



Code of Conduct

Responsibility, ethics,
transparency and respect.



Mundial SA



This document and the information contained therein are the property of Mundial, including its subsidiaries and all companies of which it holds equity interests, directly or indirectly ("Mundial"), and cannot be copied or reproduced without the express authorization of the company.

Welcome to Mundial!

The Mundial Code of Conduct is a commitment to defend what the company believes in, following a responsible, ethical, transparent and mutually respectful stance.

It is applicable to all employees¹, as well as to the members of the Board of Directors of Mundial, its subsidiaries and all companies that it holds a shareholding interest in, directly or indirectly, and extended to suppliers of goods, services and materials, business partners, integrated producers, clients and other parties involved and/or interested in the business (collectively, "persons involved").

Here you will find the main ethical conducts that should guide your daily life and your relations in Mundial, or even when acting on behalf of it, bringing guidelines that should guide the conduct of all, which were adopted in accordance with internationally recognized guidelines, such as those coming from the Universal Declaration of Human Rights of the United Nations (UN) and the International Labor Organization (ILO).



Understand, practice, and multiply these principles.

Mundial is counting on you!

¹ For the purposes of this Code of Conduct, employees are understood to be any employee, including, but not limited to, temporary employees, trainees, minor apprentices, Statutory Officers, as well as members of the Board of Directors and controlled companies of which Mundial holds equity interests.

Principles of Mundial

Mission

Manage the brands of Mundial, developing and marketing international products with quality and differentiated design, serving the consumer and industrial market.

Vision

To be a company with an international presence, with outstanding performance in the main markets, financially healthy, managing and marketing products and services, with desired and valuable brands.

Values

- Perseverance
- Boldness
- Creativity



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1 Application

This Code of Conduct guides the activities of Mundial, and its disclosure is guaranteed by its availability on the intranet and on the company's website, in a digital way.

Also, printed copies of this Code of Conduct are available for everyone to access, in the Human Resources Department of the units, being also delivered during the Integration to the new employees, in addition to being available on the walls of the Mundial manufacturing units.

This document may be updated from time to time, and updates will be informed in the internal, external and widely disseminated communication vehicles for all employees and other persons involved.

Its terms must be known and agreed to by everyone, from the Management to the employees of Mundial, its subsidiaries, and all companies that it holds a corporate interest in, directly or indirectly, allocated in Brazil or abroad, and extended to suppliers of goods, services and materials, business partners, integrated producers, clients and other parties involved and/or interested in the business (collectively, "persons involved"), and must be respected in relation to any acts performed in the professional exercise before Mundial or when acting on its behalf.

2 Structure

For better application of this Code of Conduct, as well as to manage the Compliance Program, Mundial relies on Senior Management, Compliance Management and the Ethics and Compliance Committee.



3 Practices

The safety standards and rules provided for in the legislation and those established internally by Mundial, including internal policies and procedures, must be respected in the execution of all tasks, in all workplaces and installations of Mundial. It is the duty of all persons involved to carry out their activities observing these guidelines, immediately communicating any situation of concern or disobedience, given the nature of the violation, directly on the Confidential Channel of Mundial, from the link: www.canalconfidencial.com.br/mundialsa/ or on the telephone: 0800 882 0415.

Mundial expects all suppliers, commercial representatives and contracted third parties to conduct their business and activities with transparency and integrity and to be committed to the standards of this Code of Conduct.

It is important that everyone is aware of their responsibilities, avoiding situations that may harm Mundial and/or its reputation in the market, or even that may harm the people involved in Mundial, directly or indirectly.

3.1 Prevention of Corruption and Bribery (Law No. 12.846/13)

Mundial values the fairness and moral, ethical and democratic commitment of its employees during all stages and activities inherent to its operations, in the interaction with the internal and external public and with other organizations and institutions in the public and private spheres. Thus, it fully condemns any and all acts of corruption, working continuously in the development and implementation of actions aimed at curbing this practice.

- Employees or persons involved with Mundial may not offer, accept, promise or give anything of value, theirs or Mundial, directly or indirectly, to any third party, mainly government agent or authority, national or international, with which Mundial has related, is related or may relate, as a way to avoid linking such act to any interest to ensure improper advantage for itself, for Mundial or for others.

