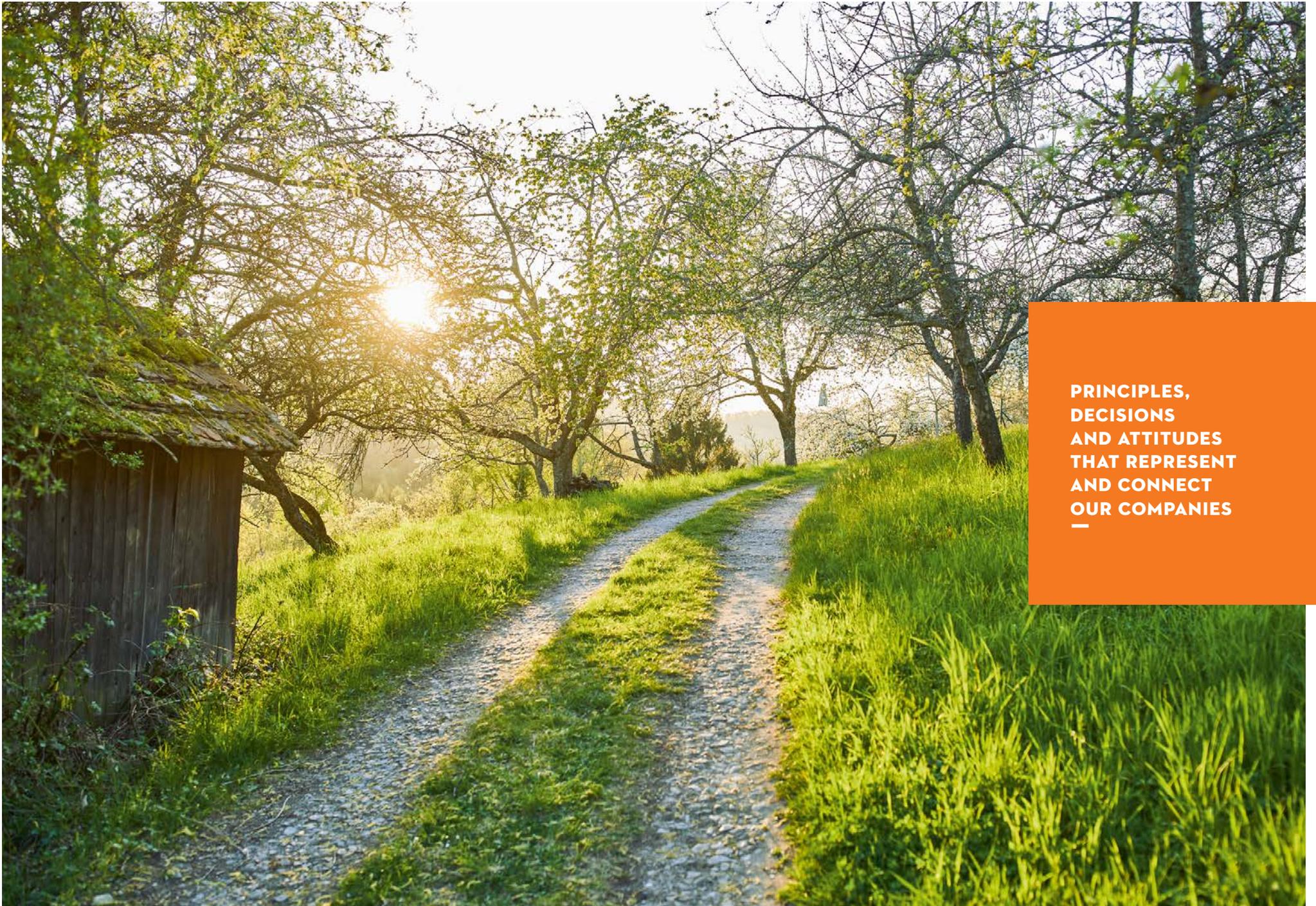


The background of the entire page is a vibrant landscape photograph. It shows a lush green field in the foreground, with several trees in various stages of spring bloom (some with white blossoms, others with fresh green leaves) scattered across the middle ground. A paved path or road curves through the scene, and a wooden bench is visible in the distance. The background is filled with a dense forest of tall, thin trees under a clear, bright blue sky.

