



RESPONSIBLE SOURCING POLICY OXITENO

Supplier Guidelines

START 

INTRODUCTION

Oxiteno's Responsible Sourcing Policy describes the way of working and engaging with all suppliers. We present global standards for Ethics, Social Responsibility, Quality, Health, Safety, Environmental and Management Systems.

Oxiteno fosters a network where everyone evolves together, choosing reliable and committed suppliers that offer competitiveness and excellence in products and services.

Oxiteno encourages working together and believes that a good reputation is a very valuable asset. When we recommend our suppliers follow these practices, we are contributing to the responsible and sustainable development of our value chain.



CONTENT AND AUDIENCE



This Policy is applicable to all the products and services sourced by Oxiteno, including suppliers, their subcontractors, and associated activities. It includes standards for Ethics, Social Responsibility, Quality, Environmental, Health, Safety, and Management Systems.

The content is in accordance to the standards accepted by Oxiteno based on 2 layers : Mandatory Requirements and Good Practices.



Mandatory Requirements: all suppliers must comply with these requirements. These are essential to establish and maintain business relationship with Oxiteno.



Best Practices: recommendations recognized as good practices in the market. Those are not mandatory, but we suggest they be included in short and medium-term targets and improvement plans.

We hope this Responsible Sourcing Policy will help foster sustainable and responsible business, always encouraging our suppliers to develop and improve their processes.



OXITENO'S COMMITMENT TO SUPPLIERS

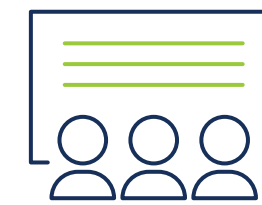
TO ENCOURAGE SUPPLIERS TO COMPLY WITH THIS POLICY, OXITENO WILL:



Provide Support: assist suppliers to identify activities that are not in line with the requirements and work to improve these conditions in a timely manner.



Improve: regularly review procedures and practices to ensure they are in line with a vision of responsible sourcing.



Collaborate: work with suppliers to improve their Ethical, Social, Quality, Environmental, Health and Safety standards. This process may include joint assessments, such as visits to industrial units to assess suppliers' compliance.



Respect: conduct the business relationship with suppliers in a fair, objective, transparent and professional way. This includes properly treating to the suppliers' employees who might be working on our offices and facilities, with the same adequate work practices applied to our own employees.

INDEX



1. ETHICS	6
1.1. Legal Compliance	8
1.2. Code of Ethics and Communication Channels	9
1.3. Ethics in Relationships and Conflict of Interest	10
1.4. Business Conduct	11
1.5. Unfair Advantages, Gifts and Presents	12
1.6. Information Security and Intellectual Property	13
1.7. Animal welfare	14
1.8. Conflict Minerals	15



2. SOCIAL RESPONSIBILITY	16
2.1. Combating Child Labor	18
2.2. Combating Forced Labor (Modern Slavery)	19
2.3. Fair Treatment, Diversity and Inclusion	21
2.4. Working Hours, Wages and Benefits	22
2.5. Freedom of Association and Right to Collective Bargaining	24



3. QUALITY, ENVIRONMENT, HEALTH AND SAFETY	25
3.1. Quality Requirements	27
3.2. Technical Specifications and Product Safety	28
3.3. Environment, Climate Protection, and Waste Management	30
3.4. Occupational Health and Safety	32
3.5. Process Security and Emergency Response	34



4. MANAGEMENT SYSTEMS	36
4.1. Commitment to Sustainability in the Supply Chain	38
4.2. Continuous Improvement	40
4.3. Training and Skills Required	41
4.4. Reputational Risk Management	42
4.5. Operational Continuity	43
4.6. Compliance with Legal and Other Requirements	44
4.7. Documentation, Forms and Records	45



5. CONSEQUENCE POLICY	46
5.1. Purpose	47
5.2. Application of Corrective Measures	47
5.3. Definitions	47
5.4. Consequences in the Event of Breaches	49

1. ETHICS



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

ATTITUDES THAT BUILD TRUST

Oxiteno believes that responsible management and business conduct must be based on ethics. We value the judgement and discernment of those who work with us, and we trust in their good faith and willingness to resolve moral issues impartially, promptly, and correctly.

This section presents the ethical principles that suppliers and business partners' decisions and conduct are based on. It is also a tool to help responsibly resolve the ethical dilemmas and conflicts of interest that arise in everyday life.



LEGAL
COMPLIANCE



CODE OF ETHICS AND
COMMUNICATION
CHANNELS



ETHICS IN
RELATIONSHIPS
AND CONFLICT
OF INTEREST



BUSINESS
CONDUCT



UNFAIR
ADVANTAGES, GIFTS
AND PRESENTS



INFORMATION
SECURITY AND
INTELLECTUAL
PROPERTY



ANIMAL
WELFARE



CONFLICT
MINERALS

ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.1. LEGAL COMPLIANCE



Mandatory Requirements

All supplies must comply with applicable local laws and regulations considering products and services. Should be adopted and observe commercial practices that are licit and transparent and are able to prevent any distortion and non-compliances.



