

Rev.:	Date:	Nature of Change :
00	10/21/19	- Initial Approval.

WORD FROM THE BOARD

It was not a mandatory requirement, but **Destaq/Injetaq** had wanted for a long time and chose to demonstrate the existence of its mechanism for the prevention and detection of illegal acts and/or contrary to the principles of ethics and integrity in its business, including, but not limiting fraud and acts of corruption and this desire was materialized in the adoption of **Destaq/Injetaq 's commitment** to maintaining a strict ethical standard, compliance of its processes with regulatory requirements, internal policies and with the implementation and maintenance of its System Integrated Management:

NBR 9001:2015 Integrated Management System – Requirements;

NBR 14001:2015 Environmental Management System – Requirements with guidelines for use;

NBR 45001:2018 Occupational Health and Safety Management System - Requirements;

NBR 37001:2017 Anti-Bribery Management System – Requirements with guidance for use;

NBR 27001:2013 Information Security Management System – Requirements (Part 1);

NBR 27701:2020 Security Techniques Extension of ABNT ISO/IEC 27001 and 27002 – Requirements and guidelines;

SA 8000:2001 Social Responsibility.

Through the principles of ISO 37001 (Anti-Bribery Management System), we have developed this CODE OF CONDUCT, to demonstrate our commitment to ETHICS.


Destaq/Injetaq Code of Conduct , I am sure that, if you are not applying the guidelines contained therein, you will start doing so, that is, you will apply these values as a basis for your behaviors and decisions on a daily basis. . In addition, your continued attention and adherence to the **Destaq/Injetaq** Policy on Ethical Business Conduct will be critical to our success.

As we work together to build a strong future, we will all continue to live our values, and apply them to a high standard, embodied in **Destaq/Injetaq 's Policies of Ethical Business Conduct** every day and at all times.

All our customers and partners expect this of us, and more than that, we expect this of ourselves.

Any complaints, doubts and suggestions related to any relevant matter dealt with in this Code of Conduct should be forwarded through our *hotline channel* , through the website www.injetaq.com.br or by phone: 11-4070-5621.


Yours sincerely,



Domingos Tabone
Director



Edgard Gomes
Director



Edson Abrell
Director

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PRESENTATION OF THE CODE OF CONDUCT

This Code of Conduct has the purpose of describing the behavior that employees, collaborators, must adopt in the performance of their functional activities.

The principles of the Compliance System are:

- Ethics in **Destaq/Injetaq 's internal and external business** ;
- Loyalty to **Destaq/Injetaq** ;
- Fair, courteous and respectful treatment among co-workers;
- Fairness and consideration appropriate to the interests of other persons linked to **Destaq/Injetaq** : customers, business partners, government authorities and the general public;
- Respect and protection for the environment, Occupational Health and Safety;

HIGHLIGHT/INJETAQ PRESENTATION

Destaq Desenhos Mecânicos Ltda. was founded in 1988 with the aim of providing services to the automotive and auto parts industries, working in the areas of product design, bending, cutting and drawing tools, thermoplastic injection molds, assembly devices, machining and control devices. Since the beginning of its activities, it has been constantly improving its area of projects, having a sector specialized in computer graphics properly equipped with the most modern technologies available in the current market, and **Injetaq** is its main customer.

Injetaq Indústria e Comércio Ltda. was founded in 1991, with highly specialized equipment and labor, the company is able to provide services to the automotive and auto parts industries in the areas of molding, tooling and injection of thermoplastics, as well as, of experimental prototype parts, made of sheet metal or plastic.

Its main suppliers of Foundry, Styrofoam and Engineering Plastics also have the highest technology in the segment that contributes to our meeting the main requirements of our customers.

LOCALIZATION

Destaq/Injetaq is located with its own headquarters at:

Address: Rua Capistrano de Abreu, nº. 306

Neighborhood: Fraternal Garden

City: Diadema

State: Sao Paulo

CEP: 09940-470

Telephone: +55 11 4070-5656

Site: www.injetaq.com.br

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0. START

This Code of Conduct applies to the following areas of interest, divided into Chapters:

- Personal obligations;
- Customer Relations;
- Relations with Certifying Bodies;
- Discrimination;
- Interest conflicts;
- Bribery, business entertainment and gifts;
- Misuse of privileged information;
- Compliance with the law;
- Control;
- Obligations of collaborators/partners;
- Posture of your contractors.

This Code guides all **Destaq/Injetaq operations** and complements the current policies, guidelines and rules adopted.

Destaq/Injetaq strives to ensure that its employees assimilate the principles of this code and, whenever possible, act in synergy with the areas of interest.

The documentation of the **Destaq/Injetaq** Compliance system does not contradict current and applicable legislation where we provide our services. If there are differences, the most restrictive requirement will be considered valid.

In this Code of Conduct we present our Mission, Integrated Policy, Principles, Values and Commitments, related to ethics and integrity.

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1. OUR MISSION

Destaq/Injetaq's mission is to do things differently, to involve management and people to add value to the business; so that they adopt practices aimed at improving the company's competitiveness; that do not allow illegal and unethical practices; that avoid the risk of the organization inheriting an environmental liability; that are constantly concerned with improving productivity and employee and customer satisfaction, including health and safety; that has profit and perpetuity in the market.

In terms of quality, our mission is:

"Make and sell mechanical drawings and projects; construction of tooling for stamping; devices in general; molds and models for casting and thermoplastic injection."

