

**INTEGRITY PROGRAM
CODE OF CONDUCT**

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1. PRESENTATION

This Code of Conduct, which provides QUALIMAN's Integrity Program, aims to guide the Company's relationship with its internal and external publics, determining, especially, to its employees and Directors, suppliers and other physical and legal entities with whom they relate, which act in compliance with the guidelines and principles contained in this document, and which observe and respect, as well, the standards and current law at the sites where the Company maintains its activities.

To comply with and to enforce such commitments, QUALIMAN's Top Management is dedicated to provide that this Code of Conduct may be informed to the general public, through its introduction at QUALIMAN's corporate site, and to its employees and Directors, suppliers and other physical and legal entities with whom the Company relates, through physical submission of a copy of this Code, with the acknowledgment of its receipt given in the respective enclosed Terms.

2. APPLICATION

The QUALIMAN Code of Conduct is applicable to all its employees and Directors, henceforth called "collaborators" or "collaborator", such that their leaders, within their management competencies, shall keep their teams permanently informed of the existence of this Code of Conduct and occasional changes, shall require their obedience, as well as require QUALIMAN's suppliers, and other physical and legal entities that relate with the Company, to comply with and to enforce the guidelines and principles contained in this Code of Conduct.

Aside from keeping permanently informed its collaborators on the Code of Conduct and occasional changes, which provides its Integrity Program, QUALIMAN will also give, to these collaborators, periodic trainings on the practical aspects of the guidelines and the integrity policies required by its internal standards and law applicable to its business.

3. PRINCIPLES AND VALUES

QUALIMAN aims to perform its business by respecting the current law and as commitment to social responsibility practiced in all its operations, reaffirming in this Code of Conduct the principles and values that guided its constitution. Highlighting, for purpose of preservation of its integrity through its collaborators, whereby, in its relations with the Public Government and with third parties in general, they follow the applied standards and law and requires that the negotiations resulting from them may be done transparently and conducted only by people formally authorized by the parties.

In this sense, QUALIMAN does not tolerate any practice of corruption in its business, or authorize collaborators or third parties, in hits behalf or in proper name, to practice or mediate the practice of any illicit act. It also does not admit illicit combinations, of any nature, with competitors or partners.

QUALIMAN has as principle not to do any type of donation, sponsorship or financing to political parties. Being prohibited, therefore, to its collaborators the execution of any expenses in this sense. However, donation to renowned entities and registered as philanthropic in nature could be done, the QUALIMAN's discretion, and after expressed authorization given by its Board of Directors.

4. CONDUCT GUIDELINES

Every employee of QUALIMAN, and, when applicable, suppliers and other physical and legal entities that relate with QUALIMAN, have the responsibility of ensuring, during their entire relation with the Company, that the described rules and procedures to follow may be fulfilled:

- a) To respect the current law, internal standards and business guidelines of QUALIMAN;
- b) To act honestly, respectfully and transparently, without obtaining undue advantages;
- c) Not to request, demand, accept, promise, give any type of favor and advantage, gratuity or tip for himself or for another person;
- d) To maintain mutually respectful personal and business relation, in behalf of QUALIMAN, mutually commutative;
- e) Not to submit and not to conspire with any type of threat, violence, bias, abuse, discrimination, moral or sexual harassment;
- f) To inform any risk to QUALIMAN's integrity, its business and image and to the environment;
- g) Not to practice or to conspire with child, forced, slave or degrading labor;
- h) Not to practice or conspire with any form of sexual exploitation;
- i) Not to use derogatory languages in the workplace;

4.1 SECURITY OF INFORMATION

Internet access, telephone and e-mail, software, hardware, equipment and other properties of QUALIMAN, must be restricted to the collaborator's professional activity, where the provisions established in the Company's internal standards are observed.

All data produced and maintained in QUALIMAN's equipment and information systems are its exclusive property. The collaborator must recognize and be aware that the Company has the right of access to all data and information (documents, e-mails, etc.) stored in its proprietary computers, even those for the collaborator's exclusive use.

Information protection is a duty and commitment of all collaborators, because information is essential for QUALIMAN's activities, and must adequately used and in the Company's exclusive interest, whereby its diffusion is prohibited without expressed authorization in this sense.

They are considered privileged information and confidential and strategic in nature, and, therefore, those whose internal or external diffusion may affect QUALIMAN's business cannot be announced, forwarded or commented without expressed authorization in this sense by its Management.

4.2 FRAUD AND CORRUPTION

QUALIMAN does not admit the practice of any act related to fraud and corruption on the part of its collaborators, as established in this Integrity Program.

QUALIMAN's collaborators are prohibited from promising, offering, authorizing or giving, directly or indirectly, undue advantage, which may involve or not monetary interests, to any physical or legal entity, for their own interest or the Company's interest.

QUALIMAN's collaborators must use the Company's financial resources in compliance with the need, by recording this use on specific reports, sent to QUALIMAN's Management.

