



CODE OF ETHICS AND DATA PROTECTION





INTRODUCTION

Astra's **CODE OF ETHICS AND DATA PROTECTION** is a guidance tool for the company's relationships with its audience, whether they are internal or external. The goal is to ensure transparency, seriousness and professionalism in the conduction of business. Besides that, the document brings guidelines regarding the collection, treatment, sharing and exclusion of data from individuals in adaptation to the General Data Protection Law (LGDP – in Portuguese translation), that came into force on September 2020.

Astra's values are founded on pillars of ethics and transparency in its relationship with employees. This Code aims to serve as a conduct guide, an internal regulation of behavior to provide guidance especially to younger employees and newcomers.

Astra treats people's privacy with ethics and integrity and because of that acts with responsibility in the treatment of personal data of its shareholders, employees, clients, consumers, sales representatives, partners, suppliers, competitors and others related.

Astra has a set of rules and procedures available for consultation on the internal network (I:\NORMAS) This Code does not replace any rule previously established by the company.



IMPORTANT

In case of doubt about any topic, reflect upon whether the conduct chosen:

- Is legal or licit?
- Is in accordance with Astra's rules and regulations found in this manual?
- Reflects Astra's values?
- Respects Astra's employees?
- Is in line with the company's practices?
- Reflects an ethical attitude toward customers, suppliers, the community, the press and other external audiences?
- Is it in agreement with the General Data Protection Law (LGDP in Portuguese translation)?

If the answer to any of these statements is **NO**, then the conduct **IS NOT IN ACCORDANCE** with the behavior expected by Astra.

If the doubt remains, please contact Astra at etica@astra-sa.com or fill in the form available at the reception of the company's units.

For any questions concerning Astra's conduct regarding General Data Protection Law and complaints of data leakage, please contact the email address: privacidade@astra-sa.com or fill the forms available on Astra's website (on the tab: Contact) or on the app Astra Connection (icon LGPD on the menu)- this is directed to the company's employees.



INTRODUCTION

This Code of Ethics and Data Protection presents rules and ethical standards, in responsibility with privacy, and behavior standards which must be applied in all Astra's relationships and must be followed by all employees, at all hierarchical levels.

Are considered as internal audience permanent employees, interns and trainees; and are considered as external audience the sales representatives, suppliers, service providers, customers, government bodies, charitable organizations, class associations, unions, press and consumers.

It is essential for Astra that everyone understand the corporate values established in this Code of Ethics and perform their duties in compliance with this document.



MISSION

To be present with the **largest number of items** in the **largest number of customers** across **Brazil** and the **world**, with **personalized service** and products with **functional design**.



VISION

To be recognized as a **Brazilian multinational and multi-specialized company** which creates **products and solutions** for people's **everyday life** and which aims to be a reference in **practicality, design** and **well-being**.



VALUES

Ethics in relationships and conduction of business.

Simplicity in structure, processes and relationships.

Respect for society as a whole and for the environment.

Close contact with all our audiences.

Friendliness in the way of being and acting.

Care in the preservation of Astra's way of being and doing.



CHAPTER 1 | RELATIONSHIP WITH EMPLOYEES

- a)** Astra is committed to preserve diversity in the workplace, which is defined by mutual trust and respect, in which everyone feel responsible for the company's performance and reputation.
- b)** Astra recruits, employs and promotes employees only on the basis of qualifications and skills that are necessary for the job to be performed. In addition to this, the company is committed to providing safe and sound working conditions to all its employees. It is also dedicated to working together with employees in order to develop and enhance the abilities and skills of each individual.
- c)** Astra does not employ any form of forced, compulsory or child labor and respects the individual's dignity and freedom of association of employees. The company shall keep good communication with employees by means of information and procedures of conduct.

ITEM 1.1 | CONFLICT OF INTEREST

- a)** Conflict of interest in the relationship between employees and the company occurs when employees use their influence with the intention of benefiting personal interests, for themselves or third parties, and which may result in damages or losses to the company.
- b)** Situations of conflict of interest take place when employees:
- i. Use their position aiming at gaining personal advantage, facilities or any other form of privilege or benefit for themselves or third parties.
 - ii. Grant preferential treatment to any customer or supplier.

iii. Receive or grant gifts as a means of having undue influence for personal gain or rewards for themselves or third parties.

iv. Offer hospitality or entertainment, make donations or social contributions on behalf of Astra, without the required authorization.

v. Have corporate links, on their own or through their spouse or relatives, with suppliers, competitors or Astra's customers, when the position they hold gives them power to influence transactions or to grant access to inside information.