Best Practices

Suppliers should adopt risk management procedures and internal audits, for finance and accounting, auditing procedures and training to prevent and correct any illicit behavior or legislation non compliances.



ETHICS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.2. CODE OF ETHICS AND COMMUNICATION CHANNELS



Mandatory requirements

All employees directly or indirectly connected to the company must have access to means or tools to report complaints or concerns about any of these issues.

These means or tools must ensure that employees feel comfortable speaking in good faith and that they are not retaliated against.



Best Practices

A Code of Ethics must be established, promoted, and made accessible by anyone, regardless of their relationship with the company. It must be applicable to all managers and employees and must be adhered to. Every employee must be encouraged to foster its content among people they engage with.

Regularly provide training and retraining, promoting the principles in the Code of Ethics and Corporate Policies.

Provide an “Open Channel” for guidance on ethical dilemmas and questions related to the Code of Ethics and Corporate Policies. This channel can be accessed publicly, guaranteeing anonymity, secrecy, impartiality and independence in analysis of the complaint.



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.3. ETHICS IN COMMERCIAL RELATIONSHIPS AND CONFLICT OF INTEREST



Mandatory requirements

Equity, transparency and accountability must be intrinsic to any organization. Oxiteno's suppliers must treat all stakeholders in a fair and equitable manner, rejecting any act of discrimination or improper favoring of any person or company.

Situations that pose real or supposed conflicts between personal and company interests must be avoided. The parties involved must ensure business is based on ethics and honesty.



Best Practices

Encourage respect for diversity and human rights, raising awareness and advising employees that opinions and criticism must always be made in a reasoned, respectful, and professional manner.

Raise awareness of relationships with public and private officials by setting rules that are based on the company's legitimate interest.

Hold non-mandatory activities to prevent and combat any kind of disrespect, harassment, offense, prejudice, or discrimination.



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.4. BUSINESS CONDUCT



Mandatory requirements

The conduction of all commercial business must be guided by ethics. Every and any form of bribery must be prohibited, with zero tolerance of corruption, fraud and extortion in all business negotiations.

The setting up or joining of any type of cartel, as well as commercial agreements to fix prices, share customers or markets, or, by any other means, limit competition, are prohibited.

Corporate policies and practices must be adopted to ensure that relationships, partnerships and business with agencies, companies, employees and representatives of the government or private sector are based on honesty, transparency and responsibility in every instance.



Best Practices

Employ supplier selection policies and practices that guarantee transparent, honest and fair processes for everyone. They must never illegally favor one supplier or service provider over others.

Work to ensure that the entire value chain, suppliers, subcontractors and service providers, comply with the principles of this policy, or equivalent policy agreed upon.



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.5. UNFAIR ADVANTAGES, GIFTS AND PRESENTS



Mandatory Requirements

No kind of payment, financial incentive or improper benefit of any kind can be accepted for oneself or external representatives. The same goes for the use of confidential or privileged information for the purpose of profit.

Suggestions such as gifts, presents, hospitality, travel or entertainment must not be made in exchange for favors or requests for help in relationships with the government.



Best Practices

The rules for giving gifts and offering hospitality must be clearly established, implemented and communicated, with reasonable limits being set out so that this can be done legitimately and in line with company principles. Communication on giving gifts and hospitality must be reinforced from time to time, especially on commemorative dates.



ETHICS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.6. INFORMATION SECURITY AND INTELLECTUAL PROPERTY



Mandatory Requirements

Care must be taken to ensure the integrity and protection of the company's information and computer systems, their responsible use, and the constant search for security vulnerabilities.

Data and registrations of companies and people (clients, external representatives, business partners, suppliers, service providers, or employees) must be used responsibly, privately, and according to legal limits. Management processes, projects and product formulas are the company's intellectual property. They must be handled confidentially and protected against theft and cannot be shared without formal authorization.



Best Practices

All confidential information must comply with capital market guidelines and rules. Technological safety measures and precautions must be implemented to protect commercial information, rights and patents, as well as intellectual property against unauthorized access and use.

A specialized consultancy must regularly check the level of security and compliance with issues regarding information handling and back-up.



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.7. ANIMAL WELFARE



Mandatory Requirements

Animal testing must be done to the highest level of responsibility, saving animals from any unnecessary suffering. A commitment must be established to test on animals only when required by law, or if there is a scientific basis. Animal testing must be based on an ethical and scientific rationale.

Only animals from breeding sites authorized and monitored by veterinary authorities may be used for testing. There may be exceptions when, for example, there are no official breeders, as in the case of livestock and fish, when animals can be acquired from selected livestock and fish farms, if permitted by specific regulations.



Best Practices

A commitment must be agreed upon to apply the latest scientific discoveries in the areas of animal welfare and livestock farming.

Clear goals must be set out and to reduce animal testing, and investments established for the development of alternatives (for example, mathematical models, computer simulations, or growth of isolated cells in a Petri dish).

Innovation through collaboration with partners (for example, other companies and academia) must be encouraged to reduce and replace animal testing in research. There must be specific animal welfare agents and / or committees to advise on and monitor the implementation of animal testing, and to cooperate with authorities.



ETHICS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

1.8. CONFLICT MINERALS



Mandatory Requirements

There must be a transparent declaration from suppliers to ensure a supply chain free from conflict regions.



