

Code of Ethics and Conduct

ALL ABOARD!



MESSAGE FROM CEO

The responsibility to preserve OGMA's century-old reputation lies with each and every one of us. That means to put the utmost integrity in everything we do. By acting with integrity, we foster a safe, respectful, and inclusive workplace. This is the basis to build healthy relationships with our Customers, our Shareholders, our market, our community and with each other. Our continued success begins with each of us making the right decisions every single day.

Our Code of Ethics establishes a set of common values and policies to which everyone is expected to adhere. Please go through our Code attentively and put this information into practice, focusing on making OGMA a better and stronger Company, at all times.

ALL ABOARD!

Paulo Monginho
CEO
OGMA





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OGMA CORPORATE VALUE

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OGMA Code of Ethics and Conduct is based on the Company's business values and seeks the good practices of corporate and accounting governance. In that regard, the Code prescribes guidelines for transparent, objective and timely communication, as well as for action taking and decision making in accordance with responsibility, quality, honesty, trust, respect and loyalty standards, at all times.

The Code reflects the commitment to achieving business goals ethically, with integrity and social responsibility, valuing our relationships with Shareholders, Employees, Customers and Suppliers, preserving environment and contributing to the development of the communities where we are present.

Practicing of OGMA corporate values unites us and shapes our attitude, positively reinforcing our results and providing for the sustainability of our Company.

VALUES

PARTNERSHIP

Best results come from teamwork. We work together with our Customers to offer the solutions that best suit their needs. The satisfaction of our Shareholders is also of utmost importance. Only by achieving solid financial results, will we develop and build the success of our Company.

FLEXIBILITY

Knowing our Clients is a key factor. This is the only way we can meet and anticipate their needs and exceed their expectations. Our technical capability and know-how provide us with an increased versatility to offer customized services and solutions.

ETHICS

The success of our Company depends directly on our people. This means that we must act with honesty, justice, transparency and respect, valuing all people individually and rejecting all kinds of discriminatory practices.

EFFICIENCY

We know that on-time delivery, trust, safety and adaptability are key issues to our Customers. We put our experience at their service to ensure their success and take them further in their own business. We are committed to adopting environmental best practices, reducing waste and unnecessary expenses, in compliance with all applicable occupational safety and health requirements.

BUSINESS EXCELLENCE

The satisfaction of each Customer is our main goal. This means providing the service in the shortest possible time, with the highest product quality and observing process safety, at all times.



OGMA **ETHICS AND COMPLIANCE PROGRAM**

OGMA

ETHICS AND COMPLIANCE PROGRAM

OECP - OGMA Enhanced Compliance Program

In order to guarantee the highest level of ethics and integrity in its activities, OGMA has established an Ethics and Compliance Program. Such program is intended to promote ethical values and ensure that everyday actions are carried out in Compliance with the applicable laws and regulations.

OGMA Enhanced Compliance Program is based on fundamental issues such as:

Responsible leadership, organization and managerial structure;

Permanent risk mapping and management;

Appropriate policies and internal control standards;

Internal communication and continuous training;

Monitoring, auditing and reporting channels, which are intended to assess and ascertain potential deviations from established conduct or procedures ("Fundamental Elements of Compliance").

This Program is coordinated by OGMA Compliance team, under the sponsorship of OGMA CEO, and with permanent support from Embraer Compliance Office.

01

RESPONSABILITIES



➤ 1.1 Compliance with the Code

Strict compliance with the Code is expected from all members of corporate bodies, Directors, Administrators, Employees (regardless of their managerial level within the Company), Trainees, OGMA Subsidiaries and other companies controlled by OGMA. The Company further assures that, by means of the established policies and internal procedures, OGMA service providers and third parties acting on its behalf will comply with the provisions in this Code.

