



**Code of Conduct**  
**BUTTING Brasil**



**BUTTING**

## Foreword

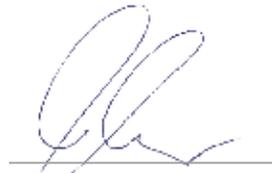
Practising responsibility has always been the basis of our corporate culture at BUTTING. Practising responsibility gains trust. Trustful, respectful treatment of customers, suppliers and employees, together with courage, diligent and careful work, have been the basic principles of our success as a family business – for more than 235 years.

Compliance means that our entrepreneurial activity always remains within statutory requirements and ethical principles.

By using this Code of Conduct as the basis of our compliance management, we intend to lay down provisions so that our actions are fault-free, correct and exemplary at all times. In addition to the Code of Conduct, the way we see ourselves and our attitude to management at BUTTING should determine our activity and shape our corporate culture – for the benefit of our employees, our company and all our business partners.

BUTTING – Progress by Tradition

For our customers and our staff, for this and the next generation.



(Uwe Margraf)

The Management of the Butting Tubos Inox Ltda.

## Scope of validity

This Code of Conduct applies to Butting Tubos Inox Ltda.

Compliance with the law is a matter of course in our entrepreneurial activity. However, violations cannot be reconciled with our values, since they damage the reputation of our company and may also have serious legal consequences.

## Law and ethics

As a company active worldwide, BUTTING must take account of varying social, political and legal conditions in Germany and internationally. It is a matter of course to us that in every country where we work, we operate our business in line with existing laws and regulations.

BUTTING undertakes to comply with fair, ethical and transparent business practices. We do not purchase any materials or services that do not conform to national or international laws and conventions. At the same time, we undertake to use raw materials with legal and sustainable origins. So we also do not knowingly purchase raw materials from conflict regions (“conflict minerals”).

BUTTING sets particular store on conforming with statutory provisions on the employment of our own and of third party employees and does not permit illegal employment or moonlighting.

## Responsibility

BUTTING gives its employees as much individual responsibility as possible. At the same time, we stand for compliance with the law and with BUTTING’s own guidelines.

Our executives should be contacts for the employees: for all kinds of questions, professional and personal anxieties and on issues that affect compliance with statutory provisions.

The dual control principle applies to all our relevant business transactions, such as signing contracts and approving payments. It requires a second person to check, and if required, to sign a transaction or documents.

## Teamwork

Our employees are selected and supported on the basis of their qualifications and skills. We condemn any form of discrimination, for example by unfair treatment, harassment, bullying or libelling – in social networks as well – and support a respectful partnership with one another. We have displayed and explained our most important values in the “Teamwork Centre”.

We guarantee equal opportunities and equal treatment, irrespective of ethnic origin, skin colour, gender, disability, world view, religion, nationality, sexual orientation or social origin. This also applies to political opinions, providing these are based on democratic principles and tolerance towards those who think differently.

## Conflicts of interest

Wherever possible, BUTTING avoids conflicts of interests. We also take an active part in eliminating conflicts of interest once they have been detected.

This applies to conflicts of interest within the company and to conflicts with customers, suppliers and competitors.

We expect that our employees will devote all their labour power to BUTTING and will take up other activities only to a legally permitted extent and as provided for in their contracts of employment.

## Competition

There can only be stable business cooperation for the benefit of all if there is fair competition and strict compliance with the legal framework. Thus BUTTING undertakes to respect and comply with the national and international rules of fair competition and not to undertake any actions that violate anti-cartel legislation. We do not make any bogus proposals, do not have discussions with competitors about prices, capacities or not competing with one another, and do not make any agreements on dividing up customers, territory or production programmes.

Our agreements with customers and suppliers are complete and clear, and subsequent changes and additions are documented. This also applies to provisions on the payment of bonuses, credits, commissions, advertising or sales promotion allowances. We select our suppliers purely on a competitive basis after comparing the price, quality, reliability, performance and suitability of the products or services on offer.

## Avoidance of corruption

We condemn any active or passive form of bribery and any attempt to do so. Gifts, favours, hospitality, offers of entertainment and other benefits are only given or received if they remain within what is legally permitted or if they do not go beyond normal business practice in the relevant region and are not of disproportionately high value and do not represent a bribe.

## Avoidance of money-laundering

Money-laundering describes the process of concealing the origin of illegally received or suspicious sums in order to make these appear legitimate. In most countries, money-laundering is a criminal offence. Fighting money-laundering is the term used to describe controls to prevent, detect and report money-laundering activities.

We expressly commit to upholding all the laws to prevent, detect and report on money-laundering activities and have business relationships only with customers and business partners that pursue legitimate business activities and use legitimate financial means.

## Customs duties and foreign trade

BUTTING complies with all the control regulations when purchasing, manufacturing or marketing goods or transferring or acquiring technologies. Before dispatching or exporting any goods, BUTTING collects the required authorisations from the responsible authorities and submits all statutorily prescribed end user declarations voluntarily.

BUTTING is strictly opposed to the manufacturing of ABC weapons and against the further development of support technologies suitable for this purpose.

BUTTING complies with all the applicable foreign trade and customs regulations.

## Secrecy and data protection

Confidential information refers to all information that is not freely accessible. This information amounts to a corporate asset, and so any unauthorised forwarding may damage the interests of BUTTING or of third parties acting on our behalf. In the same way as we treat non-public data confidentially, we respect and protect confidential information from third parties.

BUTTING commits itself to handling all personal data responsibly, with due care and in line with valid data protection provisions. Direct or indirect use of confidential business information during and after the end of an employment relationship for personal advantage, for the benefit of third parties or to the detriment of BUTTING is prohibited.

### **Breaches of the code**

BUTTING reserves the right to examine and inflict appropriate punishment within the operational and statutory provisions in the event of breaches of this code.

### **Whistleblower system**

BUTTING gives its employees the opportunity to bring any problem to the attention of the responsible executive, the Compliance or Legal Officer or the HR department, openly or anonymously, personally, electronically, in writing or on the telephone.

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