**CODE OF  
ETHICS AND  
CONDUCT  
FOR STIHL  
BUSINESS  
PARTNERS**

---



**PRINCIPLES,  
DECISIONS  
AND ATTITUDES  
THAT REPRESENT  
AND CONNECT  
OUR COMPANIES**  
—

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# 1

## ABOUT STIHL

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STIHL Ferramentas Motorizados Ltda. (“STIHL” or “Company”), as a subsidiary of a German family owned company, is committed to conducting business in a sustainable and responsible manner - in the interest of the Company, its employees, and stakeholders. STIHL’s sustainability is represented by economic, social, ethical and environmental responsibility.

Compliance with applicable laws and regulations in the respective countries is the basis for the relationships maintained by the Company. In addition, STIHL respects the cultural, social and political diversity of societies and nations. Its values are established in the Group’s Corporate Culture and represent a commitment by all employees within STIHL and in their relations with people from other institutions, public or private.

STIHL Brasil is certified in the Quality Management System (ISO 9001: 2015), Environment (ISO14001: 2015) and Occupational Health and Safety (ISO 45001: 2018).

The commitment towards the establishment of responsible management for sustainability is a permanent attitude and means a broad vision of business continuity, with production and consumption standards that respect environmental limits, dignified living conditions for the population, reduced inequalities, creation of an environment of trust, integrity and transparency, in addition to encouraging innovation in processes and products that guarantee the Company’s competitiveness.

For it to function as a company, STIHL depends on its relationships with public agencies, the community, suppliers, the distribution network, and customers, referred to here as Business Partners. Based on this, this Code of Ethics and Conduct for Business Partners was built, which contains rules to be observed by the entities with which STIHL has or will have business relations. STIHL respects the principles of the United Nations Global Compact and the Declaration of the International Labor Organization (“ILO”) and demands that this also be observed by its Business Partners.



**ALL COMPANIES  
INTERESTED IN  
MAINTAINING  
BUSINESS RELATIONS  
WITH STIHL MUST FULLY  
COMPLY WITH CURRENT  
LEGISLATION AND RESPECT  
THE GUIDELINES OF  
THIS CODE OF ETHICS  
AND CONDUCT FOR  
BUSINESS PARTNERS.**

