



CODE OF ETHICAL CONDUCT



Objective

CSP Code of Ethical Conduct has the objective of reflecting the organizational principles and values that must limit and guide the attitudes and behaviors from all the Company's employees, so that their actions are in accordance with the premises defined in this document.

Who it applies to

This Code applies to all employees, trainees and service providers who work at CSP, and it must regulate the relations they keep inside and outside the Company, with suppliers, customers, public and private – national and international – organizations, banks, other partners and competitors, with all levels of public authorities, with the local community and society in general, prevailing and serving as a guideline to all the Company's norms and policies.

The principles and rules established here are valid for an undetermined period of time and are part of your Employment Contract.

Company's Ethical Principles



- Respect to life in all its forms, regarding the concern with quality of life, health, environment and safety of all the Company's employees.
- Integrity, honesty, justice, responsibility, impersonality and coherence between speech and practice, which involves the Company's daily actions.
- Respect, truth and legality in relations with people and organizations.
- Respect to differences and ethnic, religious, social, cultural, linguistic, political, aesthetics, age, physical, mental and psychic, gender, sexual orientation and other kind of diversities.
- Incentive from the Company leadership to a respectful and trusting environment, with equalitarian treatment to each member of the team, serving as an example in the practice of ethical guidelines for employees and third parties.
- Responsibility and dedication at work, in the treatment with each person, with the material or non material assets, and with the image of the Company.
- Valorization of employees commitment and investment in qualification and continuing education.
- Distinction between personal and professional interests of the Company's employees, explicitly or implicitly disabling any behavior, professional relation or act that presents any characteristic of personal advantage.
- Development, implementation and dissemination of the sustainability culture regarding several business areas and audiences the Company aims, converging the business objectives and the desires and interests of the community in which the Company operates, always aligning them with sustainable development.

- Respect to the local culture where the Company is introduced and work to preserve it.
- Search for growing levels of excellence, competitiveness and profitability, considering social and environmental responsibility, contributing to the country's sustainable development.
- Development and growth of business allied to all stakeholders.

Ethical Conduct Rules



- The practice of conversations and attitudes involving physical or verbal violence is forbidden, as well as sexual or moral harassment (through abusive attitudes, such as threats and intimidation) concerning any person, inside or outside the company, regardless of hierarchical level, position or function.



- Use information which is considered confidential exclusively for professional purposes; using them for personal or other people's benefit is prohibited.



- Avoid any personal or telephone argument involving confidential or competitive information, whenever in public places or online.



- It is forbidden to access websites or forward electronic messages regarding any kind of discrimination, sexual content or other inappropriate themes in the work environment.



- It is forbidden to influence, coerce, manipulate or mislead anyone involved in internal or external audit work or any public authority.



- In case of conflict of personal and CSP interests, abstain from representing the Company in the respective subject, immediately communicating the fact to the immediate superior.



- It is forbidden to make use of the function to obtain benefits or any other form of illegitimate advantage for oneself or for third parties. It includes accepting any personal advantage from a commercial partner; it also applies to advantages to other people related to the employee in any way (relatives, friends, acquaintances, etc.).



- Employ suppliers and partners that respect, act and are in accordance with all legislations and regulations applied to the contracted service or product, besides rules and conduct guidelines in this Code.



- Establish an ethical relation with all stakeholders: employees, shareholders, customers, suppliers, service providers, competitors and the community, observing and supporting fair commercial practices.



- Minimize any adverse environmental impact, trying to use natural resources in an efficient and responsible way.



- Motivate conscious consumption of available resources, avoiding, for example, to print unnecessary files, the waste of water, electric power, raw material, etc.



- Fight, within its productive chain, any form of exploitation of compulsory, forced, slave or child labor.

Think about it before deciding



- 1.** Is my attitude coherent with CSP Policies and Norms?
- 2.** Can what I want to do be made in a way to avoid ethical and/or interest conflict?
- 3.** Does my attitude or action compromise legal principles? ?
- 4.** Am I acting in an ethical way, according to the principles in this Code?
- 5.** Can my attitude reflect negatively not only for me, but also for the other person or for CSP?
- 6.** Putting yourself in the other person's position, would you like others to have this kind of attitude toward me?
- 7.** May adopting this conduct or taking this attitude embarrass myself in the present? And in the future?
- 8.** With my attitude, may I embarrass my coworkers? My family? CSP?
- 9.** What are the consequences, for myself and/or for the Company, if my attitude voluntarily or involuntarily goes public?
- 10.** Will this attitude allow me to sleep well?



General Considerations

This Code indicates what CSP expects from each professional in different situations that can be faced at work or even outside, believing that the participation from all the Company's employees is of fundamental importance to the adherence and continuous improvement of the ethical conducts anticipated in this document.

Channels to Access the Code

Whenever you are undecided about how to act, consult this document. If you still have doubts about the situation, suspect of or know facts that may cause harm to the Company or that contradict or seem to contradict the principles in this Code, communicate them using the Ethical Code Ombudsman Channel email ***ouvidoria@cspecem.com*** or on the ***phone number 0800 2805502***.

