

CODE OF ETHICS AND CONDUCT

SGI_RH.795/2017-CORP REV03



USINA
CORUPIPE

PRESIDENCY MESSAGE

The ethical conduct and upstanding behavior have always made Usina Coruripe a reference in our country. This is the result of the constructive work of our team, whose manners has always been guided by trust and transparency.

To strengthen and disseminate this culture, we present our Code of Ethics and Conduct. Through this Code, we hope to further consolidate mutual respect, which has always guided our relationships with customers, suppliers, competitors, employees, shareholders, society, government and the environment.

We count on everyone's collaboration, so that the reputation of being a solid company, based on honesty and integrity, with consistent ethical principles and values, which is aware of its responsibilities towards all its stakeholders, is kept.

We believe our behavior will continue to make a difference, ensuring credibility and building an increasingly positive image in the market.

Have a good reading.

Mário Lorencatto
CEO

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MISSION

To produce sugar, ethanol and energy with safety and sustainability, generating value to shareholders, employees, partners and society.

VISION

To be the benchmark in the markets where we operate, always positioning ourselves as one of the most profitable companies in the industry.

VALUES

Respect for people

Sustainability

Quality

Customer Satisfaction

Safety

Ethics

PRESENTATION



The Code of Ethics and Conduct aims to guide behavior, actions and decisions at Usina Coruripe, based on all the company principles and values. The document provides the company's professionals with guidelines related to how to act on a daily basis and in decision-making moments, thus reducing the risk of subjective interpretations regarding moral, ethical and behavioral aspects.

After reading the Code of Ethics and Conduct, the employee must complete the Term of Commitment (on last page), in order to certify that the guidelines and principles of our Code have been fully understood e agree that they will be duly followed.

This guide translates Usina Coruripe way of being and acting, and it must be used by all those who, directly or indirectly, are involved with the company integrity and reputation, in order to guide all behavior, actions and decisions.

USINA CORURIPE ETHICAL PRINCIPLES

01

INTEGRITY

Integrity is a fundamental principle inside Usina Coruripe. Private interests cannot be in conflict with the company interests. In addition, it is essential that the behavior of everyone who makes up Coruripe is exemplary.





02

RESPECT FOR PEOPLE

Respect for individual differences and always courteous relationships with people, especially with co-workers of any function or position, are part of Usina Coruripe culture, which is an essential condition for everyone's individual and professional development.

The company respects the human being diversity, without discrimination based on color, gender, race, religion, sexual orientation, origin, age, disability, marital status, social class, union membership or political affiliation, in order to contribute with the well-being and improvement of the quality of life of everyone who makes up the company.

03

EQUALITY

We aim to provide equal opportunities through a working environment that favors learning, professional development and recognition.





04

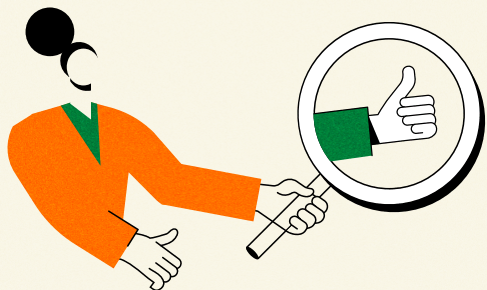
SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

We are committed to the social development of the community, to the balance and sustainability of the environment in which we operate, and to complying with all applicable regulations and laws.

05

TRUST

Our relationship is driven by trust, through honesty and transparency in relationships with all its stakeholders, as it is based on constant ethics in business.



06

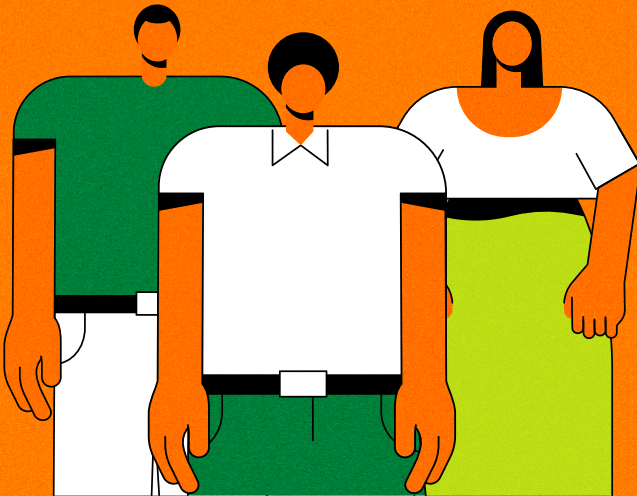
TRANSPARENCY

Usina Coruripe values transparency in all its relationships with its employees and society.