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## 2

### **PURPOSE AND TARGET AUDIENCE**

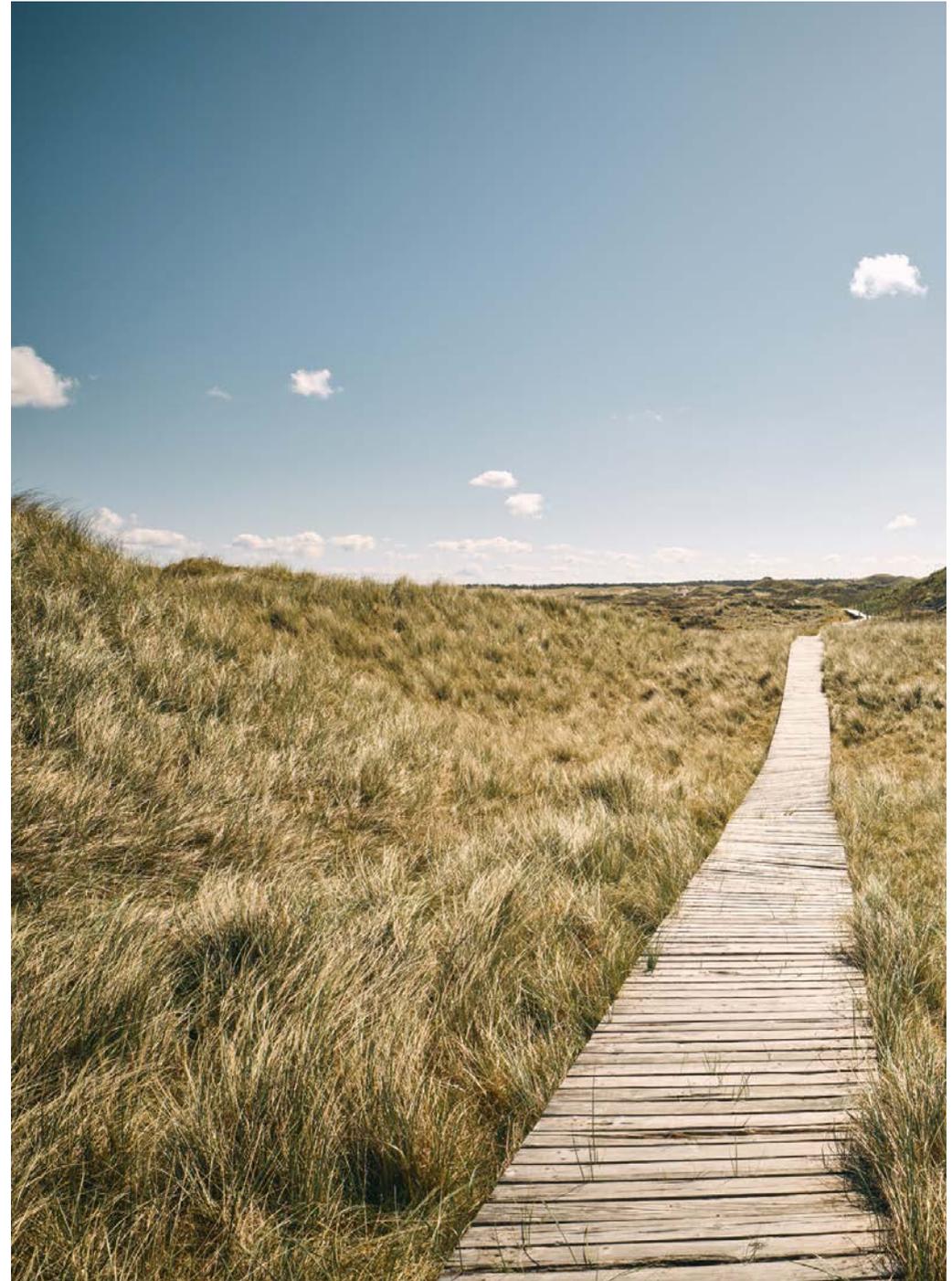
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In order to maintain STIHL's excellent reputation, image, and credibility, the Company expects its Business Partners to also always act in strict compliance with current legislation and responsibly, and must also ensure that its partners and subcontractors do so also.

Thus, the main purpose of this Code is to prevent the occurrence of practices that are illegal and/or that contradict the principles and internal rules of STIHL.

The Board of STIHL Brasil assumes responsibility for the commitment to direct the Company in accordance with the law. Therefore, all companies interested in having a business relationship with STIHL must also fully comply with the current legislation and respect the guidelines of this Code of Ethics and Conduct for Business Partners.

STIHL will not tolerate violations of this Code. In the event of non-compliance, the Business Partner will be subject to the applicable administrative, civil, labor and/or criminal responsibilities, and the Company reserves the right to implement all contractual and legal measures, including the discontinuation of the business relationship.



# 3

## BUSINESS INTEGRITY

STIHL expects all negotiations conducted on behalf of the Company to always prioritize exclusively the interests of the companies, in a fair manner with all those who make up the business environment, in accordance with the laws, regulations and standards, establishing the highest ethical standards in compliance with and respect for Brazilian and international legislation, when applicable, in all spheres, be it labor, pension, tax, environmental, protection of personal data, anti-corruption and antitrust, among others.

STIHL strongly rejects any illegal practices or unethical conduct, even those that may bring economic returns. If there must be some breach of the current legislation or the Code for a given business to happen, that business must not continue, regardless of how profitable it may be.

### It is profit guided by ethics.

Among the many possible situations to which Business Partners may be exposed, it is required that everyone:

- Act in strict compliance with all applicable laws and regulations;

- Treat everyone fairly, with dignity and respect;
- Comply with all labor and pension obligations towards employees;
- Pay their taxes;
- Maintain an appropriate relationship with public agencies, never committing or participating in any act of corruption or bribery. It is strictly forbidden to promise, offer or give, directly or indirectly, to a public agent or a third person related to him (wife, husband, children, uncles, partners, etc.) any kind of improper advantage (money, entertainment, travel, gifts, donations or something of value). During the relationship with public agents, the following must be fully observed and abided by: anti-corruption law (12,846 / 2013), the public tender law (8,666 / 1993) and other related laws;
- Disclose accurate and honest financial information;
- Do not put themselves in a situation where conflicts of interest may arise
- Do not offer or accept to give any type of commission or undue advantage to STIHL employees;

- Safeguard STIHL's assets, property, and especially its image;
- Protect STIHL's confidential information, intellectual property and other similar rights;
- Comply with the contractual obligations established between the parties;
- Report any violation of ethical and legal standards through the STIHL Ethics Hotline.