All financial operations of QUALIMAN must be entered in the accounting books, respecting the principles provided in the pertinent law and in good accounting practices. The records containing errors that aim to fraud the law are considered serious lack of conduct.

4.3 CONFLICT OF INTERESTS

The occurrence of any situation generated by confrontation between QUALIMAN's interests and the private interests of its collaborators is not permitted, which may come to compromise the Company's interests or influence inappropriately its activities, such as, for example:

- a) Improper use of privileged information;
- b) exercise of activity of supply of goods and services to physical or legal entities hired by QUALIMAN or its competitor;
- c) actuation as consultant, adviser or mediator of private interests of physical or legal entities hired by QUALIMAN or its competitor;
- d) receiving of gift from whoever has interest in business decision in the department where the collaborator participates.

4.4 OUTSOURCING CONTRACT

The business relations of QUALIMAN with its suppliers are based, primarily, on quality, competitive prices and compliance with the validity of the good or service to be supplied; and, secondly, on the name and tradition in the supplier's market. Thus, QUALIMAN guides its collaborators that in purchasing and contracting processes of goods and services, especially, in those that may involve goods and services to be supplied as result of contracts signed by QUALIMAN with the Public Government, aside from giving a copy of its Code of Conduct, with acknowledgment of receipt, to introduce in the contract to be signed with the supplier, if it is the case and if possible, an application prevision clause of the Integrity Program provided in QUALIMAN's Code of Conduct; of contractual rescission, in case the contracted party practices harmful acts to the Public Government; and payment of indemnity in case of responsibility imputed to QUALIMAN for act of the contracted party.

4.5 GIFTS, SOUVENIRS AND HOSPITALITY

QUALIMAN's collaborators are prohibited from suggesting, requesting, offering or accepting gifts or souvenirs, of any value, from customers, suppliers, competitors and contracting parties, except brand remembrances, as, for example: pen, mechanical pencil, appointment book, calendar, card holders and notepads.

Gift or souvenir of estimated commercial value greater than BRL 100.00 (one hundred reais) must be refused and returned with the information that its acceptance is against QUALIMAN's internal standards. In the event of impossibility of being returned, the gift or souvenir must be sent to the Company's Audit sector, for its remittance as donation in social campaigns.

QUALIMAN's collaborators are prohibited from accepting personal invitations for trip and lodging of contracted companies, contracting parties, suppliers or competitors. Expenses paid by contracted companies, contracting parties, suppliers or competitors, related to meal or public entertainment are acceptable, provided that they are justified due to work or normal business courtesy, within reasonable limits and that they may not imply in embarrassment or need for retribution.

4.6 HEALTH, SAFETY AND ENVIRONMENT

It is the responsibility of all QUALIMAN collaborators, as well as its suppliers of goods and services, to comply with the determination of the Quality, Health, Safety and Environment (QHSE) Policy and Guidelines of QUALIMAN and, if it was the case, of the contracting parties of QUALIMAN.

a) Safety and Health

To promote the prevention of health and safety in the workplace, requiring the observance and compliance with standards and cares that prevent accidents and propitiate a safe and healthful workplace, including the use of uniforms and protection equipment, defined as obligatory, as established by the safety standards.

To watch over the preservation of life, physical integrity and safety of people whom they relate with, establishing systematic control and monitoring actions through hazard identification spreadsheets and OHS (occupational health and safety) risk assessment.

It is prohibited the sale, purchase, distribution and consumption of illicit beverages and drugs in QUALIMAN's premises and in the premises where it is providing services, as well as accessing and maintaining in these premises, during working hours, under the effects of consumption of illicit beverages and drugs.

It is prohibited to smoke in the workplaces, toilettes and restaurants. It is permitted, however, only in predefined places and authorized for this end.

b) Environment

To promote the preservation of the Environment, so as to reduce impacts to acceptable limits, and its collaborators, including contracted and subcontracted companies of QUALIMAN, must watch over the compliance of the following principles:

- a) To respect the environment and to take care of its preservation, inside and outside the company;
- b) To strive in improving the quality of human life;
- c) To value biodiversity;
- d) To endeavor efforts that prevent the depletion of non-renewable resources and to contribute toward the development of environmental awareness.

4.7 RESPECT TO DIVERSITY AND EQUALITY

QUALIMAN repudiates all and any form of bias or discrimination, whether by reason of race, color, nationality, origin, religion, gender, sexual preference, social class, civil status, age, weight, height, physical deficiency or other personal characteristics or any other act contrary to the principles and commitments of this Code of Conduct, in its premises, and the transgressor must be reported immediately.

4.8 POLITICAL AND RELIGIOUS ACTIVITIES

QUALIMAN, in accordance with its business principles and values, does not have any Political and Religious position, whereby its collaborator is prohibited, inside the Company premises and in places where the Company executes its activities, during working hours, to make use of his own or Company resources for this purpose.