- Mundial and any persons involved may not hinder or intervene in supervision carried out by public agents or bodies.
- Mundial and any persons involved, including, but not limited to, contracted third parties, may not defraud, manipulate or prevent bids and contracts, of any kind, linked to government agencies in any instance and may not defraud or manipulate the obtaining of licenses, authorizations or permissions before public agencies.

3.2 Prevention of Laundering of Assets and Capital (Law No. 9.613/98)

Mundial and the people involved are aware of the content of Law No. 9.613/98 (“Law to Combat Laundering of Goods and Capitals”) and its complementary regulations, including, but not limited to, the regulations and resolutions of the Financial Intelligence Unit - FIU (former COAF) and the Central Bank - BACEN, and are therefore committed to observing them. As a way to prevent the insertion of money of illicit origin in the market, any person involved, in the exercise of their activities with Mundial, is prohibited from receiving any cash, in kind, for investment, remuneration or payment purposes.

It is the duty of all employees to check for evidence of Money Laundering crime in their activities. If there is any suspicion, the employee must communicate to his superior, or carry out the communication on the Confidential channel of Mundial for the proper investigation and, if applicable, inform the regulatory body, as determined by law.

3.3 Compliance with other local laws, rules and regulations

Observance and compliance of laws are the duty of all. Each employee and person involved has an obligation to comply with the legislation and rules in the development, performance and execution of all their activities, as well as respecting the internal rules, policies and procedures of Mundial, local regulations and the customs of each country or region of operation. It also supports the principles of the United Nations Universal Declaration of Human Rights and the International Labor Organization’s Declaration of Fundamental Principles and Rights at Work.

3.4 Compliance with the General Data Protection Law – LGPD

The General Data Protection Law - LGPD aims to regulate the processing of personal data of individuals, guaranteeing fundamental rights related to the protection of freedom, privacy and intimacy of people and allowing the holders of personal data more transparency and control over the collection and use of their information.



The LGPD describes how personal data should be treated by companies and how they should structure their governance and relationship with the data subject and with the National Data Protection Authority, an agency of the federal public administration also created by the Law. Mundial adopts technical and organizational measures aimed at protecting the personal data of holders against accidental or unlawful destruction, loss, alteration, communication or dissemination, or unauthorized access, in addition to ensuring that the environment (whether physical or logical) used by Mundial for the processing of personal data is structured in order to meet security requirements, standards of good practices and governance, and the general principles provided for in the LGPD and other applicable regulatory standards. Thus, any employee who participates in any project or activity that carries out the processing of personal data that is under the responsibility of Mundial, whether as an employee, partner or supplier, has a great commitment to the application and monitoring of the defined security controls.

In this context, it is worth highlighting some principles that should guide activities involving personal data.

- To be proactive and non-reactive; and act in a preventive, non-corrective manner.
- To respect at all times, in the exercise of its activities or in the creation of a new product or service, the privacy of the holder of the personal data.

- To ensure that people involved in the processing of personal data (other areas, partners, suppliers, etc.) carry out their activities in an appropriate manner, observing the Policies, Rules and Procedures of Mundial aimed at the protection of personal data and that they clearly understand what the purposes of the treatment are.

With these measures, Mundial reaffirms its commitment to comply with the LGPD, contributing to the strengthening of the protection of the privacy of the holder of personal data; freedom of expression, information, opinion and communication; the inviolability of intimacy, honor and image, and economic and technological development.

3.5 Working Environment

Relationships in the work environment are aligned with the values of Mundial, collective agreements and applicable contracts, observing the legislation and rules in force. Respect for others creates an excellent work environment, as well as freedom to clarify doubts, avoiding any form of embarrassment to oneself or others. Mundial does not allow any order of retaliation.

Everyone must be treated with respect and dignity, and physical or verbal behaviors that are humiliating, that may interfere with functional performance or that create an intimidating, abusive, hostile and offensive work environment are not accepted, as well as violent behaviors (physical or verbal).

It is necessary that the employees of Mundial follow the ethical conduct established in this Code of Conduct, and:

- make fair, equitable offers of employment and in accordance with local laws;
- respect diversity and provide equal and fair opportunities for all;
- promote a work environment free from moral or sexual harassment or any abuse of power, bullying, prejudice, discrimination and psychological or physical aggression, making the relationship between everyone healthy.