# 4

## SAFETY PRACTICES AND WORKING CONDITIONS

### 4.1 OCCUPATIONAL HEALTH, SAFETY, AND THE ENVIRONMENT

Health and safety at work are priorities for STIHL. Constant investments are made by the Company in order to avoid occupational accidents and diseases.

In this regard, STIHL Business Partners must also guarantee the full safety of their employees with regard to work hours, compliance with health and safety standards applicable to their activities, safety practices established by STIHL and in the sense that the compensation, work hours and benefits are in compliance with the mandatory minimum.

Likewise, they must contribute to ecologically sustainable development, continually seeking to reduce the environmental impact of their inputs, operations, products and services, be in good standing with all inspection agencies, maintaining all required environmental licenses in force and observing the environmental, urban, and regulatory legislation when carrying out its activities. STIHL values and encourages sustainable practices and projects by its partners.

Any and all services or products can only be made available to STIHL when all the appropriate or requested licenses and permissions have been obtained by the Company.

STIHL repudiates and does not tolerate the use of its products to carry out illegal logging. Dealers and consumers of STIHL products must obtain the respective environmental licenses and legally required registrations, such as the federal technical registry and the mandatory license for carry and use of chainsaws. Business Partners are encouraged to endorse STIHL as a company that is against any illegal deforestation practices, and is concerned with sustainable management and practices.

### 4.2 QUALITY AND SAFETY OF PRODUCTS AND SERVICES

STIHL emphasizes the quality of its products and services. Technical assistance products and services must provide the final consumer with the highest degree of satisfaction. And for the products to have the expected quality and safety, all components must be supplied with quality and in accordance with the specifications agreed to in contracts and/or other documented agreements between the Company and its suppliers.

### 4.3 WORKPLACE ENVIRONMENT AND CONDITIONS

STIHL will not enter into or maintain a business relationship with suppliers and business partners who are party to the performance of forced labor or conditions similar to slavery, child labor, sexual exploitation, and human trafficking. STIHL will not tolerate any Business Partners carrying out any practices that go against current legislation, the principles explicit in this Code of Ethics and Conduct, or that are contrary to the rules of the International Labor Organization. Ingesting or being under the influence of alcohol or any other narcotic during the work to be performed at STIHL, for STIHL or on behalf of STIHL is not allowed.

During the execution of the contract, the Business Partner must ensure that its employees dedicate their full time to the activities inherent to it.

### 4.4 HARASSMENT, DISCRIMINATION AND FREEDOM OF ASSOCIATION

STIHL does not allow any discriminatory act based on race, color, religion (or lack thereof), gender, age, marital status, sexual orientation, place of origin, or disability practiced by its Business Partners, including in processes of recruitment, selection and promotion of employees. Business Partners

must ensure means that prevent discriminatory or harassing practices, as well as deal with penalties for possible violators.

**Human rights must be observed, with respect for dignity, the value for life, the right to life and freedom, including of opinion, expression and free association.**

#### PRACTICAL EXAMPLE

I work for a company that provides services to STIHL, but the work conditions that our boss imposes on us are degrading. We do not have access to adequate safety equipment and we, as workers, are required to do overtime without being paid for it. Does STIHL have anything to do with the problem between me and my contracting company?

#### ANSWER

In the same way that STIHL acts internally to defend the maintenance of ethics, work safety and integrity of its professionals, we also demand that our suppliers do the same. This abusive conduct can be reported through the STIHL Ethics hotline, so that STIHL may take the necessary measures.

# 5

## CONFIDENTIALITY, INFORMATION SECURITY, USE OF COMPANY RESOURCES AND DATA PROTECTION

Business Partners must properly preserve and use STIHL assets. The assets are for professional use only. The goods and resources, whether tangible or not, including financial, computers, printers, furniture, facilities, vehicles, uniforms, machines, tools, systems, ideas, concepts, brands, records and/or information from STIHL, which are in possession of Business Partners, shall be treated responsibly and used exclusively for the benefit of STIHL. Any use, withdrawal, and/or transfer of any asset or resource, whether tangible or not, can only be carried out with prior written authorization from STIHL. Consult the contact person at STIHL for clarification of doubts and necessary measures.

