, correctly and with integrity, respecting the fundamental precepts of this Entity. I promise to report any conduct per two established standards. Finally, I declare that I am aware that: a) the Code of Conduct may undergo updates and, therefore, the most current version will always automatically replace previous versions, replacing or adding precedents that must also be followed. The updated version will always be available on the Entity's website; b) all denouncements registered in the Denunciation Channel will start an analysis process conducted by a Committee formed for this purpose, based on appropriate measures; c) Failure to comply with the Code of Conduct will imply the adoption of measures by the Entity.

Name: \_\_\_\_\_

Office: \_\_\_\_\_

Company: \_\_\_\_\_

Relationship with the Entity: ( ) Colaborator ( ) Associate ( ) Customer  
( ) Supplier ( ) Service Provider ( ) Business Partner ( )  
Others: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

## DECLARATION OF AWARENESS AND COMMITMENT



### **Excellence**

Commitment to excellence in internal governance and in processes, products and services, offering solutions with high added value to the public of interest of the Entities, attending to their needs and expectations.

### **Commitment to Results**

Constantly be in pursuit of achieving the stated objectives, as well to measure and disclose the performance through research and other appropriate ways.

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## **ENTITIES' BASIC GUIDELINES**