2. OUR VISION

"To be recognized as a high quality Supplier, for our products, services, punctuality and innovation. Satisfying all the expectations of our customers".

3. OUR VALUES

HONESTY: Be truthful in your actions and statements.

JUSTICE: Be honest and fair with what is agreed upon.

RESPECT: Be considerate, reverent and ethical, valuing employees.

COMMITMENT: Being aware that many other people need our work, and it is necessary to develop it with pleasure, proactivity and responsibility. Do more than is asked and always desire growth as a human being.

CORDIALITY: To be kind, polite and civilized, expressing gestures of donation in favor of the other person.

ETHICS: To be ethical in the internal and external business of the company.

ATTENTION: constant attention to customer needs.

SUSTAINABILITY: sustainability in personal and professional life.

KNOWLEDGE: knowledge, rigor and precision in carrying out the work.

4. OUR PRINCIPLES

Integrity – **Destaq/Injetaq** professionals must offer and provide professional services with integrity and be considered by clients as deserving of complete trust.

Objectivity – **Destaq/Injetaq** professionals must be objective in providing professional services to the client.

Competence – **Destaq/Injetaq** professionals must provide services to clients in a competent manner and maintain the necessary knowledge to continue to do so in the areas in which they are involved.

Confidentiality – **Destaq/Injetaq** professionals must not disclose any confidential client information without their specific consent, unless in response to legal proceedings to defend against allegations of malpractice by the professional or in connection with a civil dispute between the professional and the customer.

Professionalism – the conduct of **Destaq/Injetaq** professionals in all matters must reflect zeal and respect for the company, friends, suppliers, customers, among others:

- Impartiality;
- Responsibility;
- Transparency;
- Ability to respond to complaints;
- Risk-based approach.

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5. OUR COMMITMENT

Destaq/Injetaq 's commitments are :

- Fully comply with applicable laws and/or regulations;
- Combat corruption, cartel, fraud, money laundering, illegal bidding and competition processes, either by its employees or by third parties acting on its behalf;
- Prohibit retaliation of any kind;
- Avoid conflicts of interest;
- Prevent facilitation payments;
- Ensure confidentiality in the handling of cases and other sensitive Compliance issues;
- Encourage people to report acts or attitudes that are contrary to the organization's code of conduct.
- Act with absolute honesty and integrity in everything we do.
- Respect our physical and social environment.
- Valuing and developing the diverse talents, initiatives and leadership of our employees.
- To win the admiration of all our customers, partners and suppliers.
- Take care of all the Company's assets, assets and assets.
- Respect and honor the name of the company before civil and business society.

6. EFFECTIVE ACTIONS

The effective actions taken by **Destaq/Injetaq** are:

- Systematics to deal with deviations from **Destaq/Injetaq** requirements, as well as non-compliance with legal and/or regulatory requirements.
- Communication channels for reporting violations of the Code of Conduct, adequate structure to analyze cases (potential or concrete) and appropriate remedial measures, including disciplinary sanctions, when applicable.
- Communication to stakeholders and the external public about the importance of adherence to the requirements of the Compliance System and the principles of ethics and integrity contained in this **Destaq/Injetaq** Code of Conduct.
- Identification through its legal body of the Compliance risks to which **Destaq/Injetaq** is exposed, and respective mitigation measures (risk management).
- Access channels, to communicate a complaint, allegation, suspicion or information that represents an eventual or potential violation of the code of conduct, misconduct, non-compliance with internal rules or transgression of applicable legislation and/or regulations, whether by an employee or third party, which has a business or professional relationship with **Destaq/Injetaq** .
- Documented procedure for the established controls, describing the function responsible for the execution, frequency, criteria for sample size and selection, criteria for evaluating the results and what measures should be taken in case of deviations.

7. NEED FOR A CODE OF CONDUCT

As a Director of a responsible company, we know how important it is that it is not enough to do things well - it is essential to do them correctly. This means making business decisions and taking actions ethically and in compliance with the requirements of applicable law.

When making these decisions, **Destaq/Injetaq**'s values must be clearly present in all our interactions. This Code of Conduct is an extension of **Destaq/Injetaq**'s values and reflects our continued dedication to ethical practices and compliance with applicable regulations.

By following the guidance provided in this document, we recognize our individual and collective responsibilities to manage our business activities with integrity in the performance of our mission.

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8. HOW TO USE THE CODE OF CONDUCT

This Code of Conduct provides a summary of the regulatory requirements and business practices that guide our decisions and activities. The Code contains information on our policies as well as information to obtain guidance on a particular business practice or compliance issue. A careful analysis of this document and commitment to the application of the requirements set out therein is advisable.

This Code of Conduct is not intended to cover every situation that a **Destaq/Injetaq** employee may face, but it provides for the most common corporate situations.

It is everyone's responsibility to be aware of the content of this Code and to respect it.

9. WHAT THIS CODE OF CONDUCT REQUIRES AND WHO MUST FOLLOW IT

These Conduct Policies help employees and third parties responsible for **Destaq/Injetaq** to follow a global vision, adapting attitudes with the Laws and Corporate Norms.

Destaq/Injetaq is us, everyone who works or provides services of any nature and somehow share the same work environment and the day to day of the company. Our posture must be based on respect, ethical commitment, transparency and commitment to the truth.

This code defines ethical standards that guide our conduct and our relationships in professional activity, provides objectivity and clarity in the interpretation of ethical conduct principles, assisting in everyday decision-making and points out basic guidelines so that we can, in each area or activity, develop our specific standards of ethical procedure.