Business Partners must maintain the confidentiality of all STIHL information to which they may have access, protecting it and not disclosing it to third parties, unless the disclosure is previously and expressly authorized by the

Company, observing the additional obligations established in confidentiality agreements and/or contracts with STIHL.

### ? PRACTICAL EXAMPLE

I have a company that provides services to STIHL, and during the work carried out internally at the factory I had access to information considered confidential regarding the STIHL production process. Perhaps this information can earn me some payment from a competitor.

### ! ANSWER

If it is proven that STIHL's internal and confidential information was leaked by your company, STIHL will adopt all legal measures holding you administratively, civilly and even criminally liable before the Courts.

When STIHL equipment or resources are used, including the use of an internet access network, the use must be limited to achieving the purpose for which the loan occurred or for which the access at the Company was given. Business Partners are responsible for any misuse or for any legal non-compliance that damages STIHL, including, but not limited to, the download of pirated programs, downloading unnecessary applications for the purpose, accessing web pages, or social networks that have no connection to the business, in addition to unnecessary recording or photographic records.

## 5.1 PROTECTION OF PERSONAL DATA

Business Partners must be committed to the protection of personal data processed by them, their employees, representatives and subcontractors, whether as controllers or data operators, maintaining an internal structure with appropriate technical and organizational measures for the control and security of personal data, with a specific person in charge, and with processes that guarantee the treatment, storage, sharing, and disposal of personal data, all in compliance with the General Data Protection Law (Law No. 13,709/2018) and any other applicable laws and regulations related to the processing of personal data and privacy, as well as all guidelines and codes of conduct issued by the National Data Protection Agency (ANPD) or other competent authority.

Business Partners must ensure that they collect and process only data that is strictly necessary to serve a particular purpose, that they have an adequate legal basis, and that they act transparently with the data owner, in order to guarantee the exercise of all their rights. In addition, any and all treatment carried out by Business Partners on behalf of STIHL must take

place in accordance with their instructions and in accordance with applicable law. Business information and personal data must circulate in secure and controlled computing environments, including the appropriate access rights management procedures. Business Partners are responsible for ensuring that they have an adequate legal basis -- including consent, when necessary -- for the treatment and sharing of personal data that may be transferred to STIHL throughout the business relationship, exempting STIHL from any liability in this regard.



# 6

## STIHL IMAGE

Business Partners play a leading role in maintaining the good image of STIHL, and must, whenever in service for or on behalf of STIHL, maintain an ethical and respectful professional posture. The use of the STIHL image, name, or brand is not allowed, unless previously and formally authorized in the contract and within the limits established therein.



# 7

## ANTI-CORRUPTION PRINCIPLES AND RESPECT FOR LAWS

STIHL will not accept the use of fraudulent practices or any type of corruption in its business environment. That is unacceptable conduct, subject to applicable legal and contractual measures, such as, but not limited to:

- Offer, pay, promise, transfer, or authorize payments in cash or anything of value, directly or indirectly, to STIHL managers, directors or employees;
- Offer, pay, promise, transfer or authorize payments in cash or anything of value, directly or indirectly, to public employees, public officials, members of political parties, candidates for public office, and persons elected or nominated for public office;
- Finance, fund, or sponsor the practice of illegal acts;
- Falsifying documents, brands or products; and/or
- Perform or be involved in illegal activities or conduct, such as tax evasion, smuggling, bribery, graft, etc.

Business Partners must also ensure the selection of their suppliers and subcontractors, ensuring that they act in accordance with current legislation and this Code of Ethics and Conduct, especially regarding activities for STIHL.

### 7.1 UNFAIR COMPETITION AND ANTITRUST LEGISLATION

STIHL repudiates the making of agreements between companies or deliberations that seek to restrict free competition, such as price fixing and market division. In this regard, it does not matter whether such agreements or combinations occur verbally or in writing.

STIHL observes and respects competition and antitrust laws. Business Partners cannot discuss prices, costs, business plans, business strategies, or other confidential business information with their competitors. The relationship with competitors must be guided by ethics and loyalty. STIHL does not allow any obtaining of market information or competitor information through questionable or illegitimate means.

