

# CODE OF ETHICS

---

**docol** 

**MEKML**

July 2022

# SUMMARY

- 3** | Presentation
- 4** | Organizational Guidelines
- 5** | Introduction
- 6** | Conduct in Relationships with Stakeholders
- 15** | Systematization (complaint and conflict resolution procedures) of the Code of Ethics
- 16** | Glossary

# PRESENTATION

---

Throughout its history, Docol/Mekal has sought to be a company committed to the excellence, always seeking to do business in an integral and responsible manner, aiming at its continuity and contributing to sustainable development. The company has a real desire to provide its consumers and customers with products that facilitate their daily lives and, at the same time, can contribute to the preservation of our planet's natural resources, especially water.

In this trajectory, Docol/Mekal grew and began to deal with greater complexity in relations with its stakeholders, in addition to living with an increasing number of different cultures. Taking this scenario into account, the principles and values of Docol/Mekal become the fundamental basis, so that the organization can continue to conduct its practices in an ethical and transparent manner.

All this reflection originated the Docol/Mekal Code of Ethics, which details our organizational conducts and commitments.

The Code of Ethics is a set of principles that reflect how we relate to our customers, employees, communities and shareholders.

Knowing, understanding and experiencing the Docol/Mekal Culture Code is essential to building our company's reputation. It must be part of our daily lives, of our decisions, regardless of where we are and what we are doing.

In this way, a document was constituted expressing the way Docol/Mekal conducts its daily life, assuming commitments for the construction of a more just and equitable world. It is worth mentioning that this is a tool that has an educational character, with the main objective of guiding and maturing our practices.

Therefore, Docol/Mekal is committed to complying with this Code by all its employees and expects its stakeholders to relate to us with reference to the guidelines described herein.

Sincerely,

**Guilherme Bertani**  
*Chief Executive Officer*

# ORGANIZATIONAL GUIDELINES

---

## VISION

To be a brand recognized nationally and internationally for offering sustainable, innovative and high-quality products with wide and effective distribution, with profitability and growth.

## MISSION

To contribute to the conscious use of water with design, comfort, quality and technology, generating value for society, employees and shareholders.

## DOCOL/MEKAL PRINCIPLES

**Customer:** Continuously expand relationship and satisfaction.

**Profit:** Ensuring sustainable growth.

**Innovation:** Anticipate solutions.

**People:** Respect, develop and value the personality of each individual.

**Docol/Mekal:** Brands of excellence and reliability.



## Our essence.

PROTAGONISM



EXPERIMENTATION



AGILITY AND CONTROL



EXCELLENCE

SIMPLICITY



STANDARDS



EMPATHY



MERIT

# INTRODUCTION

---

**Having an ethical conduct means working in an integral, honest and virtuous manner, valuing life and contemplating the common good.**

---

The Docol/Mekal Code of Ethics aims to present, through guidelines, clear guidance that will assist the conduct of employees in their relations with all stakeholders (internal public, suppliers, consumers and customers, shareholders, community, environment and government and society) and in the company's decision-making.

All employees, temporary, intern or third parties submitted to this Code of Ethics have a commitment to report any and all violations of this Code or Brazilian legislation to which they are aware or distrust situations. Failure to report cases that violate the Code of Ethics, risk the reputation of Docol/Mekal and may subject the company to the application of fines that would affect the company's financial results.

Reporting a violation gives Docol/Mekal the opportunity to detect a potential or actual violation of the Code in advance and address this issue with the competent bodies.

The conduct guidelines in this document are divided as follows:

## **1. Internal Audience**

- 1.1 Commitment to Comply with Labor Legislation
- 1.2 Occupational Safety
- 1.3 Use of Personal Information and Data
- 1.4 Use of Assets
- 1.5 Conflict of Interest
- 1.6 Recruitment and Selection
- 1.7 Moral or Sexual Harassment
- 1.8 No to Discrimination
- 1.9 No to Child and Slave Labor
- 1.10 No to Alcohol and Drug Use
- 1.11 Relations with the Press and Social Networks

## **2. Relationship with Suppliers and Service Providers**

## **3. Relationship with Customers and Consumers**

## **4. Relationship with Competition**

## **5. Shareholders**

## **6. Environment**

## **7. Community**

## **8. Government and Society**

## **9. Accounting Records**

---

# CONDUCT IN RELATIONSHIPS WITH STAKEHOLDERS

---

## 1. INTERNAL PUBLIC

Employees, temporary, interns and third parties

### 1.1 Commitment to Comply with Labor Legislation

Docol/Mekal complies with the applicable legislation, both in the field of human and labor relations.

