





Ethical code of conduct and the principles
guiding our business practices

The foundation that makes us thrive



MISSION. NG manufactures custom capital goods in an economically sustainable way, with social and environmental responsibility, meeting the market's needs with innovative solutions, and bringing value to the company, partners, employees, and customers.



VISION. Being a reference company in the markets where it operates, through quality products, services, and relationships.



VALUES. Ethics in its transactions; social responsibility through the adoption of attitudes, behaviors, and actions which promote the wellbeing of its employees and the external public; and environmental responsibility, with attitudes which consider economic growth adjusted to the preservation of the environment.

The Sou NG ['I am NG'] Program brings general conduct aspects which must guide our day-to-day actions, as well as the principles which determine the standing of NG Metalúrgica. To see the full list and get more details on each principle, visit www.ngmetalurgica.com.br.

In case of questions, as well as reports on the violation of this code, you can contact the Sou NG Program through the following channels:

- Talk to **your leaders**
- Through the email address: comitedeetica@ngmetalurgica.com.br
- Or via the **intranet** portal



1. People relations and conduct in the workplace

Courtesy, respect, transparency, precise communication, and collaboration, regardless of title or position, must guide our work relationships in order to ensure a healthy environment.

Our company abhors and rejects any acts of discrimination, disqualification, intimidation, and constraint due to ethnicity, color, gender, sexual orientation, religion, ideology, origin, social condition, age, physical or mental ability, marital status, and hierarchical position, including acts of psychological violence, moral harassment, or sexual harassment.

Team work must be encouraged at all levels of the organization, strengthening the integration between all our professionals.

The consumption of alcoholic beverages is forbidden in the workplace and during work hours, as well as entering the company with any level of inebriation.

The use or possession of drugs and the permanence in the workplace in any altered state due to the use of these substances are also forbidden, and can affect the safety or performance of other employees and collaborators.

No guns of any kind are allowed within the premises of the company, except for professionals with express authorization.

The use of cell phones within the premises of **NG** is forbidden, except for those provided by the company for use exclusively for professional activities and interests.

As part of the culture of NG Metalúrgica, our company also values the privacy of all its employees. In line with that, NG Metalúrgica employees must always pay attention when handling personal data of other professionals with whom they work, never requesting personal information beyond those strictly required for the fulfillment of their tasks.

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2. Customer relationship

All employees and collaborators, being aware of the importance of our customers, must be and remain focused on and committed to the search for solutions that exceed their expectations and satisfy their interests, in line with the objectives of **NG**.

Customers must be treated with politeness, courtesy, and efficiency. The information provided must be precise, always respecting what is agreed.

NG Metalúrgica professionals must also keep in mind a privacy by design model when handling personal data provided by clients. This means that personal information may not be solicited without consistent grounds or stored in disagreement with the company's institutional policies.



