



“We are committed to economically and environmentally sustainable business practices, providing safe working conditions”.



CODE OF BUSINESS CONDUCT

COMMITMENT TO THE HIGHEST STANDARDS





OUR COMMITMENT

PROMETIM Management strives for the highest standards of Business Excellence because performance counts. Our business is conducted by respecting Human dignity, in recognition of the Human Rights and in accordance with all the applicable laws. We are committed to economically and environmentally sustainable business practices, providing safe working conditions. In response to violations of human rights related to mining of certain minerals from the conflict region in the eastern part of the Democratic Republic of Congo (DRC), the U.S. Securities and Exchange Commission (SEC) approved the Final Conflict Minerals Rule under the Dodd-Frank Act, to implement reporting and disclosure requirements related to conflict minerals, and we require to all our customers, partners and transparent and conflict-free supply chain. suppliers to comply with respective requirements for a transparent and conflict-free supply chain.

We continuously develop the abilities of our employees and evaluate performance objectively. By showing mutual respect as we collaborate across cultures, we recognize the freedom of association of our workforce.





WE LISTEN AND WE ACT

We conduct our business with integrity and transparency. We oppose corruption. PROMETIM delivers, superior products and services to our customers. We support free and fair competition, and we comply with all the relevant competition laws. We also take due care in the selection of our business partners, complying with export controls and anti-money laundering regulations. We treat our suppliers to strive towards the same high standards for business conduct and product quality, which we have set for our customers. PROMETIM protect proprietary business information, private data and intellectual property rights. Proprietary company information and data may be released to third parties only with prior authorization. We keep accurate records and guarantee complete reporting of financial and operating information to management, shareholders and third parties.



We accept the challenges of ethical conduct. In critical situations we will support each other to keep our commitments to move PROMETIM forward, and we will speak if things must be corrected or improved. Concerns are raised with local management. Should this not be possible, or not satisfactory response is received, every PROMETIM employee may escalate a concern in the management structure – up to a member of the Executive Board, to a Compliance Coordinator, or to Corporate Audit.



- We always act with integrity and honesty
- We will declare potential conflicts of interest
- We will protect company assets and will not use our position at PROMETIM for personal gain
- We take pride in PROMETIM, and we protect our good reputation as well the image and value of PROMETIM brand.

PROMETIM: SUPPLIER CODE OF BUSINESS CONDUCT

At PROMETIM we continue to see our business successfully grow. A key component to our success has been our commitment to maintaining the highest standards of business behavior in our dealings with our colleagues, customers, suppliers, subcontractors and the communities in which we work.

Our Supplier Code of Business Conduct aims to be a practical and clear guide to the behavior that PROMETIM expects from our suppliers and subcontractors, and its people.

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If a supplier or subcontractor is found to have violated this code, PROMETIM may ask the supplier for further information relating to the issue and show what actions have been taken to remedy respective situation.

Our Supplier Code of Business Conduct aims to be a practical and clear guide to the behavior that PROMETIM expects from our suppliers and subcontractors, and its people.

PROMETIM ask that suppliers and subcontractors regularly monitor compliance with this code and notify the company if any issues arise or if there are any concerns regarding compliance with it. At its discretion PROMETIM may monitor compliance with this Supplier Code of Business Conduct through questionnaires, information requests, site inspections and third-party due diligence when required.

Your compliance with this code will help ensure our continuing business relationship and success as businesses.



Paula Dantas

(Founder and Managing Partner)



PROMETIM



ANTI-BRIBERY AND CORRUPTION POLICY

PROMETIM Anti-Bribery and Corruption Policy, establishes principles that must govern our conduct and our business with integrity and professionalism, honesty and complying with all applicable laws and regulations.



At PROMETIM we follow the national and international standards, complying with the U.S. Foreign Corrupt Practices Act (FCPA) and the “UK Bribery Act” and similar anti-corruption laws worldwide, always reinforcing, our intention and obligation to act honestly and ethically in all our business dealings. This policy applies to all employees, partners, and suppliers. Bribery and corruption are not only against our Company values; they are illegal and can expose both the employee and the Company to fines and penalties, including imprisonment and reputational damage. At Prometim, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying, or receiving bribes or kickbacks, or by any other means that is considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees and representatives of the Company are expected to decline any opportunity which would place our ethical principles and reputation at risk. While certain laws apply only to bribes to government officials (domestic and foreign); this Policy applies to nongovernment business partners as well.



“ZERO TOLERANCE” POLICY

Prometim adopts a “Zero Tolerance” Policy aiming to strengthen our integrity, governance and competence efficiency and competitiveness with our customers, partners, and suppliers. Laws and regulations are strict when dealing with Government Officials. Reasonable corporate hospitality that is acceptable with other business associates might not be allowable when Government Officials are involved.

Prometim employees and representatives should seek clarification on any questions or concerns regarding activities under consideration or the interpretation of any law. Any violations can be reported to direct line managers or to Administration. The integrity and compliance policies and procedures rely on its management commitment and extend to all its hierarchical levels of the company.



INTEGRITY, ETHICS, RESPONSIBILITY

“People want to work with companies they can trust. Over the years, Prometim, has built a strong reputation for being an ethical, trustworthy company. Each of us has a responsibility to protect that reputation by demonstrating honesty and integrity as we interact with our customers, business partners and each other”

Paula Dantas

(Founder and Managing Partner)