

# CONDUCT

## MANUAL

TRAMONTINA

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*Tramontina, along its history, has acquired a solid reputation, inspiring trust and becoming a reference in management practices. All of that is possible because we manage the business with integrity and according to the laws and regulations that govern our activities.*

*In order to meet consumer expectations, we keep a constant effort to innovate and produce with quality. We have the principle of permanently investing in new technologies, employee training, people's safety, and environmental preservation, as well as fulfilling the social commitment to supporting action to the benefit of the communities.*

*Transparency and knowing people's worth are part of Tramontina's values, and this Conduct Manual was created to emphasize the principles through which our company carries out its relationships with all the audiences.*

*The guidelines, rules, and policies herein must be followed and practiced in the exercise of employees' everyday activities and of those that have any kind of relationship with Tramontina, and everyone is responsible for ensuring their fulfillment.*

*We hope this Manual is used as a reference and that it strengthens even more our corporate culture with ethical behaviors consistent with the business environment and stimulates the practice of these same principles in your personal life, thus, contributing to building a fairer and more responsible society.*



# 1.

## Essence

*Tramontina's essence is summarized in the corporate Mission, Vision, and Values, which are fundamental for the company's sustainability.*

### MISSION

To do things well in order to inspire people and foster meaningful experiences, generating value and satisfaction for customers, consumers, employees, stakeholders and communities.

### VISION

To be the leading Brazilian company in consumer satisfaction by delivering the best solutions for everyday life. To remain a reference brand in quality, innovation, whole some relationships and human values.

## VALUES



### Customer Satisfaction

High level of quality to continuously improve people's lives.



### Transparency

Ethics, clear purposes, whole some relationships and dialogue with partners.



### Work

Focus, discipline, and results.



### Leadership

Qualified professionals, the latest technology and low cost to be competitive.



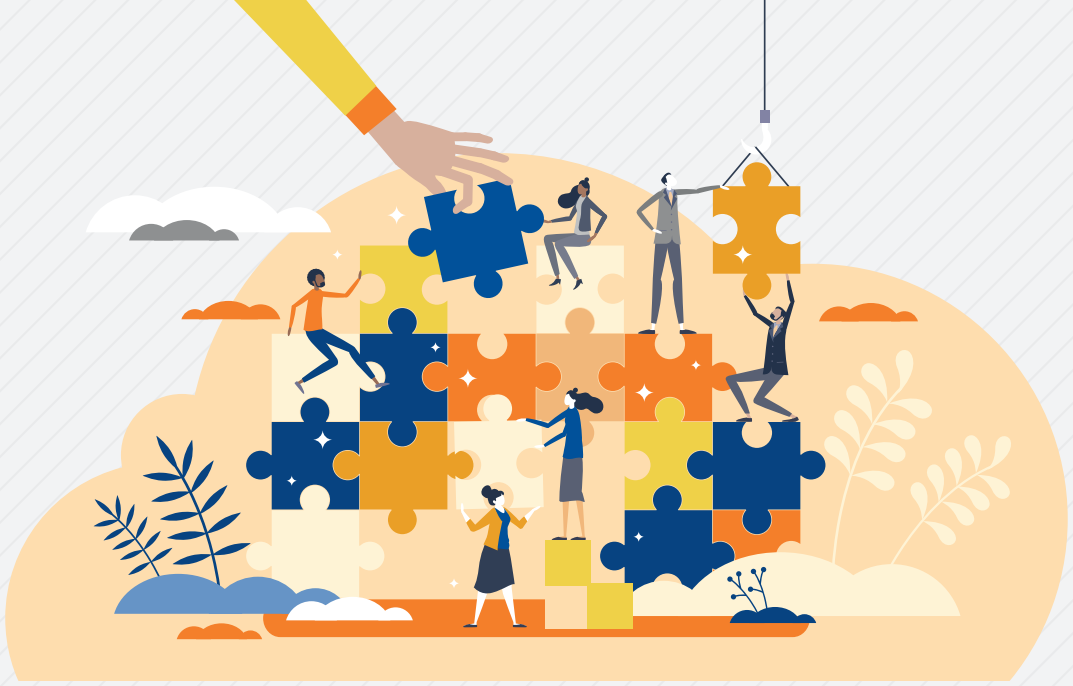
### Dedication

Devotion and passion in everything that is done.



