



Funep

Commitment to

integrity

in processes

Code of Ethics and of Conduct



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I. INTRODUCTION

The Code of Ethics and Conduct of Funep, is intended to mark out the ethical conducts of all those involved, directly or indirectly, with the Foundation, which are: **Internal Stakeholders** - members of Trustee and Fiscal board and Executive Board, Coworkers (Employees, including apprentices) and Interns and **External Stakeholders** - Customers (Professors / Researchers, bookstore customers, literary works authors and participants of Events), Financiers, Sponsors, Suppliers, Power of Attorney Holders and Service Providers, who must know it and publicize it, observing and defending its compliance. Financiers, Suppliers and Trainees, who must know it and give it publicity, observing and defending its compliance.

This Code aims to establish a respectful and transparent relationship pattern among all those involved, guiding decision-making within Funep's values and ethical principles.

Therefore, this Code is in Compliance, which means that it is in line with laws and regulations (internal and external), i.e., it meets with the laws and regulations of the Regulatory Agencies as well as with the Foundation's systems of control regulations which exist to ensure compliance with the external rules imposed by these Regulatory Agencies.

The success of an Integrity or Compliance Program is based on the commitment of all those involved, establishing and meeting: the pre-established policies and procedures, the code of ethics and conduct in relationships, the Foundation's communication plan, the trainings, the reporting channels, the activities monitoring, the performance evaluation, the needs for continuous improvements and the required corrections.

Funep works according to the Brazilian Laws which rule an Integrity or Compliance Program, because since December 2020 it has established and implemented an effective Anti-Bribery Management System, based on the requirements of the ABNT NBR ISO 37001 Regulation, always seeking for high standards of quality management, in accordance with the requirements of the ABNT NBR ISO 9001 Standard, respecting the transparency and veracity of its accounting and financial information, which are audited annually by the Court of Auditors of the State of São Paulo and by the Public Ministry.

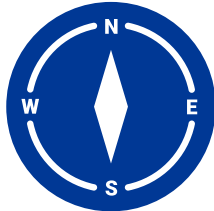
It is important to highlight that Funep has a Personal Data Privacy Policy, which is in accordance with the General Personal Data Protection Law (LGPD), Law number 13,709, from August 14, 2018, and subsequent amendments. The Information Technology policies and procedures seek to comply with good data governance practices.

Executive Board



II. What is an ethical decision?

Parameters to be considered when answering this question:



1. Is it against the law?
2. Is it contrary to this Code, the Anti-Bribery Policy and / or the other policies and other Foundation documents?

In order to make any decision, the members of the Trustee and Fiscal Board, the Executive Board and the Collaborators must analyze, reflect and take a position only after having answered the two questions presented above.



III. From the object of Funep's code of ethics and of conduct

Funep's Code of Ethics and of Conduct aims to establish principles and norms, which must be respected by the Internal and External Stakeholders, who will be subject to the rules/regulations described below.

Funep neither agrees nor participates in any kind of fraud, bribery or corruption, as well as, doesn't practice harmful acts to public and private administrations, and searches for measures to prevent, detect and correct ethical deviations. This Code, the Anti-Bribery Policy and other existing integrity documents will be used to guide decision taking in cases of ethical conflicts.



IV. Funep principles



Funep acts based on the principles of legality, impersonality, morality, publicity, cost-effectiveness and efficiency, being its responsibility:

- a) Encourage respect as a pillar of all relationships;
- b) Ensure compliance with laws, institutional rules and social commitment;
- c) Provide an appropriate working environment;
- d) Act with responsibility for the preservation of Funep's assets, ensuring an efficient management results for its co-workers;
- e) Contributing to society by developing products and providing services which could be useful for scientific, educational, intellectual and cultural improvements in Brazil.



V. Mission, vision and values



Mission

Contribute to the scientific and technological development of the country, through the knowledge distribution and propagation, the commitment with generated contents and the specialized services provided.



Vision

To be recognized as an innovated Support Foundation and committed with excellent provision of services.



Values

Integrity: work guided by ethics, respect, equality, legality and credibility;

Effectiveness: work directed to resolve quickly and efficiently any challenges;

Commitment: work carried out with responsibility, proactivity, precision and excellence;

Transparency: committed to perform management activities with openness, providing reliable information;

Innovation: an ongoing search for improvement and updating in management processes, offering quality in the relationship with partners and with the external community.



