



Code of Conduct

OJI PAPÉIS ESPECIAIS



Message from the Company President

We, professionals from OJI PAPÉIS ESPECIAIS, embrace this Code of Conduct, which has its basis on the Code of Conduct of Oji Holdings Corporation, the local legislation and customs, as well as our vision, mission and values. We base our business activities on the consciousness of our responsibilities as citizens and on the ethics of an organization, which values the society reliability.

We will commit ourselves to apply the code in every moment, for ourselves and for our suppliers, service providers and any other people who can be hired by OJI PAPÉIS ESPECIAIS, as a way to contribute to a better society. As employees of OJI PAPÉIS ESPECIAIS, we are going to express the proud of our role and we are going to contribute to the closer communities by means of social and environmental activities oriented by the commitment to safety and protection of the environment, in a way to contribute to the company and society progress.

We will completely understand the essence of the Code of Conduct and we will comply with the rules, rights and individual obligations, and we will always seek the best performance.

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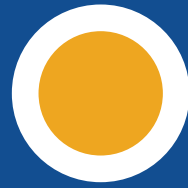
*Guidelines for action
in OJI PAPÉIS ESPECIAIS
based on our **values***

integrity ○

sustainability ○

excellence ○

synergy ○



integrity



Accordance with the Law

To ensure that our activities are fair and honorable we comply with the prevailing Rules and laws in the country, respect corporate ethics and all social standards, including common sense.



Appropriate Records

We will record correctly the transactions and activities of the company, will manage properly and will store the records in accordance with the laws and regulations of the company. We will conduct.



Act fairly with equality in rights and duties, with transparency and respect for life, security and differences.

The information, especially financial, in accordance with current regulations.

We will enforce the antimonopoly law, and other laws and regulations, paying attention in the legislation for subcontracting and devoting ourselves to fair trade, without committing illegal actions as participation in cartels, collusion, or similar actions. We will not use and will not participate in works using child or forced labor.

We will strive our best not to do unfair competition, unauthorized use of the trade secrets of the company, as well as from other companies. Also, we will not engage ourselves in sales activities, which adversely affects the trust of interested parties: our employees, suppliers, customers and community.

We will respect the patents, copyrights and third party intellectual property.

We will respect the laws, regulations and international trade-related treaties, as well as company rules related to the acquisition of raw materials, import and export operations.

We will keep required records of the company's assets (equipment, intellectual property, materials, values, etc.), in appropriate way, whether tangible or intangible, usable and manageable.



Dissemination of Management Information and Company Secrets

We will seek transparency in our management. We will disclose our management policy, business and other corporate information related to economic, social and environmental issues in a timely and appropriate manner.

We reject and do not use privileged information (insider trading) and the company is unprecedented for personal interest or actions that generate such suspicion.

The company's customer information to sales, manufacturing, research and development and others are confidential, and are important assets of the company. We will get this information properly and we will not provide to third parties nor we will use them for personal purposes or without authorization. We will respect the confidentiality of information provided by third parties and will deal with it the same way the company handles confidential information of its professionals.





Ensuring Security

At all stages of our activities, we will prioritize safety. Controlling chemicals adequately, managing disaster safety and prevention in our operational facilities and equipment, in order to become even more reliable, ensuring the safety of our products and services.

We will ensure the integrity and health in the work environment, operating in accordance with the safety practices. We will be fully aware during the performance in the work environment, preserving the mental and physical health without the use of alcohol and drugs. We will take all possible measures to ensure our health and safety.



Respecting Human Rights

We will respect the fundamental human rights of all people and will not discriminate or intimidate individuals according to their philosophy, belief, nationality, national origin, religion, sex, social class, hierarchical level within the company or similar actions, and we will not invade privacy, not allowing others to do it too.



Use of Company's Assets

We will not use company assets for personal use, except as expressly authorized.



Conflicting Interests

We will refuse the participation or involvement in actions that may adversely affect the company's profit and will not use our position, authority, or knowledge acquired in the company to use than in professional way.

We will not engage in contributions and illegal or bribery donations according to PO 04.01.050 - Bribery Prevention Regulation.

as well as request to vote in elections or any other action without authorization of the company.

We will refuse all relations with antisocial groups and radical organizations that do not act with integrity.



Participation in Political or Religious Activities at the Work Environment

We will respect all political and religious beliefs, but we will commit ourselves not to carry out such personal activities and improper disclosure in the work environment,



Gifts and Courtesies

We will not accept gifts or courtesies characterized as obtaining benefits in any negotiations.

We will limit gifts and entertainment according to the PO 04.01.050 – Bribery Prevention Regulation, are they received or sent as gifts, amenities for suppliers/customers and interested parties, being prohibited the receiving of complimentary cash under any hypothesis.



Anti-corruption Regulations

We will commit to observe strictly the provisions of anti-corruption legislation in force, in particular the Federal Law No. 12,846/2013, eschewing especially from practice, to third parties or authorities of any sphere, the offer, promise, payment, granting, request or acceptance, directly or indirectly, of any advantage, financial or not, aiming to influence them to practice any improper measure or induce them to take or omit themselves from taking any action in violation of their contractual or legal obligations.