### Knowing People's Worth

Growth based on commitment to employees.



## 2. Who does the Conduct Manual apply to?

Stakeholders

Directors

Employees

Temporary Workers

Interns

Apprentices

Customers, Suppliers, Service Providers,  
and Representatives

### 3. Work Environment

Tramontina is committed to maintaining a healthy, respectable, fair, safe, productive, and inclusive work environment for everyone. The leaderships should be example of such practices for their teams and promote their development. The organization values transparency in its actions, communicating to its internal audience any and all relevant facts. Such behavior minimizes rumors and speculations, as well as reinforces the relationship and trust.

#### EXTERNAL RECRUITING

For those who want to be part of the team, on the company's site, you can register yourself at the "Work at Tramontina" section. The virtual mode contact enables unification and management of updated data for performing a quick search, fulfilling the hiring demands for full-time, internship, Young Apprentice, and Pcd (Disabled Person) positions.

**CV registration and update are performed at Tramontina's site:**  
[www.tramontina.net/trabalhe-na-tramontina](http://www.tramontina.net/trabalhe-na-tramontina)

#### INTERNAL SELECTION

The internal selection and promotion process is determined according to the company's demand, considering the profile of the candidates, their skills and competences for the position. The principles of fairness and equality will always be observed.

## **BENEFITS**

Tramontina has constant care for the employees' quality of life, as well as of their dependents. Our benefits cover the health, education, culture, leisure, well-being, and pension (Tramontinaprev) areas.

It is essential to use the benefits – such as medical and dental assistance, meal voucher, transportation voucher, registered services, covenants, leisure areas, and other benefits – with care and responsibility. Improper use, deviation of purpose, or frauds will not be accepted and will be subject to applicable sanctions.

## **PROFESSIONAL APPRECIATION**

Tramontina cultivates long-lasting relationships, since the people – our homegrown talents – are our most valued asset. Such loyalty is the result of stimulating talent development, quality of life, and team appreciation.

With such purpose, Tramontina constantly promotes the employees' personal and professional skills and development. We provide leadership, behavioral, and technical courses, extension programs, in-company MBAs, among other initiatives.

In case of position promotions, employees take part in selection processes where they are assessed with clear, egalitarian criteria in a merit system – skills, role performance, leadership, abilities, and behavioral profile. Opportunities for employees' growth are announced, with the possibility of promotion to work in units within Brazil and in the international market.

## **LABOR EXPLOITATION**

Tramontina respects the Universal Declaration and adopts measures to prevent violation of such rights. It does not practice forced and child labor, and it does not have a relationship with companies or people that have such conduct.

## **SOCIAL REINTEGRATION – RIGHT TO WORK**

Tramontina acts against discrimination and supports an inclusive environment. We endorse article 6 of the Brazilian Federal Constitution, which promotes the social and fundamental right to work for the population in a situation of socio-economic vulnerability, ensuring social reintegration to such people.

## DIVERSITY AND INCLUSION

Tramontina respects diversity. We do not accept any sort of discrimination and prejudice, whether of religion, culture, nationality, race, age, gender, sexual orientation, marital status, political party, physical and intellectual condition, or of any other nature.

## AFFECTIVE RELATIONSHIP

Tramontina is not against affective relationships nor family relationships between employees, as long as there are no conflicts of interests on the terms of the Tramontina Conduct Manual and of the company's pertinent policies. Private matters should not interfere with the work routine, whether public display of affection or quarrels.



## CONFLICT OF INTERESTS

Conflict of interests happens in situations where employees can act against Tramontina's principles or interests due to personal or third-party interests. It can be upon making an improper decision or not fulfilling one's professional responsibilities.

- For that reason, the person must inform, when hired or over time of work, the existence of potential situations of conflict of interests.
- A strictly professional relationship should be kept with Tramontina's suppliers or potential suppliers.



## LEADERS AND THE LED

Organizational leadership is an important factor for the company's development and it is defined by a set of actions directed to the organization and people management. Tramontina acts with focus, discipline, and result, investing in the development of leaders and of the led. An indication of such management is its workforce, with the employees remaining for a long time in the company. In order for that to effectively happen, some standards of conduct were set for leaders and the led:

### Leaders

- Have an ethical behavior and the responsibility to train, monitor, and guide their team.
- Perform the Performance Review and provide constant feedback to the led.
- Set goals and monitor results.
- Direct the fulfillment of internal rules, legal requirements, and guidance of the Conduct Manual.
- Promote effective communication with constructive dialogs, engagement, and good management practices.