All Employees (CLT's), Contractors (MEI Regime – Individual Micro Entrepreneur), PJ – (Legal Entity), among other hiring regimes, and the Board of **Destaq/Injetaq** are responsible for understanding the policy requirements that apply in their work and for reporting any suspected violations of law or these policies.

The Code of Conduct, in addition to being applicable to all those mentioned above, is also extended to the respective third parties, and requires the following levels of compliance from each one:

Employees (CLT's), Contractors (MEI Regime - Individual Micro Entrepreneur), PJ - (Legal Entity):

It is the responsibility of everyone mentioned above:

- Read all sections of this manual so that its full content is clear. Know the topics covered by each Business Conduct Policy.
- Understand in detail this Business Conduct Policy, which describes your responsibilities at work.
- Access the Code of Conduct whenever you need the policies necessary to perform your work ethically.

Of individuals and/or legal entities, acting on behalf of Destaq/Injetaq:

All **Destaq/Injetaq** employees shall require that any individuals and/or legal entities acting on behalf of **Destaq/Injetaq**, identified as “third parties”, agree to follow the applicable policies of **Destaq/Injetaq**.

The Directors and Employees of **Destaq/Injetaq** must:

- Require the third party to comply with relevant **Destaq/Injetaq** policies, signing terms of commitment, responsibility with this Code of Conduct.
- Require third parties to undertake appropriate Training carried out by **Destaq/Injetaq**, so that they understand the requirements of the policies.
- Monitor the third party's work and take the necessary action, including terminating the third party's commitment to **Destaq/Injetaq**, in the event of non-compliance and disrespect to **Destaq/Injetaq**'s policies.

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From the Service Providers and Relevant Products for Destaq/Injetaq:

The person responsible for the Purchasing Sector must distribute this Code of Conduct, before the conclusion of the Contract for the Provision of Services or Products from relevant suppliers of **Destaq/Injetaq** (in addition to Accounting, Legal Counsel, etc.), which in some way come to put into risk the ethics and integrity of the name and image of **Destaq/Injetaq** before the market and civil society, and that they agree to follow this Code of Conduct.

Likewise, the Directors and Employees of **Destaq/Injetaq** must:

- Require the supplier to comply with relevant **Destaq/Injetaq** policies, signing terms of commitment, responsibility with this Code of Conduct.
- Require suppliers to undertake appropriate training conducted by **Destaq/Injetaq** so that supplier understands policy requirements.
- Monitor the supplier's work and take the necessary action, including the termination of the service provision agreement between **Destaq/Injetaq** and the supplier, in the event of non-compliance and disrespect to **Destaq/Injetaq's** policies.

From the Directors of Destaq/Injetaq:

Directors have additional responsibilities towards employees, third parties and suppliers and must:

- Make sure that everyone understands and complies with the laws and policies of **Destaq/Injetaq**, which are found in this Code of Conduct.
- Create a working environment and relationship in which employees and third parties, and if applicable suppliers, acting on behalf of **Destaq/Injetaq**, embrace our mission, follow our principles, believe in our values, and honor our commitment.
- Take steps to avoid violations of the law and **Destaq/Injetaq** policies and proceed in accordance with the Penalty for Violations policy outlined in this Code of Conduct.
- Take immediate and appropriate action to escalate violations and correct process flaws that allow violations to occur.
- Ensure that anyone who reports a suspected violation or who cooperates in the company's investigation is protected from retaliation.
- Guide your employees/teams about the importance of the Integrated Policies and the use of the Information Technology Policy, avoiding punishment for guilt, resulting from the wrong choice when selecting the employee and for not exercising surveillance to prevent the use of irregular practices.

10. GENERAL ASPECTS

Failure to read or not be aware of the existence of this Code of Conduct does not relieve an employee of the responsibility to act in accordance with the Code.

Destaq/Injetaq reserves the right to include, modify or delete any part of the content of this Code, when it deems it necessary and without prior notice, but undertakes to train employees on the changes made and make the updated Code of Conduct available to third parties. .

11. CONTROL MECHANISM

When necessary, **Destaq/Injetaq's** management will use disciplinary control mechanisms, aiming at full and continuous compliance with this code, guaranteeing, in all eventualities, the full right of defense and argumentation of the parties involved.

12. CODE MAINTENANCE

It is up to **Destaq/Injetaq**, to permanently assess the relevance and relevance of this Code, as well as determine the necessary actions for its maintenance and dissemination at all levels of the company.

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In this way, periodic internal review actions are carried out to update this content, as well as to practically apply the rules of this code.

It is also incumbent upon the judgment of all cases involving the assumption of violation of the ethical principles expressed herein, as well as deliberating on issues relevant to the topic.

13. CODE OF CONDUCT

The basis of this Code of Conduct is as follows:

"We will do business legally and ethically in all aspects of our operations. The policies in this section describe the requirements of Employees (CLT's), Contractors (MEI Regime – Individual Micro Entrepreneur), PJ – (Legal Entity), acting on behalf of **Destaq/Injetaq**, must always respect, in relation to all laws and policies of **Destaq/Injetaq**."