Mundial does not admit under any circumstances:

- ✘ The entry and/or permanence, on its premises and/or in external service, of child labor and the work of people under 16 years of age, except through special hiring of “minor apprentice” (thus considered aged between 14 and 18 years, in the form of the applicable special legislation).
- ✘ The exploitation of forced, slave labor through intimidation and/or unpaid labor.
- ✘ Conduct that causes embarrassment, that is, disrespectful to subordinates or other people of Mundial, such as offensive words and nicknames, intimidation, moral or sexual harassment and psychological or physical aggression.
- ✘ Any and all forms of discrimination or prejudice involving age, race, color, national origin, sex, politics, religion or creed, disabilities or physical limitations.
- ✘ Lending money to Mundial’s employees, except for consignments authorized by the company.
- ✘ Consuming or being under the influence of alcoholic beverages.
- ✘ Use of cigarettes, cigarillos, cigars, pipes or any other tobacco product, whether or not derived from tobacco, in the workplace.
- ✘ Consumption, possession or trading of illicit drugs, as well as being under the effect of these substances.



It is forbidden to use, keep or carry weapons on the premises or in any activity related to Mundial. Service providers who may eventually use weapons as a work tool must be duly authorized, identified, and technically qualified to do so.



Mundial adopts standardization in areas and activities where safety equipment is mandatory. These must be used according to internal guidelines and applicable safety standards. For the people exempted from wearing the uniform, the recommendation is to wear clothes appropriate to the corporate environment and avoid exaggerations that overlap with professionalism.



Mundial is also committed to a strong work ethic and strictly prohibits its employees, contractors and agents linked to Mundial from engaging in bribery and corruption, as well as presenting any conduct that could raise suspicion of illicit activities.

3.6 Trade unions and class associations

Mundial proposes to maintain a respectful relationship and support collective initiatives and agreements to improve the quality of life and benefits of employees, as well as recognizing the legitimacy of unions, associations and class entities.

Mundial respects the employee's right to join the union of their professional category or to which the establishment is linked, as well as supports the participation of employees in the activities of associations and class entities in which they are affiliated.

3.7 Clients and consumers

Clients and consumers are the reason and inspiration for Mundial to manufacture and market increasingly better products and offer unparalleled services. It is the desire of Mundial to constantly increase its credibility with clients and consumers, so all employees and people involved must be committed to:

- Be transparent in the relationship, always attending with effectiveness and courtesy
- Deliver what was promised.
- Do not sacrifice under any circumstances the quality of products, services or brands.
- Do not use the name Mundial for your own benefit or that of others.
- Maintain the established and desired standard for products and services, as this is the quality assurance of Mundial.
- Caring for the interests of Mundial, helping to solve problems, forwarding requests and complaints to the responsible areas.
- Be open to criticism, opinions, suggestions and contributions in the permanent search for improvement of the quality of products and services.



3.8 Registration

Mundial clients must be duly identified through individual and complete registrations, in order to confirm their origin (identification of how they arrived at Mundial), the information provided, their profile and interests.

- Registration information must be updated whenever necessary.
- Preferably, the contracts must be formalized by their own instrument, between Mundial and the client, with clear bases as to the obligations of the parties and establishment of remuneration compatible and adequate to the negotiated product or service provided, with a specific termination clause in case of violation of Law No. 12.846/13 and being an original copy with each party.

3.9 Suppliers, service providers and business partners

Mundial considers transparency and impartiality fundamental in its relationship with suppliers, service providers and partners, guiding its decisions on technical factors, quality of products and services, such as:

- Business terms and conditions based on ethical principles in order to preserve mutual trust.
- Allow equal opportunities for all.
- Permanently demand improved productivity in processes, as a way to ensure competitiveness and contribute to the preservation of fair competition.
- Seek compliance with current legislation applicable to its business.

In addition to the items above, in any case, the guidelines established in the "Suppliers Manual" must be observed in relations with suppliers and service providers, as well as in the Administrative Procedure - Contracting of services and expenses (PA0001), both available on the intranet of Mundial.