No employee of a Business Partner is authorized to provide STIHL information to its competitors, even after the termination of the business relationship, under penalty of STIHL taking appropriate measures, including criminal ones.

The employee of a Business Partner who is related to an employee of a STIHL competitor must immediately report the fact through the STIHL Ethics Hotline or other available means of communication.

### ? PRACTICAL EXAMPLE

Some competitors and I were in a meeting and some commented on the prices of their products and agreed to apply the same prices. Can I talk to them about it?

### ! ANSWER

No. You should stay away from these types of conversations and agreements. STIHL seeks Business Partners who are committed to the principle of free competition and who are guided by current legislation.

# 8

## OFFERING GIFTS AND INVITATIONS

As a principle, gifts or invitations to STIHL employees must not influence STIHL's decision-making process, which must be based on the Company's internal laws and regulations and only for its benefit. The treatment given by STIHL employees to their Business Partners must be equal, and there can be no benefit from one company at the expense of others, and the specific contracting rules must always be met.

If you offer a gift or an invitation to an employee and they don't accept it, don't insist and don't take offense. It means they are acting this way in compliance with the rules and limits established in the STIHL Code of Ethics and Conduct for Employees.

### Always prohibited:

- Offer any gifts and/or invitations that are illegal or result in violation of the law;
- Offer cash and/or cash equivalents, bank checks, money orders, investment securities, negotiable instruments, loans, etc;
- Offer or request anything "in return" or as part of an agreement to do something in return for the gift or invitation;

- Offer any gift or invitation from suppliers or bidders during a tender process.

### ? PRACTICAL EXAMPLE

Bearing in mind that my contract with STIHL expires in 2 (two) months, I had the idea to present my contact at STIHL with a bottle of wine. Is that a problem?

### ! ANSWER

Yes, because the gift may be being offered with the objective of obtaining the renewal of the contract by questionable devices, which puts the supplier's reputation in doubt.

Occasional meals are permitted with Business Partners within the context of commercial activity. Preferably, in meals with STIHL employees, each company must pay for the meals for their respective employees.

# 9

## CONFLICTS OF INTERESTS

A conflict of interest exists when an employee's objectivity and loyalty can be put in doubt due to particular interests and the possibility that their decisions about the company's business will no longer be directed exclusively to its benefit.

Relatives or friends, in general, can generate a conflict of interest. If you are a relative or friend of any STIHL employee, if you are a former STIHL employee, if you know of a situation in which you understand that there is a conflict of interest or of any facts that may lead to personal favoritism, you must report this fact through the STIHL Ethics Channel or other available means of communication, in order to assess the existence or not of any conflict of interest. It is better to resolve the conflict than to feed it. An omission will have consequences.

If you have an affective relationship or kinship with any STIHL employee, you must sign the Statement of no Conflict of Interest (Appendix I).



# 10

## RELATIONSHIP WITH DEALERS

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STIHL dealers are selected in accordance with STIHL business practices and treated ethically. The commitments made, mainly in the agreements with STIHL, must be honored and there must be transparency in the negotiations.

Dealers, as STIHL Business Partners, must comply with all the rules contained in this Code of Ethics and Conduct for Business Partners.



In addition, the following rules must be met by dealers:

- Do not seek, accept, or use privileged and/or confidential information to obtain advantages in business with the Public Sector;
- Do not grant gifts or invitations to a public official during the bidding process of the bidding agency or for the purpose of obtaining or maintaining business;
- Do not provide incomplete or incorrect information, statements or warranties;
- Comply with the laws and principles of Public Administration;
- Keep all legally required licenses up to date, including the federal technical registry;
- Guide consumers regarding the need to obtain environmentally required licenses, such as the license to carry and use chainsaws and pole pruners.

You have an obligation to report to the Ethics Hotline, or other available means of communication, whenever you become aware of any illegal practices carried out by a dealer or by an STIHL employee.

### ? PRACTICAL EXAMPLE

My company is participating in a bid to supply STIHL products. I think we have little chance of winning the competition and so I thought of giving a gift to the person responsible for the bidding and in return ask for inside information about competitors' prices. Is that a problem?

### ! ANSWER

Yes, because no type of gift or invitation can be given in order to influence the decision to contract someone else, much less in exchange for favors or inside information. It is worth mentioning that no type of benefit can be granted to a public agent, since, in addition to violating this Code of Ethics and Conduct, it would be against the law.