It is the responsibility of Employees (CLT's), Contractors (MEI Regime - Individual Micro Entrepreneur), PJ - (Legal Entity) to ensure the intellectual property of documents created by **Destaq/Injetaq** and computer programs, articles, images or any other information obtained from Internet, and meet the copyright requirements of the author of the material, which is protected under the laws, rules and treaties, national and international, applicable to the protection of copyright, intellectual property and trade and industry secrets, including by Brazilian Laws number 9,609 and 9,610, both of February 19, 1998."

This code also encompasses the objective administrative and civil liability dealt with by the "ANTI-CORRUPTION" Law number 12.846/2013 - in force since 01/29/2014.

In this way, all Employees (CLT's), Contractors (MEI Regime - Individual Micro Entrepreneur), PJ - (Legal Entity) who speak on behalf of **Destaq/Injetaq** must be aware that they are acts against the Public administration:

- I. Promise, offer or give, directly or indirectly, an undue advantage to a public agent, or a third person related to him/her;
- II. Proven to finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in this Law;
- III. Evidently, using an intermediary individual or legal entity to hide or disguise their real interests or the identity of the beneficiaries of the acts performed;
- IV. Regarding bids, when applicable, and contracts:
 - a) To frustrate or defraud, by means of an adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;
 - b) Prevent, disturb or defraud the performance of any act of public bidding procedure;
 - c) Remove or seek to remove a bidder, by means of fraud or offering an advantage of any kind;
 - d) Fraud public bidding or contract resulting therefrom;
 - e) Fraudulently or irregularly create a legal entity to participate in public bidding or enter into an administrative contract;
 - f) Obtain an undue advantage or benefit, fraudulently, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public bidding notice or in the respective contractual instruments; or
 - g) Manipulating or defrauding the economic-financial balance of contracts entered into with the public administration;
 - h) To hinder the investigation or inspection activity of public bodies, entities or agents, or to intervene in their performance, including within the scope of regulatory agencies and supervisory bodies of the national financial system.

14. GENERAL GUIDELINES OF THE CODE OF CONDUCT

Show absolute honesty and integrity in all activities and relationships at **Destaq/Injetaq**;

Work so that, in the search for results, the spirit of collaboration with colleagues and other areas of the company prevails;

Maintain an attitude of respect, courtesy and cooperation with colleagues, customers, suppliers and business partners;

Respect intellectual property, recognizing the value and authorship of projects, ideas, proposals and initiatives, both from colleagues and third parties.

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15. RELATIONSHIP WITH CLIENTS

Guarantee, in all aspects, the service with technical and ethical excellence to our customers, guaranteeing them quality, confidentiality, impartiality, security.

Create and maintain relationships with our customers, within the ethical standards and excellence that you would like to be served if you were the customer.

every effort to ensure a balance between the interests of **Destaq/Injetaq** and the needs of the customer.

Promote the correct integration between your co-workers and our customers (when necessary), thus ensuring the excellence of **Destaq/Injetaq** in this service.

16. RELATIONSHIP WITH SUPPLIERS AND PARTNERS

Strive to develop attitudes and activities with technical excellence and compatible with legislation and ethical principles.

Require that our suppliers and partners commit to high standards of ethical behavior and operate in the best interests of **Destaq/Injetaq**.

Ensure that our suppliers and partners provide quality services and products, while maintaining their flexibility and reduced costs.

Never make any kind of negative comment or statement from a co-worker, partner or competitor to suppliers.

Not participating in any unethical or illegal practices with our suppliers or partners, not accepting bribes or any other form with the aim of securing an advantage in closing any deal.

Preserve the integrity of the position, without using our function or information about our activities to influence decisions that may favor private interests or those of third parties.

Maintain, whenever necessary, the due confidentiality of the work we carry out.

Maintain clear and transparent communication throughout the process, without creating expectations that we will not be able to meet.

Comply with the agreements and contracts signed.

Do not act in such a way as to place any supplier or partner in a position where they may feel obliged to offer, provide entertainment or dispense personal favors in order to continue performing their activity with **Destaq/Injetaq**.

Do not accept offers or entertainment occasions in situations that are not foreseen and approved by the Board of **Destaq/Injetaq**.

Regarding Social Responsibility:

When **Destaq/Injetaq** receiving, handling or promoting goods and/or services from suppliers/subcontractors or sub-suppliers who are classified as homeworkers, it will take special measures to ensure that such homeworkers are afforded a similar level of protection as would be afforded to homeworkers employees directly, under the requirements of applicable laws. Such special measures shall include, but are not limited to:

(a) establish written and legally binding acquisition agreements that require compliance with minimum criteria;

(b) ensure that the requirements of the entered purchase agreement are understood and implemented by homeworkers and all other parties involved in the purchase agreement;

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(c) maintain, on company premises, comprehensive records detailing the identities of home workers; the quantities of goods produced/services performed and/or hours worked by each domestic worker;

(d) scheduled and unscheduled monitoring activities to verify compliance with the terms of the acquisition agreement entered into.

17. RELATIONSHIP WITH COMPETITORS

Maintain a healthy relationship with our competitors, always behaving with seriousness and honesty.

Ensure the quality of coexistence and relationship with competing companies. **Destaq/Injetaq** will not endorse any initiative that, in any way, may affect the image of its competitors.

Do not criticize our competitors of any kind to customers or business partners.

Don't look down on a competitor or their products or services.

Obtain information from our competitors through honest, ethical and legal methods.

18. WORK ENVIRONMENT RELATIONSHIP

Maintain a cordial and healthy relationship with all our co-workers.

Recognize diversity, respecting individual differences and values without discriminating between color, race, nationality, age, sexual orientation and political positioning.

