

CODE OF ETHICS AND CONDUCT

APPLICATION

This Code of Ethics and Conduct applies to the matters addressed by GCE, including decisions, strategies, businesses, contracts, investments, purchases, supplies and direct or indirect labor relations.

This document reinforces the commitment to conduct business globally with the highest standards of honesty and integrity.

Based on Federal Law 12.846 / 2013, GCE adopts practices to eliminate and restrain corrupt acts within its structure and operations. Such practices aim to prevent and to comply with the laws and regulations applicable to GCE's internal business and policies.

The content of this Code of Ethics and Conduct has the commitment of GCE Management and is based on the following anti-corruption practices:

- GCE's Internal Guidelines – Policies, procedures and internal regulations.
- Compliance Audit
- Communication channels available for topics related to conduct or reporting to all interested parties.

GCE'S COMPLIANCE POLICY

"To work with ethics and transparency. To comply with legislation is a non-negotiable commitment."

GENERAL ETHICS GUIDELINES

1. ETHICS are the ideal of conduct, which guides each human being about what is good and correct, guiding one's life in relation to his peers, aiming at common good. Work ethics guide not only the content of decisions (what I should do) but also the decision-making process (how I should do it). Concerns with efficiency, competitiveness and profitability can never go against ethical behavior.
2. In relation to companies and organizations, the code of ethics is a representation of its values, which cooperates with the fulfillment of the company's Mission and Vision. It guides the actions of its employees while informing its social posture to all interested parties.
3. GCE's Code of Ethics and Conduct contains a set of guidelines that should be used by everyone in the organization, persistently and continuously in the performance of their activities, in order to provide confidence to their employees, customers, suppliers, partners and the society as a whole (community and government).
4. The conscious and rational application of these guidelines will provide a reach of excellence in all aspects, while simultaneously in the hands of all employees, an instrument for their own development.

5. GCE's Code of Ethics and Conduct presented below is valid as of its publication and must be complied with in all of its paragraphs as of this date on, not being retroactive, that is, not being valid for facts occurred before its publication.

RESPONSIBILITIES AND DUTIES OF THE EMPLOYEES

1. To know and to comply with all the principles of this Code, the programs, policies and GCE's standards, respecting them and contributing to their effectiveness and improvements. Employees should especially respect and enforce the provisions contained in the "Code of Ethics and Conduct", under penalty of suffering the specific disciplinary sanctions, in accordance to the seriousness of the act performed.
2. To act daily, guided by the GCE Culture, composed of this code of ethics and conduct, management system procedures and policies.
3. To respect the equality and diversity of people, ensuring the right to freedom of expression in the daily contact with other employees.
4. Not to accept any type of discrimination within internal company processes (such as recruitment, promotions, and access to training), or in the relationship between employees. People must be respected and have the same access to opportunities, regardless of sex, race, age, origin, marital status, sexual orientation, religion, political beliefs, disabilities or social position.
5. To contact the immediate Manager and / or the Compliance Officer when identifying any type of discrimination or possible relationship between employees that may cause coercion, embarrassment, physical or moral aggression.
6. To maintain the privacy of each employee, especially with regards to personal information under the custody of GCE. Such information should be considered confidential, and they are to be treated in accordance with all applicable laws of privacy.
7. To preserve an environment with the necessary health and safety conditions for the development of all the activities that are to be carried out.
8. To carry out the established safety standards and to use the mandatory safety equipment whether personal or collective required in the site, encouraging one's colleagues to do the same.
9. To contribute to the preservation of a healthy environment, avoiding the spread of unofficial information (rumors / gossip). Inquiries related to organizational matters should be clarified with managers.
10. To be aware of one's responsibilities regardless of one's position in the company, and to always be committed to the objectives and goals of GCE, seeking the best possible results in terms of one's activities and the function one occupies.
11. To comply with guidelines so as to avoid active or passive corruption, also any kind of facilitation or bribery, reporting any case to the Director or to the Compliance Officer.