RULES OF CONDUCT

EMPLOYEES

(EMPLOYEES, TRAINEES
AND SERVICE PROVIDERS)



For Usina Coruripe, people are the basis for building an ethical company. Within this context, Usina Coruripe's internal public, made up of employees, trainees and service providers, plays a key role.

USINA CORURIBE COMMITMENT

01 **Use** a permanent, outspoken and open dialogue, respecting other people's opinions and freedom of expression;

02 **Cultivate** trust and transparency in relationships;

03 **Provide** adequate human, material and technological resources to perform the activities;

04 **Keep** confidential information in safe places, to limit access and avoid discussions about confidential data in the public areas of the units;





- 05** **Promote** fair remuneration and benefits aligned with the market;
- 06** **Promote** well-being, health and safety, integration of people and team spirit;
- 07** **Recognize** and value people, favoring professional growth and personal development of employees;
- 08** **Pay** punctually and collect all social charges;
- 09** **Do** not use child labor. Furthermore, never subject workers to conditions that are degrading and analogous to slave labor;
- 10** **Respect** the human rights and individual freedom of each citizen. When laying someone off, treat them with respect and appreciate their dedication;
- 11** **Respect** the privacy of employees and protect their personal data.



EMPLOYEE COMMITMENT



01 **Follow** the practices, policies and procedures established by Usina Coruripe strictly to ensure the quality of the activities performed;

02 **Fulfill** their duties and attributions responsibly and safely to perform them in the best possible way;

03 **Practice** the 5S (Use, Ordinance, Cleanliness, Health and Self-discipline);

04 **Call** the leader or the Occupational Safety area, in case of unsafe acts and actions or conduct, which may cause car accident at work, material or environmental damage;

05 **Respect** any co-worker; comply with and observe safety, environment and health signs;





06 **Smoking** only in permitted places at the company premises;

07 **Avoid** wasting water and electricity and inform those responsible when you find situations like these;

08 **Do** not disclose information received by internal communication to the external environment. Communication with the market, media, etc., must be done by the company's Communication department;

09 **Notify** your immediate superior in advance when necessary to be absent from work for any reason;

10 **Use** the resources made available by the company properly, keeping their conservation and good state of use;

11 **Do** not use personal or material resources from Usina Coruripe, in private work or activities;



EMPLOYEE COMMITMENT



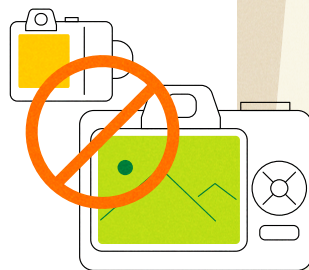
12 **Do not** remove, without prior authorization from the person in charge, any document or equipment from Usina Coruripe;

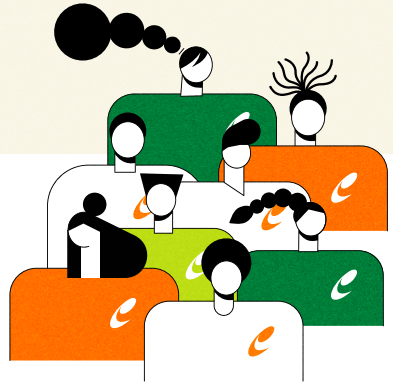
13 **Never use** cameras without prior authorization from your superior;

14 **Act in** accordance with the interests of the company whenever representing it at external events or in the relationship with the external public;

15 **Have an** honest and fair conduct and act with integrity of character, eliminating any personal advantages due to the position held;

16 **Keep a** good work environment. Interact with respect, politeness, trust and discipline;





17 **Appreciate** everyone's commitment and team spirit, focusing on a suitable organizational climate;

18 **Care** for the company image and the good name of Usina Coruripe, keeping its idoneous reputation;

19 **Act** considerately and honestly with the people with whom you interact, respecting the customs, habits and local culture;