Combat any type of intimidation that characterizes sexual harassment or moral harassment (the latter understood as the act of disqualifying people and/or their reputation through words, gestures or attitudes due to the hierarchical bond).

Respect intellectual property, recognizing the value and authorship of projects, ideas, proposals and initiatives, both from colleagues and third parties.

Maintain, whenever necessary, the due confidentiality of the work we carry out. Use internal means of communication (such as Whatsapp, Skype, e-mail from **Destaq/Injetaq**) only for matters relevant to our work and in a constructive way.

Collaborate in promoting a cooperative and productive work environment, with openness, honesty and respect.

Never make any kind of negative comment or statement from a co-worker, either internally, or with customers, suppliers or partners.

Responsible and appropriate use of work materials, ensuring the integrity and safety of equipment provided by the company to carry out the work.

Ensure and contribute to compliance with this Code of Conduct and, whenever necessary, inform and refer ethical questions and issues to the Management Representative for Compliance matters.

Our office environments are monitored by cameras. All images processed and stored - if necessary - are subject to review.

19. RELATIONSHIP WITH GOVERNMENT BODIES

The relationship with representatives of Government Agencies must be guided by high standards of transparency, honesty and integrity in all contacts.

Destaq/Injetaq encourages the political activity of its employees as a legitimate exercise of citizenship and the strengthening of democratic principles in our country. The political and/or partisan activity of your employees, however,

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must be contained at the individual level, outside working hours and without any connection to our company name. No employee may use the name of **Destaq/Injetaq**, or link in any direct or indirect way, in their political-party activities.

No payment in cash, gifts, services, entertainment or any other benefit may be offered, directly or indirectly, to any authority or servant of the direct, indirect Public Administration or Foundations, whether federal, state or municipal.

The destination of any contribution in value, goods or services on behalf of **Destaq/Injetaq**, for political campaigns, political parties and candidates is not allowed. **Destaq/Injetaq**, as a company, also does not make contributions to political parties or electoral campaigns, being a prerogative also valid for its Directors.

20. RELATIONSHIP WITH THE PRESS

Our relationship with the media must be guided by transparency, credibility and trust, always observing ethical values. Our representatives, when authorized to speak on behalf of **Destaq/Injetaq**, must express the institutional point of view, not presenting private opinions.

Employees are prohibited from providing restricted information about any Business Unit of the Company and its clients and partners referred to the press, unless expressly authorized to do so, together with the person responsible for the interface with the Press.

21. MANAGEMENT'S RESPONSIBILITY FOR THE FINANCIAL STATEMENTS

Destaq/Injetaq understands that financial statements are the set of information that must be determined annually, in compliance with the criteria and forms in accordance with Law 6404/76.

The Company's Management is responsible for the preparation and fair presentation of its financial statements in accordance with accounting practices adopted in Brazil and for the internal controls that it has determined to be necessary to allow the preparation of financial statements free of material misstatement, regardless of whether caused by fraud or error.

For this purpose, it uses an Independent Audit firm, whose responsibility is to express an opinion on our financial statements based on an audit conducted in accordance with Brazilian and international standards. Those standards require that we comply with ethical requirements and plan and perform the audit to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing selected procedures to obtain evidence regarding the amounts and disclosures presented in the financial statements. In this risk assessment, the auditor considers the internal controls relevant to the preparation and fair presentation of **Destaq/Injetaq's** financial statements to plan audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of those controls. **Destaq/Injetaq** internals.

Our audit also includes evaluating the adequacy of accounting practices used and the reasonableness of accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

Our financial results, as well as balance sheets, are available to any business partner and/or supplier and can be obtained from our Financial Sector, upon formal request.

22. SOCIAL NETWORKS

The publication of opinions must be based on the principle of good faith, and in legal compliance only in one's own name, avoiding associating any type of personal opinion with our company.

Appropriate language and vocabulary must be used in order to avoid any type of opinion that may be considered ambiguous, subjective, aggressive, hostile, discriminatory, vexatious, ridiculing or that in any way may harm the image of the company, its employees, partners, suppliers and customers. To that end, we encourage:

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- Be selective in the communities in which you are associated;
- Avoid posting personal photos in unconventional or liberal situations;
- The company does not authorize you to speak on its behalf without prior authorization;
- The company does not authorize to post or disclose derogatory or offensive comments about the work environment, its employees, the board, partners, suppliers and competitors;
- The company does not authorize mentioning customer names, internal rules, campaigns and information pertaining to **Destaq/Injetaq**.

Employees are expected to act in accordance with the Code of Conduct, ensuring the protection of their reputation and that of the company, and inform the Management Representative of any suspicious situation that they identify as related to our company.

23. CONFIDENTIAL AND PROPRIETARY INFORMATION

Confidential and Proprietary Information is all information internally linked to **Destaq/Injetaq**, regardless of its content (technical, commercial, marketing, financial, etc.) or its means of propagation (verbal, printed, electronic, etc.).

It is **Destaq/Injetaq**'s responsibility to provide reliable systems for storing and communicating business data and information and protecting such information with the highest level of security.

Destaq/Injetaq does not sell, share or triangulate customer and partner databases, whether registration data, business results or financial data.