# 11

## RELATIONSHIPS WITH SUPPLIERS

---

Suppliers are selected according to STIHL business practices and treated ethically. The commitments made must be honored and there must be transparency in the negotiations. Suppliers, as STIHL Business Partners, must comply with all the rules contained in this Code of Ethics and Conduct for Business Partners.

In addition, the following precepts should guide behavior with suppliers:

- All contracts and commitments must be honored;
- All safety standards must be strictly followed, especially those contained in the Health, Safety and Environment Requirements for Suppliers, available at <https://www.stihl.com.br/documentos-disponiveis.aspx>;
- All specific rules for each type of supply must be observed, which can also be found at <https://www.stihl.com.br/documentos-disponiveis.aspx> and/or agreements made with STIHL.

STIHL allows the hiring of companies that have relatives or friends as partners as long as they approved by the Purchasing and requesting departments. In addition, all Company rules related to hiring must be observed.

**? PRACTICAL EXAMPLE**

I own a service company, and my brother, who works for STIHL, informed me that his company is in need of the same services that I provide. Is it okay for me to provide my services to STIHL?

**! ANSWER**

It is important to be careful, as this type of situation can generate a conflict of interests due to the existence of a parental relationship between a STIHL employee and a potential supplier. For your company to be hired, the management of the department where your brother works and the purchasing department manager needs to be aware of the relationship and approve the contract. Even so, your company will have to go through the entire normal bidding process with the STIHL Purchasing department, without any benefits or special treatment.

## 12

### PROMOTION OF ETHICS

Business Partners must promote ethics and good conduct practices among their employees through formal training and development programs. A copy of this Code must be provided to those people in your companies who engage in activities with STIHL.



## 13

### STIHL ETHICS HOTLINE

STIHL has the STIHL Ethics Hotline, operated by a specialized company that guarantees total independence in the reception, screening, and direction of events reported. Anonymity will be ensured for all persons who wish to report violations of this Code of Ethics and Conduct for Business Partners, maintaining confidentiality about the identity of those who report.

The information registered in the STIHL Ethics Hotline will be presented to the Company's Ethics Committee for appropriate internal dealings.

The STIHL Ethics Hotline is available through the following means

**Telephone:**  
0800 721 1425

**E-mail:**  
canaldeeticastihl@ethicspeakup.com

**Web Site:**  
<https://ethicspeakup.com.br/canaldeeticastihl>

## 14

### BREACH OR INFRINGEMENT

STIHL reinforces that full compliance with the legislation and the principles defended in this Code of Ethics and Conduct for Business Partners is non-negotiable, and if it is found that any Business Partner fails to comply with the Contract, they may be held accountable administratively, civilly and/or criminally, in addition to being subject to charges for any damages that STIHL or third parties may suffer as a result of illegal and/or unethical actions committed.



**TO PRINT AND FILL IN MANUALLY.**

**TERM OF AWARENESS AND RECEIPT OF THE CODE AND STATEMENT OF NO CONFLICT OF INTEREST**

By this statement I, **DECLARE:**

1. That I am aware of the content of the Code of Ethics and Conduct for Business Partners and that I comply with all the provisions contained therein.

2. That I have a degree of kinship (spouse, parents, children, siblings and/or grandparents) or affective relationship with a person who holds a position or job at STIHL.

( ) NO

( ) YES

If so, please state their name, the relationship maintained (affective relationship or degree of kinship) and the position held at STIHL:

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Degree of kinship or type of affective relationship: \_\_\_\_\_

3. That said relationship does not represent a conflict of interest. I declare that the relationship with STIHL and with STIHL people is strictly professional, that I do not receive confidential or privileged information, that I do not offer or make any kind of payment or provide any advantage to STIHL employees, and there is no situation that represents a conflict of interest.

4. That I will provide information regarding about any conduct that is illegal or contrary to the Code, through the STIHL Ethics Channel.

Name of Business Partner: \_\_\_\_\_

CNPJ (Corporate Tax Identification): \_\_\_\_\_

Name of the legal representative: \_\_\_\_\_

CPF (Individual taxpayer registration number): \_\_\_\_\_

Date and Signature: \_\_\_\_\_

The signing of this statement by the Business Partner does not imply STIHL's agreement regarding any conflict of interest, and STIHL may determine that a situation is likely to conflict.



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