**Conduct Guidelines:**

- Employees are obliged to comply with current legislation.
- Actions that constitute violations of the Code of Ethics, Docol/Mekal policies and standards, are subject to applicable disciplinary measures, regardless of hierarchical level, and without prejudice to applicable legal penalties.

### 1.2 Occupational Safety

Docol/Mekal provides its employees with a safe and healthy working environment. The company believes that health and safety at work are everyone's responsibility and therefore promotes awareness of compliance with the rules established by current legislation.

**Conduct Guidelines:**

- Employees must strictly comply with the Occupational Health and Safety standards, obeying the warnings and regulations, using personal protective equipment and acting consciously and responsibly in the prevention of accidents in the workplace and outside it.

### 1.3 Use of Personal Information and Data

Information is an asset which, like any other, must be adequately protected and each user is responsible for complying with the standards and procedures adopted by the company.

**Conduct Guidelines:**

- Information on customers, suppliers, operations, people and operating results of the company, whose knowledge is acquired in the exercise of the function, must be kept in absolute secrecy, both internally and in public places, and must be used only for the exercise of the company's activities.
- Information requested by interested parties may only be provided by the employee with the authority to do so, or when they have received superior authorization.

- Information made available internally by printed or electronic means must be used exclusively for the purposes for which it is intended in the company.
  - Data communication systems, voice, electronic programs and procedures, such as: electronic mail, internet access and intranet, should be used to meet the interests of the company. Their use will be subject to the provisions of the Computer Security Policy.
  - The commitment to privacy of employees, customers, partners and the general public must be observed in each operation of the company.
  - Docol/Mekal adopts all necessary practices for the proper treatment and data protection of its officers, employees, customers, third parties and individual partners, in accordance with the legislation applicable to the subject in Brazilian territory, specifically with the General Personal Data Protection Law, Law No. 13.709/2018 (LGPD).
- 

## 1.4 Use of Assets

The company's assets are fundamental for the proper execution of its activities and therefore must be protected and preserved by all employees.

### **Conduct Guidelines:**

- The employee must use Docol/Mekal's assets solely and exclusively to fulfill the company's objectives.
  - The employee must ensure the proper use and conservation of the assets, avoiding losses, waste or damage to such.
  - Moderate use of the means of communication (telephone, fax, e-mail, Internet, computer, printer) for personal purposes is tolerated, provided that such use is authorized by the immediate management and does not contravene internal guidelines or harm the work.
  - Docol/Mekal assets such as tools, parts, equipment and others, can only be removed from the company with the authorization of the immediate management, accompanied by tax documentation and only for work activities related to the company.
  - Theft, robbery, and fraud will be treated with the rigor of the law.
  - All knowledge generated when exercising the activities of employees are intellectual property of Docol/Mekal. Furthermore, patents, trade secrets, trademarks, copyrights and other proprietary information must be identified and protected.
-

## 1.5 Conflicts of Interest

Docol/Mekal respects the right of employees to perform other activities, whether paid or unpaid, outside working hours. These activities must, however, be lawful and not conflict with the responsibilities and good performance of such.

### **Conduct Guidelines:**

- The employee must inform Docol/Mekal of their external activities, relationships and financial interests that may present conflicts of interest with the company's business.
- The employee must not accept paid or unpaid work that will compete with its activities of Docol/Mekal, nor use equipment or materials of the same for this purpose.
- The marketing of products or services on the company's premises, within or outside business hours, is prohibited.
- The employee must not pressure or coerce co-workers, third parties or suppliers to participate in gift lists, memberships, donations, raffles, etc. Only donations to campaigns authorized by the company will be allowed.
- Any political party activity must take place outside the working hours, without using the resources, facilities or the name of Docol/Mekal.

## 1.6 Recruitment and Selection

The recruitment and selection of people is carried out based on technical criteria where competencies and behavioral aspects for the function are evaluated.