➤ 1.2 Responsibility of Employees

Comply and provide for the compliance with all the provisions in the Code, namely the strict observance of general principles concerning ethics, transparency, social responsibility, laws and regulations, environment, human dignity and individuality, occupational safety and health, seeking continuous improvement in regard to business productivity, competitiveness, profitability and sustainability;

Understand and be aware of all laws and regulations related to their activity;

Participate in all Events, Training Sessions and Workshops concerning the Company policies and internal written procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;

Understand and be aware of how such policies and internal procedures relate with their own activities, actively participating in meetings, Kaizen events and other initiatives intended to

continuously adapt work processes and instructions to the Company policies and internal procedures, to an extent that such policies, directives and procedures are integrated in day-to-day business operations;

Seek, where necessary, support and guidance from the related Compliance Ambassador and/or leaders, who, in turn, shall seek clarification of doubts and of rules to be observed from OGMA corporate areas such as the Legal Department, Compliance Office and Human Resources;

Report any concern regarding a potential or effective violation of the law, the Code or the Company policies and internal procedures.

1.3 Responsibility of the Leaders

Comply and provide for the compliance with all the provisions in the Code, namely the strict observance of general principles concerning ethics, transparency, social responsibility, laws and regulations, environment, human dignity and individuality, occupational safety and health, continuously seeking improvement, professional enhancement, and personal growth with a view to productivity, competitiveness, profitability, and business sustainability;

Promote a working environment that, by means of words and actions, values an ethical attitude and the highest level of transparency, integrity and honesty in all activities;

Have an in-depth knowledge of the Code, internal policies and the regulatory environment under their authority;

Understand and introduce in day-to-day business operations the requirements established in laws and regulations, where applicable, by means of OGMA policies and internal procedures;

Supervise related internal processes, seeking support from the Compliance and Internal Audit offices, where necessary, in order to ensure compliance with the policies and requirements of the law;

Share with the team, at all times, the relevance of participating in Compliance events intended to provide them with a full, harmonious integration of policies, directives and macro processes in day-to-day business operations;

Participate and encourage their teams to participate in all Training Sessions and Workshops concerning the Company's policies and internal procedures for which they are designated, so that they are capable of complying and enforcing compliance with such policies and procedures;

Immediately act where a violation to the Code is identified, and adopt preventive measures for the detection and correction of any occurrence of failing or deviant conduct;

Seek, where necessary, support and corporative guidance from the Legal Department, Compliance Office and/or Human Resources in the clarification of doubts and of rules to be observed;

Report any concern regarding a potential or effective violation of the law, the Code or the Company's policies and internal procedures.

02

WORK ENVIRONMENT



All laws and regulations that guarantee freedom of association, privacy, collective agreements, immigration rights, working hours and remuneration shall be respected.

OGMA shall not tolerate any form of forced, compulsory or child labor, nor any situation of workplace harassment, whether of a sexual or moral nature. OGMA shall not accept either any form of protectionism, conflict of interest, hostile work environment, or discrimination of any kind on the basis of ancestry, age, gender, sexual orientation, marital status, family situation, reduced work capacity, disability, chronic illness, nationality, ethnic origin, religion, political or ideological belief.

In this regard, OGMA shall promote a safe and healthy work environment by adopting systems and measures, established in policies and written procedures, to prevent its employees from being exposed to risks at work. At OGMA, all employees are expected to report any concerns relating to safety rules and the violation of such rules, as well as any incidents or suspected occurrences concerning thereto.

Last but not least, all employees shall be treated with respect and dignity, and provided opportunities for professional growth, learning and professional fulfilment, because, after all, together we fly higher!

03

COMPANY ASSETS, RESOURCES AND INFORMATION



All OGMA assets (1), resources (2) and information shall be protected and used for the Company's business and benefit only, and not for personal interests or gains. Disclosure of information of any kind, which is not classified as public, whether concerning the Company or third parties, including customers and suppliers, shall be forbidden.

➤ 3.1. Intellectual and Industrial Property

Intellectual and industrial property includes all exclusive rights concerning products, equipment and/or knowledge processes, tangible and intangible assets, which applies to patents, trademarks, inventions, design, copyrights, databases, trade secrets, domain names, industrial design, logotypes, conferences, projects, computer software, etc. OGMA's intellectual and industrial property shall be protected from misuse or inappropriate use, unauthorized disclosure and/or use for personal gain. The observance of the same principles shall apply to the intellectual and industrial property of third parties.

➤ 3.2. Internet, E-mail and Social Media

Internet, Wi-Fi and e-mail and other electronic systems are provided by OGMA for professional communication purposes. Therefore, the use of such electronic systems, Internet or e-mail, or social media tools shall not be permitted for the purpose of sending, receiving or downloading contents, which may impair job performance. Social media, at work or in any other place, shall not be used to expose

private or confidential information of the Company or of its employees. Therefore, disclosure of contents that may expose the image of the Company or of its services, employees, business partners and third parties shall not be permitted either.