Best Practices

A policy must be set out and implemented which sets out processes to identify whether suppliers use conflict minerals. The policy must be approved and declared in writing to all the suppliers who might be using conflict minerals.





2. SOCIAL RESPONSIBILITY

SOCIAL RESPONSIBILITY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

ACTIVE COMMITMENT THAT STRENGTHENS SOCIETY

Aligned with the best international practices, Oxiteno respects all human and employee rights and those of local communities. It is committed to fostering these principles across its network, always alert to compliance with the law, respecting cultural diversity, and seeking to bridge the social inequality gap.

This section features the core Social Responsibility requirements that must guide our suppliers and business partners' conduct, in accordance with the basic standards of the International Labor Organization (ILO) and the principles of the United Nations Global Compact.



COMBATING
CHILD
LABOR



COMBATING
FORCED
LABOR



FAIR TREATMENT,
DIVERSITY
AND INCLUSION



WORKING
HOURS,
WAGES
AND BENEFITS



FREEDOM OF
ASSOCIATION AND
RIGHT TO COLLECTIVE
BARGAINING

SOCIAL RESPONSIBILITY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.1. COMBATING CHILD LABOR



Mandatory Requirements

Under no circumstances is child labor tolerated. The minimum age for hiring must respect the legislation in each country, or ILO recommendations, whatever is the strictest.

If the company employs young people, their working hours must comply with local laws, not interfering with or preventing their education. Employees under 18 years old must not be exposed to dangerous, unsafe or unhealthy jobs or situations.



Best Practices

Policies on the hiring of young apprentices and interns, outlining the minimum age and forms to perform the job, within the organization, in the supply chain and at business partners must be set out.

All managers, supervisors and suppliers must be trained and regularly retrained on the policies for hiring young apprentices and interns.

Regularly monitor the effectiveness of existing hiring policies within the organization and in the supply chain, carrying out actions and corrections when necessary, and ensuring that all the rights of children are protected.



SOCIAL RESPONSIBILITY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.2. COMBATING FORCED LABOR (MODERN SLAVERY)

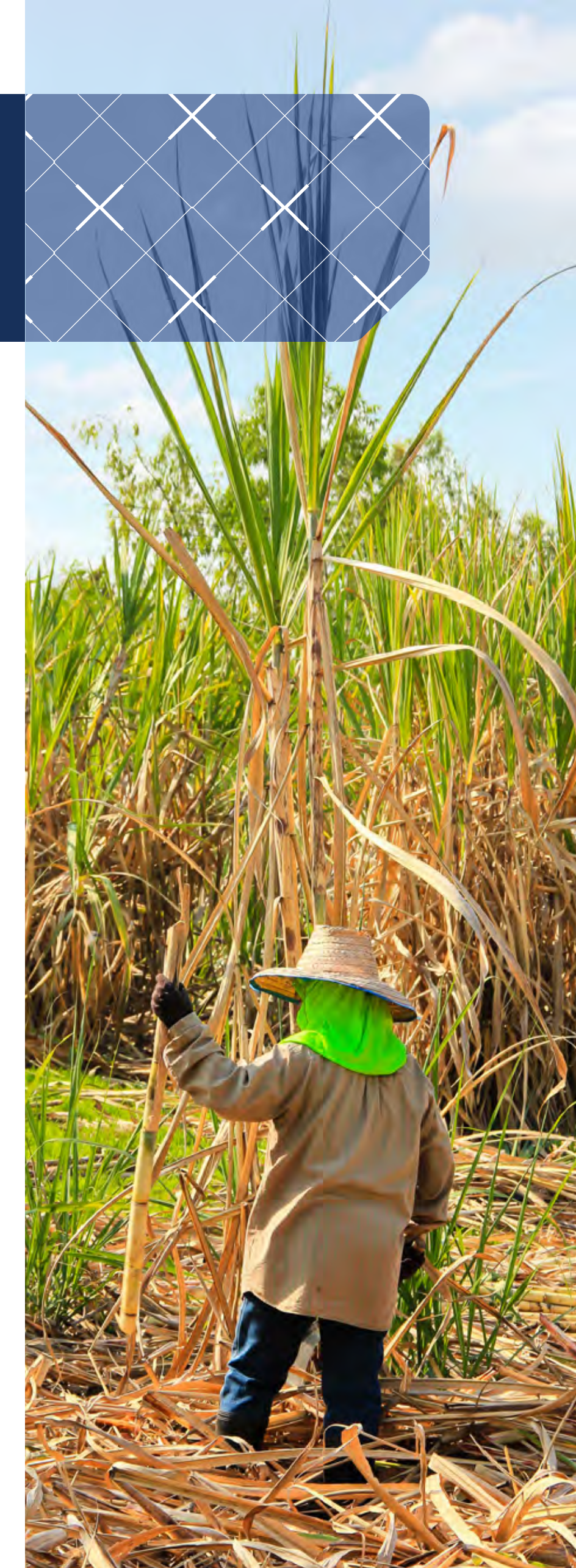


Mandatory Requirements

Involvement in or support for the use of forced labor is prohibited. Workers cannot have their documents withheld or be obliged to repay employers a debt through work (peonage, contractual bondage, compulsory prison work, modern slavery). A firm and clear position must be established regarding the protection of human rights.