### **Conduct Guidelines:**

- The nomination of candidates for existing vacancies in Docol/Mekal is allowed and these will be evaluated within the established criteria, without any kind of favoritism for the candidate, regardless of the position, function or position of the person who made the nomination.
- The employee who made the appointment must not exert any type of pressure or charge, whether it is with the HR area or the head responsible for the vacancy.
- Docol/Mekal uses objective and transparency-based employee promotion criteria exclusively to meet the requirements necessary for the role.



## 1.7 Moral or Sexual Harassment

The integrity of employees must be ensured at all levels and therefore no actions in which moral or sexual harassment is considered will be tolerated. This situation can be characterized in any type of professional relationship, whether of customers, suppliers, employees, Managers, among others, regardless of the hierarchical relationship.

### Conduct Guidelines:

- The role, hierarchical position or influence should not be used to sexually or morally harass employees, as well as to obtain advantages or favors for themselves or others.
- All employees, within the company's facilities or in activities promoted by it, must act respectfully, without causing embarrassment to co-workers.
- Managers are responsible and must be attentive to prevent any situation of moral or sexual embarrassment involving their employees, such as insinuations, gestures or acts that may cause humiliation or unjustified exclusions and that may interfere with the individual performance of the employee at Docol/Mekal.

**Report any of the situations mentioned to the ethics committee. The evidence must be analyzed and in cases of verification of the act, appropriate measures must be taken.**

---

## 1.8 No to Discrimination

The statement of the Docol/Mekal principles highlights the respect and appreciation of employees, and no discrimination or prejudice of any kind is allowed.

### Conduct Guidelines:

- Attitudes of discrimination, disqualification, intimidation and embarrassment will not be tolerated due to race, color, sex, sexual orientation, religion, political conviction, origin, social class, age, disability, marital status or hierarchical level.
- It will not be permitted to use the company's resources to send currents or religious messages, thus respecting the diversity and choice of each one.
- Except as required by law or to observe the protection of the life or safety of individuals themselves, sensitive personal data that may lead to discrimination or any kind of embarrassment should not even be collected by employees. Human Resources is the department responsible for the employees' personal information.

## 1.9 No to Child and Slave Labor

Docol/Mekal does not hire minors under the age of 16, according to the law (except under the condition of younger apprentice) or use any form of forced labor (or slave-like) and repudiates any organization that has this practice.

### Conduct Guidelines:

- Employees are committed to informing HR of the existence of child or forced labor (or analogous to slavery) in any organization with which the company relates so that appropriate measures are taken.

## 1.10 No to Alcohol/Cigarette and Drug Use

The use of alcohol/cigarettes and illegal drugs in the workplace is prohibited, as they endanger the health and safety of employees.

### Conduct Guidelines:

- The distribution, possession or consumption of alcoholic beverages or any substance considered an illegal drug on the premises of the company is prohibited.
- The entry of a person who presents alteration due to the use of illegal drugs or alcohol on the company's premises is prohibited.

## 1.11 Relations with the Press and Social Networks

**We value the transparency and credibility of the information, always observing the ethical values in our marketing strategy.**

---

### Conduct Guidelines:

- The Relationship with the Press must be based on respect and professionalism, and it is especially necessary that only authorized persons may serve it for the purpose of interviews or release of official notes, observing also to do so, always in accordance with the guidance of the Company's Board of Directors;
- Disclosure of company information on websites or social networking apps such as Facebook, Twitter, Instagram, WhatsApp and others is prohibited. As well as exposure of conflicts between employees through social networks.
- If it is necessary to disclose any information outside the company, including external or employee requests to carry out academic or schoolwork that focuses on Docol/Mekal's activities, such disclosure must be authorized by the Company's Board of Directors, in writing.
- The use of Docol/Mekal information in academic activities, lectures and congresses will only be possible after evaluation and authorization from the immediate leaders and directors of the employees who will use this information.

## 2. RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

The selection and contracting of Docol/Mekal suppliers and service providers are always based on technical and impersonal criteria, seeking the best cost-benefit ratio and respecting the principles of free competition.