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3. Supplier relationship

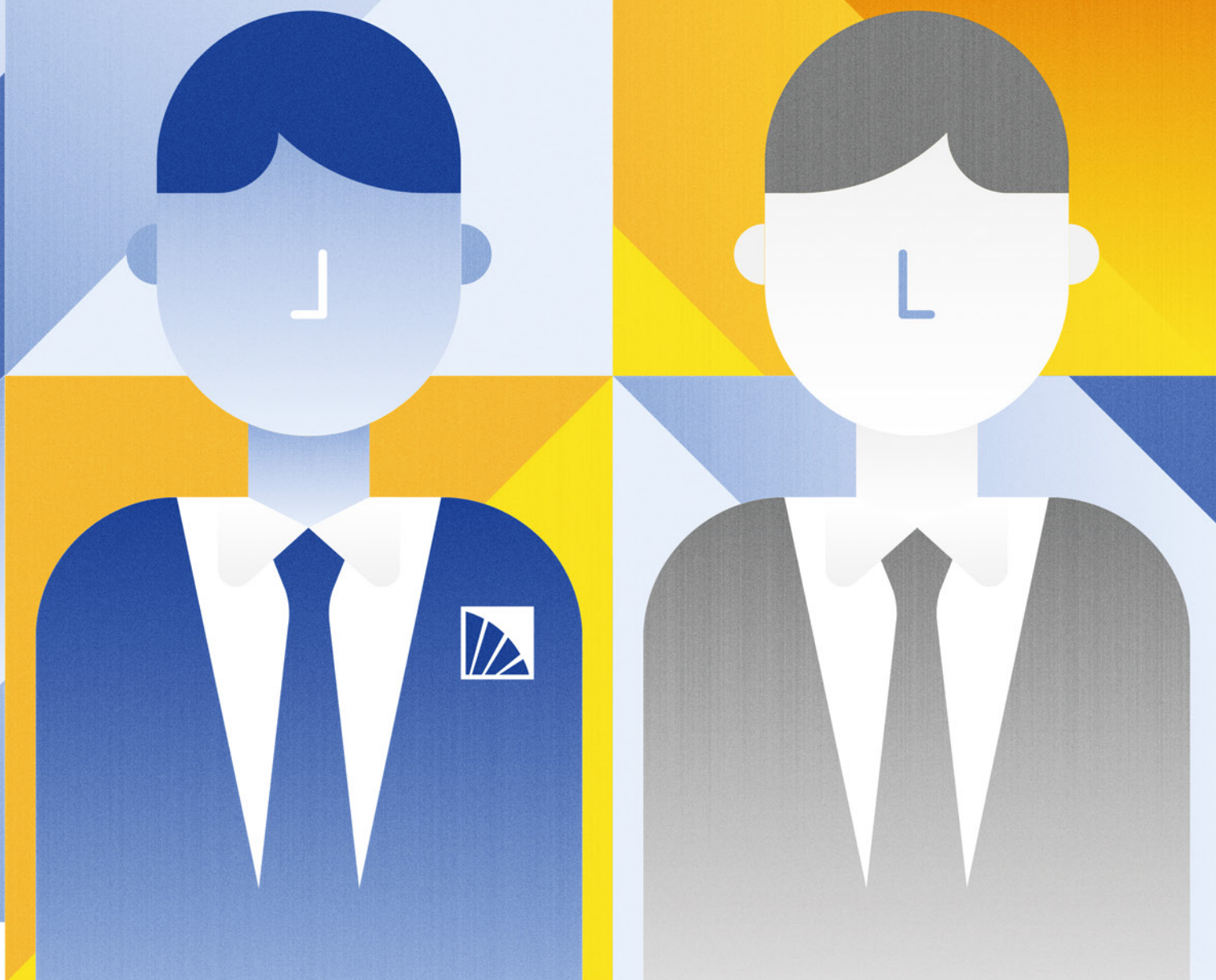
Our suppliers must share our ethical principles and the search for continued improvement in quality.

The choice of our suppliers must be based on strictly professional, technical, and economic criteria, always taking into account **NG's** needs.

NG does not allow child labor, forced labor, slave-like labor, and other labor practices that are contrary to this Code. NG does not tolerate any relationship with suppliers aiming at obtaining personal advantages.

In some instances, our suppliers may be responsible for handling personal data obtained by NG Metalúrgica. In these cases, NG Metalúrgica may also be held liable for this type of treatment.

Therefore, NG Metalúrgica professionals must ensure that the data handling conducted by the company's suppliers is compliant and within the anticipated parameters. This can be done through the observance of hiring protocols and auditing of the clients' operations, for instance.



4. Competitor relationship

NG believes that fair competition is healthy insofar as it prompts us to continuously pursue higher levels of performance.

Mutual respect must always guide relationships with competitor companies.

Information, knowledge, and processes considered as properties of **NG** may not be made available to or shared with competitors, except in cases where express authorization is given.

The gathering of information on competitors must take place in a lawful and transparent manner.

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5. Relationships with government bodies and trade associations

NG is a company which abides by the law, rules, agreements, and its respective applicable regulations. Therefore, it does not accept the payment of bribes to any individuals aiming at alleviating irregularities which, when occurred, must be corrected through the appropriate legal means.

Similarly, no company employee may offer benefits aiming at influencing decisions or gaining advantages.

Everyone must pay attention to the laws, rules, and regulations applicable to the performance of the activities in their field of work.

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6. Relationships with community and environment

NG is a company which promotes sustainable development and interacts harmonically with the communities where it is active.

All employees have the responsibility to ensure processes and activities which promote respect for the environment and safety, as well as the social and economic development of these communities.

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7. Conflict of interest

At **NG**, conflicts of interest are inadmissible.

Thus, in all internal or external relationships, the employee or collaborator may not use his/her position in the company for the purpose of influencing decisions that may favor personal or third-party interests to the detriment of the company's interests.

Presents, advantages, and courtesies may not be accepted by employees and collaborators, except for gifts which are usual in commercial practices and which, ethically, cannot be construed as bribes.

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8. Parallel activities

NG is not opposed to the participation of its employees in other activities of civil, religious, political, and social organizations, provided that these do not affect their responsibilities and commitments undertaken with the company.

NG recognizes and ensures the right to free association and unionization of its employees, respecting and valuing their participation in these groups, where any discrimination practices regarding associated and unionized employees is forbidden.

It is not acceptable to use the assets and work hours that should be dedicated to **NG** for personal unauthorized purposes unrelated to the company's interests.

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9. Confidential and privileged information

The company's affairs must be treated with discretion by its employees and collaborators.

Privileged or sensitive information may not be disclosed, unless expressly authorized by the company.

Employees must ensure the protection of all things confidential and the effective transmission of data at **NG**.



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10. Compliance with the code of ethics

All our employees and collaborators must show integrity in their conduct, consistent with the company's values and ethical principles, where everyone is responsible for compliance with this code.

Therefore:

- When becoming aware of any situation characterizing unlawful, questionable, or unethical conduct, any person must notify their leadership or the **Ethics Committee**.
- The disclosure of false or distorted information is inadmissible. The practice of acts which violate this code is unacceptable, as well as the authorization or omission of and the complicity with such acts.
- Eventual errors made must be honestly acknowledged and informed to the leadership or the **Ethics Committee** immediately.
- In case of doubt, the employee or collaborator must always seek guidance from his/her leadership or the **Ethics Committee**.

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An illustration of a hand holding a book. The hand is light blue with a darker blue cuff. The book is yellow with a blue spine. The background is a collage of geometric shapes in shades of blue, yellow, and orange.

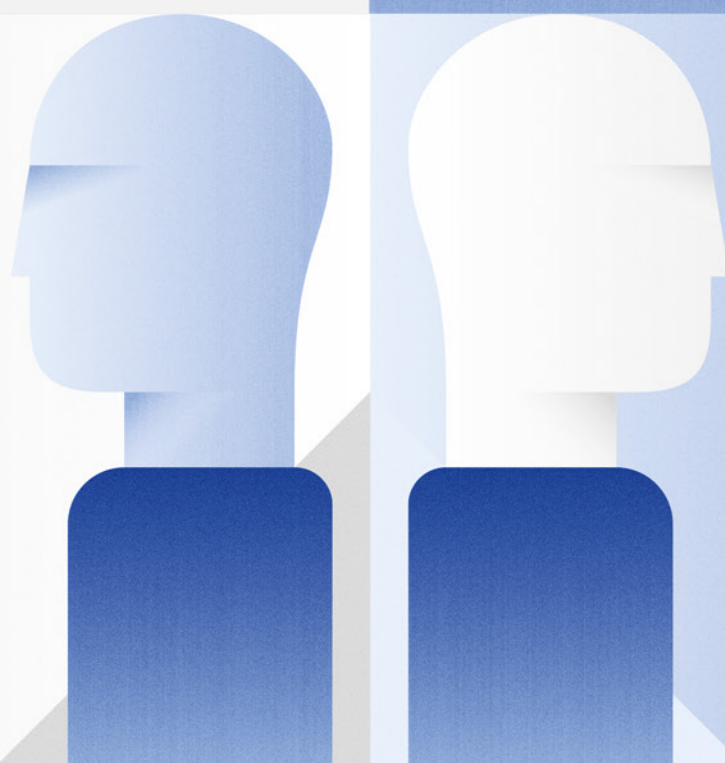
11. Responsibilities

All employees and collaborators at **NG** must follow the principles of the **Code of Ethics**, where it is the responsibility of the leaderships – supervisors, chiefs, managers, and directors – to notify the Ethics Committee regarding the occurred cases and reports received.

It is the **Ethics Committee**'s responsibility to coordinate the disclosure and review process of this Code, aiding all employees and collaborators in the clarification of questions, as well as orienting the applicable sanctions in cases of violations to this Code.

The Committee is comprised by the Vice-President, the Director of Operations, and the Human Resources Coordinator. The issues addressed in the **Ethics Committee** are confidential.

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12. Communication channels for questions and reports

Reports on the violation of principles of this code and the resolution of questions regarding ethical issues may be done **personally**, through the electronic address comitedeetica@ngmetalurgica.com.br, address via the intranet portal and/or with the members of the **Ethics Committee**.

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