We are obligated and committed to cooperate with any investigations, probe, judicial or administrative proceedings, audits or other measures sponsored by public agencies, businesses or institutions authorized by the company, to investigate irregularities or illegalities that have or may have been committed in the development of activities of the company.





sustainability



Harmony with the Environment

We promote the sustainability of our business by maintenance and development activities that are in harmony with the environment from a global perspective.

We will comply with business laws related to our activities in an appropriate manner to perform legally the procedures, licensing, notifications and reports stipulated.

We will respect the laws and regulations related to the environment and other requirements of the organization as well as implement environmental improvements in industrial processes.



Do better without compromising the resources: human, environmental and social over time.



Relationship with the Interested Parties

We will establish relationships of trust and transparency with all interested parties, including customers, suppliers, workers, shareholders, media, government and the surrounding community.

We will contribute to the development and improvement of society in active participation in socially oriented activities.

We will respect cultural diversity and customs so, to contribute to local communities.



Relationship with the Clients

We will do our best to serve our customers and protect the bond of trust. We will properly manage the information including corporate and personal information secrets.

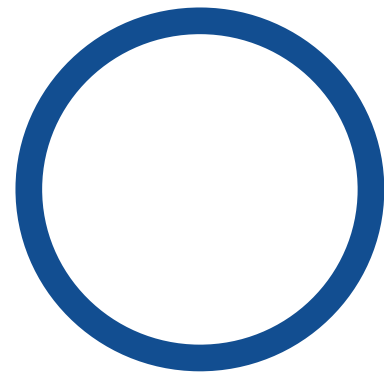


excellence



Development

We will strive to promote self-development, acquire knowledge and improve skills.



Think and act as if you were the owner. Seek the superiority or the state of being good in the highest degree, in people management and in processes.



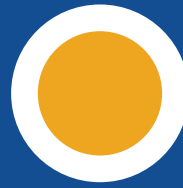
Appropriate Use of the IT and Telephony Systems

We will use IT and telephony systems of the company consciously, without abuse and/or use of sites other than for professional development, according to the rules of the company PC.05.001-Information Security. We will not send chain letters or emails that violate human integrity or reduce the productivity of the working environment, and will not promote the destruction or alteration of data. No use of unauthorized software is allowed.



Provision of Services and Safe Products

We will contribute to society and culture, developing and offering products that enable us to gain satisfaction and confidence of customers, reaching the highest level of excellence.



synergy



Work Environment

We seek a work environment with open and transparent dialogue. Thus, we will not keep to ourselves the problems but consult the immediate supervisor and/or the proper channels to gather efforts towards problem solving.

The work environment should be focused on the development of professional activities. We understand that loans of values, loan-sharking and any other activities that may affect the environment or the good progress of work should not be practiced.



Group Actions

We will use common sense in our actions and we are aware of our relationship with society. We will strive to participate as good members in activities designed to contribute to a better society.



Clarifications and Complaints

Questions of interpretation, unexpected cases and noncompliance complaints of this Code must be presented to superiors or forwarded to the Ombudsman.

Together we are stronger. The union happens when people believe each other, believe because they can trust, share and do much more.

In situations where the subject may cause embarrassment if treated with the immediate leadership, the employee can send his question directly to the Conduct Committee through the Ombudsman channel.

Reports of fraud, embezzlement, bribery in acts or transactions involving employees, suppliers, contractors and business partners should be accompanied whenever possible by concrete facts and data.

Every complaint received by the Ombudsman will be treated with confidentiality. No retaliation to the employee will be accepted due to report in good faith.

If the employee suffers retaliation of any kind, he shall immediately inform the Ombudsman.



Conduct Committee

The Conduct Committee, formed by member of the Board and Human Resources of OJI PAPÉIS ESPECIAIS, is responsible for:

- Examine questions relating to the Code of Conduct sent to the Ombudsman with impartiality and seriousness;
- Search solutions for the situations presented to it;
- Ensure uniformity of the criteria used in resolving similar cases;
- Give feedback to complainants.



Disciplinary measures

The existence of roles, policies and procedures is an essential condition to a successful company. The leadership has the responsibility to ensure all of them to be followed for the harmonious and efficient operation of the Organization.

The leadership is responsible for informing, orienting and preparing its team to a correct implementation of the policies and organization rules, being a model to be followed.

Noncompliance of the standards and rules may not be tolerated and are subjected to disciplinary measures:

- **Verbal warning;**
- **Written warning;**
- **Suspension;**
- **Dismissal without fair cause;**
- **Fair dismissal.**

The implementation of the penalties should be done, when it is possible, right after the committing a fault, under the penalty of tacit acquiescence. It is assumed a longer period for the penalty application when the lack requires fact-finding and due responsibilities. Sanctions should be fair, reasonable and proportional to the seriousness of the misconduct. Similar faults should receive similar sanctions.

The employee must request orientation to his immediate supervisor in cases where, for lack of infrastructure and adequate resources, it is not possible to meet the standard.

In turn, the supervisor should take the case to an appropriate level of the organization to seek a definitive solution.

HR should always be consulted about what the disciplinary measure to be applied and, when it is necessary, it is recommended to consult the Legal Department for guidance.



"I declare having received, read and comprehended the Code of Conduct from Oji Papéis Especiais and I assume the commitment to respect all the ethical standards and behavior rules established in this Code of Conduct.

I also affirm that I will take care of the compliance by all other people to whom it applies."

Date _____

Name _____

Registration _____

Signature





OJI PAPÉIS ESPECIAIS

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