ITEM 1.2 | AMENITIES, GIFTS AND INVITATIONS

a) Gifts and institutional invitations are acts of courtesy and kindness which are accepted in a business relationship. Gifts that amount to the practice of courtesy between the parties of a business relationship, and which do not amount to the obtainment of benefits in any negotiation, can be accepted by Astra's employees.

b) Everyone should be aware of the context of receiving gifts and not only its value. In case of questions the immediate leadership must be contacted.

c) Freebies, gifts and any other advantages must be politely declined at the moment they are offered, always that they may characterize a situation of commitment with the donor.

d) Invitations to events, with expenses incurred by customers, suppliers, government bodies and other audiences of interest, can only be accepted when there is a concrete opportunity to develop a business relationship, when they are extended to other professionals from other companies and with Management's permission.

e) Events of professional interest, such as lunches and dinners, shall not be deemed as abnormal or engaging, to both the donor and the receiver, since they do not characterize a situation of commitment.

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- f)** Business trip offers shall be previously authorized by the Management.
 - g)** Objects received as awards, which represent a distinction or tribute to Astra, must be forwarded to the Communication department.
 - h)** Employees are forbidden to accept, on their behalf or of their families, gifts or benefits which may result in their commitment. If they have doubts, they must refer to their immediate leader. The acceptance of offers in cash is prohibited under any circumstance.
 - i)** It is prohibited to receive offers of money for any reason, just as it is prohibited to make inappropriate payments to any person with the intention to facilitate the sale of products or services, even if that costs the business opportunity.
 - j)** The same principles shall be applied when Astra offers gifts or invitations to their partners or customers.

ITEM 1.3 | INFORMATION SECURITY

Employees who have access to strategic or confidential information about Astra, due to the nature of their position, whether it is on-site or remote working, must:

- a)** Handle with absolute professional secrecy all information concerning Astra and related entities, received by any means, from inside or outside the company, and not disseminate it for any reason, including to their families and relatives or social media.
- b)** Not disseminate to third parties, disclose, copy or even use information, under any pretext, without prior authorization from Astra's Management.

c) Keep in a safe location, under their entire responsibility, both civil and criminal, all material, documents, drawings, files and other data taken from Astra's facilities.

d) Follow the company's internal guidelines and standards about information security.

ITEM 1.4 | USE OF ELECTRONIC INFORMATION SYSTEMS

a) The use of Astra's computers, cellphones and personnel for professional purpose shall respect specific internal regulations.

b) The exchange, storage or use of obscene, pornographic, violent, discriminatory, racist or defamatory content is forbidden. Games and chain mails are also forbidden.

c) General users shall not expect privacy in the use of these systems and features. For that reason, Astra may at its discretion use and monitor any piece of information transmitted or found in these environments. This rule encompasses information written or stored in electronic systems and any other related environment. It also includes information developed technically, obtained by associations, acquisition, license, purchase or outsourced to the company.

d) Passwords to have access to the system are personal and exclusive, and shall not be given to third parties, not even co-workers. Any kind of software and program shall not be copied or installed in the company's computers without prior permission from the IT department.

ITEM 1.5 | BEHAVIOR ON SOCIAL MEDIA

- a) Astra does not allow, without previous authorization the production and dissemination of internal pictures and videos on social media that expose production processes, equipment, work environment, events, commercial actions, internal campaigns, company's logo and co-workers without their prior consent.
- b) Messages and comments about the company and its internal and external audiences must follow the rules set out by this Code of Ethics and ethical standards of good behavior and conduct, at the risk of being held liable on a criminal basis.

ITEM 1.6 | INTELLECTUAL PROPERTY

- a) All files and information related to the professional activity that have been created, received or stored are the property of Astra.
- b) In the event of the departure of an employee, all information kept by them must be referred to their superior.

ITEM 1.7 | PROPERTY SECURITY

- a) Goods belonging to Astra are meant to be used for its operations only and cannot be used for personal purposes, except in cases previously authorized by the Management.
- b) It is the responsibility of employees to care for the proper use and conservation of the company's property.

ITEM 1.8 | PREJUDICE

- a) Astra does not accept discrimination or prejudice of any kind. The company appreciates diversity in work relationships. Therefore, everyone deserves a respectful, friendly and fair treatment, regardless of their positions.
- b) In recruitment, selection and promotion processes, candidates shall only be assessed for their ability to meet and adapt to the job expectations.