It is incumbent upon all of our employees to respect the confidentiality of all proprietary information, observing:

- Not to use confidential and proprietary information for personal advantage or any purpose other than the business activity of **Destaq/Injetaq**;
- Not talking about **Destaq/Injetaq** confidential information with friends or family or when in public places such as elevators, airplanes or restaurants;
- Not to disclose Confidential Information from **Destaq/Injetaq** to any person outside **Destaq/Injetaq** who does not have a confidentiality agreement for this information or to third parties within **Destaq/Injetaq** who do not need to know the information;
- Not receiving confidential information from an employee about their previous employer.
- Maintain this confidentiality even when we are no longer part of the **Destaq/Injetaq** staff.

24. COMMUNICATION POLICY

- Always collaborate to ensure that the company maintains complete, fair, accurate, and properly understandable disclosure standards.

- Establish and maintain open, honest and clear communications; listen carefully; and develop relationships based on trust, respect and mutual understanding.

- Assume responsibility for responding to the needs of our customers, colleagues, suppliers, auditors and partners, within the H24 rule (Responses within a maximum of 24 working hours after receiving the message).

- Send communication via e-mail directly to the person responsible for the task, using a copy for the immediate superior, when deemed necessary.

- Do not use the blind copy feature in internal emails.

- Do not use the company's communication resources, such as e-mail service, telephony for private matters.

- Use the company's printed materials, such as folders, business cards, sheets, gifts and slides only for commercial purposes of interest to **Destaq/Injetaq**.

- Do not use material from the company or from the printers for private or student purposes.

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25. RESPONSIBLE MANAGEMENT

- Commit to managing our activity responsibly to maintain the trust and respect of our customers, partners and suppliers.
- Act with integrity, assuming responsibilities, giving answers to our customers and partners and contributing to the evolution of **Destaq/Injetaq**.
- Wisely use and protect the company's resources, including its capital and products.
- Take care, maintain and conserve all equipment/furniture - individual or collective - that are available to everyone for the execution of the work.

Destaq/Injetaq funds or properties for illegal, improper or unethical purposes.

- Do not circumvent internal procedures in the preparation of expense reports.
- Contribute to the protection of the environment and the preservation of its resources.
- Be constantly attentive to work safety and occupational health, both for your own benefit and that of your colleagues.
- Responsible and appropriate use of work materials, ensuring the integrity and safety of equipment provided by the company to carry out the work.
- Ensuring that payments classified as high risk are pre-approved by Senior Management.
- Not to engage in or promote any activity that could be characterized as money laundering.

26. MERGER AND ACQUISITION

Responsible management also encompasses cases of acquisition, merger or incorporation, and it is up to our company, in the event of a possible acquisition, merger or incorporation scenario, to ensure the values and principles contained in this code. One of the obligations is the collection of information, balance sheets and other accounting, tax and financial data covering judicial and administrative proceedings, certificates from different areas and offices, contracts with obligations to mature, in short, everything that interferes with the assets, liabilities or justifies the contingency (present and/or future) of the company or group involved in the acquisition, merger or incorporation process with or with **Destaq/Injetaq**. The final decision will be based on our ethical and moral values, in addition to considering all matters and terms dealt with in this Code of Conduct.

27. CONFLICTS OF INTEREST

It is essential to avoid circumstances in which personal interest conflicts, or may appear to conflict, with the interests of **Destaq/Injetaq** or its customers, partners and suppliers. The interest can be characterized by any material advantage in favor of oneself or third parties (relatives, friends, etc...) with whom we have or have had personal, commercial or political relationships.

Employees do not have the right to participate in business of a private or personal nature outside of **Destaq/Injetaq**, provided that such business, in addition to being legitimate and legal, does not interfere or conflict with its interests or result from confidential information obtained from **Destaq/Injetaq** due to the exercise of the position or function. In case of doubt, the employee must formally contact the Management Representative for proper guidance.

It is forbidden for everyone to use the position to obtain facilities or any form of favor, for themselves or for others. It is forbidden to participate in decisions about doing business with organizations in which the employee or a member of his/her family has interests or which may generate personal benefits for this employee.

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28. RECEIVING AND OFFERING GIFTS AND FAVORS

Employees, by virtue of their position or function at **Destaq/Injetaq**, are prohibited from receiving, promising and offering gifts or any good of value and to people with whom **Destaq/Injetaq** does business.

Such prohibition does not apply to the receipt of gifts, understood as those that have no commercial value or are distributed as a courtesy, advertising or on the occasion of events and that do not have a value greater than BRL 100.00 (One Hundred Reais), at market value, an amount that may be updated by **Destaq/Injetaq**.

In this way, it is prohibited to accept, suggest, request, give and receive, directly or indirectly, gifts, favors, benefits, which have commercial value, above that mentioned in the upper paragraph, from customers, suppliers, partners, third parties and public or private entities.

29. INTELLECTUAL PROPERTY ISSUES

The use of the Network, the Internet and corporate e-mail by employees is permitted and encouraged as long as such use is directly linked to the social objectives and activities of **Destaq/Injetaq**, and its use for the personal benefit of employees is prohibited.