Computers and servers, including e-mails sent or received, are the property of OGMA and shall not be considered as personal assets or content, except otherwise legally specified. However, in the observance of the applicable laws, the Company shall not access any information contained in employee computers, in the course or after termination of employment contract, without the consent of the respective user.

3.3. Books and Records

OGMA shall comply with all applicable laws and accounting standards, and in this regard shall not make erasures or alterations on its accounting ledgers, records, financial statements, financial transactions, work cards, delivery notes, invoices and other documents, records or systems holding the Company liable ("Books and Records"), whereas all employees, in performing their job functions, shall provide for the accuracy and truthfulness of such Books and Records.

Further to the prohibition on erasures and alterations made on accounting ledgers and records, all employees, in performing their job functions, shall provide for the truthfulness and completeness of data, strongly preventing false or inaccurate entries.

Payments that do not correspond, in part or in whole, to the purpose specified in the related document shall not be authorized.

3.4. Confidentiality and Disclosure of Information

OGMA, in its normal relationship with Employees, Suppliers, Service Providers, Customers and other business partners, receives, sends and manages information from third parties, which, in addition to the Company's own information and/or data, is considered as Confidential. Information either verbal, written, electronic or in any other format, concerning OGMA and its Employees or third parties, which should be subject of secrecy, confidentiality and special protection shall be classified as "confidential". Subjects falling under Confidentiality shall not be discussed or addressed with strangers or even with fellow workers that have no connection with the specified subject, and neither shall they be addressed (in person or on the telephone/mobile) on lifts, restaurants, airplanes or other public places.

Such commitment made by all stakeholders will provide for the compliance with laws, regulations and contractual agreements, in regard to data protection and confidentiality, as well as to the appropriate and legitimate use, storage and management of such information.

Disclosure of information to the public, where necessary or relevant to Company's objectives, or where required by law or imposed by court, shall be made by Directors or specifically authorized Employees only. Such disclosure shall observe the applicable laws, regulations and Company policies, as well as any contractual agreements, in case of information provided by third parties.

It should be noted that the secrecy provision on Confidential Information shall remain valid even after the professional and/or contractual relationship with OGMA comes to an end.

3.5. Data Protection and Treatment

OGMA ensures the right to data protection to all its Employees, Suppliers, Service Providers, Customers and other Business Partners in regard to any activity requiring treatment of personal data, namely access, storage, viewing, collection, exclusion, sharing and other treatment actions provided for by OGMA.

Data protection shall comply with the data protection policy in force at OGMA, with the applicable internal regulations on information security and with the laws and regulations on data protection, particularly, the Portuguese law and the General Data Protection Regulation (RGPD) (EU) No. 679/2016 without prejudice of further legal or regulatory dispositions.

OGMA is committed to data protection and, as such, expects its Employees, contractors and/or Business Partners, which may, in any manner, deal with personal data treatment, to comply with all related procedures, the data protection and treatment policy in force at OGMA and all applicable laws and regulations.

OGMA shall neither authorize nor tolerate any practice that may constitute a violation of personal data protection.

(1) Examples of OGMA assets are as follows: equipment, provisions, fixed assets, tools, stocks, systems, software, vehicles, and so on.

(2) Examples of OGMA resources are as follows: licenses, records, telephones, voicemail and email, financial resources, and so on.

(3) Examples of Confidential Information are as follows: (a) commercial information (e.g. names of customers, suppliers or advertisers, business strategies, costs, prices and further market data); (b) technical information (e.g. methods, know-how, processes, projects and design, whether or not protected under industrial or intellectual property rights); (c) strategic information (e.g. future business development, sales or marketing strategies); (d) information concerning employees, managers, consultants, service providers, representatives, business agents and managers (e.g. capabilities, competences, managerial levels, salary or compensation values, employee records or equivalent, medical records, and so on); as well as (and) any copies or records, either verbal or written, in any format, which have been directly or indirectly provided to OGMA employees and that concern the Company, its subsidiaries, shareholders, customers, service providers or suppliers, and that are not classified as public.