### Conduct Guidelines:

- Docol/Mekal must select suppliers and service providers that do not use child labor and forced labor (or analogous to slavery), that comply with labor and tax legislation and that respect the country's environmental legislation.
- The company must select suppliers and partners who commit to Docol/Mekal's privacy policy. The contracting of services or tools from third parties that do not guarantee the lawfulness of their activities or that violate the privacy of third parties is prohibited.
- Docol/Mekal fulfills its contracts with suppliers and service providers, according to the negotiated conditions.
- Employees must not accept any favors, loans, special services, payments or special treatments of any kind - including financial gratuities - from persons or organizations that do or seek to do business with Docol/Mekal.
- Gifts will not be accepted. It is the responsibility of the employee to return the gift and communicate it to their immediate manager regarding its return, obeying the previously established process.
- Institutional gifts can be accepted, such as: pens, diaries, blocks, calendars, etc.
- The employee's professional travel and lodging expenses must be paid by Docol/Mekal, according to the travel policy, even if the invitation came from the supplier. In exceptional cases, the fact must be previously communicated to the area director, and must be formally approved.
- When there are sweepstakes at events and training, even if sponsored by suppliers or by Docol/Mekal, the object of the sweepstakes is the employee's, and they must notify their immediate manager.
- The employee must refrain from participating in technical and commercial negotiations with suppliers or service providers where there is a conflict of interest, such as:
  - Having a relative who works at a supplier or service provider with direct influence on the negotiations.
  - Having substantial participation, individual or family, in an organization that negotiates or wishes to negotiate with Docol/Mekal.

**If you identify a potential conflict of interest, you should formally report it to your leader.**

---

### 3. RELATIONSHIP WITH CUSTOMERS AND CONSUMERS

Based on its mission and principles, Docol/Mekal's commitment is to continuously expand the relationship and satisfaction with customers and consumers, seeking to exceed their expectations through the constant improvement in the quality of products and services.

**Conduct Guidelines:**

- Employees must be aware of the importance of customers and consumers and committed to seeking solutions that meet and satisfy their interests, in line with the company's objectives.
- Customers and consumers must be served with agility, courtesy and efficiency and the information passed on must be objective, accurate, clear and transparent. Such information shall be provided without differentiation in treatment and free from distinctions arising from personal interests or feelings.
- Negotiations with customers and consumers, whether to provide technical assistance or to offer new products, must take into account the commitment to privacy, and will be carried out in a non-intrusive and respectful manner.
- When interacting with customers, consumers, followers, interested and curious in general on social networking pages or profiles on the Internet, the company should adopt procedures that minimize the exposure of individuals to privacy risks. Data collection and interaction with the public will necessarily be promoted based on consent or other legal permission, in compliance with data protection laws.
- Docol/Mekal fulfills its contracts with customers and consumers, according to the negotiated conditions.
- Docol/ Mekal does not condone illegal or unfair practices performed by customers. We will comply with legal requirements associated with anti-corruption and anti-money laundering prevention controls and will not comply with such practices.

### 4. RELATIONSHIP WITH COMPETITION

The relationship with our competitors must be based on ethical standards, avoiding any action or practice that may characterize unfair competition.

**Conduct Guidelines:**

- Employees who are related to employees of direct competitors must notify the company's management of this fact.
- These are actions prohibited by law that aim to or may produce the following effects:
  - Limit, distort or in any way harm free competition or free enterprise;
  - Illicitly dominate the relevant market of goods or services;
  - Abuse a dominant position.

## 5. SHAREHOLDERS

The interests of the shareholders must be ensured, always maintaining financial security, transparency and guarantee of sustainable business growth, as well as compliance with all tax, environmental and legal requirements.

### **Conduct Guidelines:**

- The activities and performance of the company must be communicated in a precise, transparent and timely manner so that there is appropriate monitoring by the shareholders.
- The confidentiality of information that is not yet known to the general public must be ensured by all.
- Docol/Mekal must ensure the company's alignment with the objectives set by the shareholders.

## 6. ENVIRONMENT

As described in the Quality Policy "we seek in all actions continuous improvement and compliance with the requirements". Docol/Mekal remains committed to protecting the environment where it operates. This is a responsibility of management and employees at all levels.

### **Conduct Guidelines:**

- Docol/Mekal must comply with environmental legislation and, whenever possible, exceed legal and regulatory requirements.
- Docol/Mekal must continuously seek improvement in its processes so that natural resources are used rationally.
- Docol/Mekal must respect the rights and consider the environmental interests of the community.