VI. Respect as pillar of all relationships

1. WORK ENVIRONMENT



Funep's Trustee and Fiscal board members, Executive board members, Collaborators and Trainees have the following duties:

- a) Perform their duties with ethics, responsibility, impartiality, commitment and transparency;
- b) Do not allow moral, sexual and electoral harassment in the work environment;
- c) Guarantee fair salaries and equal remuneration criteria for men and women in the exercise of the same function or who perform work of equal value, respecting all labor rights;
- d) Respect the hierarchy, the institutional rules and values which inspire Funep, not adopting ideological, religious, political and ethnic preferences, as well as gender and origin;
- e) Do not publicly use Funep's name without the permission of its legal representatives;

- f) Use Funep's Report Channels to tell about any irregularity, illegality or violation of the present Code which they have gained access;
- g) Respect and promote Funep's mark;
- h) Act proactively as a team, seeking to achieve the Funep's goals, accepting divergent and constructive opinions, to solve conflicts, in order to create a participative and cooperative work environment;
- i) Do not use your social networking profile on behalf of Funep and its partners, except for sharing Institutional news;
- j) Hiring relatives is not allowed (spouse, parents, children, siblings, uncles, brothers-in-law and first cousins), in the following situations: when there is a blood relationship between a Collaborator who is participating in the selective process and the applicant for the position and also when the applicant is applying for a position in the Sector where a family member works.
- k) It will be up to the Executive Board or the Board of Trustees to apply sanctions to all those who commit ethical/legal violations.

2. EMPLOYMENT EQUALITY



Funep's members of the Board of Trustees and Supervisors, the Executive Board, Collaborators, including Young Apprentices, and Interns must:

- a) Seek mutual respect and equal treatment in all relationships;
- b) Demand equal treatment among all Employees, with no discrimination of any kind (ethnic, gender, political, cultural, religious, age, marital status, disability or sexual orientation).



3. DATA PRIVACY



Funep's Trustee and Fiscal board members, Executive board members, Collaborators and Trainees have the following duties:

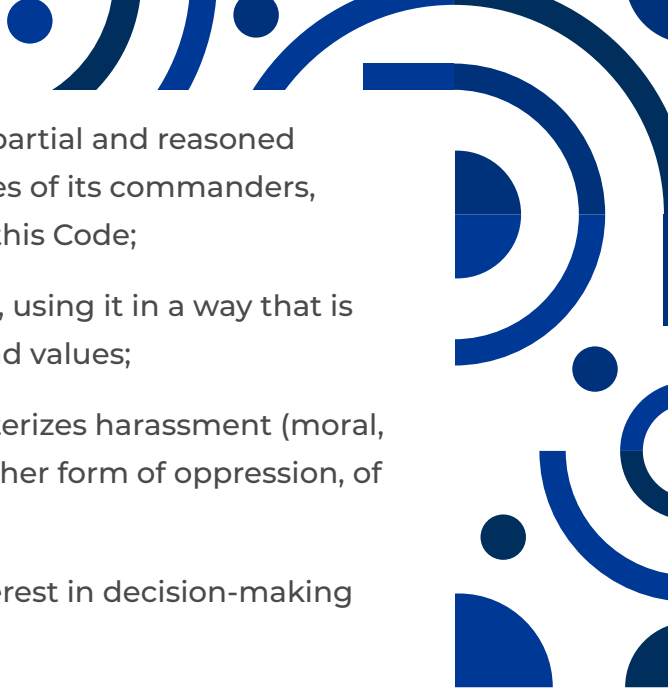
- a) The information about Funep's contracts with Financing companies and Sponsors, Clients (Teaching Staff / Researchers), suppliers and service providers must be treated confidentially, as well as the obtained results in these contracts;
- b) Search for suppliers' reliability and integrity and, wherever possible, purchases must be negotiated;
- c) Maintain the confidentiality of the information to which they have access by virtue of their duties, even after their dismissal, under penalty of being held legally liable for the losses and damages caused;
- d) Comply with Funep's rules and policies related to the General Personal Data Protection Law (LGPD);
- e) Sign the acknowledgment in the "Term of Commitment to Confidentiality of Information and Protection of Personal and Sensitive Data" about the personal data treatment and sensitive personal data to which they have access.

4. HONEST RELATIONSHIP AMONG FUNEP'S EMPLOYEES



The leaders (Executive Board and Sector Coordinators) must have the following conducts in the exercise of the activities inherent to the function:

- a) Know and share, including through their own attitudes, the rules, principles and values contained in this Code;

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- b) Manifest itself, when necessary, in an impartial and reasoned manner in relation to inadequate postures of its commanders, always guided by the rules contained in this Code;
 - c) Do not misuse the power vested in them, using it in a way that is not consistent with Funep's principles and values;
 - d) Do not engage in conduct which characterizes harassment (moral, sexual or electoral), embarrassment or other form of oppression, of any nature, in relation to subordinates;
 - e) Do not be led by feelings or personal interest in decision-making inherent to the function;
 - f) Do not hire people under 16 years old, with the exception of the Young Apprentice Program;
 - g) Do not use child or slave labor in all its service sector;
 - h) Do not use illicit means to generate political influence nor allow the use of advantages to achieve their contractual obligations and in competitive bidding;
 - i) Do not, in any way, practice unfair competition;
 - j) Promote an appropriate anti-bribery culture within Funep;
 - k) Encourage the use of reporting procedures for actual or suspected bribes;
 - l) Ensure that there will be no retaliation, discrimination or disciplinary action for reports made in good faith or based on a reasonable belief in violation or suspected violation of the Anti-Bribery Policy (except when the individual participated in the violation);
 - m) Ensure that there will be no retaliation, discrimination or disciplinary action against Employees and / or Interns who refuse to participate in bribery, even if such refusal may result in some loss to Funep;
 - n) Comply with and enforce Funep's Anti-Bribery Policy and Code of Ethics and Conduct.



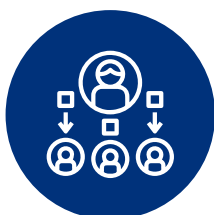
5. HONEST RELATIONSHIP WITH CUSTOMER



It is the responsibility of Funep's members of the Board of Trustees, Executive Board and Employees and Interns:

- a) Serve Funep customers in a transparent, ethical, courteous and assertive way;
- b) Base the relationship on the principles of legality and transparency, so that the purpose and use of resources must not be questioned;
- c) Request that customers, when performing activities on behalf of Funep, respect its mark, its values and its resources;
- d) Do not provide undue advantage to any partner with which Funep has an institutional or commercial relationship;
- e) Not requesting gifts, benefits or undue advantages;
- f) Only accept institutional gifts without commercial value that constitute a practice of kindness and cordiality between the parties, in accordance with the respective Funep Policy.
- g) Avoid accepting invitations for entertainment, such as participation in Events closing dinners managed by Funep, unless all Employees are invited or the invitations made available can be drawn among everyone.

6. HONEST RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS



It is the responsibility of Funep's members of the Board of Trustees, Executive Board, the Employees and Clients:

- a) Hiring suppliers and service providers that fulfill legal, technical, quality and ethical criteria;
- b) Rejecting suppliers and service providers who show evidence of illegal, unfair or fraudulent practices;

- c) Rejecting suppliers and service suppliers that offer undue benefits to maintain a business relationship with Funep;
- d) Do not offer undue benefit to any partner with which Funep has an institutional or commercial relationship;
- e) Do not use your position to receive gifts, benefits or advantages from other partners that Funep maintains an institutional or commercial relationship with, except the ones included in previously approved projects;
- f) Only accept institutional gifts with no commercial value that configure the practice of kindness and cordiality between both sides, in accordance with the respective Funep Policy;
- g) Gifts, presents and hospitality received in violation of these guidelines and Funep Policy must be returned by Employees to Suppliers or Business Partners. If it is not possible to return it, the item received must be forwarded and informed to the Compliance Officer for the appropriate destination to be defined, such as, for example, being drawn among Funep Employees, eliminating those who may be exposed to situation of conflicts of interest;
- h) Prevent suppliers and service providers who commit violations against Anti-Bribery Policy and this Code from signing new contracts of any type with Funep;
- i) Funep's Executive Board is responsible for applying disciplinary measures or sanctions, such as: written notification, extrajudicial notification, contract termination, third party blocking and legal proceedings, to third parties who commit ethical/legal violations.



VII. Sustainability (Conduct)

1. HUMAN WORKING CONDITIONS



Funep members of the Board of Trustees and Auditors, the Executive Board, Funep Employees and Trainees are obliged to:

- a) Proactively act as a team, working for Funep's goals, accepting different opinions and with positive character, in order to solve conflicts, looking for a participative and cooperative environment;
- b) Ensure that the work environment remains free from criticism or the reproduction of rumors which have a negative impact on the image of Funep, Funep's professionals and those with whom Funep is linked;
- c) Seek for a safe and healthy work environment that offers and encourages freedom of expression and involvement, as well as professional and personal growth.