Employees in the use referred to in the item above, assume, among others, the following obligations:

- a) Fully respect the legislation in force in the country and the International Treaties to which Brazil is a signatory, not practicing any acts prohibited by such rules;
- b) They will not practice any acts contrary to morals and/or good customs prevailing in society;
- c) They will fully respect the legislation in force in the country and the International Treaties to which Brazil is a signatory, not practicing any acts prohibited by such rules;
- d) They will not practice any acts contrary to morals and/or good customs prevailing in society;
- e) They will immediately notify the General Representative of **Destaq/Injetaq** if they become aware that any other person, using the domain "injetaq.com.br", has practiced any act that constitutes a violation of copyright, pedophilia, discrimination, or that if there is a violation of the provisions of the previous paragraphs of this item;
- f) They will not create unnecessary risks for **Destaq/Injetaq** nor for the business acts performed by **Destaq/Injetaq**;
- g) They will not carry out any activity that is known to impair the performance of **Destaq/Injetaq's** networks and services;
- h) They will not practice any act that could compromise the image and/or the assets of **Destaq/Injetaq**.

By way of example, among the activities strictly forbidden to employees include:

- a) Visit Internet sites, obtain, store and forward material with offensive, defamatory, discriminatory, racist, obscene, pedophile and/or pornographic content;
- b) Download (download) commercial software or any other material whose copyright belongs to third parties, without previously obtaining or certifying that **Destaq/Injetaq** already has the corresponding license to use or other types of authorization;
- c) Attack and/or search in unauthorized areas ("Hacking");
- d) Create or transmit offensive, defamatory, discriminatory, obscene, pedophile and/or pornographic material;
- e) Carry out activities that waste the efforts of technical personnel or the resources of the **Destaq/Injetaq** network;
- f) Introduce and/or circulate, intentionally, any form of computer virus;
- g) Carry out sales and/or offer of goods and/or services that are not in the exclusive interest of **Destaq/Injetaq** or without its authorization; to carry out activities of a political-party nature; propagate chain messages or "pyramids", carry out religious preaching; to carry out operations that entail a high volume of transmission; make advertisements and/or commercials that are not in the strict interest of **Destaq/Injetaq**;
- h) Attempts to violate and/or carry out the violation of security systems, unless authorized by **Destaq/Injetaq** for the purpose of testing the protection mechanisms; intentionally spreading viruses;

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- i) Delete, change or add data and/or information in databases, websites or pages on the Internet, belonging to third parties, with the aim of causing damage, inducing error, generating embarrassment, depreciation or mockery to them;
- j) Participate in chains;
- k) Participate in chats, except when expressly authorized by **Destaq/Injetaq**, in the exclusive exercise of the company's social objectives;
- l) Obtain and/or save "cracks" and "serial numbers" to open "sharewares"; "pirated" versions of "software", monitoring tools ("sniffers") and/or password "cracking" software;
- m) Use anonymity services for browsing and sending messages;
- n) Use false credentials when sending "e-mail"; use "free-mail" services to send offensive messages;
- p) Use the computer and/or networks to carry out any types or forms of fraud or to send offensive or harassing material to other employees;
- q) Issue, disclose, send, transmit, distribute, disseminate, allow access, store or reveal information, internal "e-mails", data, trade secrets or any other information belonging to **Destaq/Injetaq**, its customers, employees or suppliers ;
- r) Forge any of the email sender header information;
- s) Upload any software licensed to **Destaq/Injetaq** or data owned by **Destaq/Injetaq** or its customers, without express authorization from the Board of Directors, by the software or data.

When accessing a blocked website, the main page will be immediately replaced by a warning screen warning that the respective website is blocked according to the company's rules, there will be a link on this page where it is possible to send the blocked link requesting the unblocking to the IT service provider from **Destaq/Injetaq**. The release or not of access to the link will depend on an analysis to see whether or not the respective link is in accordance with the company's standards.

30. ANTI-CORRUPTION LAW (12.846/2013) JOINT LIABILITY

Corruption is a worldwide problem, involving governments, citizens, institutions and public or private companies, producing negative effects of several orders:

- It harms the environment - when commercial or industrial enterprises receive improper authorization to operate even without fulfilling all the appropriate technical conditions;
- It harms public finances - when companies join forces with public agents to defraud bids, overprice public works, cancel taxes due, divert resources from public bodies in general, pass laws and regulatory acts of purely private interest;
- It harms democracy and the republic, as it makes the public administration hostage to private and minority interests, serving only the groups that hold great economic power, diverting public agents from their essential function of serving collective interests, in an isonomic way.

One of the main provisions introduced by the new Law is the introduction of strict liability of the legal entity, in the civil and administrative spheres, for acts of corruption committed in its interest or benefit. Thus, it allows the legal entity to be held responsible regardless of the responsibility of the individuals involved, and it is also not necessary to prove that there was an intention of the directors or companies to harm the treasury.

The Law also emphasizes that the liability of the legal entity will not exclude the individual responsibility of its directors or administrators or any natural person author, co-author or participant in the illicit act. However, these individuals can only be held responsible for illegal acts to the extent of their culpability.

With this new Law, joint and several liability was established. The parent companies, subsidiaries, affiliates or, within the scope of the respective agreement, the consortium members will be jointly and severally liable for the practice of the acts provided for in the Law. When declared jointly, they may be required to pay a fine and full compensation for the damage caused.

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As a way of complying with the new text of the Law, companies are creating internal mechanisms and procedures such as:

- Code of ethics;
- Code of Conduct;
- Whistleblowing channel;
- Internal controls;
- Exemplary punishment for any conduct contrary to the law.

In addition to formalizing documents, you as an employee must be aware of the need to use the best market practices in order to ensure full compliance with these corporate provisions and compliance with legislation.

The publication of this Law is a beginning for society to organize itself, to train itself to exercise power within the order. This is popular participation and social control. (See the Law, in its entirety, at the end of this manual).