ITEM 1.9 | CHILD OR FORCED LABOR

- a) Astra does not accept forced or slave labor, nor the use of child labor.
- b) The hiring of minors shall respect the laws enforced in the country.

ITEM 1.10 | HARASSMENT AND ABUSE OF POWER

- a) Astra does not accept any kind of harassment, nor situations that represent disrespect, intimidation or threat in the relationship between employees, at any hierarchical level.
- b) Harassment occurs when a person takes advantage of their higher hierarchical position to humiliate, disrespect or embarrass someone else. Psychological harassment occurs when someone is put in a humiliating situation during working time. Sexual harassment takes place when the person tries to take advantage in exchange for sexual favors.

ITEM 1.11 | POLITICS AND RELIGION

a) Astra recognizes the inviolability of the right to freedom of thought, conscience, religion and philosophic or political belief of its employees. However, it does not allow political or religious manifestations within its premises in support or in favor of any political party or religion.

b) Political and religious events institutionally promoted by Astra shall respect the balance between all parties and beliefs, ensuring an equal opportunity of manifestation.

ITEM 1.12 | CONDUCT OUTSIDE THE COMPANY

In an external environment, Astra's employees must:

a) Be careful with their conduct in public spaces, acting with caution and zeal, and not put the company or their careers at risk.

b) Have a conduct that is suitable to this Code when using the company's vehicles or in situations in which employees can be identified.

c) Ask for previous permission from the Management when they are invited to give lectures or speeches outside the company's premises, if the topic addressed is related to the performance of their duties or information about the company and its activities.



CHAPTER 2 | RELATIONSHIP WITH SALES REPRESENTATIVES

Sales representatives are third-party professionals hired to intermediate sales of Astra's products in all kinds of outlets across the country. Because of that, all the rules on this document must be observed as well as the standards of conduct of customers to whom they provide services, if there are, regarding the ethical principles for the performance of their activity, especially in public bids.



CHAPTER 3 | RELATIONSHIP WITH CUSTOMERS

- a) Astra complies with legal standards in manufacturing its products and tries to ensure safety and quality to its customers so as to meet their needs.
- b) In the scope of its activities, Astra is subject to municipal, state, federal and international laws and regulations. The provisions of this Code are based on and are in compliance with applicable laws. In case of conflict, the law prevails.



CHAPTER 4 | RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

- a) Astra's suppliers must follow all applicable laws. In the cases in which law and this code addresses the same subject, it is expected that suppliers apply the one that offers higher protection to their employees.

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- b)** Forced, slave and involuntary labor is strictly prohibited. Employees have the right to choose their jobs and suppliers shall never use any type of coercion to make their employees exceed the limits of local labor laws, their labor or collective agreements.
 - c)** Astra does not admit child labor and does not hire suppliers that do not follow local labor laws regarding the minimum age for employment.
 - d)** Suppliers must guarantee to its employees a safe and health work environment, in accordance with the current safety at work standards, adopting measures to avoid accidents that may arise in the course of work, such as training in health, fire and safety; waste and chemical products management, the use of personal protective equipment and safe installations.
 - e)** Suppliers who work in the company's premises must acknowledge and commit to comply with occupational safety and health regulations to the same extent Astra requires it from its employees.
 - f)** Suppliers must supply products and services in accordance with quality and safety standards demanded by applicable laws, regulations and standards.
 - g)** Suppliers must guarantee safety and confidentiality to files, data and Astra's information under their responsibility. Suppliers will not use confidential or restrict information provided by Astra in their own benefit or of others.
 - h)** Suppliers must adopt personal data protection measures, in accordance with applicable laws.
 - i)** Astra's suppliers are assessed by means of strict criteria (price, deadlines, quality, among others) and without discrimination. All decisions must have technical and economic back-up, and no kind of favoritism is allowed.

j) Astra may terminate a business agreement with a supplier whenever there is impairment of interests or disregard of legal, tax, environmental or occupational safety and health matters.



CHAPTER 5 | RELATIONSHIP WITH UNIONS

- a) Astra acknowledges union entities which may legally represent its employees, and to which free association is respected.
- b) Negotiation and dialogue with union entities are regularly held through competent channels, whenever it is necessary or requested.



CHAPTER 6 | RELATIONSHIP WITH PUBLIC AUTHORITIES

- a) Astra respects the regulations and the authorities of all instances of government.
- b) As a principle, the company does not donate or contribute to governments or other people or institutions, except nonprofit organizations of social nature, provided that it does not constitute improper gains.