04

RELATIONSHIP WITH BUSINESS PARTNERS AND THIRD PARTIES

Customers, Suppliers,
Governments, Competitors,
Shareholders and Investors

➤ 4.1. Conflict of Interest

A conflict of interest occurs when an individual's interest in personal gain or advantage interferes in OGMA's business decisions. Situations that may create, or appear to create, a conflict of interest shall be avoided. Examples of potential conflicts of interest are, not limited to:

▮ Deciding upon deals with suppliers, customers, competitors, business partners or third parties in general, where such deals involve companies or any other entity owned or managed, or which belong to, or are operated by, relatives or close friends or professional acquaintances;

▮ Requesting presents, gifts, courtesies, bonuses, favors or any other benefit, whether professional or personal, for oneself, one's relatives, close friends or third parties;

▮ Performing services or works other than those set out by the Company, whether internal or external, paid or unpaid, that may result in competition or conflict with OGMA activities and negotiations, including sales or promotion of products and/or information of any type in OGMA's premises, during or outside standard working hours;

▮ Using OGMA's resources, working hours, equipment, materials or information to carry out services or activities that impair the performance of OGMA's activities or interests, or that violate any of its policies or written procedures;

▮ Using one's position or influence at OGMA to provide unfair advantage in hiring people, unduly supervising or benefiting family members, relatives or acquaintances, or even using one's position to improperly benefit from external activities not related to the Company;

Performing activities related with a third party in which the Employee has economic and/or financial interest, to an extent that such interest may, in any manner, influence one's actions on behalf of the Company;

When faced with a situation that poses or may pose a potential conflict of interest, or in situations where such conflict of interest cannot be avoided, the Employee shall inform the related manager or the Human Resources department, without prejudice of using the Helpline either on OGMA Portal or on OGMA's Website.



4.2. Gifts, Presents and Hospitality

Entertainment, Travel Expenses, Accommodation and Other Benefits

Offering and receiving of gifts, presents and hospitality such as entertainment, travel expenses, accommodation or other advantages or benefits that may appear to be improper, or, or that allow the employee to act towards obtaining undue advantage, should be avoided. In such situations, it is recommended, as an example of good practice, that the employee thank his/her interlocutor for the recognition of a mutually valued relationship between both parties and explain why such offer may not be accepted under the observance of OGMA's policies.

Gifts, presents and hospitality of a modest nature, reasonable in value and not extravagant may be exceptionally offered or accepted in connection with the promotion, demonstration or explanation of OGMA products and services.

Gifts, presents or hospitality shall not be offered or accepted: (a) in money, (b) if there is any intention to obtain an undue advantage, or (c) where prohibited under the laws or regulations applicable to the related parties.

As for Public Authorities, which are required to comply with specific standards and regulations, offering and accepting of gifts, presents and hospitality are, as a rule, prohibited, and the employee shall elucidate the concerned Public Authority that the reason for declining such offer is intended to prevent any undue procedure and, thus, is beneficial to both parties. Any exception hereto shall be handled in advance with the Compliance Office.

For further information, please consult our policies and internal procedures, such as OGMA Anticorruption Policy (ONS-000618), OGMA Gifts Procedure (ONS-000811), OGMA Hospitality Procedure (ONS-000797), or contact your Compliance Ambassador and/or the Compliance Office.



4.3. Donations and Sponsorship

As part of its corporate responsibility, OGMA may donate products, services or funds in order to support scientific research activities, arts and culture, social, educational and sports projects. As a principle, all donations shall meet transparency requirements, with clearly defined aims and objectives and without any expectation of return or exchange, and shall be substantiated by appropriate documentation, with appropriate accounting records and in accordance with relevant laws and regulations.

Sponsorship shall be allowed which is used for brand promotion, advertising, or opportunities for OGMA to demonstrate or promote its products and services, or in exercising its corporate responsibility.

Donations and sponsorship shall not be used to gain undue advantages, either directly or indirectly, whether for the Company or for individuals.

For further information, please consult our policies and internal procedures, such as OGMA Anticorruption Policy (ONS-000618), Corporate Management of Donations (ONS-000595) and OGMA Sponsoring Procedure (ONS-000538), or contact your Compliance Ambassador and/or the Compliance Office.