Our company respects national and international "Anti-Trust" legislation, where their content applies to all our operations, relationships and processes. This rule applies to all our employees and third parties acting on behalf of **Destaq/Injetaq**, or who collaborate in projects, services and business processes involving our company.

SOCIAL RESPONSABILITY

31. CHILD LABOR ISSUES

The **Destaq/Injetaq** does not support or engage in the use of child labour, that is, any work performed by a child under the age specified by law, with the exception of the provisions of ILO Recommendation 146.

32. ISSUES REGARDING FORCED LABOR

The **Destaq/Injetaq** does not support or engage in the use of forced labour, such as any work or service that is extracted from any person under the threat of any penalty for which said person has not voluntarily volunteered, or whose work or service is thank you as a means of payment for a previous debt, nor does it require employees to make 'deposits' or leave ID documents when they start working with the company.

33. HEALTH AND SAFETY ISSUES

Destaq/Injetaq, keeping in mind current industry knowledge and any specific hazards, provides a safe and healthy working environment and takes appropriate measures to prevent accidents and damage to health arising out of, associated with or occurring in the course work, minimizing, as far as is reasonably practicable, the causes of hazards inherent in the work environment;

34. ISSUES REGARDING FREEDOM OF ASSOCIATION AND THE RIGHT TO COLLECTIVE BARGAINING

Destaq/Injetaq respects the right of all employees to form and join labor unions of their choice and to bargain collectively.

35. DISCRIMINATION ISSUES

Destaq/Injetaq does not support discrimination in hiring, compensation, access to training, promotion, termination of contract or retirement, based on race, social class, national origin, religion, disability, gender, sexual orientation, union membership or political affiliation. , or age.

36. ISSUES REGARDING DISCIPLINARY PRACTICES

Destaq/Injetaq does not support the use of corporal, mental or physical coercion and verbal abuse.

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37. ISSUES REGARDING WORKING HOURS

Destaq/Injetaq complies with applicable laws and industry standards on working hours. The normal working week is as defined by law, but does not regularly exceed 48 hours. Employees are guaranteed at least one day off every seven-day period. All overtime work is paid on a special basis and under no circumstances exceeds 12 hours per employee per week.

Otherwise, in addition to what is allowed above, the extra work is voluntary.

38. ISSUES REGARDING COMPENSATION

Destaq/Injetaq ensures that wages paid adhere to the standard working week and meet at least minimum industry standards and are sufficient to meet the basic needs of employees and provide some extra income;

Destaq/Injetaq ensures that deductions from wages are not made for disciplinary reasons, and ensures that the breakdown of wages and benefits is clearly and regularly detailed for workers, and that wages and benefits are paid in full compliance with all applicable laws. applicable and that the remuneration is made either in cash or in the form of a check, in a way that is convenient for the workers.

Destaq/Injetaq ensures that work performed only contract arrangements and false learning schemes are not carried out, in an attempt to avoid fulfilling its obligations to employees under applicable legal conditions and associated with labor and employment laws and regulations. social Security.

39. ISSUES RELATED TO ADDRESSING CONCERNS AND TAKING CORRECTIVE ACTION

Destaq/Injetaq investigates, handles and responds to the concerns of employees and other interested parties, regarding compliance/non-compliance with the company's policy and/or requirements of applicable standards; the company avoids reprimanding, dismissing or otherwise discriminating against any employee who has provided information regarding compliance with applicable regulations.

Destaq/Injetaq implements remedial and corrective action and allocates necessary resources appropriate to the nature and severity of any identified non-compliance against company policy and/or the requirements of applicable regulations.

40. VIOLATION OF THE CODE OF CONDUCT - COMPLAINTS AND DETERMINATION COMMITTEE

Whenever we deem it necessary, and regardless of the hierarchical level, we must report occurrences against this Code of Conduct to the Conduct Committee.

Preventing and detecting violations of this Code or the law is a matter that our company takes seriously. Likewise, any potential violation of the Code or the law will be investigated immediately. Accordingly, our employees are required to cooperate fully and honestly in any investigation, audit or internal control activity, which includes responding promptly to all requests for information. All documents, including but not limited to hard copy, electronic and e-mail files, are proprietary to the company and may be reviewed from time to time in accordance with **Destaq/Injetaq's** policies and guidelines for purposes of investigation, audits or activities of internal control or to ensure compliance with legislation. All issues will be investigated with total confidentiality of the facts and guarantee of non-retaliation to those involved. And they will be sent under absolute secrecy and, according to the severity, those responsible for proven violations will be notified of the sanctions that will be taken.

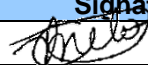

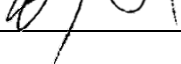
The company, through its Directors, guarantees that there will be no penalty, reprisal or retaliation for the good faith referral of doubts, questions or complaints related to violation of this Code or regarding any matters dealt with in this Code.

Complaints, doubts and suggestions related to any pertinent subject and dealt with in this Code of Conduct should be forwarded through our "hotline" channel, through the website www.injetaq.com.br or by phone: +55 11 4070-5621.

All reporting is made anonymously, through the reporting channels mentioned above, ensuring and guaranteeing the anonymity of the reporting person, where you can report the occurrence of facts, fraudulent or not, that may eventually violate the terms contained in this Code or regarding any matters treated in this.

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	Name:	Occupation:	Date:	Signature:
Issuer:	Cleiton Melo	Quality Analyst	10/21/2019	
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