CHAPTER 7 | RELATIONSHIP WITH THE PRESS

Contacts with the press must be made via the Communication department. Only spokespeople previously trained by the Communication department are allowed to contact the press on Astra's behalf.



CHAPTER 8 | RELATIONSHIP WITH THE COMMUNITY

- a) Astra carries out citizenship, education, culture, sport and environmental projects which benefit the community, always prioritizing projects approved through tax incentive regulations.
- b) The company does not accept community practices that benefit personal interests of managers, employees or politicians in detriment of institutional interests.



CHAPTER 9 | RELATIONSHIP WITH THE ENVIRONMENT

Astra's environmental practices aim at sustainable development and compliance with environmental laws. The company promotes awareness campaigns and employees' training regarding environmental issues, so they can respect and improve the system, aiming at reducing the impact on nature and achieve continuous improvement in environmental work.



CHAPTER 10 | PRIVACY AND PERSONAL DATA PROTECTION

a) Astra acts accordingly with the General Data Protection Law and behaves in a responsible way, following the laws principles. They being:

i. **Legality:** carrying out the processing of personal data only in accordance with local laws and/or following the best international regulations of personal data protection.

ii. **Purpose:** carrying out data processing for specific, legitimate purposes and guaranteeing information to the data subject.

iii. **Need:** limitation of essential data collection and use for the purpose of data treatment.

iv. **Adequacy:** compatibility of data treatment to its informed use. Meaning, data will only be collected and used if necessary and essential for offering company's services.

v. **Transparency:** broadcasting clear and precise information about carrying out data treatment.

vi. **Open Access:** easy and free access to all people of how data is treated.

vii. **Data Quality:** ensure precision, clarity and update on collected data, according to the need and to fulfill the purpose of its treatment.

viii. **Confidentiality:** guarantee data access only to authorized personnel.

ix. **Data safety and confidentiality:** guarantee information safety, aiming to prevent invasions, illicit accesses, destruction or loss of data.

x. **Prevention:** guarantee the adoption of measures to prevent damages to data subject due to data treatment.

xi. **Responsibility and accountability:** show adoption of effective measures, capable to prove the observance and compliance with personal information standards and, guarantee the efficiency of these measures.

xii. **Non-discrimination:** impossibility to carry out data treatment for discriminatory purposes, illicit or abusive.

b) Astra has a firm commitment with privacy and it is committed in protecting any personal information eventually transmitted by the company. Stablishing, this way, obligations compatible with the ones requested by Brazilian law, besides for good practices and accepted international standards, aiming in guaranteeing adequate levels of protection to the personal information treated by the company.

Obligations to be adopted by all people linked to Astra:

i. Adopt the best practices related to personal data protection and treatment, data origin and quality, as well as prevention of data leakage occurred by this treatment.

ii. Apply and respect principles of loyalty and lawfulness, purpose limitation, transparency, open access, adequacy, need (minimizing), elimination, quality, confidentiality, data safety and reliability, prevention and responsibility and accountability, in any moment during personal data processing, in accordance with the dispositions of Brazilian law. Besides that, carry out normative self-regulatory processes with measures that guarantee compliance with standards of data protection.

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- iii. Assure that the respective shareholders, legal representatives, employees, suppliers or third parties involved in data treatment activities follow legal dispositions applicable to personal data protection, including its non-disclosure or transfer on the terms of applicable law.
- iv. Do not carry out inappropriate, irregular or illegal personal data treatment, in a direct, indirect, active or passive way.
- v. Assure that personal data activities follow good faith and the principles of its purpose, adequacy, need, open access, data quality, transparency, safety, prevention, non-discrimination and responsibility and accountability, which definition is available on the General Data Protection Law.
- vi. Adopt personal data protection policies, management plans for personal data incidents indicating possible remediation measures that may be applied, training plans and internal communication about personal data treatment.
- vii. Guarantee data holders the exercise of their rights, allowing, at any time, that they request: confirmation of the existence of personal data treatment; access to their personal data, correction of incomplete, inaccurate or outdated data; anonymization, blocking or deletion of unnecessary, excessive or data treated in non-compliance with the General Data Protection Law; portability of personal data to other service or product provider, without this implying in business or industrial disclosure; information on public and private entities as to which Astra has carried out shared data usage; information about the possibility of not providing consent to their personal information treatment; right of withdrawal from the consent that has been granted; right to petition against the controller before NPD (National Data Protection Agency) and opposing to data processing.
- viii. Limitation of collection, use, retention, disclosure and transfer of personal data to a minimum necessary to the carry out of its purpose, with coverage of allowed, proportional, not excessive and legit.