20 **Be** proactive and always suggest new ideas and methodologies to enhance and improve the development of activities;

21 **Have** attention, respect and additional care in relation to children, the elderly and pregnant women;

22 **Treat** people with respect: do not discriminate, do not mistreat, do not threaten, do not oppress, do not embarrass, do not slander, do not disqualify and do not harass anyone;



EMPLOYEE COMMITMENT

23 **Do not** accept from suppliers and/or service providers any gifts, favors, commissions and advantages that may raise suspicions of undue favor, except for in the case of gifts (identified as free distribution with no commercial value for displaying a brand or advertising, characterized as institutional) and business meals;

24 **Inform the** hierarchical superior of invitations to events whose expenses are borne by customers, suppliers, government agencies and others, which must be previously approved;

25 **Use the** transportation voucher correctly. That is, from home to work and vice-versa. Do not sell or pass it on;

26 **In case** of sick leave, notify leadership beforehand and deliver medical certificates as soon as you return to work.

SUPPLIERS

Usina Coruripe's suppliers and/or service providers are of fundamental importance to the company. Thus, the manners with them must be based on the following aspects:



01 Do not do business with suppliers and/or service providers with a dubious reputation, for example: suppliers who use child labor and/or who subject workers to degrading working conditions or conditions similar to slavery;

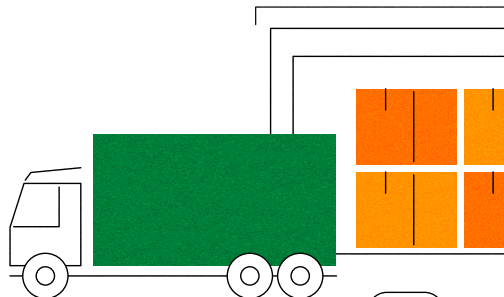
02 Establish impartial criteria for selecting suppliers and/or service providers, rejecting any type of favoritism or discrimination;

03 Care for the image of suppliers and/or service providers, as well as compliance with all agreed commitments;

04 Value legality, trust, professionalism, ethics and impersonality in all acts and actions performed with suppliers and/or service providers;

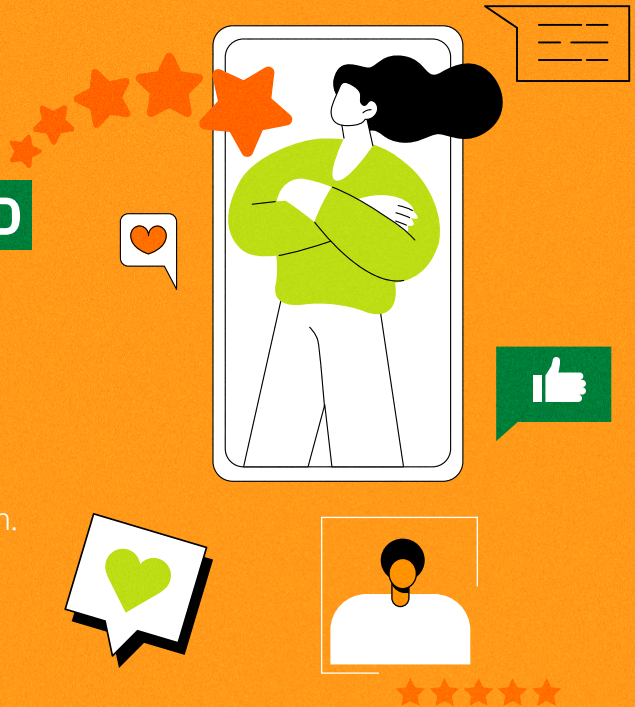
05 Treat all Usina Coruripe suppliers and/or service providers honestly, cordially and equally, in order to develop and keep solid relationships with the company, thus incurring benefits for both;

06 Do not allow any personal relationship with the supplier to become harmful to our company interests and needs. The selections and approvals of suppliers and/or service providers must be based on criteria of a technical and professional nature (for instance, quality, cost).