3.10 Relations with the Public Administration

Before carrying out any interaction with a Public Agency or Public Agent, the manager, employee or any person representing Mundial must make sure that they have authorization to represent it. It is necessary that more than one representative attend meetings, interviews or gatherings with members of the Public Administration.

In relation to written communications, it is recommended that they be made exclusively from the employee's corporate email and directed to the official email of the Public Agent, with a copy to the hierarchical superior.

3.11 Occupational health and safety

Mundial has a Health and Safety Policy in order to make continuous improvement in the work environment, ensuring the safety of the facilities, meeting the relevant legal requirements, promoting the physical and mental well-being of employees and service providers, through a Health and Safety Management System based on the prevention of accidents, diseases, illnesses and work-related incidents.

Employees and service providers must be attentive to the guidelines of their unit regarding Health and Safety Standards, Internal Standards of Mundial, appropriate clothing and Personal Protective Equipment (PPE) necessary for the execution of their professional activity.

3.12 Quality

All manufactured and marketed products must meet the quality requirements of Mundial and the needs of the client, observing the best practices of the market.

The goal is to offer the market innovative solutions in a healthy, creative and continuously better way, providing the satisfaction of all. Not just products and services, but a solution for the client. Seek simple, creative and differentiated solutions that exceed the requirements of our consumers.

3.13 Environment

Mundial respects the environment and is concerned with the correct disposal and reduction of waste generated, in addition to investing in improvements and the environmental education of employees.



Mundial has an Environmental Policy that aims to apply continuous improvement in products and processes, through the Environmental Management System, prioritizing the reduction or elimination of environmental impacts, in accordance with current legislation.

3.14 Communication

Mundial maintains an open channel with the press, making available all the information necessary for the clarification and dissemination of its activities. The employee is advised to:

- Never give information and/or interviews without being authorized by the Board.
- Inform your suppliers that they are not authorized to disclose projects without the authorization of Mundial.
- Not talk about Mundial confidential projects in public environments (airplanes, restaurants, etc.), this information may be misinterpreted or misused.
- When identifying any incorrect transmission of data or news that affects the image of Mundial, immediately inform your superior, the Legal/Compliance department or the Board.

3.15 Social responsibility

The social responsibility of Mundial has as part of its mission the support and development of citizenship, developing campaigns and programs aimed at this end. Mundial is still committed to promoting social inclusion in the Company's environment, providing opportunities for young people to enter the labor market through the Young Apprentice Program, as well as taking actions with the community. You can check out the Company's annual Socio-Environmental Balance Sheet available on the Mundial website.

3.16 Donations and incentives

Mundial is concerned about the problems that involve society and, therefore, supports donations of financial resources, products for the benefit of institutions, entities, and social projects that are properly regulated. For the incentive to be released, the authorization of two Officers of Mundial is required.

3.17 Markets and competitors

The relationship with the market and competitors must be based on ethical standards, and it is the duty of all employees to avoid any actions or practices that violate the principles of fair competition, always acting in full compliance with all applicable antitrust and competition laws

Mundial believes that fair competition is a constant stimulus for innovation and the pursuit of excellence in the quality of its products and services. Thus, people involved with Mundial will not engage or collude with any conduct that may represent anti-competitive practice, under the terms of the applicable competitive legislation, and are prohibited from disclosing information or discussing with competitors marketing plans, promotion and disclosure of products or services.



All employees, especially those who are in regular contact with the competition, have a responsibility to ensure that they are familiar with applicable competition and antitrust laws. In case of doubt, the Legal Department should be contacted for guidance on the subject.

3.18 International community

Mundial is present in several international markets, with different practices and standards in relation to its business. Mundial encourages respect and integration of different cultures and believes that diversity is a competitive advantage for the business.

Respecting the cultural particularities of each person, country and region, this Code and the principles that govern it must be faithfully complied with by all employees.

3.19 Political activities

Mundial maintains a good relationship with institutions and government representatives, dealing with the organization's affairs and interests impartially, without any political party connotation. It is not opposed to its employees running for political office. However, it does not allow them to promote electoral campaigns within Mundial premises, without authorization from the Board.

Regardless of the time of year, employees are not allowed to wear clothing (t-shirts, caps, stickers and others) alluding to parties and/or candidates during the workday or in external service by Mundial.