All workers, be they full-time or temporary, must have employment contracts that are freely agreed and signed between employer and employee, or as provided for under local law. Likewise, these contracts can be terminated freely by workers.

The company must prevent the use of corporal punishment, psychological or physical coercion, and verbal abuse to workers.



SOCIAL RESPONSIBILITY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.2. COMBATING FORCED LABOR (MODERN SLAVERY)



Best Practices

Establish hiring policies within the organization, in the supply chain, and at business partners. All managers, supervisors and suppliers must be trained and regularly retrained on hiring policies.

Promptly deploy corrective actions and measures if any adverse impact or deviation is identified, in addition to those stipulated by law.

Regularly monitor the effectiveness of existing hiring policies within the organization and in the supply chain. Adapt and review when necessary, ensuring that all human rights are respected.

SOCIAL RESPONSIBILITY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.3. FAIR TREATMENT, DIVERSITY AND INCLUSION



Mandatory Requirements

There must be a practical approach to fair treatment, diversity and inclusion, fostering a corporate culture that embraces inclusion and the appreciation of individual differences in gender, sex, race, ethnicity, generation and culture.

Any discrimination based on race, social class, nationality, religion, disability, sex, sexual orientation, union membership, politics or age must be stopped. The company must not allow sexual harassment, psychological harassment, threatening, abusive or exploitative behavior, and in particular must pay attention to employees most likely to suffer discrimination.



Best Practices

All employees, managers and supervisors must be trained and regularly retrained to be aware of and prevent any form of harassment, abuse or other form of intimidation.

Diversity and inclusion must be considered in the strategy level in the companies, defining long term targets and action plan.



SOCIAL RESPONSIBILITY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.4. WORKING HOURS, WAGES AND BENEFITS



Mandatory Requirements

Working hours must never exceed the limit set by legislation and employee compensation must be in compliance with these laws. The base salary and benefits offered to employees must be fair and paid on time to provide a proper standard of living to employees and their families, and some extra income.

Contractual arrangements that may harm workers, or deductions from wages as a punitive or disciplinary measure, are not allowed (except for deductions in legal provisions, stipulated by law).

A pay slip must be issued with the exact payment, compensation, income, benefits, incentives / bonuses and deductions.

Overtime must be made at a higher rate, as set out by national legislation or applicable collective agreement. All overtime must be optional.



SOCIAL RESPONSIBILITY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.4. WORKING HOURS, WAGES AND BENEFITS



Best Practices

Harvest periods, maintenance shutdowns, or peak work periods must be planned to avoid overtime, unless under exceptional circumstances. Dimension an average workforce appropriate in size, skills and resources, according to each activity.

Working hours must allow a balance between work and private life.

Establish fair compensation systems to award worker performance, eligibility, knowledge, skills and experience. Salaries must be assessed regularly, according to the local cost of living, basic needs and market references.



SOCIAL RESPONSIBILITY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

2.5. FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING



Mandatory Requirements

The right of all employees to form or join unions and to bargain collectively, ensuring that no one is subject to retaliation, must be respected. Employees must understand their rights and feel free to exercise them.

Harassment, intimidation and special treatment are not permitted for employees who join associations of their choice and which bargain collectively on their behalf, or as a representative of employees (if permitted by law).



Best Practices

When requested by legally recognized by representatives, collective bargaining and / or negotiations can be agreed (if legally permitted).

The legal establishment of committees and / or independent representations for employees to discuss specific issues related to health, safety and social activities must not be prevented.

All requirements and objectives set out by the International Labor Organization Conventions on freedom of association and collective bargaining must be complied with.



3. QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL RESPONSIBILITY



QUALITY, ENVIRONMENT, HEALTH AND SAFETY



MANAGEMENT SYSTEMS



CONSEQUENCE POLICY

RESPECT FOR LIFE THAT GENERATES EVOLUTION

We believe it is essential for the strategy of any organization to have clear guidelines to monitor and foster continuous improvements. Through them, we can consistently exceed expectations, ensuring product performance and safety.

To establish more sustainable processes and acquisitions, we follow effective policies, processes and procedures for managing environmental impacts. Our supply chain plays a strategic role in these initiatives. So, we always work with suppliers committed to the same objectives: greater energy and resource efficiency, biodiversity management, waste reduction and recycling for the development of cleaner and more sustainable processes.

We are also committed to achieving zero accidents and injuries, as well as overall well-being inside and outside the workplace. This commitment is enhanced by Health and Safety policies and procedures and by massive communication and training campaigns.

This section features the core requirements for Quality, the Environment, Health and Safety that must guide our suppliers and their subcontractors' activities and operations.



QUALITY REQUIREMENTS



TECHNICAL SPECIFICATIONS AND PRODUCT SAFETY



ENVIRONMENT, CLIMATE PROTECTION, AND WASTE MANAGEMENT



OCCUPATIONAL HEALTH AND SAFETY



PROCESS SECURITY AND EMERGENCY RESPONSE



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.1. QUALITY REQUIREMENTS



Mandatory Requirements

A Quality Management System with the appropriate scope for the product or service offered to clients, such as ISO 9001, be implemented and maintained.

Quality management must be established. People who are properly trained and competent for such functions shall ensure its performance and execution.

“Non-Compliant” products and services, when classified as such, must undergo an investigation process, being registered, processed and monitored until its completion. All non-compliance analysis must be based on the investigation of its cause, immediate action, and the establishment of action plans.



Best Practices

External audit processes carried out by recognized and accredited bodies must monitor the efficiency and effectiveness of the Quality Management System.

Ensure that suppliers or business partners also follow such quality standards.

Put into place continuous training and recycling for employees, making it clear that personal and professional growth directly reflect on the quality of products and services.

Promote and foster excellence and innovation in the products and services offered, to achieve sustainable growth. Improvement and maximum performance must be sought in all activities, ensuring the quality of products, processes and services and increasing productivity and competitiveness responsibly. Adopt principles for decision-making on quality issues guided by proactivity, speed, flexibility, innovation and creativity.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.2. TECHNICAL SPECIFICATIONS AND PRODUCT SAFETY



Mandatory Requirements

Products and services shall be delivered in accordance with the specifications set out in contracts, purchase orders, or specific agreements, in accordance with the quality and safety criteria established.

Any intention to change the technical specification of raw material, manufacturing processes or supply chain changes that may impact the products, packaging and services provided shall be announced a minimum of 30 (thirty) days in advance.

All materials must be stored safely and in suitable, labeled containers. The packaging must comply with the product's hazard, and identification must be clear and appropriate. Relevant product safety information for products handles inside or outside the company must always be available to clients, distributors, and end users.

QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL RESPONSIBILITY



QUALITY, ENVIRONMENT, HEALTH AND SAFETY



MANAGEMENT SYSTEMS



CONSEQUENCE POLICY

3.2. TECHNICAL SPECIFICATIONS AND PRODUCT SAFETY



Best Practices

Train and advise everyone involved in handling dangerous products. Provide quick and easy access to product safety documents in the local language. Information on health, safety, and the environment must be provided for non-hazardous substances as well.

Monitoring internally and of suppliers must ensure compliance and suitability of packaging and equipment used in the transport of hazardous substances. Loading and unloading checklists must be followed to ensure that the product is stored and transported safely.

QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.3. ENVIRONMENT, CLIMATE PROTECTION, AND WASTE MANAGEMENT



Mandatory Requirements

All applicable national and international laws and regulations in relation to environmental and waste management must be complied with, and changes made must be recognized and complied with. All permissions, licenses, regulatory registrations or information on restrictions must be obtained, maintained and updated. All business and production activities must be carried out in accordance with these documents.

Emergency action plans must ensure that all environmental accidents are promptly stopped in order to minimize their consequences. Systems must be installed to prevent and mitigate spillage and accidental releases into the environment.

Service providers for waste collection and disposal, treatment facilities and landfills must be monitored and evaluated periodically. Waste disposal facilities must also be approved.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.3. ENVIRONMENT, CLIMATE PROTECTION, AND WASTE MANAGEMENT



Best Practices

Conduct operations, purchasing, manufacturing, distribution and supply of products and services to protect and preserve natural resources, the climate, and the environment. This objective must be part of the company's strategies, policies and goals.

The necessary natural resources (water, energy sources, raw materials, for example) must be used effectively and appropriately. The consumption of these resources as well as the emission of greenhouse gases must be monitored and controlled.

An Environmental Management System appropriate to the products or services offered, such as ISO 14001, EMAS or ISO 50001 (energy management systems), must be implemented and maintained. Regulatory changes must be integrated into the reviews of this system.

Environmental conservation goals, aligned with the company's strategic objectives, must be set and monitored. Actions must be suggested and carried out when these goals are not met. Transparency regarding the performance of conservation targets must be ensured.

All teams must be properly trained and recycled regarding the environmental aspects, impacts, controls and procedures associated with their activities.

Sustainable Practices and Awareness Programs must be incorporated into all operations and at suppliers to reduce waste generation, carbon emissions and greenhouse gases, the consumption of natural resources, and impacts on biodiversity.

There must be a continuous effort to reduce the use of energy, raw materials and water, and to minimize waste and emissions into the air, water, and soil.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.4. OCCUPATIONAL HEALTH AND SAFETY



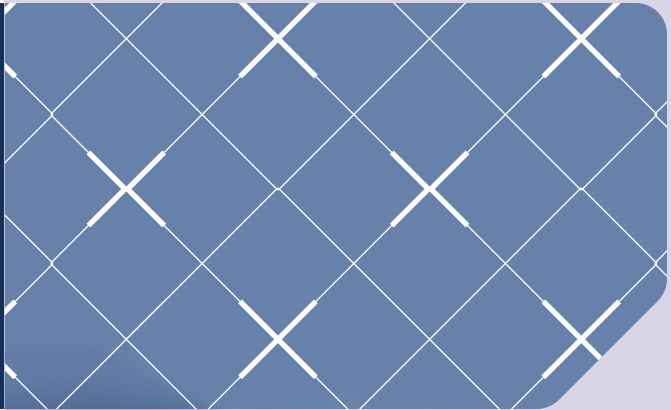
Mandatory Requirements

A healthy and safe working environment must be provided to avoid accidents and injuries arising from or associated with workers' activities, or as a result of the company's operations.