### The Led

- Have the commitment to act with engagement, ethics, respect, discipline, and diligence.
- Perform tasks to fulfill goals, maintain productivity, and indicate process enhancement.
- Ensure the environment is organized and clean, as well as suggest improvements.
- Respect internal rules and people's diversity, keeping a good relationship with leadership and colleagues.
- Be aware that the work is performed as a team. The company's goals depend on everyone.

## OCCUPATIONAL HEALTH AND SAFETY

Tramontina constantly promotes actions to minimize and eliminate potential health and safety risks. Our company develops training so that everyone can understand and fulfill policies and procedures. Everyone must have a safe behavior and comply with safety rules and procedures.

- Employees must be aware and respect the internal rules of occupational health and safety.
- Everyone is responsible for promptly notifying the competent areas of any situation that can pose a risk to employees.
- Employees, third parties, and visitors: Personal Protective Equipment (PPE) must be worn – according to standards of regulation for acting in production areas, risk and visitor areas, even temporarily.
- Emergency situations must be managed with responsibility and promptly reported to managers.
- In circumstances of serious and imminent (about to happen) risk to people's lives or physical integrity, everyone is assured the right of refusal, suspending activities until corrective measures are taken. No behavior that poses a risk to people's health and safety will be allowed.

## CORPORATE UNIFORMS

Tramontina adopts Corporate Uniforms according to the position: production, administrative, and point-of-sale areas, and the wearer is responsible for the uniform's care and upkeep. For employees that do not have to wear uniform, the recommendation is to wear clothes that are proper for the corporate environment, avoiding exaggerations that overshadow the professionalism. Common sense, always. With the intent of preserving the company's branding, the detailed specifications – composition and wearing guidelines – of each uniform category are part of specific manuals (dress code) made available to employees.

## MORAL AND SEXUAL HARASSMENT

Tramontina does not accept any type of moral harassment and behaviors that affect the dignity or promote an intimidating, hostile or offensive environment, regardless of the hierarchical level, or that harm people's performance in the work environment.

Likewise, any verbal, gestural or physical sexual proposals or insinuations, as well as sexual harassment practices, are prohibited and considered improper behavior.

The distribution or display of offensive, vulgar or derogatory material is not allowed, including inappropriate pictures or drawings. There can be no insults, jokes, defamations or degrading and undesirable comments about race, ethnicity, religion, sexual orientation, age, appearance, physical or mental disability, or stereotype of a person – whether individually, collectively, personally or in any means of communication.

## VIOLENCE

Tramontina does not tolerate demonstrations of violence, whether verbal, physical, moral, psychological, social or otherwise, in the company's facilities and places related to work, as well as environments outside the company.

## LEGAL AND ILLEGAL DRUGS

- It is prohibited to show up or remain in the work environment or also during any other activity related to Tramontina drunk or under the influence of any type of illegal drug.
- Consumption of alcoholic beverages is restricted to social events, as long as in a moderate way and in such a way that does not affect any behavior that might offend the guidelines of the company and of the Conduct Manual.
- As provided by Brazilian Federal Law 9,294/69, it is prohibited to make use of cigarettes and similar tobacco-derived products in closed environments. Tramontina adopts the same measure, i.e., smoking is prohibited within the company's indoor facilities, including the use of e-cigarettes.

## BEAR ARMS

It is expressly prohibited to beard or store arms within Tramontina's facilities or in activities related to it, with the exception of professionals authorized to do so in order to perform their duties.

# 4. Tramontina Companies

## ACCESS

Only personnel with prior authorization are allowed access to Tramontina companies' facilities.

- **Employees:** when starting at the company, they receive an identification badge – for personal use and that is untransferable – to record their presence in entries, exits, punch-clocks, and restaurants (turnstiles), and for legal controls and records, such as delivery of PPE. It is also possible to record by means of a biometry (digital reading) previously registered with HR.
- **Visitors:** need to identify themselves and present a document at the front desks. Access authorization is responsibility of the employee/area that is receiving the visitors.