12. Preserve the Company's confidential or exclusive information to which the employee has or had access to during the term of the employment contract and also after its termination, not sharing such information with competitors and not disclosing matters that constitute a strategic differential, such as: price policies, terms of contracts, financial results, technologies, projects of technological development of products, processes and services, know-how, legal proceedings in ongoing development of new services, market research, technical documentation, strategies and strategic objectives, among other information.
13. Not to provide information of any kind and on any topic related to GCE. Requests made by external organizations, public bodies or the press must always be forwarded to the Director.
14. To immediately inform the Manager or the Compliance Officer the identification, findings or news of risk or threat to the business, operations, property, the values, or the integrity of employees or third parties, so that appropriate corrective or preventive measures are taken.
15. To care for the physical property of the company, which includes the facilities, equipment, furniture, consumables, and other goods and resources, taking care of them so that their use is made with discernment and rationality, seeking excellence in the quality of the work performed.
16. To care for the intellectual property of GCE, which includes its brand and logo, the technology, information (financial, commercial and others), formulas, plans, strategies, and other non-physical values that constitute the company. The misuse or any unauthorized disclosure of such information is not permitted, and employees are to adopt the ethical procedure of secrecy of this patrimony even after the termination of employment contract. Providing such information is not authorized, it is illegal, and it may result in criminal prosecution.
17. To avoid improper behavior in public and maintain adequate personal conduct when one is wearing uniform, badge or clothes with our company's or partners' brand, or traveling in a vehicle with the logo, caring for the image of GCE. We must be aware of the image that the public will be forming according to our attitudes and speeches. Likewise, one must inform the Manager whenever one witnesses or becomes aware of any occurrences that may damage the company's image.
18. To mind one's personal image whenever representing GCE, or when in service for GCE, to prevent any bad impression about the organization from being passed on to customers, consumers, suppliers and the general public.
19. Not to use the company's reputation or assets, including working time, to promote one's own activities or political interests. One's job should not be affected by one's personal political views or one's choice to make political contributions.
20. When carrying out external activities of personal nature, employees cannot, under any circumstances, carry out operations or activities that may cause or supposedly cause conflict of interest, unless with prior written authorization from one's direct superior. The employee must refrain from performing any action related to such practice until he or she obtains the corresponding answer to his or her query.

21. Not to hinder the investigation or inspection of public agencies, entities or public agents nor intervene in their activity.
22. Not to promise, offer nor give, directly or indirectly, inappropriate advantage to any public official, public entity or any third person somehow related to them.

As for social media:

1. To avoid publishing topics related to one's daily life in the company, as well as all and any topic or event that happens or is reported in one's work environment.
2. Not to use the image (logo or any other institutional symbol) in the development of websites, blogs or social profiles of employees, partners, suppliers or customers. Otherwise, the use of social networks to give opinions or content that makes any reference to GCE must always value the good image of the company and be clear and precise, to avoid misinterpretations or posts which do not correspond to the opinion of the organization, nor of its directors.
3. To use corporate email only for professional matters, and matters which are associated with the company's routine. It is to be understood that all content sent or received through these messages are property of GCE, therefore giving the company the right to use and disseminate them.

RESPONSIBILITIES AND DUTIES OF THE LEADERSHIP

1. To act daily guided by GCE's Culture, which is composed by this code of ethics and conduct, procedures, policies, bylaws, behavioral competencies and of leadership.
2. To ensure direct communication and free access of employees to their leaders so that their ideas are heard and taken into account, creating an environment of transparency and cooperation.
3. To dedicate special attention to one's conduct by adopting an exemplary posture, in a way to be followed by other employees.
4. To promote a participatory and loyal administration based on communication, by informing its employees about guidelines, results, objectives, goals and business strategies, or by allowing and stimulating freedom of expression and of everyone's opinion.
5. To be impartial in their actions, always making decisions based on technical and fair criteria. Never to embarrass or coerce one's subordinates, whichever situation it may be.
6. To keep and preserve a healthy and harmonious work environment, in which there is trust, respect and justice, aiming at valuing the human being, his personal well-being and his quality of life, even trying to stimulate the balance between personal life and professional life of all of our employees.