4.9 PSYCHOLOGICAL VIOLENCE, MORAL AND SEXUAL HARASSMENT

QUALIMAN does not admit under any hypothesis physical and/or psychological violence, moral and sexual harassment in its premises.

- a) Psychological violence is characterized by explicit or subtle humiliating and embarrassing words, gestures, attitudes, which may consider against the collaborator's dignity, which can cause him damage to his physical and psychic integrity and provoke malaise to the workplace.
- b) Moral harassment is characterized by exposure of the collaborator to embarrassing and humiliating situations during the exercise of his function, repeatedly and for a prolonged period of time, which can compromise his professional career and employment, causing damage to his physical and psychic integrity, and provoke disturbance to the workplace.
- c) Sexual harassment is characterized by embarrassment caused to the collaborator through embarrassing insinuations with the objective of obtaining sexual advantages or favor, where the agent takes advantage of his condition as immediate superior or influence inherent to the exercise of his job, position or function.

5. REPORT AN INCIDENT CHANNELS

Any violation to the instruments of this Code of Conduct must be informed directly to the collaborator's immediate superior so that this may adopt the immediate and necessary measures for cessation of this violation and, in case its continuity or consummation results in injury to others and/or to the Company, to submit the fact for consideration of the Company's **INTERNAL AUDIT** for pertinent provisions.

Notwithstanding, if for any reason, contact with the immediate superior is not possible or convenient, or even one does not feel comfortable to do it, or the collaborator wishes to

remain anonymous, QUALIMAN makes available in its head office, branch offices and construction sites, Suggestion Boxes for the same purpose.

The following **Report an Incident Channels** are also available to QUALIMAN collaborators and suppliers, as well as to the general public, so that they may report incidents when they identify or suspect any illicit act or indicated as prohibited in this Code of Conduct, as well as any activity that may place in risk the integrity of QUALIMAN, which can be accessed through the following media:

Telephone: 0800.774.1980 or +55 11 4646.1159

E-mail: auditoria@qualimanengenharia.com.br

Site: www.qualimanengenharia.com.br

QUALIMAN ensures the possibility of anonymity to access the Report an Incident Channels, if it is the informer's interest, confidentiality to its investigation process and impartiality of its decisions, as well as no retaliation to the one who acts in good faith will be tolerated or applied.

6. INTERNAL AUDIT

The reports placed in the Suggestions Boxes or made through the Report an Incident Channels will be sent to QUALIMAN's INTERNAL AUDIT, which is the body appointed by the Board of Directors as responsible for its receipt, previous analysis, filing if inconsistent, and in case consistent, investigation of responsibilities and remittance of consolidated and conclusive report, with recommendation of disciplinary measures, for analysis and decision of QUALIMAN's Board of Directors.

QUALIMAN's INTERNAL AUDIT is also responsible for continuous monitoring of the application of the Integrity Program in the Company's business, through periodic audits (in person or remote) in the bodies of its Head Office, Branch Offices and Construction Sites, aiming to check its effective implementation, and allowing the identification of faulty points (nonconformities) which may require corrections and improvement, and thus allow the Company to respond opportunely to any new risks that may have arisen or may arise.

7. COMPLEMENTARY PROVISIONS.

The violation of any of the instruments of this Code of Conduct subjects the violator to disciplinary penalties, which include warning, suspension or dismissal. In the application of penalty, the nature and seriousness of the violation, will be considered, observing always the internal standards of QUALIMAN and the current law.

QUALIMAN's Code of Conduct, approved on 10/20/2016, starts to take effect in substitution to the previous in effect, entitling the Board of Directors of QUALIMAN to promote its diffusion and periodically carry out review and update.

ANNEX I

(COLLABORATORS)

TERM OF RECEIPT AND COMMITMENT

I declare, for all due purposes, that I received a complete copy of the CODE OF CONDUCT of QUALIMAN ENGENHARIA E MONTAGENS LTDA, and I have been made aware of its provisions, committing to comply with them totally.

I further declare that I was informed of the obligation of its observance in all situations and circumstances that may be, directly or indirectly, connected to activities of my Employment Contract signed with this Company on ___/___/___.

I finally declare, that on the hypothesis that situations might occur not expressly provided in this CODE OF CONDUCT, but may place in risk QUALIMAN's integrity, I will immediately inform the fact to my immediate superior.

Name:	
CPF/MF no.	
[Individual Taxpayer's No.]	RE:
Place and Date:	
Signature:	

ANNEX II

(SUPPLIERS)

TERM OF RECEIPT

I declare, for all due purposes, that I received a complete copy of the CODE OF CONDUCT of QUALIMAN ENGENHARIA E MONTAGENS LTDA, and I have been made aware of its provisions.

I further declare that I was informed of the obligation of its observance by QUALIMAN's suppliers in all situations and circumstances that may be, directly or indirectly, connected to activities of the Contract signed between QUALIMAN and PETROBRAS, on ___/___/___.

Corporate Name:
CNPJ [Federal Employer Identification Number]:
Place and Date:
Representative's Name:
Signature: