



Ethics, Integrity & Transparency

The goals of our integrity system are:

- to develop and maintain a culture of consistent ethical leadership and working practices across all levels of the organization
- to enable an ethical, safe, respectful and inclusive working environment for all
- to foster an understanding of, and adherence to, our values and expected behaviors among staff at all levels
- to develop and maintain organizational resilience against actions, decisions and behaviors that compromise the integrity of our organization, or those who represent it
- to reduce the likelihood and impact of integrity violations as much as possible
- to build awareness and confidence in the integrity reporting channels so that – where they cannot be prevented – a greater proportion of violations are reported
- to ensure that actual and suspected breaches of our values and behavioral standards are effectively and robustly managed

Our integrity system is guided by the following principles: accessibility, confidentiality, data protection, fairness and due process, safety and security, independence, mutual responsibility, clarity and proportionality.

In addition to establishing the strategic functioning of the system, the Strategic Framework also defines the scope and parameters of the responsibilities, mandates, and powers of those who work within the system.

Code of Business Conduct and Ethics

The Company's directors, officers and employees are required to comply with the Company's Code of Business Conduct and Ethics. The purpose of the Company's Code of Business Conduct and Ethics is to deter wrongdoing and to promote, among other things, honest and ethical conduct and to ensure to the greatest possible extent that the Company's business is conducted in a consistently legal and ethical manner. Employees may submit concerns or complaints regarding ethical issues on a confidential basis by means of a telephone call to an assigned voicemail box or via email.

The Company will also disclose any amendment to, or waiver from, a provision of the Code of Business Conduct and Ethics that applies to a director or officer



DeeKay Excellence
Explore within you

Code of Business Conduct and Ethics

Our Responsibilities—Personal Integrity, Corporate Values and Ethical Principles

We are a Company committed to:

- **Passion for Excellence**—Strive to achieve the best in everything we do.
- **Integrity**—Hold ourselves to the highest ethical standards. To interact in an open, honest positive manner and be guided by what is right.
- **Teamwork**—Work together with trust, openness, honesty and respect.
- **Inspired People**—Build a culture where people are motivated, engaged, valued and growing. Our people make the difference and are the essence of Rainmaker Systems.

Our core values support and guide our leadership in establishing the strategic direction of the Company. Sound judgment shall be exercised in the service of our reputation as a business leader, employer of choice, and good corporate citizen. Our employees and representatives are expected to conduct their business in accordance with these values and with our Standards of Business Ethics and Conduct (“The Standards”). DeeKay Excellence reputation is based on the personal integrity of each of its employees and those with whom we do business. We strive to be compliant with laws, regulations and policies; we endeavor to conduct ourselves in a manner beyond reproach. Actions speak louder than words.

This booklet is not a set of rules. It is a resource to be used in making decisions that will affect us all. It provides guidance in assessing situations. As always, if you are faced with a situation in which the proper path is unclear—think and ask before you act. Only with all of us working together can we continue to achieve our vision.

Our Responsibilities to Our Stakeholders

—To Ourselves

Integrity is at the heart of who we are as individuals. Integrity is at the heart of Rainmaker Systems as well.

—To Each Other

We owe each other honesty, respect, and fair treatment. We value the unique contributions of each employee.

—To Our Business Partners, Clients, and End-User Customers

Our business partners, clients, and end-user customers trust the quality and value of our service offerings. We depend on strong relationships with our business partners and clients to provide us with continued opportunities to grow our business.

—To Our Community

When we give back to the community, we instill pride in our employees and gain the respect of the citizens in our community.



Transparency with related parties

DeeKay Excellence is committed to ensure that transactions between DeeKay Excellence and any Related Party are transparent, fair, and in accordance with applicable laws

A Related Party is any individual or legal entities that:

- Holds common shares of Braskem or may exercise Material Influence over it;
- Is directly or indirectly Controlled by, Controls or is under common Control with a shareholder that exercises Control or Material Influence over Braskem.
- Is a Key Person, or his/her Close Relative, of Braskem, its Controlled Entity, its Controlling entity or any legal entity that exercises Material Influence over Braskem.
- Is a company jointly or separately Controlled by, or under Material Influence of any person mentioned in the above item.
- Is a Controlled Company, in which a Third Party has a shareholding stake.
- For any reason or circumstance, is in a condition or situation in which there are grounds for concern that it cannot contract on market terms, where the following principles are observed:
 - competitiveness (prices and conditions of services compatible to market prices and conditions);
 - compliance (adherence of the services provided to the contractual terms and liabilities practiced by DeeKay Excellence, as well as to adequate information security controls);
 - transparency (adequate reporting of the agreed conditions, as well as the corresponding effects on the financial statements of DeeKay Excellence);
 - equity (setting of mechanisms that prevent discrimination or privileges, and of practices that ensure that privileged information or business opportunities are not used to the benefit of individuals or Third Parties).

Transactions with Related Parties include and are not limited to the transfer of resources, services or obligations between the Company and a Related Party, regardless of whether a price is charged in return or not.

Transactions with Related Parties must be reviewed any approved in accordance with Company Guidance Materials on Related Party Transactions.