## SAFEGUARDING ASSETS AND TANGIBLE RESOURCES

Tramontina oversees the permanent quality and maintenance of its assets. Facilities, equipment, machines, furniture, vehicles, valuables, among other properties, are exclusively for the company's operational use and cannot be used in someone's own benefit or that of other people and/or organizations.

- All assets and resources are exclusive property of Tramontina and should be used for professional purposes. The employees are responsible for safeguarding, preserving, and using them conscientiously, ensuring they are not damaged, lost, stolen, or unduly used for private, illegal and unethical purposes.
- Company equipment and materials cannot be used for any personal purpose.
- Assets made available by Tramontina, such as corporate equipment, computers, telephones, and e-mails, including messaging systems and applications, can be checked and audited at any time without prior notice. Tramontina will not tolerate that such resources are used for illegal activities, pornography, gambling, or other offensive matters.
- Tramontina reserves the right to determine that any employee, working for or within the company's facilities, is subjected to search, personal inspection or of their locker, bags, package, or vehicle.

## INTELLECTUAL PROPERTY

Intellectual Property includes several assets: brands, industrial drawings, domain names, copyrights, innovations, inventions, processes, products, projects, prototypes, ideas, financial, commercial and market information, or any other non-material activity developed at Tramontina or contracted by it. All property rights related to intellectual property assets that are directly or indirectly created by Tramontina's employees, temporary workers, interns, and apprentices, even when their role does not have any relationship with the development of research or inventions, are exclusive property of Tramontina. The company shall be able to use them in part or as a whole, with or without modifications, and request before competent official bodies their registration both in Brazil and abroad.

## MEANS OF COMMUNICATION AND THE INTERNET

Access to landlines and cell phones, to the internet, as well as the use of e-mails, software, hardware, equipment, and other Tramontina assets, should be restricted to the professional activity, observing the guidelines set in the Internet, Intranet, and E-mail Use Regulation.

- Data produced and kept in equipment and information systems is exclusive property of Tramontina.
- Employees, temporary workers, interns, and apprentices should be aware that the company has access to internet records, e-mail, and information stored in computers, as well as to the use of mobile and landline resources.
- Employees must keep company information confidentiality even after employment contract termination. Employees discharged from Tramontina cannot record, copy or take with them copy of documents, e-mails, information, processes or procedures to which they had access.



# 5. Information, Communication, and Social Interaction Security

In order to ensure information security, competitiveness, and preserve people's image and data, Tramontina recommends that:

Without authorization of Tramontina's areas in charge, it is not allowed to publish or share company information, whether related to the market, processes, programs, systems, strategic plans, technologies, projects, financial data, business trends, and results, because they are confidential.

## COMMUNICATION CHANNELS WITH EMPLOYEES

In any communication channel (printed and digital), offensive, derogatory, or defamatory personal postings are not allowed, as well as those that expose the image of Tramontina and its employees, customers, and service providers.

## OFFICIAL CORPORATE COMMUNICATION CHANNEL – WORKPLACE

Tramontina has an official internal channel for communicating, sharing information and experiences, storing content, enabling exchange of ideas, getting to know more about our company and also about our employees. Workplace is a platform for unifying internal communication and strengthening engagement of all the employees. In such channel we should also follow Tramontina's codes of conduct and ethics, as well as the guidelines provided in the Workplace/Tramontina Good Practices Manual.

## INTERACTING WITH THE MEDIA

The relationship with the press happens through Corporate Marketing, which defines the strategies, actions, and initiatives that can be disseminated on TV, in newspapers, magazines, sites, blogs, radio stations, among others. Such relationship is straightforward and free of interests that are not the release and the fulfillment of journalistic, institutional, and advertising demands, product campaigns, and organization innovations, services, practices or processes.

## PUBLIC PLACES

When talking about business, one should always make use of neutrality and discretion. The use of electronic equipment, as required, should be made with great attention in order to avoid theft and exposure of company strategic information.

## AT TRAMONTINA COMPANIES

- We should pay attention to the circulation of confidential documents, information, chats, and e-mails, not leaving them exposed, ensuring that they arrive at their recipient without any deviation.
- Passwords and access codes to internal systems are individual and untransferable. Tramontina does not allow their sharing and considers the owner fully responsible for their use.
- You should care for media resources and other devices (cell phone, pen drive, CDs, notebooks, and printers) provided for the performance of your activities.
- It is not allowed to install media resources and/or use your own or unauthorized devices for carrying or transmitting information related to work.
- It is not allowed to photograph and film facilities, products, and processes without prior authorization.
- Inside Tramontina facilities, gambling or other types of betting is not allowed, as well as the use of company equipment or resources for such purposes.