3.20 Conflict of interest

The conflict of interest occurs when the employee or the third party that maintains a direct relationship with Mundial uses its influence or commits acts with the purpose of benefiting particular interests and that are contrary to the interests of Mundial or that may cause damage or losses, whether direct or indirect.

The employees of Mundial and the third parties that maintain a direct relationship with Mundial, must treat clients fairly, without benefiting or harming one client to the detriment of another for any reason, whether personal or professional.

Employees and third parties who have a direct relationship with Mundial may not use their link with Mundial to obtain undue advantages for themselves or unduly favor other businesses/people. It is important that they avoid even situations that appear to be a conflict of interest, or that may cause people to doubt their sense of integrity.

They should also take care to identify situations that represent a potential conflict and that may interfere with their ability to act in the best interest of Mundial's clients. The people involved with Mundial must formally communicate to the hierarchical superior, the Management and/or the Senior Compliance Department whenever a certain situation and/or operation represents a possible conflict of interest or competition, so that the appropriate measures and/or formalizations are provided.

Mundial does not accept the conduct presented below, considering them conflict of interest, resulting in consequences for labor and contractual purposes.



3.20.1 Private interests

The Mundial employee must not:

- ✘ Use the prestige of the position or the name of Mundial for their own benefit or that of others.
- ✘ Develop in parallel to its work in Mundial directly or indirectly, competing and/or complementary activities to the Company's business, without its express authorization, except those of an academic nature.
- ✘ Be the owner or partner of a company or any economic activity that may represent a conflict of interest with Mundial.
- ✘ Provide employment opportunities to influence authority.

3.20.2 Parallel professional activities

Employees may perform external parallel professional activities, paid or unpaid, provided that:

- There is no exclusivity clause in the contract.
- Do not jeopardize the fulfillment of your employment contract with Mundial.
- Do not jeopardize your income at Mundial.
- Do not use the resources of Mundial, including its dependencies.
- They are carried out outside the working hours agreed with Mundial.
- Do not conflict with the business, interests, service providers and performance of Mundial.

3.20.3 Hiring of family members and affective relationship

- ➔ The hiring of family members of employees may be considered, provided that they are evaluated and compete for employment opportunities on equal terms with other candidates.
- ➔ The intention to hire any professional with a kinship or close friendship with the people involved must be communicated to the hierarchical superior.



Hiring of first-degree family members in the same area and work shift, or boss-subordinate relationships between people with family ties are not allowed .



The employees of Mundial who have a kinship, affective or personal relationship with suppliers or service providers must declare the conflict of interest by completing the form made available by the Compliance Management



Due to the average behavioral standard expected from all employees, in direct and indirect performance for Mundial, it is recommended that displays of affection beyond the conventional cordialities be avoided during the exercise of activities and in the Mundial environment.

3.20.4 Promotional gifts, presents, hospitality and entertainment

Promotional gifts, presents, hospitality and entertainment received or offered to employees and third parties that maintain a direct relationship with Mundial may denote potential favoritism to the detriment of Mundial's interests.

In relationships with the external public (suppliers and clients), employees and third parties who have a direct relationship with Mundial are prohibited from receiving promotional gifts, presents, benefits or advantages of any kind and nature (leisure trips, entertainment tickets, financial compensation, etc.) from suppliers, clients, partners or competitors.

Mainly, acceptance or offer, directly or indirectly, of favors, money, entertainment, gifts and hospitality to a Public Agent or a third person related to it, for the purpose of obtaining advantages, influencing or compensating decisions for their own benefit or that of Mundial, are prohibited.



It is not permitted to receive promotional gifts, presents, hospitalities and entertainment from Third Parties who are participating in the hiring process.

In cases of entertainment and hospitality, such as invitations or tickets to sporting events, concerts, movies, theater, etc., these should be offered to Mundial, and not to a specific person. Depending on the evaluation of the Senior Management and/or Compliance Management, the area manager may draw tickets for its employees.

The acceptance of gifts, entertainment and hospitality may not occur in the event of a conflict of interest or to determine the conduct of those who receive the item. Employees may accept invitations from suppliers, clients, partners or competitors to participate in presentations, courses, lectures and related activities, provided that they are aligned with the interests of Mundial and approved by the immediate superior.