A Risk Management system must be implemented to assess the hazards (physical, chemical, biological, psychological and ergonomic) for each activity, including routine or non-routine services. Action must be suggested and implemented to reduce exposure to these risks.

Clear and efficient policies and procedures for occupational health and the safety of workers must be established and updated periodically. These policies and procedures must be widely disseminated and communicated.

In production units, employees, supervisors, managers and security guards must receive continuous training in relation to workplace risks, as well as measures to protect against exposure to hazardous chemicals. Suppliers and service providers must also be included, ensuring their safety and occupational health.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.4. OCCUPATIONAL HEALTH AND SAFETY



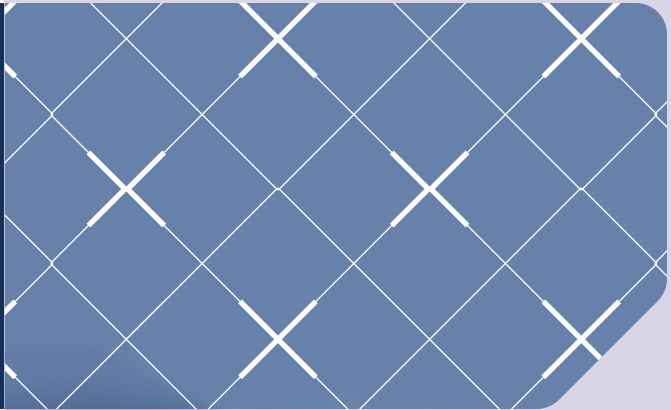
Best Practices

Implement and maintain an Occupational Health and Safety Management System suitable for the products or services offered, such as ISO 45001 or OHSAS 18001. Comprehensive management of suppliers and service providers must also be carried out, considering the training and monitoring they offer. Instruct everyone who enters the industrial facilities on safety measures in the event of an emergency.

Training, Health Promotion Initiatives and Programs, such as ergonomic inspections, health awareness courses, repetitive strain injury and work-related musculoskeletal disorder prevention campaigns, must be carried out.

All workers must be properly trained and recycled regarding the hazards, risks, controls and safety procedures associated with their activities. Specific objectives and indicators for occupational health and safety, such as reducing the rate of accidents and incidents, medical absences, and so on, must be established.

Monitor the effectiveness of occupational health and safety systems, and exposure to hazardous substances, suggesting actions and reviewing policies and procedures to reflect changes and risks in workplaces.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.5. PROCESS SECURITY AND EMERGENCY RESPONSE



Mandatory Requirements

Every production process must prioritize employee health and safety, minimizing any potential for negative consequences from undesirable events, such as chemical spillages, explosions, harmful gas releases, and so on.

The facilities must be suitable, having escape routes and emergency exits. The fire detection and firefighting equipment must be periodically evaluated, with operational tests ensuring that they are always unobstructed and available for use.

An emergency action plan and properly trained teams must be set up in accordance with safety standards and local laws. This plan must be reviewed regularly, and whenever there is a significant change in the locale.

Training and drills must be conducted periodically, considering all the elements of the safety plan to ensure that employees understand the rules and know how to proceed in an emergency. Reactors and machinery must be equipped with appropriate safety systems and devices.



QUALITY, THE ENVIRONMENT, HEALTH AND SAFETY

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POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

3.5. PROCESS SECURITY AND EMERGENCY RESPONSE



Best Practices

Make data and information available on the safety of production processes, setting out the operational safety limits and the potential dangers of these processes. Guidelines for communications with employee families, government authorities, and the media must be drawn up.

Security reviews and reappraisals must be carried out regularly, or after significant changes in processes. The assessment must be carried out by a competent person, documenting and registering the safety measures that have been drawn up and implemented.

Have an integrated approach with external emergency services, through partnerships with specialist service providers or public service first responders, such as the local fire department. The information must be shared proactively by all parties.

Multidisciplinary teams must carry out periodic monitoring and safety assessments of production processes, deciding on operating procedures for routine and non-routine operations.

Concepts relating to safety must be a priority over anything else the organization has to do. Assess the potential impacts of activities on employees and the local community, taking steps to mitigate or prevent any negative impacts.



4. MANAGEMENT SYSTEMS



MANAGEMENT SYSTEMS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

ADMINISTRATIVE INTELLIGENCE THAT INSPIRES IMPROVEMENTS

At Oxiteno, we are truly committed to improving our value chain as a whole, to do increasingly competitive and sustainable business with suppliers and partners.

So, we have policies and procedures to ensure the implementation and maintenance of a management system that fosters the continuous improvement of processes. Likewise, Senior Management must demonstrate commitment and leadership in decisions made, having full autonomy to develop an effective management system, in addition to ensuring engagement of the areas and providing the necessary resources.

This final section, then, presents the main requirements for Management Systems in accordance with our Responsible Supply Policy.



COMMITMENT TO
SUSTAINABILITY IN THE
SUPPLY CHAIN



CONTINUOUS
IMPROVEMENT



TRAINING AND
SKILLS REQUIRED



REPUTATIONAL RISK
MANAGEMENT



OPERATIONAL
CONTINUITY



COMPLIANCE WITH
LEGAL AND OTHER
REQUIREMENTS



DOCUMENTATION,
FORMS AND RECORDS



MANAGEMENT SYSTEMS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.1. COMMITMENT TO SUSTAINABILITY IN THE SUPPLY CHAIN



Mandatory Requirements

Suppliers and business partners must be contacted and encouraged to comply with the principles set out in this Responsible Sourcing Policy, or its equivalent.

Criteria must be established for the selection, qualification and hiring of suppliers, including the commitments and objectives related to this Responsible Sourcing Policy, or its equivalent.



MANAGEMENT SYSTEMS

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.1. COMMITMENT TO SUSTAINABILITY IN THE SUPPLY CHAIN



Best Practices

The results of sustainability assessments for decision-making must be taken into account. Criteria for the selection of suppliers, such as ethics, social responsibility, among others, must be taken into account, besides price and delivery time.

Monitoring of the supply chain, with evaluations or audits, must be constant, ensuring it meets the requirements set out in this Responsible Supply Policy, or its equivalent. These assessments and audits must be documented.

There must be a continuous effort by suppliers to identify sustainable sources, improving and promoting sustainability and social responsibility practices in the ecosystem they operate in.



MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.2. CONTINUOUS IMPROVEMENT



Mandatory Requirements

Sustainability programs aligned with the company's strategic objectives must be implemented, taking the necessary measures to ensure that all relevant aspects are complied with.

The performance of sustainability programs must be periodically monitored, and reviews and actions must be implemented to foster continuous improvement.



Best Practices

Periodically monitor the performance of sustainability programs in relation to similar and equivalent companies in the sector, identifying and implementing best practices.

A periodic sustainability assessment (internal and external) must be carried out to ensure continuous improvement. This assessment shall be carried out by independent and competent members.

A sustainability report must be published regularly, containing the initiatives and advances made during a given period.



MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.3. TRAINING AND SKILLS REQUIRED



Mandatory Requirements

A training program must be established for all teams, employees and managers to obtain and develop an adequate level of knowledge, and skills, including sustainability in processes and activities.

Newly hired or transferred operational level employees must be properly trained before they perform their activities.

The training must include an attendance requirement and evaluation of results, as well as risk analysis of the potential consequences for non-compliance or missed training.



Best Practices

Provide periodic training and recycling of teams, employees and managers, to improve processes and foster suggestions for improvement.

Consider the importance of performance, knowledge, and skills in planning employee progress, promotions and successions.



MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.4. REPUTATIONAL RISK MANAGEMENT



Mandatory Requirements

There must be a methodology to identify, assess and categorize reputational risks in conducting any new business. The results of this assessment must be documented and stored.



Best Practices

Reputational risk assessments must be made with consultations carried out by the organization itself, experts or a third-party company. A periodicity of revaluations must be defined and executed.

Incorporate the management of reputational risks and sustainability in excellence for the sale of inputs and products.

MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.5. OPERATIONAL CONTINUITY



Mandatory Requirements

There must be an operational continuity plan that describes how to resume business after any kind of disruption. The plan should be preventive, reducing, minimizing, or mitigating negative impacts.



Best Practices

The level of resiliency of systems and their operational capacity to withstand internal and external events must be determined. This means being able to recover after a catastrophe without losing vital work and management resources, while maintaining operational performance.

A high level of security and operational continuity must be established and implemented through specific corporate planning. The company must determine the need to use redundant Data Centers located in different regions to host identical copies of its data and operating systems securely. The use of power generators is also vital to keep the structure operating.

MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.6. COMPLIANCE WITH LEGAL AND OTHER REQUIREMENTS



Mandatory Requirements

All the applicable legal requirements must be identified, implemented, monitored and reviewed, including updating and adjustments to these requirements.

All licenses, legal permissions and authorizations to carry out the operations must be obtained, maintained and renewed.

A comprehensive registry of hazardous substances must be set up, keeping the requirements and licenses to operate up to date.



Best Practices

Map, identify and track requirements and legislation, using reliable methodologies and systems, such as technology, IT tools, consultation with specialists, or joining industrial associations.

Take organizational and operational measures to reduce and mitigate problems and violations regarding compliance with laws, regulations and agreements defined in the contract.



MANAGEMENT SYSTEMS

RESPONSIBLE
SOURCING
POLICY
OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

4.7. DOCUMENTATION, FORMS AND RECORDS



Mandatory Requirements

An appropriate documentation system must be established, with policies, manuals, guidelines, procedures and records (e.g., audit reports, work-related injury and illness rates, employee salaries, inspections carried out by environmental and regulatory bodies, performance assessments, and so on). Documented information may only be shared in accordance with legal and antitrust provisions.



Best Practices

The documentation must comply with applicable standards and management systems, being clearly established in terms of accuracy, verification, storage, backup and recovery.

Based on relevant management systems, such as Quality, Health, Safety and the Environment, to guide, implement, administer, and control all types of documentation.



5. CONSEQUENCE POLICY

CONSEQUENCE POLICY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

VALUES FOR THE PRESERVATION AND INTEGRITY OF BUSINESS RELATIONSHIPS

5.1. Purpose

To define internal criteria and measures to be adopted when any occurrence of misconduct, non-compliance with the mandatory requirements described in this Responsible Sourcing Policy, or non-compliance with the Codes of Ethics and Conduct of Oxiteno and the Ultra Group are detected or reported.

The Consequence Policy is subject to reviews and changes in accordance with regulations, applicable laws, policies and internal guidelines.

5.2. Application of corrective measures

The application of corrective actions, administrative measures or penalties of a restrictive or sanctioning nature for suppliers and service providers begins with the identification of irregularities in conduct, either by failure to comply with the mandatory requirements in this Responsible Sourcing Policy, or in contradiction with the Codes of Ethics and Conduct of Oxiteno and the Ultra Group.

The adoption and continuous improvement of remediation, administrative measures or penalties will always be designed to mitigate the risk associated with business conducted with our suppliers and service providers, so that they do not have conduct themselves in a way not consistent with our values and principles. All the efforts will be of an educational and advisory nature, aiming to identify a generating fact, with no more consequences for the said fact.

5.3. Definitions

CONSEQUENCES

Remediation, administrative measures or penalties that may be sanctioned as a result of the complaints and /or breaches detected:

- **Corrective actions:** actions designed to improve work processes through the management of processes, systems, and people. They may be related to communication, training, and the creation, revision and implementation of internal or other controls.



CONSEQUENCE POLICY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

VALUES FOR THE PRESERVATION AND INTEGRITY OF BUSINESS RELATIONSHIPS

- **Administrative measures:** administrative consequences that suppliers and service providers will be subject to for the violation of the principles or requirements established in the Responsible Supply Policy.
- **Penalties:** penalties suppliers and service providers will be subject to for violation of the principles or requirements established in the Responsible Sourcing Policy.

COMPLAINT

Reporting by any media or means of communication, of a breach of the principles and commitments established in the Responsible Sourcing Policy

BREACH

Any action or omission that is contrary to the principles and commitments set out in the Responsible Sourcing Policy.



CONSEQUENCE POLICY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

5.4. Consequences in the event of breaches

The criterion for the application of remediation, administrative measures or penalties will be any failure to comply with the mandatory requirements described in the Responsible Sourcing Policy or contrary to the Codes of Ethics and Conduct at Oxiteno and the Ultra Group.

We stress our position regarding the free expression of our suppliers, service providers, and their employees, including any error by an Oxiteno employee or any person acting on behalf of Oxiteno. We request that any suspected violations or actual violations be registered. Oxiteno and the Ultra Group provide an open channel for complaints that can be accessed by telephone or online by staff and the public:



ULTRA OPEN CHANNEL

+55 0800 701 7172 (BRAZIL)
+1 800 880 6491 (UNITED STATES)
+52 800 099 0646 (MEXICO)
000-416-205-2740 (URUGUAY)



WEBSITES (AVAILABLE FROM ANY COUNTRY)

www.canalabertoultra.com.br
www.openchannel.com.br
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This channel is operated by a third-party company, under management of an independent area and assure:

- Anonymity
- Confidentiality and diligence
- Confidentiality in the investigation of the complaint
- Impartiality
- Immediate action against any retaliation or exposure

CONSEQUENCE POLICY

RESPONSIBLE SOURCING POLICY OXITENO



ETHICS



SOCIAL
RESPONSIBILITY



QUALITY,
ENVIRONMENT,
HEALTH AND SAFETY



MANAGEMENT
SYSTEMS



CONSEQUENCE
POLICY

If immediate remediation or action is necessary, the supplier must inform Oxiteno's Procurement area of the plan to be implemented and executed to remedy the breach.

The applicable consequences will be managed internally by Oxiteno, and passed on to and discussed with the suppliers, and may be related to:

- Actions between Oxiteno and the supplier to leverage performance
- Monitoring and on-site auditing of supplier production units
- Commercial restrictions and reduced volume of purchases and/or services

If, after the deadline established for the implementation of the actions to improve the supplier's performance, or after repeated breach of any of the requirements verified by audit or other monitoring, or if it is not proved that the breach has been resolved, Oxiteno reserves the right to terminate its commercial relationship, and may disqualify the supplier.





Attitudes that
build trust



Active commitment that
strengthens the community



Respect for life that
generates transformation



Administrative intelligence
that inspires improvement



Non-negotiable values for
the preservation and integrity
of commercial relations

WE HOPE THAT THIS
RESPONSIBLE SOURCING
POLICY HELPS TO PROMOTE
MORE SUSTAINABLE
BUSINESSES, WITH THE
PURPOSE TO ENCOURAGE
OUR SUPPLIERS TO MAKE
IMPROVEMENTS IN ALL OF
THEIR PROCESSES.

**OXITENO INVITES YOU TO
ENGAGE ON A JOURNEY
OF SUSTAINABILITY IN
THE VALUE CHAIN.**



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