7. To guarantee the integration of new employees, ensuring that they receive all necessary information, basic guidelines and training for the correct development of their functions.

CONDUCT AND INTEGRITY

Investigations

To take all complaints and reports seriously. The investigation will take place impartially and confidentially and the team will determine if any standards or norms have been violated, as well as take appropriate corrective actions. If one's name is part of the event, it is necessary one's full cooperation and that responses to all questions are provided completely and honestly.

No retaliation

To value the help of employees who identify potential and real problems that the company needs to handle. The fact that an employee raises an honest concern or participates in an investigation will not be the basis for any employment-damaging action, including termination, demotion, suspension, loss of benefits, threats, harassment or discrimination.

Gifts, invitations and others

It is common in the course of business relationships to receive gifts and benefits from suppliers and customers. To maintain business ethics and that the offer is made out of plain courtesy without any illicit interest, you must follow the following premises:

1. Acceptance of gifts and presents from suppliers will be considered normal whenever it concerns goods directed to the company, not being of individual nature, material with the logo, provided spontaneously and without the expectation of reciprocity.
2. Not to accept commissions or money offers from suppliers and / or customers in exchange for favors of any kind.
3. Trips and stays can be accepted, if it has a nature of improvement of communication between the parties and with the interest of the professional relationship, the which it includes, for example, visits to commercial and manufacturing facilities, group meetings, courses or training and negotiations that require physical presence. However, this type of offer should not be accepted during a bidding process or similar, from whichever supplier it might be.
4. The admission of a collaborator who is a shareholder in a client or supplier will depend on a prior written approval of the Director.

In any of the cases considered in this item or in situations of the same nature, the Manager must be informed of the issue or matter, where common sense and protection of the ethical precepts defended by GCE must prevail.

Employees

1. The hiring of employees takes into account the technical and professional criteria, as well as competence, regardless of sex, race, age, origin, marital status, sexual orientation, religion, political conviction, disability or social position.
2. In case the employee has a relative who is employed or has an investment in a customer or supplier, the premises mentioned in this Code must be taken into consideration, not being allowed the exchange of favors of any kind.
3. The employee is to inform in written form to the Director in case he, the employee, has any relative linked in any way to a CGE competitor.
4. The employee's personal relationships at work should not influence one's ability to act in the best interest of GCE and should not affect any work relationship. Decisions related to employment must be based on qualifications, performance, skills and experience.

Customers and service providers

1. Choosing and contracting suppliers is based on technical criteria, professional and ethical, conducted through pre-defined processes that make decisions which are not based on personal interests. These choices seek to ensure the best options, considering quality, supplying capacity, deadlines and prices.
2. As a guarantee of reliability, harmony and transparency of the contracted services by clients, GCE respects and complies with the agreements signed, providing clear information, quickly and accurately, and acting with equal treatment, without distinctions driven by personal interests or feelings.
3. GCE intends to satisfy customer expectations, as well as have a constant improvement in the quality and performance of services provided through the Management System of Quality implemented.

Business Partnerships

During the process of choosing partnerships, companies of dubious reputation are not taken into account, or companies which exploit directly or indirectly child labor or of slavery, as well as those that do not comply with the current legislation, including the environmental.

Customer Care

1. To serve customers with attention, courtesy, sincerity and efficiency, whichever communication channel might be chosen, always respecting the rights according to current legislation.
5. Customers' requests and suggestions are registered on the channel provided and forwarded to the responsible sector promptly and correctly. As a company premise,

the inquiries are responded, even if in a negative way, in an appropriate way and within expected deadlines.

