



CODE OF ETHICS

INTRODUCTION

Astra's Code of Ethics 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.

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 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.

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.

INTRODUCTION

This Code of Ethics presents rules and ethical 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, VISION AND VALUES

- **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.

CODE OF ETHICS

RELATIONSHIP WITH EMPLOYEES

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.

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.

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.

- CONFLICT OF INTEREST

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.

Situations of conflict of interest take place when employees:

- Use their position aiming at gaining personal advantage, facilities or any other form of privilege or benefit for themselves or third parties.
- Grant preferential treatment to any customer or supplier.
- Receive or grant gifts as a means of having undue influence for personal gain or rewards for themselves or third parties.

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

- AMENITIES, GIFTS AND INVITATIONS

- 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.
- 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.
- Objects received as awards, which represent a distinction or tribute to Astra, must be forwarded to the Communication department.
- 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.
- Everyone must be aware of the context in which gifts are received, and not only of their cost; if they have any doubts they must refer to their immediate leader. Gifts, presents and other rewards shall be politely refused upon the offer, whenever it may be characterized as a situation of commitment to the donor.

In situations where Astra considers there is a risk of conflict of interest, or that may result in acts of corruption, the following conducts are established:

- 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.
- The same principles shall be applied when Astra offers gifts or invitations to their partners or customers.
- Business trip offers shall be previously authorized by the Management.
- It is forbidden to make improper payments to any person with the intention of facilitating the sale of products and services, even at the cost of losing a business opportunity.

- INFORMATION SECURITY

Employees who have access to strategic or confidential information about Astra, due to the nature of their position, must:

- 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.
- Not disseminate to third parties, disclose, copy or even use information, under any pretext, without prior authorization from Astra's Management.
- 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.

- USE OF ELECTRONIC INFORMATION SYSTEMS

The use of Astra's computers and mobile phones shall respect specific internal regulations.

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

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.

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.

- BEHAVIOR ON SOCIAL MEDIA

Astra does not allow the publication and dissemination of internal pictures and videos on social media that expose production processes, equipment, work environment and co-workers without their prior consent.

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.

- INTELLECTUAL PROPERTY

All files and information related to the professional activity that have been created, received or stored are the property of Astra.

In the event of the departure of an employee, all information kept by them must be referred to their superior.

- PROPERTY SECURITY

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.

It is the responsibility of employees to care for the proper use and conservation of the company's property.

- PREJUDICE

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.

In recruitment, selection and promotion processes, candidates shall only be assessed for their ability to meet and adapt to the job expectations.

- CHILD OR FORCED LABOR

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

- HARASSMENT AND ABUSE OF POWER

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.

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.

- POLITICS AND RELIGION

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.

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

- CONDUCT OUTSIDE THE COMPANY

In an external environment, Astra's employees must:

- Be careful with their conduct in public spaces, acting with caution and zeal, and not put the company or their careers at risk.
- Have a conduct that is suitable to this Code when using the company's vehicles or in situations in which employees can be identified.
- 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.

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. Therefore, they must respect the rules of this Code of Ethics and also the Code of Ethics of customers to whom they provide services, if any, regarding the ethical principles for the performance of their activity, especially in public bids.

RELATIONSHIP WITH CUSTOMERS

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.

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.

RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

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.

Service providers 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.

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.

It is the company's responsibility to ensure secrecy of confidential information received from suppliers.

RELATIONSHIP WITH UNIONS

Astra acknowledges union entities which may legally represent its employees, and to which free association is respected.

Negotiation and dialog with union entities are regularly held through competent channels, whenever it is necessary or requested.

RELATIONSHIP WITH PUBLIC AUTHORITIES

Astra respects the regulations and the authorities of all instances of government. 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.

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.

RELATIONSHIP WITH THE COMMUNITY

Astra carries out citizenship, education, culture, sport and environmental projects which benefit the community, always prioritizing projects approved through tax incentive regulations.

The company does not accept community practices that benefit personal interests of managers, employees or politicians in detriment of institutional interests.

RELATIONSHIP WITH THE ENVIRONMENT

Astra's environmental policy seeks 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.

DISCIPLINARY MEASURES

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

- Verbal warning.
- Written warning.
- Suspension.
- Dismissal without just cause.
- Dismissal with just cause.

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.

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

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.

MANAGEMENT OF THE CODE OF ETHICS

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

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 also applies to the members of Management, who must be a model of conduct.

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

It is the responsibility of the Human Resources department to receive the complaints of violation of this Code and, together with the Management, analyze them impartially and seriously, searching for solutions to the situations that are presented.

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

Situations that were not addressed in this Code shall be brought to the attention of the Management who, together with the Human Resources and Legal departments, will search for the most appropriate solution.

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 requirements.

All newcomers receive a copy of this Code and training for its understanding during Induction.



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