CUSTOMERS AND CONSUMERS

Usina Coruripe appreciates the satisfaction of its customers and values the good relationship with them. Such disposition must be based on the following practices:



01 Treat customers in a transparent, honest, cordial, egalitarian way, with courtesy, promptness and respect, aiming at their satisfaction, always valuing the relationship and pre- and post-sales actions. Quality, which is one of Usina Coruripe values, must always be reflected in the products and services offered by it;

02 Value legality, trust, professionalism, ethics and impersonality in all acts and actions performed with Usina Coruripe customers;



03 **Do** not copy or pass on to third parties any data and/or confidential information of Usina Coruripe customers. Confidential information is technical and commercial data about products and services, objectives, tactics and business and commercialization strategies, as well as information or data that is linked or related to business interest. Only persons authorized by the company's senior management may provide information to third parties. Unauthorized use or disclosure of confidential information is a crime and may result in civil and criminal penalties;

04 **Listen** carefully to every demand from the company customers. It is essential to provide feedback to the customer, whether positive or negative, as a way of valuing the good relationship;

05 **Do** not practice preferential treatment of customers caused by personal interests.



ENVIRONMENT

Usina Coruripe has sustainable development as its value, being focused on balance and conservation of the environment where it operates. For this purpose, the following practices must be followed:

01 Search for the continuous improvement of your practices and processes, always aiming the reduction of environmental impacts associated with the activities;

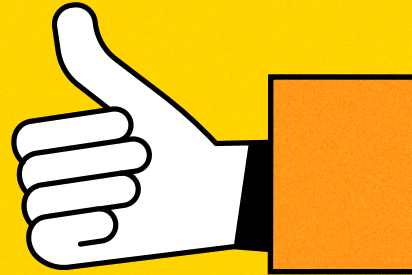
02 Spread the environmental preservation culture;

03 Prioritize the environmental balance, always aiming at the simultaneous promotion of environmental preservation with economic growth;

04 Appreciate the performance of projects and/or activities whose focus is the biodiversity protection, preservation and recovery.

COMPETITORS

Usina Coruripe keeps as principles honesty, competitiveness and respect towards its competitors. Therefore, the following stances must be adopted inside the company:



01 **Treat** competitors with the same respect the company expects to be treated;

02 **Do not** adopt actions that may be considered monopolistic, non-competitive, or contrary to market laws and practices;

03 **Not using** defamatory practices or using untruths towards the company competitors;

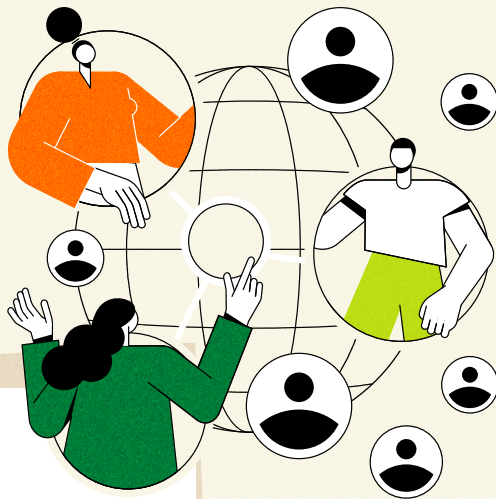
04 **Obtain** information about the company competitors in a lawful manner, through reputable practices and authorized sources;

05 **Do not** provide any company information to its competitors, except in cases approved by the Board.



SOCIETY

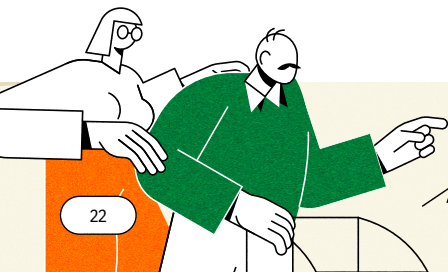
Usina Corupei values citizenship and the well-being of society, being recognized for this. In this context, it considers essential:



01 **Appreciate** the social development of the community in which it operates, through initiatives such as training and integration with Usina Corupei;

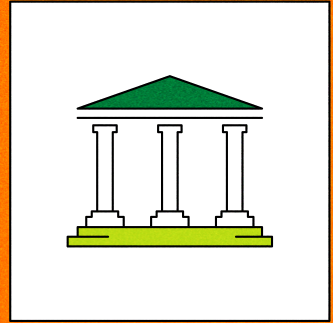
02 **Keep** relationships based on ethics, respect and trust, in a fair and balanced way, which can generate mutual benefits and contribute to social and economic sustainability;

03 **Do** not promote or support prejudiced actions that generate embarrassment or that may be harmful to the collective well-being.



GOVERNMENT

Usina Coruripe keeps a relationship of cordiality and respect with the public sector, valuing constructive relationships and supporting government actions, based on the following practices:



01 **Respect** the laws and regulations applicable to the company activities;

02 **Keep** transparency, legality and impartiality in its relationships with the government;

03 **Respect** the individual political-party options of everyone who makes up the company;

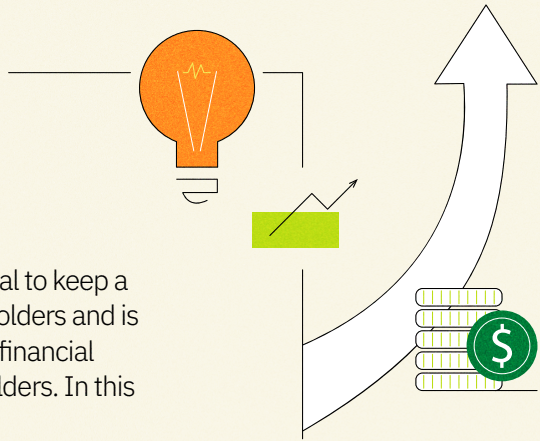
04 **Collect** the taxes due correctly and on time.

05 **Contributions to** political parties and candidates, once previously authorized by the Board of Directors, must be carried out in strict compliance with the electoral law in force.



SHAREHOLDERS

Usina Coruripe considers essential to keep a good relationship with its shareholders and is committed to achieving the best financial results, respecting all its stakeholders. In this context, it is essential that:



01 **Corporate** governance practices are adopted, as a way of promoting transparency and clarity towards its shareholders;

02 **All** the support for monitoring the company activities and performance is offered through suitable and accurate communication;

03 **Any** information not disclosed to the market yet by Usina Coruripe, which may generate undue advantages or benefits, is protected;

04 **The** focus is kept on the balance between profitability, growth and the company socio-environmental responsibility.



GDPR

(GENERAL DATA PROTECTION REGULATION)

In order to comply with the General Data Protection Regulation (GDPR), Usina Coruripe established a Privacy and Data Protection Program under which policies and procedures were developed, containing guidelines regarding the use of personal data under the Company's responsibility, available either [here](#) or through this path (content available only for employees):

Intranet / Conteúdos Corporativos / Normas da Empresa / Diretrizes LGPD

The processing of personal data for legitimate purposes declared to the data subject is allowed, but must be carried out in accordance with the policies, procedures and guidelines stipulated by Usina Coruripe in its Privacy and Data Protection Program.

Coruripe values the security of its data, therefore, it adopts fundamental security measures to guarantee a protected environment, adequate to the legislation. To this purpose, employees must protect the personal data processed by the Company while not sharing their data with unauthorized persons.

The Company's Data Officer can be reached via email:

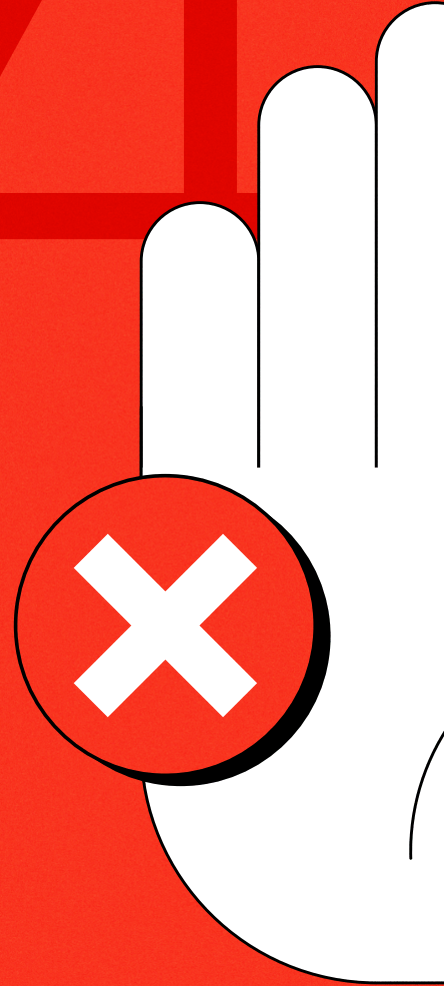
lgpd@usinacoruripe.com.br



IMPROPER MANNERS INSIDE USINA CURURIBE

The following provisions complement and reinforce the topics mentioned above, highlighting manners that are not considered acceptable inside Usina Coruripe, not admitting that:

- 01** **Relatives** of employees are hired or promoted without due impartiality (there should be no preferential treatment in relation to other candidates);
- 02** **Work** in the same department or keep under your immediate supervisor, consort, partner or relative up to the 2nd civil degree, as this situation can generate conflicts of interests;
- 03** **Any** type of advantage and/or sponsorship occurs;





04 **Advantages** are obtained through the use of a position, function or position held in the company;

05 **Benefits** and/or personal advantages are obtained from third parties (customers, suppliers, government, etc.) on account of a financial and/or commercial relationship signed on behalf of Usina Coruripe;

06 **Tasks** are carried out under influence of alcohol or prohibited substances (for example: drugs, medications that jeopardize the employee safety);

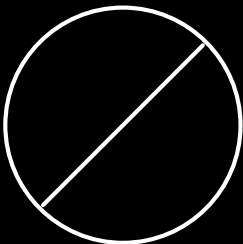
07 **Embarrassment**, disqualification, humiliation, or any behavior that includes gestures, words, acts, writings and contacts which are morally and/or sexually coercive, threatening, abusive or exploitative are taken;

08 A posture of omission or collusion with infractions and/or violations of this Code of Ethics and Conduct is adopted;

09 A loan or courtesy that can be characterized as a bribe, commission, gift or advantage of any kind is offered, due to their attributions, position or function in the company;

10 **Public** demonstrations are carried out on behalf of Usina Coruripe without the proper authorization and/or authorization to do so;

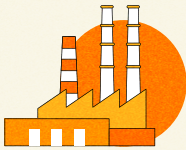
11 An employee clocks in and out to benefit a co-worker.



An illustration at the top of the page shows two hands, one from the left and one from the right, holding a large orange globe. The globe features a white stylized logo that resembles a lowercase 'e' or a swoosh. The hands are rendered in a simple line-art style. Behind the hands and globe is a large, light green letter 'G' that serves as a background element for the title.

CORRECT USE OF THE COMPANY

The care and correct use of the Usina Coruripe property contributes towards increased productivity, good results and business perpetuity. Employees must protect the company's assets and resources the same way they care about their personal assets. It is important to use them appropriately, that is, for business purposes. Company's assets and resources must be protected from loss, damage, theft, misuse or illegality.



Examples of assets that are Coruripe property or responsibility:

- Installations, equipment and their parts;
- Computers and software;
- Access to internet; e-mail;
- Copying machines; vehicles;
- Office material and other supplies;
- Intellectual property, such as the name and brand.

Employees must be especially careful when using the IT resources offered by the company, such as e-mail and internet access. Personal use of the internet is allowed as long as it is occasional, limited, and it can never affect your productivity at work. Access internet banking, check test results or look up a doctor's phone number are examples of the personal use allowed.



Transmission or access to inappropriate content such as:

- ✗ Pornography and obscenities; games;
- ✗ Discrimination; terrorism;
- ✗ Sale of non-business related products; chains;
- ✗ Partisan political advertisement;
- ✗ Activities against public property or those of third parties.



GUIDE TO ETHICAL DECISION MAKING

When making a decision it is important to consider:

- 01** **Whether the decision** will keep your clear conscience;
- 02** **Whether this decision** is consistent with the company values and ethical principles;
- 03** **If this decision** would make you “embarrassed” if other people knew what you did;
- 04** **If the decision** is contrary to professional, legal or Usina Coruripe rules;
- 05** **If you have** evaluated all the risks, impacts and consequences of your action, as well as whether it will reflect negatively on you;
- 06** **The reason why** the decision raised doubts in you.

In addition, it is interesting to consult other people for decisions that raise doubts. Moreover, it is important that the stakeholders are informed of their decision and the respective reasons that supported it.



CODE OF ETHICS AND CONDUCT MANAGEMENT

01 **This Code** management will be the responsibility of Usina Coruripe Human Resources department. The latter has the role of periodically reviewing/re-evaluating the document.