4.4. Political Contributions

OGMA shall not participate in political campaigns, nor shall it make contributions to political parties or candidates running for political office. For this reason, such donations or contributions shall be prohibited, whether they are made by the Company or by any members of the Board of Directors or of the Management.

4.5. Improper or Illegal Payments

OGMA shall prohibit its Board Members, Directors, Employees, Suppliers, Business Partners or other third parties that represent the Company from authorizing or effecting, either directly or indirectly, any improper or illegal payments to obtain business advantages.

Improper payments shall be such as money, assets, resources, private benefits, favors, gifts, entertainment and hospitality, or other that may be characterized as anything of value to obtain business or improper advantage.

Where third parties are hired to act on behalf of OGMA, such as consultants, customs brokers, attorneys or service providers with power of representation, such third parties shall observe the Company's policies and internal procedures in selecting, choosing and monitoring their activities, including herein risk analysis, due diligence and internal approvals, as established, for instance in OGMA Due Diligence Procedure (ONS-000440).

4.6. Anticorruption

OGMA is strongly committed to fighting corruption in all its forms, including extortion and bribery. In order to comply with anticorruption laws and regulations wherever it operates, OGMA has established and implemented an Anticorruption Policy and related procedures that meet the highest standards of ethics and integrity.

In this regard, OGMA shall not tolerate any form of active or passive corruption, such as extortion or bribery, in the attempt to influence negotiations, or to obtain any undue advantage, either to the Company or to the individual, and shall require all its Employees to be aware of and comply with such Anticorruption Policy.

For further information, please consult OGMA Anticorruption Policy (ONS-000618) and related procedures.

4.7. Prevention of Money Laundering and Financing of Terrorism

OGMA shall comply with all laws on the prevention of money laundering and financing of terrorism and shall provide for internal procedures concerning thereto. The Company aims to conduct business exclusively with customers and partners involved in legitimate and lawful business.

Any suspicious activities shall be promptly reported to the Compliance Office or Legal Department.

For further information, please consult Anti-Money Laundering and Combating the Financing of Terrorism Policy (ONS-000772).

4.8. International Trade Complying with Import and Export Control Laws

OGMA is subject to the international trade law and shall observe all import and export restrictions when dealing with countries, organizations and individuals, such as economic sanctions and trade embargoes imposed by countries where the Company operates.

Furthermore, the Company shall observe all import and export control requirements when obtaining licenses, permits, product classification or special permits concerning products, services, technology, information and financial operations, aiming to continuously improve the related processes and controls.

For that purpose and in order to help its employees understand their role and responsibility in complying with the applicable regulations, OGMA established its Export Control Policy (ONS-000641) and related procedures, which are reviewed as necessary to ensure that every Employee complies with the applicable standards and regulations.

For further information, please consult OGMA policies and internal procedures, or contact your Compliance Ambassador and/or the Compliance Office or Legal Department.

4.9. Data Privacy

By dealing with Employees, Suppliers, Customers and other Business Partners, OGMA may receive or manage private data. In this context, the Company shall observe the contractual arrangements it is bound to and the laws and regulations of the countries where it operates, with regard to the protection and confidentiality of such data, and shall use, collect, store and manage it exclusively for legitimate purposes while conducting its business activity.

4.10. Antitrust and Competition Laws

OGMA shall comply with competition laws and regulations in all countries where it operates, respecting competitors and Customers, competing based on the quality and differentiation of its products and services, at all times, and with the purpose of providing the best, most attractive options for the market.

OGMA shall not make or tolerate negotiations or agreements, either formal or informal, with competitors in the discussion of pricing, territories, bids, costs, profit margins, market share, allocation of Customers, presentation of proposals upon bids, or any other matter related to the conditions of sale. Therefore, such actions shall be forbidden to OGMA Employees or to third parties in a business relationship with OGMA.

All information on competitors shall be obtained by legitimately acceptable sources, also respecting the highest standard of ethical conduct in the pursuit of market intelligence and in making negotiations and contracts necessary for business development.

4.11. Integrity in Negotiation Processes

OGMA, and hence all OGMA employees, are committed to fair and honest negotiation with all its Customers, Suppliers, Service Providers and competitors.

For that purpose, OGMA procurement and provisioning processes shall be based on integrity and competitive equality to ensure that competitors are selected, at all times, based on technical, economic, professional and ethical criteria, as well as on the effective needs of the Company, and that the best quality and cost-benefit ratio in the provision of materials and services is ensured.