Government and Institutions

1. GCE maintains an ethical, transparent and responsible relationship with the Federal, State and Municipal Governments, as well as mixed-economy companies and their institutions, complying with the applicable legislation and cooperating to the fullest development of the nation.
2. Whenever necessary, out of courtesy or in compliance with legal requirements, GCE provides information to public authorities and their institutions, with promptness and veracity, within its due time and required format, thus ethically fulfilling its social and economic role.
3. If the public agent makes an unethical or illegal proposal, the GCE employee must refuse the offer explicitly and clearly, and the employee must leave the place and immediately communicate to the Compliance Officer or use the appropriate Reporting Channel.

Free competition / Bidding

GCE maintains ethical procedures with its competition, using fair and righteous behaviors in their business procedures. The company does not make comments, insinuations, or even actions that denigrate its competitors or products. Any type of practice considered inappropriate to free competition is rejected by the company.

It is forbidden:

- To frustrate or defraud, through adjustment, combination or any other procedure, the competitive nature of public bidding procedures;
- To isolate or try to remove a bidder, by means of fraud, violence, serious threat or by offering advantages of any kind;
- To abstain or withdraw from any bidding process, due to advantages offered;
- To create, in a fraudulent or irregular manner, a legal entity to participate in public bidding or compact with administrative contract;
- To obstruct, disturb or defraud the occurrence of any act of public bidding procedure;
- to disclose the confidentiality of any proposal submitted in a bidding procedure, or provide the opportunity for third parties to disclose;
- to participate in bidding or contract with the Administration, after being declared unsuitable;

- to make use of an interposed individual or legal entity to conceal or dissimulate their real interests or the identity of the beneficiaries of the acts performed.

CORPORATE SOCIO-ENVIRONMENTAL RESPONSIBILITY

1. GCE has a continuous commitment to have its businesses guided by ethical behavior that contributes to economic, social and economic development minimizing the impacts on the current and future quality of life of everyone who is reached by the company. GCE manages its routine by cooperating for the growth of communities and society, being concerned with the environment.
2. As a participant in the economic and social life of the community, GCE recognizes the importance of communities for the company's success.
3. GCE is concerned with the inputs and outputs of materials from its production processes, and it seeks to maintain reasonable and controlled levels of use of renewable and non-renewable resources, such as electricity, water and other inputs needed for the company's activities. It seeks to recycle materials from production and the office.

RESPONSIBILITIES OF THE COMPLIANCE OFFICER

1. The Compliance Officer is responsible for receiving complaints, inquiries from employees and interested parties, reports, and also it is responsible to investigate the facts, assess and judge the events impartially.
2. GCE's Compliance Officer is responsible for assisting and clarifying any eventual doubts on the application of this Code, receiving, evaluating and forwarding the denunciations, investigating the facts and assessing the incidents impartially. It is also responsible to disseminate the premises of this code and encourage the creation of bodies related to other entities and companies in the sector.
3. The application of the disciplinary measure, when necessary, should be made by the manager of the employee and communicated to the Human Resources Department.
4. Other employees may take part, temporarily, in matters related to Compliance, recognizing the diversity of people and opinions, preserving the right for freedom of speech and judgment of each employee who is part of the company.
5. It is the duty of the Compliance Officer to call meetings to carry out revisions to the Code of Ethics and Conduct whenever deemed necessary.

DOUBTS

If one does not find an answer in the Code of Ethics and Conduct regarding any situation that may arise and be in doubt about the best posture in the face of a situation, one may make the following reflections:

- a) Is it against the law?
- b) Is it immoral or unethical?
- c) May this damage the reputation of GCE?
- d) Would one be ashamed of reading about this in the media?

If any answer is YES, one should contact one's Manager or Compliance Officer, who may help find a way to deal with the situation.

Doubts may be directed to the Compliance Officer, by email (compliance@gce.com.br) or sent to the complaints channel, identifying oneself so that an answer may be provided.