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- ix. Implementing all the necessary measures to protect data, including, but not limited to, protection against accidental or illicit destruction, accidental loss, data leakage, unauthorized alteration or disclose.
- x. Apply information safety standards to guarantee personal data integrity, taking as reference the good practices on the matter.
- xi. Keep the data for the period necessary for the execution of the purposes for which they were made available, guaranteeing its confidentiality; unless there is a legal provision to the contrary, an order from the National Data Protection Authority or any judicial authority, or at the request of the data subject.
- xii. Block access to personal data and do not carry out processing when the stated purposes expire, but the retention of personal data is required by current legislation.
- xiii. Ensure that data holders have the possibility to review and correct their personal data, provided their identity is proven.
- xiv. Ensure that, in the event of a data protection incident, all interested parties are notified.
- xv. Inform the other party immediately, providing all necessary collaboration, in the event of any investigation or inspection by the National Personal Data Protection Authority or the judiciary, with due regard for the security and integrity of personal data.
- xvi. Continuously improve the Management of Personal Data Protection through the definition and systematic review of privacy objectives and protection of personal data at all levels of the organization.

xvii. Guarantee non-discrimination in the processing of personal data, preventing them from being used for discriminatory, illegal or abusive purposes.

xviii. Provide data holder with explanations about purpose of the processing of their personal data and ensure accuracy and quality of the personal data processed.

xix. Include in contracts drafts, when the contracted service requires treatment of personal data, a data protection clause, non-disclosure and confidentiality of information.

xx. Ensure education and awareness of shareholders, legal representatives, employees, suppliers, consultants, contracted third parties and, when relevant, partners, clients and consumers about the personal data protection practices adopted by Astra.

c) The contact related to General Data Protection Law must be made with the data protection committee / person in charge, through the e-mail privacidade@astra-sa.com or by filling in the forms available on the website www.astra-sa.com and on app Conexão Astra (exclusive for employees).



CHAPTER 11 | DISCIPLINARY MEASURES

a) Deviations or noncompliance can lead to disciplinary measures which must serve as an educating element and a culture creator. Possible disciplinary measures include:

- i. Verbal warning.
- ii. Written warning.
- iii. Suspension.
- iv. Dismissal without just cause.
- v. Dismissal with just cause.

b) The implementation of disciplinary measures must be made, if possible, immediately after the misconduct. A longer period for this implementation is allowed when the misconduct requires examination of facts and responsibilities.

c) The penalties must be fair, reasonable and proportional to the misconduct. Similar misconducts must receive similar penalties.

d) The Human Resources department shall be always consulted about the disciplinary measure to be taken and, if necessary, it will consult with the Legal Department.



CHAPTER 12 | MANAGEMENT OF THE CODE OF ETHICS

a) Astra's Board of Directors acknowledges this Code and its approval and all updates are the responsibility of the company's Management.

b) It is the leaders' responsibility, at all levels, to ensure their subordinates and employees understand and implement the requirements of this Code, which must serve as the model of conduct and be followed by all employees. This **CODE OF ETHICS AND DATA PROTECTION** also applies to members of Management, who must be a model of conduct.

c) Complaints can be made via the e-mail etica@astra-sa.com or through a form available at the reception of Astra's units.

d) It is the responsibility of the Human Resources department and to the committee / person in charge of data protection (in cases related to General Data Protection Law) to receive the complaints of violation of this **CODE OF ETHICS AND DATA PROTECTION** and, together with Management, analyze them impartially and seriously, searching for solutions to the situations that are presented.

e) The Board of Directors and Management may, if necessary, call an Ethics Committee to analyze more complex cases of violation of this Code.

f) Situations that were not addressed in this Code shall be brought to the attention of Management who, together with the Human Resources and Legal departments, will search for the most appropriate solution. When related to the General Data Protection Law, the situations will be dealt by the data protection committee / person in charge, who will contact the Executive Board, when necessary.

g) Training sessions are given to employees, regardless of their hierarchical level, and are meant to improve, among other objectives, the understanding of Astra's ethical and of privacy requirements.

h) All newcomers receive a copy of this Code and training for its understanding during their integration process.



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