

MULTILASER INDUSTRIAL S.A.

CODE OF CONDUCT

1. PURPOSE

1.1. The purpose of this code of conduct ("Code of Conduct") is to present the principles and the manner in which Multilaser Industrial S.A. ("Company") conducts its business by defining conduct guidelines to foster transparency, regulate the Company's internal and external relations, manage conflicts of interest, protect the Company's physical and intellectual property, and consolidate good corporate governance practices.

1.2. This Code of Conduct is intended to be a practical guide to ethical behavior that must be complied with by all employees in their professional relations.

2. VALUES AND PRINCIPLES OF THE COMPANY

2.1. The ethical principles and values that guide the Company's actions, as well as the actions of all its employees, are based on honesty, integrity, ethics, transparency, equity, corporate responsibility, respect, and excellence, and must be complied with in any place and situation by all the Company's employees, managers, and other collaborators (jointly, "Employees"), suppliers, and service providers in the relationship with the different publics and stakeholders.

3. FULL COMPLIANCE WITH THE LAW IN FORCE

3.1. In line with our principles and values, all Company employees must act strictly under the rules, laws, and regulations in force, and comply with all the guidelines issued by the Company, including, but not limited to, the rules for the protection of confidential information and fight against corruption, as detailed in this Code of Conduct.

3.2. Protection of Confidential Information

3.2.1. The Company and its employees receive confidential information from third parties, such as suppliers, business partners, service providers, and customers, and produce valuable strategic, technical, financial, and human resources information that must be kept confidential. Therefore, each employee is the caretaker of valuable and confidential information of the Company and its partners and suppliers. Any personal information about our employees shall also be kept confidential (jointly, "Confidential Information").

3.2.2. Such confidential information must not be disclosed to third parties without authorization by the relevant party, and each employee must be careful and diligent to avoid confidential information from being kept in public places or places freely accessible by people not authorized to access it.

3.2.3. Should an employee become aware of any incident involving an accidental or unauthorized disclosure of any confidential information, he/she must immediately inform the Company's Compliance and Risk Management Area, or the whistleblowing channel defined in Section 5 below.

3.2.4. Each employee is responsible for keeping the confidentiality of all authorizations and passwords to access the Company's physical and electronic systems, which are personal and non-transferable, and must be kept with due diligence.

3.3. Anti-Corruption Practices

3.3.1. Promising, offering, receiving, or authorizing, directly or indirectly, any type of bribery to obtain or provide an undue advantage in any situation, consists of unacceptable conduct and exposes the Company and its employees to possible sanctions and legal and administrative actions.

3.3.2. It is strictly prohibited to make any undue payments in any business transactions, in any country, to government agents and the private sector, including facilitation fees. The Company shall keep business records, accounts, books, and contracts to ensure that they correctly reflect the nature of the transactions and payments.

3.3.3. The Company respects its employees' rights to participate in the political process, but they are forbidden to make any political contribution in cash, goods, or services on behalf of the Company. No employee should promise, offer, or contribute corporate funds or any other corporate assets for political purposes without the prior, formal, and written approval by the Compliance and Risk Management Area.

3.3.4. Any third party representing the Company as a consultant, sales representative, distributor, or service provider must commit to comply with the policy on prevention of undue payments and the applicable anti-corruption law, not allowing or engaging in any activities that may be considered as bribery or corruption.

3.4. Internal Policies

3.4.1 In addition to this Code of Conduct, the Company currently has several formal policies designed to help guide activities and compliance with its objectives, namely (i) compensation policy; (ii) policy for appointing members of the board of directors, advisory committees, and statutory executive board; (iii) risk management policy; (iv) policy on transactions with related parties and conflict management; (v) information disclosure policy; and (vi) securities trading policy.

3.4.2. All Company employees must know the content of the Company's policies and, whenever applicable, follow their guidelines.

4. OBLIGATIONS WITH SOCIETY

4.1. Environment, Health, and Safety. The Company is committed to protecting the environment, health, and safety, and strives to comply with all applicable environmental laws and regulations. The Company must provide a safe and healthy work environment for all employees, avoid harmful impacts on the environment, prevent occupational accidents, and reduce waste emissions and the use of toxic materials.

4.2. Citizenship and Human Rights. The Company is committed to good citizenship and ensures its employees a safe and healthy work environment, undertaking not to use child or forced labor.

4.2.1. The respect for human rights shall be ensured to all individuals interacting with the Company, regardless of race, gender, sexual option, nationality, ethnicity, language, religion, or any other characteristic.

4.3. Labor Practices. The Company shall faithfully comply with labor legislation and offer fair labor practices, including the prohibition of any type of discrimination, providing equal access and fair treatment to all employees.