The Senior Management may eventually accept or offer promotional gifts, presents, hospitality and entertainment, provided that they are within the value or perception of up to R\$1,500.00 (one thousand and five hundred reais).



It is also forbidden to grant and receive from third parties, promotional gifts, presents, hospitalities, entertainment and other cash or cash equivalent offers, such as: gift vouchers, vouchers, luxury items, among others, for the purpose of obtaining benefit itself or for Mundial or, when the act characterizes the intention to influence decision-making, facilitation in business and in the contractual relationship. In addition, donation or contribution to officials and candidates for public office, parties, politicians and for political election campaigns is prohibited.

In the case of public agents, the offer of promotional gifts, presents, hospitalities and entertainment should be avoided, and in exceptional cases, Management and Senior Compliance Management should be consulted.

If the values of promotional gifts, presents, hospitality and entertainment exceed what is established by Mundial or characterize a conflict of interest, it must be refused by the employee.

In the event that it is not possible to refuse them, either for cultural reasons or due to the logistics for return, consult the Management and/or the Senior Compliance Department, which will define the best referral, considering the suggestion of a Refusal Letter for Promotional Gifts, Presents, Hospitalities and Entertainment, in order to clarify the reason for the refusal and to contribute to the maintenance of a healthy relationship with the partner, supplier or third party.

Mundial does not allow its employees to accept promotional gifts, presents, hospitalities and entertainment from the same Third Party or anyone with whom Mundial has established a relationship, more than twice in a period of 12 (twelve) months.

Whenever the employee or the third party that maintains a direct relationship with Mundial, receives an offer of promotional gifts, presents, hospitalities and entertainment outside the parameters established in this Code of Conduct, they must inform the Confidential Channel or directly to the Management and/or Senior Compliance Department, as well as the employee's manager, who will analyze and advise on acceptance or refusal. Mundial has a Promotional Gifts, Presents, Hospitalities and Entertainment Policy, which defines guidelines in this regard.







3.20.5 Sale of products to employees

The products sold by Mundial, which are available to employees for purchase at discounts, cannot be resold for profit.

3.21 Information Security and Privacy

Seeking to ensure the confidentiality, availability and integrity of information, Mundial adopts the best information security practices in its activities.

The employee of Mundial has the duty to

-  Carry out the ethical, safe and legal use of technological resources in the execution of its activities.
-  Use the security resources defined and made available by Mundial to protect information.
-  Protect your digital identity from illegitimate use or compromise of its integrity by maintaining the confidentiality of passwords and, periodically or when requested, change the combination.
-  Use only legitimate content and software authorized by Mundial.
-  Comply with the duty of safe mobility and safe disposal of information, according to standards and procedures established by Mundial.
-  Immediately notify the Information Technology Department and/or its hierarchical superior about any case of information security incident or personal data breach that may become known, regardless of whether it occurs during the exercise of professional activity or personal use of the Internet and social media.



Mundial complies with data protection laws in all markets in which it operates and uses personal data only in accordance with the purpose and legitimacy for which they were obtained, committing itself to privacy and security.

3.21.1 Intellectual property, secrecy and confidentiality






All information generated, accessed, handled, stored or discarded in the exercise of its professional activity is the property of Mundial and is subject to monitoring or blocking of its content.



It is the employee's responsibility to:

-  Keep confidential any confidential information obtained by any means or at any stage of the work developed, limiting its disclosure and access to those directly involved, and sharing this information exclusively in the workplace.
-  Preserve the confidentiality of information even after the termination of the link between the companies or with Mundial.

The employee must not:

-  Inappropriately disclose and/or use insider and/or relevant information from Mundial for the purpose of obtaining personal advantage or for the benefit of a third party.
-  Disclose unofficial information and rumors of any kind.
-  Leave sensitive documents exposed to overview on desks, computers, printers, and copiers.
- Carry out lectures, seminars or academic work about Mundial's processes and business without authorization from your immediate superior and the area's Board. This conduct is allowed only when in accordance with the People Management Policy - Academic Works About Mundial (PGP0042), available on the Intranet.
-  Make photographic or video records of products, machines or processes, without authorization of the direct manager, for any purpose, whether academic, personal archive, use on the internet, disclosure, etc.
-  Disclose or publish in any media or social network the materials of internal circulation, the emails received or sent in the domain of Mundial, the information registered in the company's systems and other modalities of internal exchange of information between people involved, whether confidential or not.