## ACADEMIC PAPERS AND INTERNSHIPS

Tramontina information published in Workplace – Knowledge Library, in the company's site, as well as in printed material handed out to employees, can be used in academic papers. When transcribing the company's institutional content, we suggest not to change the data. For more information on Tramontina – besides what is mentioned in this manual – you need assessment and authorization documented by the unit's manager, who should analyze if the disclosure is according to Tramontina's confidentiality and intellectual property criteria.

## SOCIAL INTERACTION ELECTRONIC PLATFORMS

Tramontina expects stakeholders, directors, employees, temporary workers, interns, apprentices, customers, suppliers, service providers, and representatives to have a proper posture – as well as ethical, safe, and legal use – with existing social media (external), communication and interaction technologies. It is not allowed to publish and disclose privileged and restricted images, comments, information related to Tramontina. Anyone who makes undue use of such resources will be violating their contract with Tramontina.

## PEOPLE'S DATA AND IMAGES

Tramontina has formulated the Privacy Policy to demonstrate how we use, handle and protect employees' data, with respect to their privacy and in compliance with the legal rules of Brazilian legislation.

Employees have signed the Consent Agreement for use of personal image and data in endomarketing efforts and institutional releases. They have also provided authorization for sharing their data with Tramontina Employee Association and with companies that provide benefits to employees and their dependents.

- Tramontina guides its employees, through LGPD (General Law for the Protection of Personal Data) brochure and video, to ensure the protection of personal data based on the fundamental rights of freedom and privacy.
- Tramontina requires all third parties, with whom it holds a relationship, to maintain confidentiality of the information shared or accessed by them in the course of their activity, as well as that they should use such information only for the expressly allowed purposes.
- Data and images of employees and third parties should be preserved. Any use for commercial purposes requires prior authorization formally documented. Authorized data and images should be authentic, respectful, and free of prejudice.
- The contact channel for clarifying any doubts related to the Privacy Policy is the **Data Protection Officer** (e-mail: [dpo@tramontina.com](mailto:dpo@tramontina.com)).



## 6. Responsibility in Doing Business

The commitment to good practices is something essential when doing business and should be seen in a strategic way inside the organization. We must have ethics when dealing with partners, competitors, governments, communities, and customers. Tramontina's corporate responsibility comprehends several audiences and policies, and their guidelines should be followed by everyone.

### ADMINISTRATIVE BOARD

All company employees and areas must act with integrity, transparency, and applying the best practices of corporate governance. That also means to periodically and routinely provide clear, accurate, accessible, and complete information to the Administrative Board.

### ILLEGAL, ANTI-BRIBERY, AND ANTI-CORRUPTION PRACTICES

Tramontina rigorously follows and complies with all regulations and the applicable legislation in effect against illegal practices, related to anti-bribery and anti-corruption. The company, directly or indirectly, does not receive, offer, donate, pay, promise or authorize payment in cash or in any other financial way that constitutes a practice of conflict of interests, illegal conduct, and corruption under the Brazilian laws and those of any other country. Likewise, it does not agree to give and/or receive benefits from any person, public or private entity, and it does not support any type of illegal advantage in its business for it or for third parties. Just the same, it does not hire employees and does not have professional relationship with, either individuals or legal entities, that are involved with criminal activities, corruption, money laundering, drug trafficking, and/or terrorism.

### ACCOUNTING AND FINANCIAL RECORDS

All employees are responsible for the truthfulness and accuracy of accounting and financial information, ensuring their quality, as well as for not omitting or falsifying any record, receipt, expense report, among others, with the intent of reaching goals or results.

It should be ensured that the transactions are accurately transcribed into the systems, books or company records, including filing of supporting documents subject to audit or inspection. It is necessary to ensure the integrity of such operations and forbid, under any circumstance, that they are performed with fraudulent intents.