## 7. COMMUNITY

Docol/Mekal seeks to arouse the interest to engage proactively in activities and actions aimed at social well-being in its employees.

### **Conduct Guidelines:**

- Docol/Mekal is committed to providing transparency and dialogue with the community where it operates, in addition to contributing and supporting its development through cooperative actions.
- Docol/Mekal encourages the participation of its employees in community actions.

## 8. GOVERNMENT AND SOCIETY

Docol/Mekal contributes to a fair and democratic society, paying its taxes on time and making its decisions and actions transparent, prohibits and will not tolerate any acts of corruption and bribery in its relationship with the Government.

### **Conduct Guidelines:**

- Docol/Mekal complies with the rules and legislation in force.
- Docol/Mekal contributes to the construction of Brazilian technical standards and sectoral quality programs in order to raise the standard of products in the sector.
- Docol/Mekal does not participate in any kind of political organization, but recognizes the legitimacy of these entities.
- Docol/Mekal respects the political party participation of its employees. However, it does not allow any type of active demonstration within its facilities.
- Docol/Mekal is committed to contributing to the awareness of the rational use of water.
- Not to promise, offer or contribute, donate, provide favors or send gifts, directly or indirectly, to national or foreign public entities or public servants, or the person related to such, whose purpose is illicit favoritism.
- The practice of fraud in bids and contracts with national or foreign governments is not allowed.
- Docol/Mekal does not allow an undue advantage to be offered to the competing bidder.
- Do not hinder the investigation or inspection activity of public bodies, entities or agents, or intervene in their performance, including within the scope of regulatory agencies and supervisory bodies.
- Employees must work to ensure compliance with the conduct guidelines by partners who act as intermediaries (for example, brokers, lawyers, representatives, technical assistants and consultants) in acts before the government, in the interest or for the benefit of Docol/Mekal.
- Act in strict compliance with the Bidding Law (Law 8.666/93) and the principles of integrity inserted in Law 12.846/2013 – Anti-Corruption Law and Decree 8.240/2015, communicating any act or suspicion that represents a violation of the aforementioned laws.
- Docol/Mekal advises that its representatives and employees must hold meetings or other presentations and conversations with Public Agents at official times and facilities. It is forbidden to hold a meeting of a single employee of the company with public agents. It is not advisable for a single employee autonomously validates contracts or values negotiated with public agencies.
- The company Docol/Mekal complies with all the requirements of the laws to prevent money laundering and the financing of terrorism and has procedures in place for this purpose. The company aims to conduct business exclusively with customers and partners engaged in legitimate and legal business. Any suspicious activities should be reported promptly.

## 9. ACCOUNTING RECORDS

Docol/Mekal seeks to comply with all applicable accounting laws and standards in its books, accounting records and financial statements, committing itself to record all financial transactions accurately and comprehensively.

### Conduct Guidelines:

- Any release that does not reflect the reality of the company must be reported to the leader or the Hotline.

## SYSTEMATIZATION

(complaints and conflict resolution procedures) of the Docol/Mekal Code of Ethics

If any Docol/Mekal employee or any third party has any concern or believes that any internal legislation or policy is being violated, Docol/Mekal provides the following access channels for questions, queries, anonymous complaints and other communications:



Email:  
[eticadocol@relatoconfidencial.com.br](mailto:eticadocol@relatoconfidencial.com.br)



Telephone:  
**0800 721 1404**



Website:  
[relatoconfidencial.com.br/docol](http://relatoconfidencial.com.br/docol)

**The Docol/Mekal Hotline is served by an independent company, which will appreciate the confidentiality of your information.**

### Ethics Committee

The Docol/Mekal Ethics Committee is independent and aims to promote, guide and maintain this code.

### Penalties

Failure to comply with this code may result in sanctions and punishments, which will be suggested by the Ethics Committee and which will vary according to the severity of the issue.

### Revision of the Code

The Docol/Mekal Code of Ethics will be reviewed every 2 years and reissued if necessary.

# GLOSSARY

---

This glossary aims to clarify terms or words used in the Docol/Mekal Code of Ethics.

