



1. Purpose

Celectra's Code of Conduct is a structure that describes the behavior that the company expects of each employee, supplier and representative, based on the principles of responsibility, respect, integrity, ethics and goodwill.

Based on these principles and responsible for the well-being of people, society and the environment, a Celectra company determines or prohibits the purchase of any metal originating in conflict places.

2. Settings

2.1 Conflict Minerals

As defined in 2010 by the legislation of the United States of America, without diminishing consumer protection and reform Dodd-Frank Wall Street, section 1502 (e) (4):

CONFLICT MINERAL - The term "conflict mineral" means

(A) columbite-tantalite (coltan), cassiterite, gold, tungsten or its derivatives; or

(B) any other mineral or its derivatives selected by the Secretary of State (SEC) as financial conflicts in the Democratic Republic of Congo or adjacent country. (Available at <http://www.sec.gov/about/laws/wallstreetreform-cpa.pdf>).


2.2 Countries of Coverage

Country (ies) covered as defined by the US Wall Street Order - Dood-Frank - Consumer Protection and Reform. These countries use the Democratic Republic of Congo and the nine countries with which they share internationally recognized borders: Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, Zambia.

2.3 Posted Intentionally

Intentional addition is commonly known as deliberate use of a substance, or in this case metal, in the application of a product in which its continued presence is detected to obtain a specific, specified or quality characteristic.

While the SEC (US Securities and Exchange Commission) does not define a phrase "intentionally added" in the final law *, or a preamble to the law says: "We agree that by being added intentionally, by using a by-product that is currently occurring, it is a significant factor in determining whether a mineral conflict is "necessary for the execution or production" of a product. This is actually true, who is intentionally allowed or conflict mineral in the product as long as it is contained in the product itself. product that cannot be affected by the fact that a mineral mineral is added directly to the product it sends or if it is added to a component of the product that sends recipients to a third party, including the product and work with suppliers to meet the requirements'. Thus, when determining whether or not a conflict mineral is a "necessary carrier" a product, or emitter, consider any conflict mineral that is c included in your product, even if conflict mineral, only one product because it was included as part of a component of the product that was manufactured by third parties. "

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* (56296 Federal Register / Vol.77, No. 177 / Wednesday, September 12, 2012 / Laws and Regulations.

3. Suppliers

Taking into account or mentioned above and the Code of Conduct of the Celectra Company (6-00-0001), it is determined that any mineral found as a Conflict Mineral is not used. For suppliers: a declaration of non-use of any conflict material intentionally added to the final product is required.

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