

Viralcool's Code of Conduct:

Guidelines for a good working environment.

Message from President

“Developed according to the principles and policies defined by the Sustainability Committee of Viralcool, this code of conduct seeks to define commitments and responsibilities. It contains the declaration of the set of corporate rights, duties and responsibilities, reflecting the values of the group, the Social and environmental management and the set of rules of conduct for managers, executives and employees.

The edition of Viralcool's Code of Conduct makes explicit the principles and the way the company conducts its activities, making our reputation a responsibility of all nodes.”

President Antonio Eduardo Toniolo

Mission

To produce cane, sugar, ethanol, electricity and yeast in an efficient and economic way, uniting productivity with socio-environmental responsibility.

Vision

To be recognized in the sugar-energy sector for the good manufacturing practices and the sustainable use of natural resources in a modern management context.

Values

- Simplicity and agility in decisions;
- Personal and professional development;
- A relationship of trust with our employees, suppliers and local communities;
- Respect for the environment;
- Safety in the workplace;
- Ethics and respect in the relationship with competitors and partners.

Definition of the Code of Conduct

The Conduct Code is a common reference instrument and aims at offer a clear understanding of the conduct that drives business and relationships of Viralcool.

Its principles should be present in the daily exercise of activities and cover the relationship between managers, employees, suppliers and other stakeholders related to the company.

Application of the Code of Conduct

We must all use the principles, values, and behavior rules in our daily work, as the best way to be responsible, ethical and well oriented in our actions and decisions.

In case of doubt, an updated copy of Viralcool's code of conduct will be available at: www.viralcool.com.br/en/conduct

Conduct's Communication

The forwarding of any type of communication related to the Code of Conduct (Suggestions, questions and/or complaints) can be made freely by the following channels:

- Immediate superior;
- E-mail to the Committee of Conduct: comitedeconduta@viralcool.com.br
- Face-to-face reporting at the Conduct Committee meeting;
- Written routing in a box/urn to be made available by the company in a place to be determined by the Committee.

Role of President and Directors:

- To be an example of conduct and commitment to policies and practices contained in the Code of Conduct;
- To be responsible for applying ethical guidelines in their area;
- To Lead the employees under their responsibility to full membership in the principles and guidelines of the Code of Conduct;
- To approve the preparation, revision and dissemination of the Code of Conduct;
- Take administrative decisions in the most serious violation cases of the Code of conduct.

The Conduct Committee:

The president of Viralcool will create and define the components of the conduct committee composed by four members. Preferably, a representative of the HR area, one of the socio-environmental responsibility area, one of the support staff and one director.

Role of the Committee of Conduct:

- To subsidize the management staff with information on the principles, norms and procedures relating to the Code of Conduct;
- To receive information on violations of the Code of Conduct;
- Ensuring the confidentiality of the information received;
- To analyze and evaluate the violations of the Code of Conduct, supporting the decision-making process;
- To forward to the Presidency / Directors the most serious cases of violations of the code of conduct;
- Disseminate actions and measures taken against violations of the Code of Conduct;
- Review the code annually.

Role of Human Resources:

To ensure the dissemination of the Code of Conduct to all employees and to guide in order for them to comply with and share with suppliers and stakeholders of Viralcool.

1. Discrimination in the workplace:

Valuing the diversity, the company does not compact and undertakes not to perform or admit any type of discrimination action among employees, of race, religion, sex, age, special needs, nationality or other legally protected condition.

2. Employment of forced and/or child labor:

Viralcool does not allow the use of forced and/or child labor force in any process related to the company's activities.

3. Safety and health at work:

Viralcool commits itself to protecting health, promoting safety in the carrying out its activities and taking appropriate measures to prevent accidents and damages to the health of all its employees, as well as any visitor or supplier.

4. Relations with the community:

Viralcool encourages and also maintains communication channels to ensure the open dialogue on all issues related to the performance of its activities and the demands of the communities where the companies of Viralcool are located.