All Employees, Suppliers, Service Providers and Business Partners in general are expected and, in this regard, required to commit to internationally recognized standards of ethics and integrity, which are substantially equivalent to those established in OGMA policies and internal procedures, as well as in this Code of Ethics and Conduct, and to act in accordance with the applicable legal requirements for occupational safety, health and work environment, respect for privacy, treatment of confidential information, competition law, anticorruption, import and export control and prevention of money laundering and forced, compulsory or child labor.

Likewise, OGMA shall comply with all laws, rules and procedures concerning sales processes, by conducting its operations with the highest level of integrity, ethics and transparency. In the case of sales to governmental agencies, OGMA employees shall also be familiar with and observe the applicable laws and the specific procedures, under the guidance of the Legal Department and of the Compliance Office, depending on each case.

The Company shall not tolerate any form of corruption regarding its buying and selling processes, and shall strictly observe OGMA Anticorruption Policy (ONS-000618) and related procedures.

4.12. Relationship with the Community and the Environment

As part of the sustainability process, OGMA strives to have a positive impact on the communities where it operates, through educational, social, cultural and environmental projects.

The Company is fully aware of the environmental challenges in its industry and is committed to adopting continuous improvement processes and to investing in new technologies capable of reducing potential impacts on the environment, and shall require the same type of commitment from its Suppliers and Business Partners.

05

SUPERVISION OF THE CODE AND WHISTLEBLOWER CHANNEL

Helpline



5.1. Supervision

The Board of Directors, through the CEO, shall supervise OGMA Management in regard to the compliance with this Code, of which the dissemination and support to related implementing actions shall be provided for by OGMA Compliance Office.

5.2. Whistleblower Channel | Helpline

All OGMA stakeholders, including, but not limited to, Employees, Suppliers, Customers, Shareholders and Business Partners, are encouraged to report any concerns regarding any potential or effective violation of the principles and values in the Code.

For this purpose, OGMA provides various channels for reporting of concerns or violations, as follows:

- The Board of Directors;
- The Leader or Manager;
- The Compliance Office or the related Compliance Ambassador;
- The Human Resources Department;
- The Legal Department;
- The Helpline, on **www.ogma.pt** or on **portal.ogma.pt**.

The Helpline is a confidential channel for Employees and other stakeholders to report or seek support in regard to ethical conduct concerns related to potential or effective violation of OGMA policies, this Code, or any applicable laws or regulations.

OGMA shall not tolerate any retaliation, veiled or otherwise, against any person who reports a concern in good faith through the appropriate channels made available by the Company. Additionally, all issues, concerns, complaints or violations reported through the Helpline shall be treated with confidentiality and respect for anonymity. In order to reinforce such commitment to confidentiality and non-retaliation, OGMA hired an independent company to administrate its whistleblower channel.

Please access our confidentiality and non-retaliation policies on the Helpline, which are intended to provide users with the security and comfort necessary for appropriate reporting.

Note: In some countries, the laws concerning the provisions in the Code do not permit anonymous reporting. Therefore, in such situations, OGMA shall inform the concerned complainant thereof.

How to report a complaint or concern?

On the intranet portal.ogma.pt (Compliance portal)	On the website www.ogma.pt (Compliance weblink)	On the phone numbers indicated on the sites
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This channel should be exclusively used to report concerns related to ethical conduct and compliance with the applicable laws, regulations and OGMA internal policies.

For further information, please contact OGMA Compliance Office.

5.3. Penalties for Violations

Members of corporate bodies, Board of Directors, Directors, Employees and all natural or legal persons that carry out activities for or on behalf of OGMA shall be subject to disciplinary measures in the event of violation of the principles and values established herein, including termination of employment contract or of contractual business relationship, as applicable.

5.4. Validity of the Current Issue of OGMA Code of Ethics and Conduct

This version of the Code comes into force on the date of its publication and shall be reviewed every 3 (three) years, or every time a change occurs related to OGMA's attributions or organizational or corporate structure. The current issue of the Code shall be provided to all OGMA employees, who shall not have the right to claim, under any circumstance, that they are not aware of the provisions and principles herein. OGMA Business Partners, Suppliers, Customers, Shareholders and the community may also access the Code on OGMA website.



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