## GOVERNMENT BODIES

Tramontina complies with all the laws in effect in Brazil and in the countries where it operates, supporting an open and constructive dialog, and promoting improvements at government level. During inspections and audits of any sort, employees in charge of receiving civil servants are directed to cooperate with them. The attention given to this topic is also shown through the firm ethical posture, preventing the granting of any advantage or privilege.

Employees and third parties cannot accept, suggest, promise or insinuate, to any category of Civil Servant, any type of help (financial or otherwise), payment of gratuity, bonus, commission, donation, gift, or personal advantage.

## CLASS CATEGORIES

Tramontina respects the freedom of association, acknowledges labor unions as the legal representatives of the employees, and seeks a constant dialog on the topics related to labor or union.

## CONSUMERS

Tramontina investments, as well as the work of its teams, are dedicated to creating and producing high quality products, generating customer and consumer value and satisfaction, with business relationships based on integrity, honesty, and mutual respect. No efforts are spared by the company to fulfill all consumer rights provided by law, seeking to exceed the expectations of those who come into contact with the brand.

Customers should be treated with respect and dignity, without discrimination or prejudice of any sort. One's own interests are not placed ahead of the customer's interests.

Tramontina, also worried about data privacy and protection, based on LGPD, created rules for the relationship with customers and consumers. All Tramontina Units, internal areas and employees are responsible for complying with LGPD rules.

## MATERIAL SUPPLIERS AND SERVICE PROVIDERS

The selection and hiring of suppliers and providers should be meticulous, assessing the best cost-benefit based on legal, technical, qualitative criteria, as well as on costs and terms, always in compliance with Tramontina's operation. Every deal should take place through a dialog supported by trust and transparency.

Business agreements with suppliers or service providers should include a confidentiality clause so that access can be provided to internal information.

## BUSINESS PARTNERS

Business partners are companies that somehow represent Tramontina in the market. Thus, along with the requirements related to suppliers and providers, our employees should assess the qualifications and the reputation of these third parties before hiring. Likewise, they should monitor the partners' activities and ensure they comply with our principles of ethics and integrity.

Under any circumstances, it is prohibited to have agreements with third parties to perform illegal activities or that go against the requirements of this Conduct Manual.



## COMPETITION

Fair competition enables free development of markets and also generates social benefits. Tramontina should make its own business decisions based on the principles of loyalty and fair market relationship.

In such direction, the company is against any type of express or implicit agreement with the competition related to price, territorial distribution, among others. Any actions that limit or try to limit free competition are unacceptable by the company.

It is prohibited to make any comment with the competition on our capacity to negotiate, cost management, operational efficiency, business strategy, among other.

Participation in meeting or events of trade associations should be done with care and transparency.

It is of vital importance for companies and employees to comply with all the rules and act according to the laws.

## GIVEAWAYS, GIFTS, AND HOSPITALITIES

Special attention should be given to receiving personal favors, giveaways and gifts, since their acceptance with the intent of personal benefit is not ethical and generates discredit to the employee and to Tramontina.

- Receiving giveaways and gifts should be something of impartial nature, not interfering with the relationships and decision making of the company in relation to customers and suppliers. Thus, it is paramount for the beneficiary to have common sense when receiving them.
- Tramontina employees cannot receive cash amounts offered by suppliers, third parties, and service providers.

# 7. Engaging with the Community

## POLITICAL INVOLVEMENT WITHIN ENTITIES

Political party is an individual choice. Tramontina recognizes that every citizen has the right to run for office, as long as it does that on a personal level. The company reserves its right to remain neutral and stimulates the same impartiality among employees within the work environment. This means that work hours, as well as company resources, the name, the brand or any other asset owned by Tramontina, should not be used to political party manifestations.

## RESPONSIBILITY TO SOCIETY

Tramontina's commitment to society goes way beyond generating employment and income. Our company values the social and cultural development of the communities in which it operates. It is always attentive to eventual impacts produced by its operations and invests in the development and improvement of the citizens quality of life. Tramontina promotes, on a permanent basis, activities at schools, daycare centers, charities, and professional training centers, and it also provides financial support for social projects.

It also plants trees, performs urbanization and maintenance of public squares, showing that it cares about people's well-being. Tramontina stimulates its employees to engage in voluntary activities of social responsibility and helping others, because it believes on the potential transformative and multiplying effect.