Attention It is forbidden to discuss with third parties, use, disclose, reveal, assign any title or dispose of information, whether material and/or intellectual property of Mundial or its suppliers and clients, to an individual or legal entity, and for another purpose that is not exclusively related to the operation of Mundial, and the employee is responsible for providing the due Confidentiality Agreement when necessary.

The unauthorized use of the information will subject the user to the legal sanctions and penalties provided for in the Secrecy and Confidentiality Agreement attached to the Employment Contract.

3.21.2 Use of Mundial IT systems and devices

Mundial's information systems can be accessed 24 hours a day from any location, provided that the employee has the appropriate access credential.

It is forbidden for the employee to perform any access outside working hours, except with the written authorization of the manager, who is responsible for recording overtime in accordance with the employment contract and current legislation.





It is the employee's duty

- Use the Mundial systems exclusively for your professional activity.
- Use the company's IT devices with responsibility and caution, ensuring their good condition.
- Keep Mundial files and information saved in network folders or in Mundial Office 365 apps, such as OneDrive or Sharepoint.
- Immediately notify the IT sector in case of suspicion or identification of information security incidents.



The employee is not allowed to:

- Store private information in the systems of Mundial, such as videos and photos. The storage of executable files (programs) is also not allowed.
- Make improper access attempts on accounts for which the employee has not received the respective access credential.
- Share your passwords, except in specific cases of shared computers.
 - Send information from Mundial through non-approved systems or applications, that is, whose access has not been made available by the IT sector.
- Use IT systems and devices, as well as telephony and printing services, for private purposes.

From the Mundial network, access to the following content is not allowed:

- Pornography and pedophilia websites;
- File sharing (e.g. torrent);
- Incitement to terrorism and drug use;
- Malicious code sites (viruses and malware);
- Copyright infringement (piracy, etc.);
- Inappropriate, offensive, illegal, discriminatory and similar content.



3.21.3 Use of own equipment

It is allowed that the employee, on their own initiative in order to facilitate his work, uses their private smartphone in the physical premises of the company, provided that it is authorized by the manager and allowed by the Safety Standards of the unit, and considering that during working hours the use will be exclusively for their professional activity, except in situations of personal urgency/emergency.



Detailed information on the correct use of computer and telecommunications resources is in the Information Technology Policy (PA0039), available on the intranet

3.22 Mundial Assets and Resources

The assets and resources of Mundial shall be used only for the execution of the work and conduct of the business of Mundial. All employees need to respect and have the duty to protect the assets of Mundial, such as: equipment, inventories, supplies and resources made available for the execution of activities, in the same way as commercial, strategic, financial, accounting, legal, industrial secrets and intellectual property information.



3.23 Commercialization of products

The employee is not allowed to sell any type of products/services on the premises of Mundial (the purchase or sale), personal or third parties.





3.24 Accounting

Financial and accounting records must fully and accurately reflect the operations of Mundial and its bookkeeping must be carried out in accordance with current legislation and accounting principles.

It is important that transactions are transparent and fully documented and classified for accounting accounts that accurately reflect their nature.

Inadequate, ambiguous or fraudulent accounting entries and any other accounting procedure, technique or artifice that may hide or cover up illegal payments or that aim at fraud or manipulation of any degree are prohibited.

Thus, employees are **not allowed to:**

-  Fail to record any accounting or tax financial transaction, always obeying accounting principles.
-  Disclose, including in the relationship with family members and colleagues, about any transactions, financial information that occurred at Mundial, such as: sales, profitability, results, new products or any matter that have or may have influence on employees, the Company and the securities issued by it.
-  Failure to fully cooperate with internal or external auditors, informing them of records and controls requested, in a clear, objective and transparent manner, without any omissions or manipulations.
-  To trade shares of Mundial at a time when it is aware of inside information, not yet publicly disclosed, that may affect the price of shares or the movement of the capital market.