The knowledge of conducts that infringe this document must be communicated to the Ethical Code Ombudsman Channel, along with elements that enable the fact investigation. All denunciations will be investigated, and the confidentiality of everyone involved and absence of any retaliation is guaranteed.

Doubts, criticism or suggestions about the subjects mentioned here should be forwarded and addressed to the same channel.

By doing this, you will be fulfilling your duty to care for the Company's ethical principles, avoiding disciplinary actions.

Ethical Conduct Committee

The Ethical Conduct Committee will be formed by members of CSP Executive Board and it will act whenever necessary, according to what the norms in this document determine.

In case of infringement of the premises contained on this Code, the transgressors will be subject to disciplinary penalties, which include warning, suspension and dismissal. When imposing disciplinary penalties, the nature and severity of the infringement will be considered, always observing CSP human resources norms and the applicable legislation.

Attachment



Glossary

Moral harassment – Exposure of male or female workers to humiliating and embarrassing situations, repeated and prolonged during the working day and in the practice of functions. The practice of moral harassment, for labor purposes, is a kind of improper procedure, in the terms of article 482, b, from CLT, and it can justify dismissal with due cause, as well as the agent responsibility for moral damages.

Sexual harassment – It is a type of coercion of sexual nature usually practiced by a person in a superior hierarchical position to a subordinate (but the employer is not always responsible for the harassment, it can also happen with employees), normally in a workplace or academic environment. Sexual harassment is characterized by some kind of threat, insinuation of threat or hostility towards the subordinate. Besides being a conduct incontinence, in the terms of article 482, b, from CLT, justifying dismissal with due cause, it is also considered a crime, according to the article 216-A from the Penal Code, and it can also cause the agent to be responsible for moral damages.

Productive chain – Set of consecutive stages, during which several inputs undergo some kind of transformation, until it constitutes a final product and is placed on the market.

Qualification – Professional education, which means a set of activities aiming at acquiring knowledge, skills, attitudes and behaviors required to perform functions related to a profession or a group of professions in any field of economic activity.

Customer – Term usually used to refer to a current or potential purchaser or user of products from an individual or an organization.

Company – It means a commercial or industrial society formed by shareholders, with the objective of performing a private, public or mixed economy activity, producing and offering assets and/or services, aiming at meeting a human need.

Community – Group of people organized under the same social norms, usually living on the same place, with the same government or sharing the same cultural values and historical legacy.

Conduct – Moral procedure; conscious behavior from an individual. It may be good or bad, depending on the moral and ethical code from the group he or she belongs to.

Corporation – Group of people acting as a unique body, a unique person, searching for common objectives. In a broad sense, it is a group of people subject to the same rules or statutes, being a synonym for association or company.

Culture – Complex that includes the knowledge, beliefs, art, moral, law, practices and all the other habits and abilities acquired by the man as a society member.

Diversity – The term refers to the variety and coexistence of different ideas, characteristics or elements, in a certain subject, situation or environment; quality of who or what is diverse.

Trainee – One who is in a training program. Training program is the activity commonly performed by students, in companies or public departments, aiming at professional enhancement in its study area.

Ethics – Set of norms that must adjust to relations among several society members. Moral principles that must be considered when practicing a profession.

Ethnic – Mix of races characterized by the same culture.

Supplier – One who supplies any goods or services.

Employee – One who is employed and regularly paid by the work or activity performed.

Hierarchy – Rank of different categories of employees or members of an organization.

Transgressor – Person who infringes; the one who, in spite of being legally summoned, does not present any justification during regulate term, leaving its rights in default; the one responsible for any penalties resulting from infringements noticed in documents he or she is responsible for, not only a mere representative.

Organization – Complex integrated by ideas, behavior standards, interhuman relations and, many times, material equipment, organized around a socially recognized interest.

Law – Precept emanated from the authority; life rule or norm; imposed obligation; law or moral precept or norm.

Environment – Set of physical, chemical and biological conditions, laws, influences and infrastructure that enables, shelters and runs life in all its forms. It involves all living and non living things on Earth or in some region of Earth that may affect ecosystems and human life.

Norms – Precept, rule, sense; procedure rule, life sense.

Partner – One who has commercial participation, such as a customer or supplier or, eventually, an associate.

Relative – One who is related; belonging to the same family.

Stakeholders – Term used to represent the parts interested in a process, which may be temporary (like a project) or long lasting (like the business of a company). They must be in accordance with corporate governance practices performed by the company.

Service provider – Individual who performs work offered or hired by third parties (community or company), including advisement, consultancy and/or inter-organization cooperation in a certain company.

Principles – Conduct norms; views; opinions, conclusion; (good) conduct rules or code with which someone rules his life and actions; fundamental doctrines or predominant opinions.

Acknowledgment and Commitment to the Ethical Conduct Code

I declare that I received the Companhia Siderúrgica do Pecém (CSP) Ethical Conduct Code and am aware of its contents and of its importance during the practice of all Company's activities.

I also declare that, at this moment, I do not find myself in any situation that may infringe this Code. If I find myself in any conflicting situation, it will be related in the lines below.

Signing the present Commitment Agreement is the manifestation of my free agreement and of my commitment in integrally fulfilling it.

Date: _____.

Employee, supplier or partner name: _____

Register: _____

Signature: _____