## COMMITMENT TO THE ENVIRONMENT

Environmental responsibility is one of the principles that characterize Tramontina. With the Environmental Management program, each step helps consolidate a positive culture that is multiplied among employees and communities. The company has an Environmental Committee, comprised of representatives from the manufacturing units, created with the purpose of aligning postures, considering experiences from all the units.



## 8. Whistleblowing Channel



The Whistleblowing Channel is a means for identifying eventual irregularities that might happen within Tramontina. It is a way to connect the company and its audiences, allowing stakeholders, directors, employees, temporary workers, interns, apprentices, customers, suppliers, service providers, and representatives to forward complaints related to services, behaviors, and practices in the company.

The Whistleblowing Channel reinforces the existing culture of trust, commitment, and transparency in Tramontina, demonstrating the values related to the people, ethics, and whole some relationships. In that way, it ensures transparent and welcoming environment for everyone.

**We ensure an environment protected against any form of harmful action (retaliation) against those that in good faith reported irregular practices. For that reason, this is an independent, confidential, impartial channel and is available for internal and external audiences that hold a relationship with Tramontina.**

In case you identify or suspect of deviations or violations related to any item of this Conduct Manual, you must report it immediately to the Whistleblowing Channel, which will investigate the reported facts.

## What are considered irregularities?

Actions or omissions against the law, internal rules, and the guidelines of the Conduct Manual that can cause damages to Tramontina, to its employees, stakeholders, and other audiences of interest.

## You may report on:

- Fraud
- Corruption
- Robberies, thefts, and misappropriation of goods
- Threats
- Conflict of interests
- Harassment
- Discrimination
- Safety, health and the environment
- Other irregularities

## HOW TO REPORT?



### THROUGH THE INTERNET

Address

[www.contatoseguro.com.br/tramontina](http://www.contatoseguro.com.br/tramontina)

Your computer  
identification number (IP)  
will not be shared in any  
circumstance.

### BY PHONE

Call toll free

**0800 517 0016**

(within the Brazilian territory)



## MONITORING THE REPORT

When you report on something through the internet or by phone, you receive a protocol number for monitor the development of the report. In order to do that, you should go to [contatoseguro.com.br/tramontina](http://contatoseguro.com.br/tramontina) and choose the option Check Response. We recommend that you take note of the protocol number and periodically check the development of your report.

## THE WHISTLEBLOWING CHANNEL IS AVAILABLE 24/7.

All information will be received by Contato Seguro, an outside company that is independent and specialized in receiving complaints. After receiving the complaint, Contato Seguro will forward the information, ensuring anonymity, to Tramontina Ethics Committee for due handling and forwarding to the areas in charge of investigation.

## 9. Managing the Conduct Manual

Leaderships have the responsibility of ensuring this Conduct Manual information is understood and managing manifestations of non-compliance to the principles and values of this organization.

- Whenever cases of non-fulfillment of the guidelines described herein are identified, they should be reported to the Whistleblowing Channel to be handled accordingly.
- The recommendations applied to the misconducts can be educational, corrective, a warning, and even dismissal, according to the severity of the situation.
- The Ethics Committee is responsible for deliberating on the cases, ensuring confidential handling, preserving the identity of the whistleblower and the forwarding of the information received.
- Infringements of the Conduct Manual will be subject to internal disciplinary measures and/or penalties based on the applicable legislation.
- Each person is responsible for formally reporting through the Whistleblowing Channel whenever they become aware of a potential violation of the terms of this Conduct Manual. Every received reporting will be handled with confidentiality and secrecy, with the exception of those that have a legal obligation to be informed to government authorities.





## 10. AGREEMENT

I hereby declare that I acknowledge the terms of Tramontina's Conduct Manual (July/2022 version) and main guidelines. I am aware of the importance of fully practicing and applying the rules herein. I am aware that the Whistleblowing Channel should be used to report acts of non-compliance with Tramontina's Conduct Manual and principles. My acceptance of this agreement is of my own free will.

Full name:

---

Repreg.:

---

Company:

---

Date:

---

Signature:

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*Each one of us is responsible for supporting Tramontina's principles. We have issued the Conduct Manual to reinforce our commitment with furthering such responsibility and provide guidance to all those involved.*

*As we advance, our conduct will help ensure Tramontina's Values continue to reflect in each activity.*

**TRAMONTINA**