3.25 Shareholders and investor relations

3.25.1 Disclosure and use of information of relevant act or fact

Controlling shareholders, managers (Directors and Officers) and members of the Fiscal and Advisory Board or anyone who, by virtue of their position, function or position at Mundial, its parent company and its subsidiaries, is aware of the information related to the act or fact relevant to the trading of securities issued by Mundial or referred to them:



Prior to the disclosure to the market of a material act or fact occurred in the business of Mundial, trading with securities issued by or referenced to it by the publicly-held Company itself is prohibited.



The same prohibition applies to anyone who is aware of information regarding a material act or fact, knowing that it is information not yet disclosed to the market, especially those who have a commercial, professional or reliable relationship with Mundial, such as independent auditors, securities analysts, consultants and institutions that are members of the distribution system, which it is incumbent upon them to verify regarding the disclosure of information before trading with securities issued by the Company or referenced to them.



The same prohibition also applies to managers who leave the Company's management before the public disclosure of a business or fact initiated during their management period, and will extend for a period of six months after their removal.



Transact any security issued by Mundial or referenced to them within a period of 15 (fifteen) days prior to the disclosure of quarterly and annual information.

3.25.2 Insider Trading

If any employee has relevant and privileged information about the shares of Mundial, including, but not limited to, the business strategies of Mundial, operational methods, and product formulas, among others, it is prohibited by law to trade shares of Mundial, directly or indirectly, in any capacity, or even to disclose such information to third parties. Mundial expects the employee to observe the legal provisions on the subject, as well as any and all policies, instructions or guidance of Mundial in this regard. Violation of this rule is punishable criminally and civilly by the Brazilian legislation where Mundial has its actions negotiated.

For guidance purposes, whenever there is doubt regarding the relevance of inside information, the Investor Relations Officer of Mundial should be contacted in order to resolve this doubt.



4 Other information

4.1 Access to the Code

This Code of Conduct is available on the intranet and on the Mundial website, in digital form. Also, hard copies of this Code of Conduct are available for everyone to access in the Human Resources Department and available on the walls of the internal communication network in the Mundial manufacturing units.

This document will be delivered to new employees at the time of Onboarding and may be updated from time to time. Updates will be informed in the internal communication vehicles, and will be widely disseminated to all employees.

4.2 Questions

In case of doubts regarding the policies and practices of this Code of Conduct, the employee must contact the Legal/Compliance and/or Human Resources department, or their Management or immediate Board, which may advise and assist the employee in matters related to the interpretation of the Code of Conduct.

4.3 Reporting non-compliant conduct

Mundial encourages all persons involved to express their views on possible non-compliance with the established guidelines. To this end, it provides a Confidential Channel in which the security, confidentiality and preservation of the identity of all whistleblowers and accused parties is guaranteed, to the extent permitted by law.

In addition, retaliatory actions of any nature against the reporter or persons involved in the investigation or investigation process are not tolerated.

Violations of the principles and guidelines set forth in the Mundial Code of Conduct may result in disciplinary action and, depending on the severity of the violation, such as written verbal warnings, temporary suspensions or termination of the relationship with Mundial. Such measures may also apply to false reports.

It is reiterated that any situation contrary to the provisions of this Code of Conduct or the complementary rules must be communicated on the Confidential Channel of Mundial, available on the website www.canalconfidencial.com.br/mundialsa/ or on the **telephone 0800 882 0415**. The report may be made according to the standards described in the Confidential Channel of Mundial.

Mundial guarantees that there will be no retaliation against any employee because of reports made in good faith, as this also protects the rights of the person involved.

It is everyone's commitment to maintain at Mundial a working environment in which there is freedom to clarify any doubts, records of concerns and perceptions of irregularities in a broad way.

4.4 Non-compliance with the Code and disciplinary sanctions

Failure to comply with any of the items of this Code of Conduct is an act of indiscipline, which will be duly determined and treated as such, will be subject to the penalties provided for in Mundial according to the Consolidation of Labor Laws (CLT) and People Management Procedure - Disciplinary Measures (PGP0048).

Furthermore, Mundial may adopt the appropriate disciplinary measures, without prejudice to the adoption of administrative and/or judicial measures depending on the seriousness or unlawfulness of the infraction.





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Code of Conduct

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