**Intellectual property:** sum of knowledge of a person or everyone in an organization, being primarily responsible for their competitive advantage.

**Patent:** registration of an invention or discovery offered by the government to guarantee ownership to the author, as well as exclusive use and exploitation.

**Conflict of interest:** when personal interests are opposed to the interests of the organization.

**Favoritism:** characterized when it sponsors, protects, assists or promotes people or organizations only by friendship or kinship, without considering evaluations of professional and behavioral aspects.

**Public officials:** are all those who exercise public functions or engage in any service to the State.

**Moral harassment:** negative attitudes and conduct of bosses or colleagues towards their subordinates or peers through humiliation, intimidation and demands above the bearable, during the workday or outside it. Moral harassment will be characterized when there is continuity, in a repeated and prolonged way, becoming a habit of daily life.

**Sexual harassment:** embarrassing someone in order to gain sexual advantage or favor, during the workday or outside it, making use of their superior hierarchical condition, ancestry or abusing the relationship of trust between peers. Sexual harassment will be characterized when there is continuity, in a repeated and prolonged way, becoming a habit of daily life.

**Religious harassment:** embarrassing someone with the intention of imposing on subordinates, superiors or hierarchical peers their own religious belief, during the workday or in their prayers, disclosing in an inappropriate way materials, ideas, events or ceremonies that may harm the freedom of others. Religious harassment will be characterized when there is continuity, in a repeated and prolonged way, becoming a habit of daily life.

**Political harassment:** embarrassing someone in order to gain political advantage or favor, during the workday or outside it; making use of the imposition of a worldview or political ideas linked or not to a party, benefiting from the condition of hierarchical superior or abusing the relationship of trust between peers. Political harassment will be characterized when there is continuity, in a repeated and prolonged way, becoming a habit of daily life.



**Slave Labor:** any form of degrading work and where there is no guarantee of freedom. It is much more than non-compliance with labor law.

**Forced labor:** any type of work or service required of a person under threat of sanction and for which they have not volunteered spontaneously. It occurs when work is imposed by the state, or private enterprises, or by individuals who have the power to control workers through severe deprivation, such as physical violence or sexual abuse; restricting people's freedom, detaining their wages or their documents by forcing them to stay at work, or retaining them through a fraudulent debt from which they cannot escape. Forced labour is a crime and a violation of fundamental human rights.

**Child labor:** any form of work performed by children under 12 years of age, in any economic activities; any work between 12 and 14 years that is not light work; all work under 18 years of age categorized by the ILO under the "worst forms of child labor". ILO Convention No. 182 of 1999, applicable in this case to all children under the age of 18, classifies "the worst forms of child labor" as: slave or semi-slave labor (in conditions analogous to slavery), work resulting from the sale and trafficking of minors, debt slavery, the use of children or adolescents in armed conflicts, prostitution and pornography of minors; the use of minors for illegal activities, such as the production and trafficking of drugs; and work that may harm the health, safety or morality of the minor.

**doco**||||

**MEKL**

# DISCLAIMER

---

**I hereby declare that:**

1. I am aware of all applicable laws. I have received a copy and read the Docol/Mekal Code of Ethics. I agree to fully comply with the policies and standards contained in the Code and understand that I have an obligation to report any suspected violation of the Code that I am aware of.
2. I am aware that non-compliance may imply disciplinary action or even my dismissal from the company. In case of doubts during the exercise of my duties, I will look for the relevant communication channels contained in the Code.
3. I also consider myself aware of what the company understands by ethical conduct and I also undertake, under the possible penalties provided by the contracting party in this same Code of Ethics, to carry out my work in a virtuous, respectful, correct and integral manner.
4. I am aware that the principles and requirements of the Code of Ethics are subject to change at the discretion of Docol/Mekal.
5. I am aware that misconduct or possible misconduct may be reported in confidence to the company's Ethics Committee through the following means:

**Email: [eticadocol@relatoconfidencial.com.br](mailto:eticadocol@relatoconfidencial.com.br)**

**Website: <https://relatoconfidencial.com.br/docol/>**

**Telephone: 0800 721 1404**

Legible name: \_\_\_\_\_

Registration: \_\_\_\_\_ Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

\_\_\_\_\_  
Signature

**doco**||||

**MEKL**