02 **No professional**, regardless of his level or position, can justify improper or illegal conduct, based on a superior order or ignorance of the principles and rules established in this Code.

03 **Criticisms and** suggestions for the code improvement must be informed to the Human Resources area.

04 **It is** Usina Coruripe employees' role to clarify their doubts and help with the Code improvement.

05 **Compliance with** and improvement of this document will consistently contribute to Usina Coruripe growth and consolidation.



VIOLATIONS AND FINAL GUIDELINES

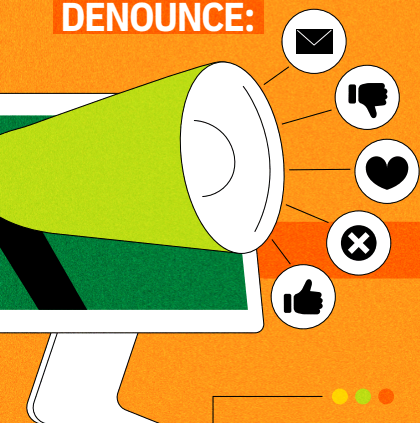
01 **All employees** are expected to comply with these guidelines under all circumstances. A member who violates a Coru ripe conduct, practice or policy, or who allows a subordinate to do so, will be subject to disciplinary action, including dismissal.

02 **Retaliation against** a member who, in good faith, reports a concern about illegal conduct or non-compliance with the guidelines established in this Code of Ethics and Conduct will not be permitted and tolerated.

03 **It is** important that Usina Coruripe knows what doubts of yours are related to this Code, so that it can guide and correct deviations. This is the reason why employees must address their concerns internally, solving issues and informing the company of acts performed in violation of this Code.

04 **Generally,** your leader is in the best position to help you with ethical concerns. That's why you should look for him first. However, this is not the only alternative. Consider contacting the level above your manager as well. For issues related to the working environment, for example, contact the HR department of your unit.

**REFER TO, GET
INFORMED,
DENOUNCE:**



CONFIDENTIAL PORTAL

Portal Confidential is Usina Coruripe's message channel, allowing the submitting of reports, complaints, and suggestions. Managed by an independent company, with impartiality and transparency, it ensures the user anonymity and the information integrity.

www.usinacoruripe.com.br/etica



The Channel can be accessed by employees and the external public without password and allows you to submit suggestions as well! You can also submit a report using the phone number **0800 009-0036**.

ACKNOWLEDGEMENT OF RECEIPT AND COMMITMENT

I declare, for all purposes, that I received a full copy (digital or printed) of the Code of Ethics and Conduct from Usina Coruripe, became aware of its content, and I undertake to comply fully with it.

I also affirm that I was informed of the obligation to follow the guidelines of this Code in all situations and circumstances that are directly or indirectly provided for in the employment contract signed by me.

Finally, I agree that in the event that situations arise which they are not present in the Code, but that may represent improper conduct or risk to my safety or of the company, I will immediately inform my superior or the Human Resources department of Usina Coruripe.

Name: _____

Position: _____ **Registration:** _____

Unit where I work: _____

Place and date: _____

Signature: _____

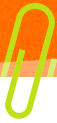


NOTES



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NOTES

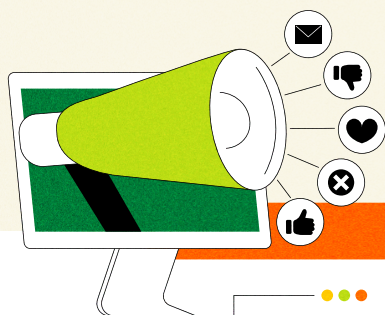


A series of horizontal dashed lines spanning the width of the white note sheet, providing a guide for writing.

DO YOU HAVE ANY QUESTION? REFER TO OUR CODE OF ETHICS AND CONDUCT



There has never been so much talk about ethics in Brazil. In politics, in the media, in the bar, everywhere. But how much do you think about ethics in your daily routine? When was the last time you referred to the company code of ethics?



**REFER TO,
GET INFORMED,
DENOUNCE:**

www.usinacoruripe.com.br/etica



USINA
COPURIBE

PRODUZINDO ENERGIA PARA A VIDA