4.3.1. The Company ensures the freedom of association, recognizes the rights of its employees to participate in collective bargaining agreements, monitors and ensures the prohibition of forced labor or labor analogous to slavery, the prohibition of child labor, as well as any other type of discrimination or conduct contrary to human rights.

4.3.2. The Company shall equally treat all employees and applicants for employment, based only on factors related to the professional criteria necessary to meet the Company's objectives.

5. WHISTLEBLOWING CHANNEL

5.1. The Company provides means for submitting reports in situations or behaviors that consist of a conflict or potential conflict with the Code of Conduct, the Company's policies, and/or the applicable law and regulation. The whistleblowing channel is available to Company employees and third parties and shall provide conditions for the whistleblower to transparently and responsibly follow the progress of the works and investigation.

5.2. Notifications of suspected or actual violations shall be reported through the whistleblowing channel specified in item 5.6 below, which is accessible to the Company's employees, suppliers, service partners, and commercial representatives, and shall be as complete as possible.

5.3. The Company shall ensure the confidentiality and independence of the whistleblowing channel, and also the possibility of sending anonymous questions, suggestions, or complaints to avoid embarrassment and retaliation.

5.4. The Company does not tolerate any type of retaliation against any person making a good faith report or complaint of a violation of the Code of Conduct, and all reports shall be addressed in a fast, reliable, and confidential manner, ensuring anonymous report (as permitted by the applicable law).

5.5. All Company employees, suppliers, and partners must promptly inform the Compliance and Risk Management Area or the whistleblowing channel whenever they become aware of or experience a situation that may be considered as conduct that violates the Code of Conduct, the other policies, and ethical principles of the Company, and/or the law and regulation in force.

5.6. The Whistleblowing Channel is free and is available on:

- Intranet: <https://intranet.multilaser.com.br/>
- Email: denuncia@multilaser.com.br
- Website: <https://suporte.multilaser.com.br/denuncia>

6. INVESTIGATION OF IRREGULARITIES AND SANCTIONS

6.1. Investigations about complaints reported and potential irregularities or violations of this Code of Conduct shall be made by an independent and qualified team, under the leadership of the Compliance and Risk Management Area and, whenever possible and necessary, with the support of external agents.

6.2. The Compliance and Risk Management Area shall assess the seriousness of the alleged violation or irregularity and, as applicable, may create a specific investigation committee to ascertain potential deviations from this Code of Conduct.

6.3. Any violations to this Code of Conduct, the Company's policies, and/or the applicable law and regulation, by any Company employee, may lead to, according to the seriousness of the act performed and after ensuring respect for the principles of adversary and fair hearing, (i) oral and written warning, (ii) application of disciplinary measures and/or temporary removal of the individuals involved in the occurrence, (iii) enforcement of improvement activities, or (iv) dismissal with cause. Any violations by suppliers or third parties may lead to a warning or contract termination, whenever applicable.

6.4. Without prejudice to the disciplinary measures defined in item 6.3 above, recommendations made based on internal investigation may also include (i) complete cessation of the activities subject to investigation, (ii) spontaneous notification of the facts to the authorities, and (iii) collection of data and information to support collaboration with the government.

6.5. Should the violations constitute a crime, the competent authorities will be informed, without prejudice to the other provisions described above.

7. TERM OF COMMITMENT AND TRAINING

7.1. All Company employees must sign a Term of Responsibility and Commitment, undertaking to ensure the application of all the provisions described herein, according to the model attached to this Code of Conduct.

7.2. The Company shall provide periodic training sessions to all employees, in person or online, on the main practices to be complied with by all employees and the need to comply with the provisions of this Code of Conduct.

8. EFFECTIVENESS AND UPDATES

8.1. This Code of Conduct was approved by the Board of Directors, is effective as of today, and may be updated whenever the Board of Directors deems necessary.

São Paulo, May 11, 2021.

Term of Responsibility and Commitment to the Code of Conduct of Multilaser Industrial S.A.

I hereby declare, for the due legal purposes, that I have received, read, and fully understood the Code of Conduct of Multilaser Industrial S.A., agree with all the terms and conditions and undertake to fully and permanently comply with and care for its content.

I also declare that all questions arising from the reading of the Code of Conduct of Multilaser Industrial S.A. have been properly clarified and that I have no questions about its full content, being able to fully comply with the code.

Name: [●]

Department: [●]

Date: [●]/[●]/[●].

Contact information

Any questions regarding the application or interpretation of the Code must be submitted to the Compliance and Risk Management Area or through the whistleblowing channel available on:

- Intranet: <https://intranet.multilaser.com.br/>
- Email: denuncia@multilaser.com.br
- Website: <https://suporte.multilaser.com.br/denuncia>

_____ Name:
Position: