

montana[®]

MONTANA QUÍMICA

Code of Ethics and Compliance

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1. Introduction

Montana operates permanently as upright and responsible company, and expects that all its employees guide their actions on values and principles adopted by the company, observing its policies and current laws.

This Code contains the directives that guide our actions and demonstrates how we are and how we want to be seen by employees, external clients, suppliers and the community, stimulating ethical behavior to be adopted in professional and personal life of employees.

Montana, aware of their responsibility, seeks improvement of its relationships. Therefore, a Code is fundamental that provides a base to treat with transparency the procedures to be adopted in situations where there is conflict of interest.

This document approaches the following topics:

- *Montana Principles*
- *Behavior in businesses*
- *Responsibility of the company*
- *Responsibility of employee*
- *Data Protection (General Law of Personal Data Protection – LGPD)*

After reading it, we invite you to fill-in and sign the “Commitment Term”, provided at the end of this publication, confirming your understanding and commitment to the Code.

The adherence to the practice of these principles is a prior condition for working at Montana Química Ltda.

The employee must:

- *Know the Code of Ethics and Compliance of Montana and undertake the commitment to comply with it;*
- *Undertake the Consenting Term to Use Personal Data;*
- *Comply with standards and other regulations applicable to its activities;*
- *Transmit the guidelines to our partners, whether clients, suppliers, employees, associated and society;*
- *Know and comply with all Policies, Standards and Procedures applicable to their position and attributions;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

2.01

Mission

Preserve for the future – goes way beyond products for Wood preservation.

Our daily work is to preserve the future of our clients, supplying products and suitable services to their needs, is to preserve longevity of Montana, working in a safe, responsible and profitable way, is to preserve natural resources in all our processes and, mainly, preserve the value of people, carrying for and motivating our employees.

2.02

Vision

Become one of the 100 greatest paint manufacturing companies in the world, offering complete solutions for wood preservation market.



2.03 Values



We attract, retain, develop and inspire people and ourselves, ensuring the results, growth and longevity of the company.



Work daily to reach the purposes and results of the organization and contribute positively for the execution of Strategic and Tactic Planning, complying with my goals and goals of my team.



We practice innovation as daily transformation activity; we think and act "outside the box", seeking different solutions and radically usable.



We spare no efforts to reach the efficacy and efficiency of our processes, services and products, and flexibility is our competitive differential.



We try to understand and know your needs to enchant, loyally and deliver products and services with excellence.



We combine efforts to accomplish the corporative objectives, enabling systemic vision, transparent communication, exchange of knowledge and agility in meeting goals.

2.04 Principles

COMMITMENT

We fly the company's flag, we are committed with the organization's mission, being fully dedicating to our goals, with a sense of belonging and prominence, seeking continuous improvement, living principles and incorporating values of the organization on daily routines.

DNA OF MONTANA

We value and incentive wood as main constructive element where it is used, promoting its use and its benefits in and oriented and practical way. We understand that wood in its entire extension. We provide suitable solutions considering all possibilities that it allows.

ETHICS

I practice the principles and universal values that guide human relationships, seeking the good, fair and true.

FRIENDLY

I contribute to reach the objectives of the company, without giving up maintain a friendly work environment, respectful and motivator, valuing and encouraging receptivity.

RESPECT

My attitudes consider the individualities, diversity, agreements, standards, negotiations established and diverse opinions. I establish mutual trust, preserve and honor the environment and organizational objectives without harming, offending or having an attitude that compromises individuals and the organization.

RESPONSIBILITY

I am aware of my role inside the organization and undertake the responsibility of my decisions and actions before other employees, shareholders and community, by organizational guidelines, company values and principles.

2.05 Data Protection

The policy of personal data privacy is very important for Montana, we are committed with the application of General Law of Personal Data Protection (Law No. 13.709/2018), we are transparent in respect to the way we collect data, use, disclose, transfer and store personal information of new employees, clients and suppliers, respecting always their privacy and human rights.

Personal information are considered all and any information directly or indirectly related to the employee, client, supplier or service provider or to any person and that may be used to identify or contract a person.

Montana seeks to guarantee that all personal information that has in database are safe, imposing safeguards in privacy.

Everyone in Montana is responsible for guaranteeing safety when processing information collected from employees, clients, suppliers and service providers.

The noncompliance of the General Law of Data Protection represents a severe insult to the principles of Montana.


The employee must:

- *Respect legal requirements;*
- *Will guarantee safety when processing information collected from employees, clients, suppliers and service providers;*


The employee must not:

- *Use or transfer personal data of employees, clients, suppliers or service providers, to third parties that are not related to the commercial interests of Montana;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be punctually analyzed.*

2.06 Montana's Ethical Principles

Montana is characterized by the recognition of its brand, for the quality of its products and services, and for valuation of people, which are key factors reflected in its capacity to compete and to generate results.

We operate in the entire Country and abroad and, for our company to continue having good performance, such recognition shall be preserved and strengthened.

The way that each person behaves is fundamental for us to be more respected every day.

The term 'ethics' comes from the Greek 'ethos' and means 'that that belongs to the character', to human behavior. According to philosophy, ethics is a set of principles and values that guide human relationships. These principles shall be universal characteristics and need to be valid for all people.

"Montana Culture" is the behavior expression of each one of us and of all together. Know and practice this Code of Ethics and Compliance is fundamental to guarantee the preservation of our culture.

✓ *The employee must:*

- Practice the Mission, Vision, Values and Principles of Montana;
- Respect everyone;

✗ *The employee must not:*

- Act in a form contrary to what was defined in the Code of Ethics and Compliance of Montana;

* This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.



2.07 Economic and social development

Commitment translated in ethical quality of company's relationship with its diverse publics, collaborating effectively for the construction of a fairer and more sustainable society. This commitment is present in the form of conducting the company's businesses. We consider the interests of our different publics and we are always trying to hear them, understand them and respond to them (employees, suppliers, consumers, community, shareholders, environment and public authorities).

Our positioning in respect to "Entrepreneur Social Responsibility" is strategic and, therefore, was incorporated to our quality policy, not consisting only in a legal or philanthropic position.

✓ *The employee must:*

- Support social responsibility actions;

* This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.

2.08 Relationships with shareholders

Guarantee a fair return to the shareholders, with attitudes that value the company's patrimony. This relationship is based on relevant and transparent information for the business continuity.

The employee must:

- Support the actions in Strategic and Tactic Planning, maintaining always the Focus on Result;
- Guarantee that registers, report and indicators reflect the reality;

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

2.09 Respect for people

Respect people is part of the values of Montana and is a condition for individual and professional development of each one. This attitude contributes for good work environment and life quality, reinforcing the principles and conduct disseminated by the company.

Montana assures equal opportunities to everyone regarding selection, training, remuneration and professional development, based on personal competence and skills.

The employee must:

- Respect everyone;
- Be honest in its relationships;
- Cultivate amicable relationships;

The employee must not:

- Make offensive jokes, as well as improper jokes or “swear-words”;
- Embarrass, threaten, nickname or intrude in the private life of work colleagues;
- Desrespect any people, including work colleagues and community to which it relates;
- Act in bad-faith;

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

2.10 Responsibility for Montana's reputation

Montana's reputation is determined by our actions and by the form how each one presents themselves and behave. An illegal or inadequate behavior from any employee may considerably harm the Company.

All employees shall devote themselves to maintaining and promoting Montana's good reputation in any circumstance or place.


The employee must:

- *Maintain and promote the good reputation of Montana in any circumstance or place;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

**2.11 Respect General Law of Personal Data Protection and Internet Civil Mark**

Montana complies with the provisions foreseen in General Law of Personal Data Protection (Law No. 13.709/2018) and Internet Civil Mark (Law No. 12.965/2014) being responsible for conscious processing (collecting, storage, transmission, discharge, printing, etc.) of personal information of its employees, clients and suppliers.

Montana has a Data Protection Officer, person that is responsible for ensuring the compliance of rules foreseen in General Law of Personal Data Protection, as well as for guiding employees, clients and suppliers about the practices to be adopted in respect to personal data protection. The Data Protection Officer of Montana may be contacted at dpo@montana.com.br.

Information collected by Montana are adequately used according to the guidelines established by the General Law of Personal Data Protection, respecting privacy; informative self-determination; freedom of expression, of information, of communication and of opinion; the inviolability of intimacy, of honor and of image; economic and technologic development and innovation; free initiative, free competition and consumer defense; and human rights; free development of personality, dignity and exercise of citizenship by natural person.

All and any personal data obtained by Montana from their employees, clients and suppliers are destined to the compliance of legal or regulation obligation and, if obtained for the purpose different from those authorized by Law, Montana will request express consent from data subject.

It is construed as Consent Term to Use Personal Data the authorization provided by the employee, client, supplier or service provider to use personal information. By consenting to the use, the employee, client, or

supplier or service provider consent with the use of this information, inclusively past, i.e., those that were already inserted in the database of Montana.

Montana is committed to treat personal data of its employees, clients and suppliers always imbued of good-faith, adopting the measures necessary for aggregation, anonymization (process of non-identification of data) and, if applicable, pseudomization of information (process where personal information are no longer attributed to an employee, client, supplier or service provider), using the best practices existing in the country.

When browsing our website, Montana may collect information that enable the identification of your equipment (static IP/MAC address, persistent cookies) and other information that may be clicked by the employee, client, supplier such as history of activities, questions and replies related to security, etc.

Personal information gathered by communication channels of Montana, allows us to maintain employee, client or supplier updated about the most recent advertisements of products, updates of service and events of Montana.

Personal Information are also to create, develop, operate, supply and improve our products, services, content and marketing, in addition to preventing losses and avoid frauds.

Montana may use personal information for internal purposes, such as audit, analysis of data, tendencies and researches aiming the improvement of products, services and communication with clients and users of Montana, inclusively improvement of website operation, as well as for compliance of court order, legislations in force or national security.

Montana may share personal information of employees, clients, suppliers and service providers with Third Parties (contracted by Montana) that supply specific services, such as payroll-run, invoicing processing, data management and improvement, supply of customer service, assessment of client's interest in Montana products, conducting surveys to assess the level of satisfaction. These Third Parties shall protect the information delivered by Montana.

As for information storage, Montana uses computer system which access is limited, maintained at the facilities that include physical security measures.

Considering that no security system is absolutely safe, Montana disclaims any liability for any damages and/or losses arising from failures, virus, databank intrusion of its products, services and website, except when acted with intent or guilt.

The employee must:

- *Respect legal requirements;*
- *Guarantee security when processing information collected from employees, clients, suppliers and service providers;*

The employee must not:

- Use or transfer personal data of employees, clients, suppliers or associates, to third parties that are not related to activities of Montana;

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



2.12 Management, responsibility and supervision

The culture of integrity and compliance of an organization starts in the highest levels of the organization. All managers are responsible for complying with their duties regarding the organization and supervision. All managers are responsible for all employees under their supervision. All managers must gain respect through the example of their personal behavior, performance and competences related to social issues. This means, among others, that each manager must emphasize the importance of an ethical and transparent behavior, make it a regular topic of daily activities and promote it through personal leadership and formation. Each manager shall equally define clear, ambitious and realistic purposes, and guide its leadership for example.

Managers shall demand the maximum responsibility possible from their employees, clearly defining the conditions that they must guarantee compliance, always and in all circumstances. All managers shall equally maintain themselves accessible if the employees intend to express their concerns, present issues or discuss a professional or personal problem. These responsibilities of managers do not release the employees from their own responsibilities. We have to work together to comply with all applicable laws and policies of Montana. These specific responsibilities of managers are detailed here for the employees to form a sense of the type of leadership and support that shall expect from the respective superiors.

It is up to the managers to guarantee that no violation to the law is made in their respective areas of responsibility. The responsibility will always be of the managers, even if they have delegated certain tasks to third parties.

The employee must:

- *The manager shall carefully select the employees with the respective qualifications and in its competences, personally or professionally;*
- *The manager shall supply to the employees precise, complete and binding instructions, especially in respect to the compliance of law (obligation to supply instructions);*
- *The manager must guarantee that the compliance with the law is continuously monitored (obligation to monitor);*
- *The manager shall clearly communicate to the employees the importance of integrity and conformity in routine activities. Likewise must communicate that violations to law are not acceptable and that will imply in legal consequences (communication obligation);*

The employee must not:

- *Neglect any situation which is presented to Manager, subject to the application of punishments applicable due to act of omission;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

2.13 Scope

When seeking transparency and ethical principles when conducting businesses executed at Montana, we expect to restrain situations of conflict of interest, assure privacy and confidentiality of information, and ethical behavior of our employees. The alignment of these guidelines is also important to select service providers and suppliers of the Company. For this reason, all professionals, identified herein as “Employees”, shall necessarily adhere to the content of this Code.

Shareholders, executives, company staff, temporary employees, interns, minor apprentices, outsourced with fix worksite at the facilities of Montana and commercial representatives.

The employee must:

- *Know the Code of Ethics and Compliance of Montana and undertake the commitment of complying with it;*
- *Comply with standards and other regulations applicable to its activities;*
- *Transmit the guidelines to our partners, whether clients, suppliers, employees, associates and society;*
- *Know and comply with all Policies, Standards and Procedures applicable to its position and attributions;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

2.14 Reading Instruction

It is primordial for everyone to completely read this Code, even if the subject approaches does not affect them directly.

Dedicate suitable time for reading and, in case of questions, seek instruction with your manager, with Quality and Compliance Management Area or Human Resources.

Maintain this Code near you on day to day bases for consultation if there is any questions about which conduct adopt in certain situations.

After the reading, fill and sign the Commitment Term to Code and send to the Human Resources Area.

O Commitment Term to Code signed is integrating part of the record of employees, with its storage responsibility of Human Resources.

 **The employee must:**

- *Fill in and sign the Commitment Term to the Code and send to the Human Resources Area. The adherence to the practice of these principles is a pre-condition to work at Montana Química Ltda;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



3.01 Fair competition and antitrust laws

A fair competition allows the free evolution of markets – with corresponding social benefits. The principle of fairness is applied equally to the competition that aims to obtain a market share.

All employees are obliged to comply with fair competition rules.

The following conducts are merely examples of practices that may lead to antitrust laws, but do not exhaust the theme:

 **The employee must:**

- *Negotiate in good-faith observing the current legislation and internal guidelines;*
- *Refuse to receive confidential information about competitors;*



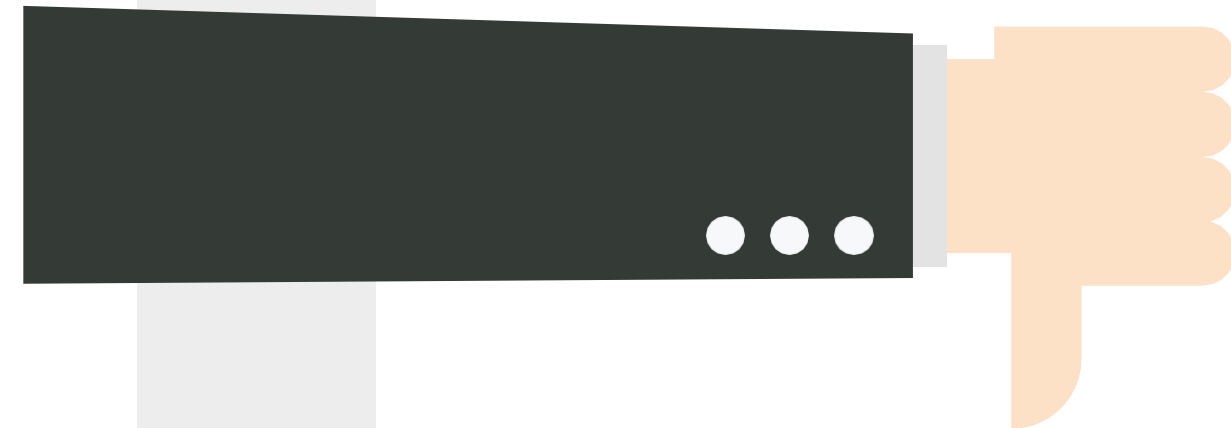
 **The employee must not:**

- *Talk to competitors about prices, production, capacities, sales, proposals, profits, profit margins, costs, distribution methods or any other parameter that determines or influences the competitive behavior of the Company, with the purpose of inducing a parallel behavior of the competing part;*
- *Establish agreements with competitors in the sense of not competing, restrict businesses with suppliers, present fictional offers in the ambit of proposals or share clients, markets, territories or production programs;*
- *Exercise any influence over release prices charged by our buyers, or try to cause to limit the exportation or importation of products supplied by Montana;*
- *Obtain confidential information of competition using industrial espionage means, bribery, theft or information interception by electronic means, neither communicate knowingly false information about a competitor or its products and services;*
- *Impede, disturb or fraud the accomplishment of any act of competition procedure;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.02 Fight corruption: offer and granting benefits

We compete fairly to obtain the adjudication of orders, based on the quality and in the price of our innovative products, and not offering to third parties undue benefits. Consequently, no employee may direct or indirectly, offer, promise, grant or authorize the delivery of monetary values or others to a public employee in exchange for its influence in an official action or to obtain any undue benefit. The same is applied to private business interlocutors in a business transaction, as compensation for an undue benefit. Any offer, promise, granting or present has to be according to the applicable laws and the policies of Montana, not entitled to generate any appearance of bad-faith or suitability. This means that no offers, promises, concessions or gifts may be given if they may be reasonably construed as attempt to improperly influence a public employee or as bribery of a business interlocutor, with the purpose of reaching a commercial advantage.



The expression “public server”, in general, includes managers or employees of any organism, agency or state of government owned entity, at any level, including managers or employees of state owned companies and international public organizations. Includes likewise candidates to political offices, managers and employees of political parties, and also political parties.

Additionally, the employees may not give money or any other value indirectly (for example, a consultant, agent, middleman, business partner or other third party) if the circumstances indicate that the party or totality of this value may be transmitted direct or indirectly to a public employee, for such to influence an official action or obtain an undue and unfair benefit, or for a private business interlocutor to obtain an unfair benefit in a business transaction. For this reason, the employees responsible for contracting consultants, agents, partners in joint ventures or other business partners have to adopt suitable measures to:

- *Guarantee that these third parties understand and comply with corruption fighting policies of Montana or equivalent;*
- *Assess the qualifications and reputation of these third parties; and*
- *Include in the agreements and contracts the suitable provisions granted to protect Montana.*

This applies particularly, although not exclusively, if foreseen that contacts may be executed with government employees on behalf of Montana. Finally, each investment decision made by the company – that refers to purchase of majority participation or minority participation in a company, or according to joint venture – have to be based in a previous verification from Compliance.

✓ *The employee must:*

- *Communicate the Compliance area in case gifts, giveaways are given or entertainment or hosting is granted to Public Agents, according to internal guidelines;*
- *Safeguard Montana from any link to specific political-party positions;*
- *Withdraw from Montana before becoming candidate for political offices;*
- *Consult the Compliance area if there are any questions about the relationship with Public Agents;*



The employee must not:

- Offer, promise, authorize or give any improper advantage to Public Agents or persons related to them;
- Offer gifts that overcome R\$ 100,00 (one hundred reais) or equivalent in local currency;
- Offer entertainment and hospitality for Public Agents for tourism purposes;
- Contribute with any resources for practice of acts that may be considered harmful to direct or indirect public administration, national or foreign;
- Use a middleman to hide or dissimulate harmful acts to direct and indirect public administration, national or foreign;
- In any way fraud, manipulate or illegally interfere in competitions and public biddings;
- Interfere or difficult the inspection or investigation by any public agencies;

* This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.

3.03 Political contributions, donations and sponsorships

Montana makes no political contributions (donations to politicians, political parties or political organizations).

Political donations by Montana Química Ltda are forbidden. Employees may make donations with their own resources, provided that the applicable legislation is respected, without any involvement and bond of Montana Química.

In the capacity of element responsible of the society, Montana contributes with monetary donations or with products in the areas of education and science, art and culture, as well as social and humanitarian projects. The sponsors wherefrom Montana purchases marketing rights are not considered donations, as well as the contributions for industrial associations or quotas of member of organizations that serve trade interests. Some donations are always forbidden, including donations to (1) people and organizations with profitable purposes; (2) deposits in private accounts; (3) organizations which objectives are incompatible with the entrepreneurship principles of Montana; or (4) that affect the reputation of Montana.

All donations must be transparent. This means, among others, that the identity of the recipient and intended use of the donation must be clearly defined and the reason and purpose of the donation must be justified and documented. Quasi-donations are forbidden, i.e., donations that seems to be a compensation for a service, but that, in fact, are substantially superior to the service value, violating therefore, the principles of transparency.

It is construed as sponsorship any contribution in currency or in kind provided by Montana to an event organized by third parties, in exchange for an opportunity to expose the brands of Montana, for example, through the presentation of Montana logotype, mentioning Montana at the beginning or at the end to speeches or participation as a speaker in a debate panel, as well as tickets for the event.



✓ *The employee must:*

- *Montana does not make any political contributions (donations to politicians, political parties or political organization);*
- *All contributions in the form of sponsorship must be transparent, based on written contract, have as purpose a legal business and be suitable for compensation offered by the host of the event;*
- *Consult the Social Responsibility area if there are any questions about the possibilities of political contributions, donations and sponsorships;*

✗ *The employee must not:*

- *Forbidden to promise, offer or provide contributions with the purpose of guaranteeing unjustified competitive benefits for Montana or for other undue purposes, and contributions may not be granted for events organized by people or organizations with objectives incompatible with the entrepreneurship principles of Montana or that may harm its reputation;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.04 Public contracts

Montana competes for achievement of contracts from state entities and public companies. In all negotiations and interactions of Montana with state owned entities, we always act transparently, honestly and precisely. We comply with all laws and regulations applicable in the ambit of public contracts, including laws that forbid attempts to improperly influence government employees.

 ***The employee must:***

- *Negotiate in good-faith observing the current legislation and internal guidelines;*
- *Refuse to receive confidential information about competitors;*

 ***The employee must not:***

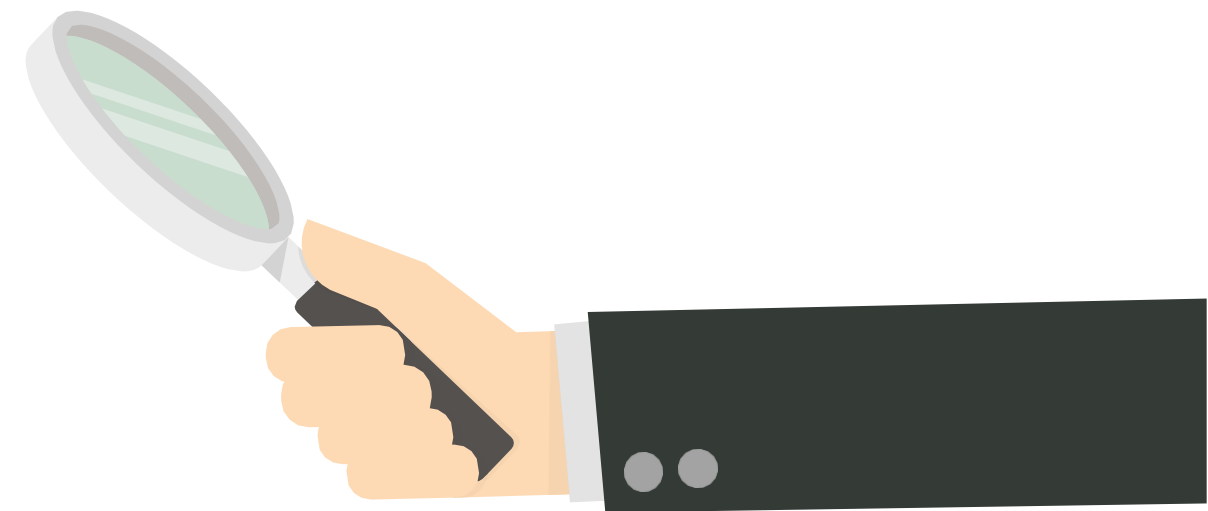
- *Harm or fraud, by adjusting, combination or any other mean, the competitive characteristic of a public or private bidding procedure;*
- *Impede, harm or fraud the execution of a bidding procedure;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.05 Fighting money laundry

Money laundry is a process that disguises the nature and origin of money associated to a criminal activity – for example, terrorism, drug traffic or bribery – integrating “dirty money” in commercial flow, in a form that seems legitimate or that is not possible to identify its true origin or its owner.

Montana has as purpose to make businesses with clients, consultants and renown business partners, which entrepreneur activities are processed according to the law and which funds are provided from legitimate sources. We do not promote money laundry. All employees must comply with the applicable laws and procedures of Montana for fighting money laundry. With the purpose of avoiding problems in this ambit, the employees have to pay attention and communicate suspicious behaviors of clients, consultants and business partners. The employees have likewise to comply with the requirements of accountancy, maintenance of registers and financial reports applicable to net assets and payments associated to other transactions and contracts.



✓ *The employee must:*

- *Pay attention and communicate suspicious acts of clients, consultants and business partners to the Compliance area of Montana;*
- *Guarantee that accounting and financial registers and reports reflect the reality;*
- *Make accounting and financial registers and controls according to the applicable legislation;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



3.06 Business Controls

Montana complies with all exportation controls, customs laws and regulations applicable in the countries where operates. The exportation controls are applied in general to transfer of merchandise, services or technology between certain national borders. The exportation control laws may be applied in the ambit of exportations or importations, direct or indirect, for or arising from countries or entities subjects to sanctions that, for example, may be assigned based on national security grounds or due to participation in criminal activities. The violation of these laws and regulations may give rise to severe sanctions, including fines and cancellation of simplified procedures of importation and exportation by governments (breach in a chain of regular and constant supply).

✓ *The employee must:*

- *The employees involved in the importation and exportation of merchandise, services or technology, have to comply with economic sanctions applicable, laws and regulations for exportation and importation control and any policies and procedures associated defined by Montana;*

**This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.07 Work with suppliers

Montana, as company, expects that its suppliers share the same values and comply with all applicable laws. Additionally, Montana expects that its suppliers operate according to the principles outlines as follows:

- Comply with all applicable laws, including General Law of Personal Data Protection (Law No. 13.709/2018) protecting eventual data delivered by Montana to the supplier;
- Forbid corruption acts;
- Respect basic human rights of employees;
- Comply with laws that forbid child labor;
- Undertake responsibility for the health and safety of its employees;
- Act according to the local and international standards applicable related to environmental protection; and
- Promote the compliance of laws above mentioned between its respective suppliers.

Montana demands from its suppliers the suitable treatment of information that are destined/shared, using the best existing practices in the country for data protection that are delivered to it.

3.08 Human Rights

The activities shall be conducted with respect to rights defined in “Universal Declaration of Human Rights of United Nations”. Montana does not use child manpower neither forced works and disseminates among its business partners the standards related to this document.

 ***The employee must:***

- *Respect human rights;*

 ***The employee must not:***

- *Disrespect any people, inclusively work colleagues and communities to which relates;*
- *Use child or forced labor on work sites;*
- *Allow child exploitation on work sites;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.09 Good commercial practices

Montana understands that a fair competition benefits clients and the entire society. Therefore, the company competes within ethical principles that guide the competition laws.

Our values are not limited to our actions. We expect the same ethical and legal position of our suppliers, clients and of all others that have any relation with us.

Bribery and anti-ethical business practices are not tolerated. It is unacceptable the discussion with competitors about prices or subjects regarding production levels, stocks, products, suppliers or clients.



✓ *The employee must:*

- *Negotiate in good-faith observing the current legislation and internal guidelines;*
- *Refuse to receive confidential information about competitors;*

✗ *The employee must not:*

- *Agree, combine, manipulate or adjust with the competitor, in any way, price, division of parts or segments in a market;*
- *Harm or fraud, upon adjustment, combination or any other mean, the competition character of public or private bidding procedure;*
- *Impede, disturb or fraud the execution of any act of bidding procedure;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

3.10 Relationship with clients

The relationship of Montana with the clients is based on trust and mutual respect, always working for the satisfaction and to overcome expectations.

We listen to our clients through relationship channels, so they may make suggestions, criticism and observations about our products and services. This communication allows us to develop solutions and improve our products and services.

Montana explains that, when browsing our website, Montana may collect information that allows us to identify your equipment (static IP/MAC address, persistent cookies) and other information that are assessed by the client, such as history of activities, questions and responses related to security, etc.

Montana allows the client to maintain precise, complete and updated personal information. Montana will retain personal information for the necessary period to satisfy the purposes described in this Code of Ethics, unless a longer retention period is required or allowed by law.

The client may request at any time the update, correction or exclusion of their personal data, except if Montana is obliged to keep the data due to equal imposition or necessary to retain them for legitimate marketing purposes.

Request to access, correct or exclusion may be made by e-mail dpo@montana.com.br, or by mail, to the following address: Rua Ptolomeu, nº 674, CEP: 04762-040, São Paulo. If the request is denied, Montana will communicate the reason for denying in writing to the client.


The employee must:

- *Seek solutions aligned with the client's needs;*
- *Relate ethically and transparently with the client;*


The employee must not:

- *Act in bad-faith;*
- *Lie in the negotiations and in the relationship with the Client;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



4. Company's Responsibilities

4.01 Fighting arrestment

Montana does not tolerate any type of arrestment, whether moral, sexual or economic, or situation that features pressure, intimidations or threats in the relationship between employees, regardless of their occupations.

No type of discrimination is allowed regarding sexual orientation, gender, religion, ethnicity, age, political conviction, marital status, social class, physical condition, nationality, among others. Diversity and different cultures must be valued.



4. Company's Responsibility

✓ *The employee must:*

- *Respect everyone;*
- *Be honest in their relationships;*
- *Cultivate amicable relationships;*

✗ *The employee must not:*

- *Make campaigns or actions of political nature in the work environment;*
- *Make offensive jokes, as well as improper jokes or use "swear-words";*
- *Embarrass, threaten, nickname or intrude in the private life of work colleagues;*
- *Produce, reproduce, share, take pictures, film or register, by any mean, explicit sex scenes or pornography, within the facilities of Montana;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

4. Company's Responsibilities

4.02 Privacy of employees

Montana respects the privacy of its employees. Personal information will be used only to comply with the legislations and regulations in force and always according to the General Law of Personal Data Protection (Law N. 13.709/2018). If personal information collection is necessary for other purposes, Montana will request express agreement from the data subject.

It is construed as Consent Term to Use of Personal Data the authorization provided by the employee to use personal information. By consenting with the use, the employee agrees to use these information, inclusively past, i.e., those that are already in the databank of Montana.

Montana allows the employee to maintain precise, complete and updated personal information. Request to access, correct or exclusion may be made by e-mail to dpo@montana.com.br, or by mail, to the following address: Rua Ptolomeu, No. 674, CEP: 04762-040, São Paulo. Montana will provide the rectification within legal term. If the request is denied, Montana will communicate the reason for denying in writing to the employee.

The employee may request at any time the exclusion of personal data, except if Montana is obliged to keep the referred data by legal imposition or for legitimate marketing purposes is necessary to keep them. The request of exclusion may be made by e-mail to: dpo@montana.com.br, or by mail, to the following address: Rua Ptolomeu, No. 674, CEP: 04762-040, São Paulo. If the request is denied, Montana will communicate the reason for denying in writing to the employee.

4. Company's Responsibility

The employee is aware and authorizes Montana to share personal data with Third Parties (contracted by Montana) providing specific services, such as payroll-run, invoicing processing, data management and data improvement. Montana will assure that these Third Parties equally protect the information delivered by Montana.

The professionals that use personal information of employees for execution of works, such as Human Resources department or managers, will be alerted as to the need to protect them, subject to the penalty of violation to this Code of Ethics and penalization according to labor legislation.



4. Company's Responsibilities

✓ *The employee must:*

- *Maintain all personal data updated;*
- *Maintain the secrecy of confidential information, complying with the applicable legislation and commitments signed;*
- *Sign the Consent Term of Personal Data Use;*

✗ *The employee must not:*

- *Share confidential information of Montana or partnership companies;*
- *Speak of confidential subject in public places;*
- *Disclose information of Clients, Suppliers, Employees without prior written consent;*
- *Use information and content of Montana for private issues or of third parties without due authorization;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

4. Company's Responsibility

4.03 Health and Safety

Health and safety of employees are treated as essential issues by Montana.

Equipment, installations and materials shall be used correctly and liable, avoiding unnecessary losses and expenses.

Health and safety are subject that refer to all employees.



4. Company's Responsibilities

✓ *The employee must:*

- *It is an obligation of everyone to always respect health and safety standards, and communicating immediately any incident or accident to immediate superior;*

✗ *The employee must not:*

- *It is not allowed to work under the effect of alcohol and/or illegal drugs;*
- *It is forbidden to use, carry or transfer illegal drugs or objects of heat generator sources or of ignition by sparkle within the company's facilities;*
- *The employees, other collaborators and visitors are forbidden from carrying or using weapons at the company's facilities, except for those legally authorized and properly trained, such as watchman;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

4. Company's Responsibility

4.04 Environment

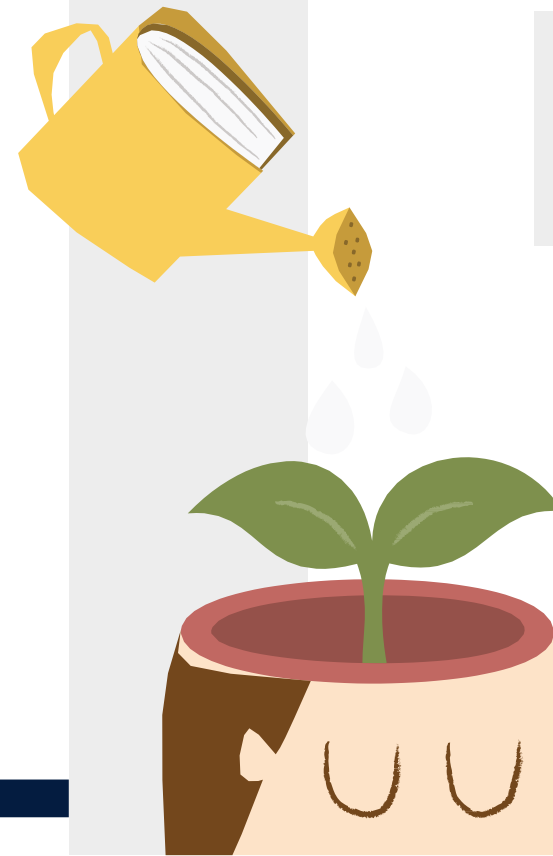
Montana adopts environmental management practices considering future generations and incentives dissemination of sustainability concept, where the company shall be economic, social and environmentally viable.

Employees shall adequately use natural resources, for the activities of the company have less influence possible in the environment.

✓ *The employee must:*

- *Respect legal requirements;*
- *Communicate any environmental incident or accident to the manager of the Environment of Montana;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



4. Company's Responsibilities

4.05 Community

As a corporate citizen and socially responsible, Montana shall have permanent care with environment balance, assessing the impact of operations to the surroundings.

Committed with the community, the company develops and values social activities of its employees. The company has as prerogative to inform the community of their preventive actions as to health and safety and environment.

4.06 Participation in political and public life

Montana does not allow its employees to maintain professional activities with public agencies or political parties. If the employee chooses to follow a public or political career, such person shall request prior dismissal from the staff of Montana Química Ltda.

The employee must:

- *Withdraw from Montana prior to becoming candidate to political positions;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

4. Company's Responsibility

4.07 Government

Montana has an ethical or cordial relationship with the public sector, complying and fully meeting the current legislation. Employees must comply with the laws, as well as meet the statutory and regulatory requisites.

The employee must:

- *Negotiate in good-faith observing the current legislation and internal guidelines;*
- *Refuse to receive confidential information about competition;*

The employee must not:

- *Harm or fraud, upon adjustment, combination or any other mean, or competitive nature of public or private bidding process;*
- *Impede, disturb or fraud the execution of any act of bidding procedure;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

5. Employee's Responsibilities

5.01 Avoid conflict of interest

Employees of Montana must make businesses decisions in the best interest of Montana, and not based on their own personal interests. Conflicts of interest arise when employees are involved in activities or have personal interests harmful to the interests of Montana.

Employees have to inform the respective supervisor about any personal interest that may arise in the ambit of the performance of their professional duties.

Employees may not use, for contracts or personal orders, companies which has commercial relationship in the ambit of their activities on behalf of Montana, if these may collect any benefit from the contract or personal order. Such is applied especially if the employee exercises or has capacity to exercises direct or indirect influence over the adjudication, or not, of a contract with Montana.

Conflicts may undertake the form of commercial relationship or a participation in a competitor or client of Montana, or a participation in parallel activities that impede or hinder the employee from complying with its responsibilities before Montana. It is important that all employees recognize and avoid conflicts of interest during the execution of their professional activities. A conflict may also arise in case of intimate relationship, in certain way.

The employee must:

- *Communicate the Compliance area any kinship or close relationship with Public Authorities, Politically Exposed Persons – PEP, suppliers, partners and/or clients;*

5. Employee's Responsibilities

The employee must not:

- *Execute parallel professional occupation or conflictin with their position in Montana;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

WITH EXEMPLIFICATION NATURE, IT IS ASSUMED AS CONFLICT OF INTEREST THE FOLLOWING SITUATIONS:

- *Contract a friend or family supplier, in less favorable conditions for Montana Química Ltda., when compared to those practiced in the market by third parties with equivalent capacity;*
- *Abuse, by any Employee, of their position in Montana Química to obtain personal advantages or for third parties.*
- *The development, by an Employee, of parallel professional activities liable to Montana Química Ltda., impeding or harming the compliance of their attributions in Montana;*
- *Montana allows their employees to trade cosmetics, food products, craftsmanship, etc., outside business hours;*

5. Employee's Responsibilities

5.02 Compete with Montana

An employee may not operate neither provide assistance to a company competing with Montana or get involved in any competitive activities.

5.03 Parallel work

Employees may not perform parallel works that constitute a competition to the activities of Montana. Before allowed to practice any remunerated parallel activity, the employees must communicate Montana and obtain a written authorization. Occasional writing activities, verifications or occasional activities comparable are not considered parallel work. An authorization will not be granted if the activity in reference is harmful to the interests of Montana. The authorization may be refused if the employees maintain commercial relationships with the company in reference in the scope of their official responsibilities when representing Montana. An authorization granted previously may also be revoked with these grounds.

The employee must:

- *Communicate the Compliance area of any remunerated parallel activity that may generate conflict of interest with Montana and obtain its written authorization;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

5. Employee's Responsibilities

5.04 Participations in outsourced companies

Employees that hold or obtain direct or indirectly a participation in business partner of Montana or in an company in which Montana holds shares, will likewise have to communicate this fact to the Compliance area, if they have a commercial relationship with a business partner or a company in the performance of their official responsibilities or if they hold a position in these same company. In the event of participation in companies listed in the stock exchange, this rule is applied only of the participation is greater than 5% of total capital.

Once communicated the participation in a third company, the Company may adopt suitable measures to eliminate any conflicts of interest.

The employee must:

- *Communicate the Compliance area any direct or indirect participation in a partner of Montana or in a company which Montana holds shares;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

5.05 Confidentiality of information

The information system is considered a valuable asset of Montana. The transmission to third parties of any none authorized information may affect the company's competitiveness, especially information capable of granting any advantage to anyone or used to influence a business. Therefore, all measures necessary shall be adopted to assure that such information are protected.

It is forbidden to use any illegal or anti-ethical mean to obtain information, even if considered useful for the business.

Electronic documents: shall be managed with the same special cares dismissed to hardcopy documents and such is responsibility of each employee, within their competence.

Noted here are industrial trade secrets, products, processes, formulas, brands, technologies, know-how, betterments, inventions, electronic information systems, among others. It is forbidden to appropriate or inadequately use competitive secrets. Do not suggest neither request other people to disclose secrets about the business.

Care and attention are recommended to make comments that involve company businesses in social medias or public places such as: airports, restaurants, elevators, taxis, among others. Not share subjects with suppliers, clients or employees with people outside Montana, unless there is previous and written permission.

Confidential or proprietary information may include in special:

- *Details about the organization and equipment, prices, sales, profits, markets, clients and other business subjects of a company;*
- *Information about production or research and development; and*

- *Internal values of financial report.*

The obligation of confidentiality is maintained even after concluded the relevant relationship, considering the disclosure of confidential information may harm the business of Montana or its clients, regardless of the time of its disclosure.

If information protection agreement are signed, comply with the terms and specific conditions in these legal instruments.

The confidentiality maintenance of persistent information, even after the withdraw of the employee, according to the additive term to the labor contract signed when hired at Montana.

Personal information about clients and suppliers will be protected by Montana according to General Law of Personal Data Protection.

The employee must:

- *Disclose when authorized, only transparent and true information;*
- *Maintain secrecy of confidential information, complying with the applicable legislation and commitments made;*
- *Use your personal social media disclosing photos, videos or comments about daily routine in work in a positive way;*
- *Disclose or share content in official channels of Montana in personal social media;*

5. Employee's Responsibilities

The employee must not:

- Share confidential information of Montana or of partner companies;
- Speak of confidential subjects at public places;
- Use information and content of Montana for private or third parties' issues without the sue authorization;
- Disclose in the social media confidential information, including about financial and/or juridical subjects, prices, proposals, among other sensible subjects;
- Comment in social media about clients, partners, suppliers or work colleagues;
- Without prior authorization of compliance areas and External Communication, speak on behalf of Montana in any communication vehicle, including any social media;
- Post photos or videos of work colleagues, partners, clients or suppliers without permission;

* This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.

5. Employee's Responsibilities

5.06 Use of electronic tools

Electronic tools made available for work, such as computers and communication systems (fix telephone and mobile, e-mail, internet and intranet) are property of Montana.

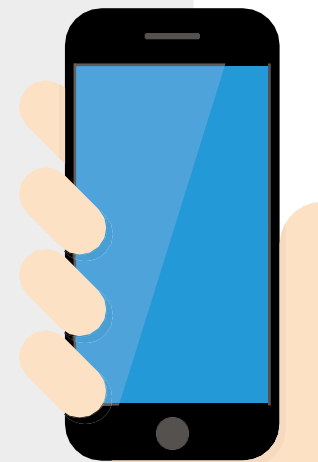
The use of internet and computer resources shall comply with the standards and internal guidelines, according to the disclaimer signed at the time of admission.

These tools are exclusively available for activities linked to the company's business and, at the time of dismissal of the employee, will be automatically cancelled.

The employees may not install, neither use computer services or software not licensed by the company.

The participation in WhatsApp groups (or similar tools) is voluntary and the employee at Montana have no obligation of responding to messages during work hours, after work shift or during vacations, rule applied for both personal telephones and for corporative telephones.

In the event of contractual termination, the employee of Montana shall promptly exit any group which discloses information of the company.



GROUP CREATION

The resources of the company may not be used to send or receive electronic information with sexual, discriminatory, illegal content or that promotes violence.

The use of these resources is subject to monitoring and may result in civil legal, labor or criminal consequence.

5. Employee's Responsibilities

✓ The employee must:

- Use electronic tools (fix telephone and mobile, e-mail, internet and intranet, others), only and exclusively to perform their activities in Montana, complying with the standards and internal instruction, according to the responsibility term signed at the time of admission;



5. Employee's Responsibilities

✗ The employee must not:

- Employees may not install neither use computer files or software not licensed by the company;
- The resources of the company may not be used to send or receive electronic information with sexual, discriminatory, illegal content or that causes violence;
- Data with costs, clients, suppliers, strategies, systems and businesses are confidential and shall not be sent by any electronic tool of Montana;
- The communication shall be respectful. It is forbidden any type of public retaliation, which generates discomfort to employees of Montana, using electronic tools of the company;
- Informal WhatsApp groups created between employees of Montana shall respect the Code of Ethics and Compliance of Montana.

* This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.

5. Employee's Responsibilities

5.07 Relationships with suppliers and service providers

The purchase decision of products, consumables or services for Montana shall be based on the achievement of the best cost/benefit ratio; but, shall also include other principles. To become our partners, suppliers and service providers shall be certified according to specific guidelines of the company, fully complying with the legislation, what includes labor, environmental and General Law of Personal Data Protection.

It is expressly forbidden to conduct businesses that result in own financial benefit, of family members, friends or that imply in reciprocity or exchange of favors. The employees shall alert the Human Resources area or Board of Directors about any situation that seems to create a conflict of interest.



5. Employee's Responsibilities

✓ *The employee must:*

- *Negotiate in good-faith observing the current legislation and internal guidelines;*
- *Refuse to receive confidential information about competitors;*

✗ *The employee must not:*

- *Harm or fraud, upon adjustment, combination or any other mean, or competitive nature of public or private bidding process;*
- *Impede, harm or fraud the execution of a bidding procedure;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

5. Employee's Responsibilities

5.08 Receiving gifts and entertainment

Employees have no authorization to use their occupations to incite, demand, accept, obtain or receive promises of benefits. Gifts in cash or equivalent are forbidden in any circumstance. Employees may accept or offer gifts, if considered as business courtesy, within the following criteria:

- Shall be received inside the company;
- Shall have low value or simply symbolic, which does not overcome a value of R\$ 100.00 (one hundred reais), and may not be seen as a bribery attempt or undue influence;
- Not cause constraint to the company or to the employee if publicly referenced;
- Be linked to business relationship;
- Not violate ethical values and principles of our company;

Notes:

a. If a gift is offered that contradicts these rules, politely reject, and if it is an embarrassing situation, notify the occurrence to the Quality & Compliance Management.

b. Gifts and giveaways above R\$ 100.00 that, for any reason may not be returned, shall be sent to Quality & Compliance Management, to be donated to charitable entities.

5. Employee's Responsibilities

The employee shall:

- *Communicate the Compliance area if giveaways, gifts are given or, entertainment or hospitality is granted to Public Agents, according to internal guidelines;*
- *Consult the Compliance area if there are any questions about the relationship with Public Agents;*

The employee must not:

- *Offer, promote, authorize or give any undue advantage to Public Agents or people related to them;*
- *Offer giveaways overcoming R\$ 100.00 (one hundred reais) or equivalent in local currency;*
- *Offer entertainment and hospitality to Public Agents for tourism purposes;*
- *Contribute with any resources for the practice of acts that may be considered harmful to direct or indirect public administration, national or foreign;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

5.09 Participation in class associations

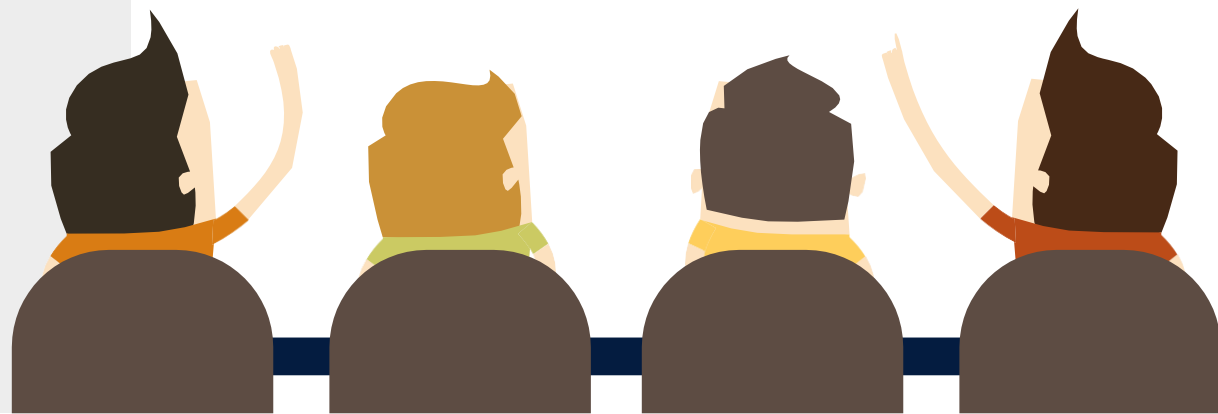
Employees may and shall participate in class associations linked to the business of Montana. In these condition it is common to be in contact with bidding employees. In this case, the exchange of information will be allowed and encouraged, provided that linked to common interests of the operation market of Montana and without the transgression of standards established in this document.

If there are any questions, seek orientation with the immediate superior or with Quality & Compliance Management.


The employee must:

- *Consult the Compliance area if there is any question about participation in class association;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

**6.01 Accounting registers and financial integrity**

An open and efficient communication requires the creation of accurate and true-to-life reports. What is equally applied to relationships with investors, employees, clients and business partners, as well as with public in general and all public organisms.

Montana shall likewise maintain robust processes and controls, for the transactions to be made based on authorizations from the management. Montana must also impede and detect the non-authorized use of its assets. It is required from all employees of Montana to certify that documents and accounting registers of Montana created by them or for which they are responsible:

- *are complete;*
- *are precise;*
- *honestly reflect each transaction of expense; and*
- *are generated in due time and according to the applicable accounting rules and standards.*

Whether this information is or not included in the public bidding or supplied to a State agency. These documents and accounting registers include all data, certifications and other office materials supplied for financial reporting purposes and of disclosure, as well as materials compiled for other purposes. Include also the registers of internal expenses (for example, expense account reports).

6. Information Processing

The employee must:

- *Disclose when authorized, only transparent and true information;*
- *Maintain in secrecy confidential information, complying with the applicable legislation and commitments signed;*

The employee must not:

- *Share confidential information of Montana or partner companies;*

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*

7. Communicaiton Channels

This Code presents the general lines of conduct code, but does not details the diverse situations that may take place on daily routine.

If there are any doubt regarding the interpretation of the Code or any other guideline of the company, as well as avoid critics and suggestions, talk to your manager or to the Quality & Compliance Management.

All and any issue that is in disagreement with this Code of Ethics and Compliance and the company's policy must be informed to the immediate superior or the Quality & Compliance Management.

If verified a violation to the Code of Ethics and Compliance of Montana the application of the penalties or disciplinary measures will be recommended, according to the applicable legislation and internal guidelines, comprising:

- *Written or verbal warning*
- *Temporary suspension of labor contract*
- *Termination of labor agreement*

The employee must:

- *Report whenever suspected or detected any violation to the Code of Ethics and Compliance of Montana;*

X *The employee must not:*

- Report incorrect or unreal facts in Communication Channels;

** This list is merely illustrative and does not exhaust all possibilities. Cases will be analyzed punctually.*



Code of Ethics and Compliance Montana Química Ltda.

I, _____, ID
 _____, RG No. _____, attest that I received, read, understood and agreed with the terms of Code of Ethics and Compliance of Montana and I am committed to observe and comply with the standards of ethics specified in this document, respecting the "Values and Principles" of the company.

I hereby declare that, that, at this moment, I am not in any situation that violates the Code.

If I find myself in any conflicting situation with the Code of Ethics and Compliance of Montana, a brief report is made in the following space:

I hereby declare, also that I am aware that, in case of violation to the Code of Ethics and Compliance of Montana, I will be subject to the applicable penalties.

I undertake the commitment of complying with the decisions of Montana in the event of noncompliance with the instructions contained in this document.

Name of Employee:

Signature:

Date: _____ / _____ / _____

Consent Term to Use Personal Data

Montana recognizes its responsibility to protect personal information of the employees.

It is understood as Consent Term to Use Personal Data the authorization provided by the employee to use personal information. By consenting with the use, the employee agrees to use this information, including past, i.e., those that were already in the databank of Montana.

The information required herein "Personal Biometry" will be stored and processed for a legal term of 10 years after the dismissal of the employee and will be used for "Control of Assiduity" of employees. The other personal documents in possession of Montana are in compliance with law 13.709/2018 (General Law of Data Protection) and decree No. 8373/2018 (eSocial).

I, _____

_____ hereby declare that I understand the reason for which the information is being requested by Montana, voluntarily agreeing to deliver them to be processed observing the purposes described herein.

I also agree with this Consent Term of Data Privacy.

Name of Employee:

Dirceu Vieira Junior – Quality & Compliance Manager

Signature:

Date: ____ / ____ / ____



Compliance montana®

Compliance Montana is a program, which communication means is safe, through which all employees, outsources, suppliers, clients and partners may report possible violations to Code of Ethics and Compliance of Montana.



IT IS VERY EASY TO REPORT

- 1 Access the site of Montana:
WWW.MONTANA.COM.BR
- 2 In right upper menu, click in:
OUR COMPANY
- 3 In lateral bar, select the option:
COMPLIANCE
- 4 Access the **LINK** at end of text,
click and fill-in.

Your report was successfully registered!



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