5. Relationship with suppliers:

The suppliers are selected and evaluated taking into account the values of Viralcool, reinforcing sustainable attitudes, among them:

- All purchasing decisions should aim at obtaining the best cost/Benefit for the company;
- The purchase of goods and services should be based on the merit of factors such as price, quality, performance and suitability.

6. Asset liability:

In the exercise of its activity, Viralcool and its employees must respect, in full, the values of the human person and his/hers dignity.

The values of heritage preservation must also be respected, devoting adequate attention to the themes of social responsibility, innovation, valuing people and improving of their knowledge.

7. Socio-environmental responsibility:

- To reuse, whenever possible, waste generated (eg: paper, packaging);
- To reduce paper prints to what is strictly necessary;
- To Save energy and water consumptions.

8. Conflict of interests:

Transparency in the relationship with its employees is an essential factor for Viralcool, for this the company values by the trust placed in each one. For safeguarding this position, conflicts between personal and corporate interests must be avoided.

Business decisions should be based on opinions free of personal gain or interest. A conflict of interest may occur when interfere in the evaluation and objectivity of an employee or in his or her loyalty to the company.

Viralcool employees are not authorized to represent the company in agreements that result in their own financial benefit, also from family members or friends.

9. Receipt of gifts:

Accepting or giving gifts are allowed as long as they are of low commercial value, and even so, the fact must be officially communicated to the immediate superior.

It is prohibited to grant or obtain favors or entertainment activities, whenever this implies obligation of the party presented.

Gifts in cash or cash equivalents are prohibited in all circumstances.

10. Insider information:

All Viralcool employees must sign a confidentiality agreement, undertaking to keep confidential any information of a confidential nature or that has not yet been disclosed by the companies.

I 1. Moral and sexual harassment:

No harassment will be allowed in any form, be it sexual, economic or moral, or situations that create pressures, intimidation or threats in the relationship between employees, regardless of their hierarchical level.

I 2. Trade union and associatives activities:

Participation in political, associative and trade union activities is free for the employees of Viralcool, since it does not interfere with its activities.

I 3. Political Activities:

No events, political campaigns or pamphlet actions will be allowed within the company by employees.

I 4. Use of alcohol, tobacco and drugs:

The ingestion of alcoholic beverages during working hours is prohibited, such as the entry of intoxicated people into companies.

Smoking is strictly prohibited in the workplace. In addition, it is prohibited the use or possession of drugs and the permanence in the work environment in an altered state by the use of these substances, which may affect the safety or the performance of other employees, or of the company's heritage.

I 5. Press and publicity:

Contacts with the press are responsibility of the communication board and Viralcool's press office. The board will indicate, when requested, representative authorized to speak on matters specific to its areas of expertise. Institutional advertisements should contain only real data and Information.

I 6. Responsible of use company assets:

All employees have a duty to protect company assets, such as equipment, stock, supplies, money, and information. Company assets should be treated with the same care given to the personal goods.

The resources of the company should only be used to conduct the business of Viralcool. Employees shall not be allowed to defraud or misuse of the company's assets, such as vehicles, equipment and materials.

The use of uniform is mandatory and restricted to the facilities of the group.

17. Use of computer systems and computerized information:

All data stored on computers, including e-mails sent and received through its network, are considered the property of the company and not the employee's private property.

Employees may not use company resources to send, receive, access or save electronic information with explicit sexual content or that promote hate, violence, gambling or illegal drugs. It is not allowed to record any company data in any electronic media, such as CD's, DVD's, pen-drives, memory cards, etc.

Employees also cannot install or use computer files or software not licensed by the company, or not approved by the administration, nor should they also use approved software's in a difference way than that established in the license or the copyright agreement.

18. Sales of products:

It is not allowed to sell products (Clothing, accessories, cosmetics, gifts, Tickets, food, etc.) within the company by employees.

19. Soccer team or twisted shirt:

Within the company premises it is not allowed to wear teams shirts nor of soccer fans to avoid conflicts and animosities between employees.

You can questions or make complaints from different ways:

- Through your immediate superior;
- E-mail: comitedeconduta@viralcool.com.br;
- Written report deposited in one of the polls located within the company: Industrial warehouse, Industrial Refectory or mechanical workshop.