2. PROPER USE OF RESOURCES



Funep members of the Board of Trustees and Auditors, the Executive Board, Funep Employees and Trainees are obliged to:

- a) Do not use Funep's resources or patrimony for private or others' purposes;
- b) Use the resources available by Funep with citizenship and without waste, acting with social and economic responsibility;
- c) Do not install or use non-original software on Funep computers;
- d) Only post articles, photos, videos, and other posts related to Funep, on the social media, after receiving an evaluation and authorization from the professional responsible for the Foundation;
- e) Use Funep's technological resources, but not only the website, e- mail and access to the Internet and its social media, only for professional and consistent goals with this Code.

3. PROTECTION OF THE FOUNDATION'S ASSETS



The members of the Trustee and Fiscal Boards, Executive Board, Collaborators and Trainees are responsible for the assets (furniture and real property) of Funep, taking care of its preservation and maintenance.

4. PRESERVATION OF THE ENVIRONMENT



It is the responsibility of the members of the Trustee and Fiscal Councils, the Executive Board and Funep's Employees and Interns:

- a) Undertake to environment preservation, to develop internal programs, involving Collaborators, and to fulfil environmental legislation;
- b) Encourage and support projects and initiatives that aim the preservation and conservation of the environment and the sustainable development promotion, such as some that already exist, such as: electronic garbage collection, battery collection, and others.

5. COMPLIANCE WITH LAWS AND REGULATIONS



The members of the Trustee and Fiscal Boards, the Executive Board, Collaborators and Trainees of Funep must respect the legislation that is in force during the exercise of their functions.

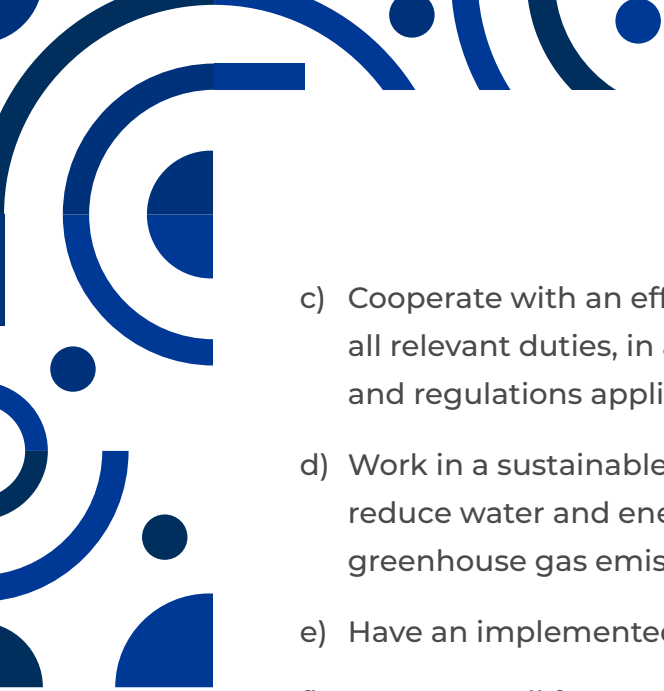
VIII. Third Parties - Suppliers

This Code of Ethics and Conduct item specifically deals with Suppliers and their relationships with Funep. Suppliers are fundamental to the services provided by Funep and, therefore, every relationship must be based on ethics, integrity and transparency.


The hiring of Suppliers is based on technical, economic, strategic, professional and ethical criteria, taking into account Funep's needs.

Therefore, the following attitudes are expected from Funep Suppliers:

- a) Comply with all requirements relating to the safety, hygiene and occupational health of its Employees, established in federal, state and municipal legislation, the UN Guiding Principles on Business and Human Rights, guaranteeing its Employees a safe and respectful working environment with equality, fairness and dignity;
- b) Offer decent working conditions in accordance with labor and social security duties; respect and appreciation of diversity; inclusion of people with disabilities; prohibition of child, slave or slave-like labor and non-acceptance of the exploitation of children and adolescents;



- c) Cooperate with an effective environmental policy and comply with all relevant duties, in accordance with environmental legislation and regulations applicable to its activities;
- d) Work in a sustainable manner, seeking, in every possible way, to reduce water and energy consumption, waste generation and greenhouse gas emissions in its operations;
- e) Have an implemented Integrity Program;
- f) Oppose to all forms of discrimination and harassment (moral, sexual, electoral, religious, political or organizational);
- g) Oppose to fraud, bribery, corruption and other acts harmful to the Public Administration in its Organizations;
- h) Guarantee the security and personal data processing with procedures which ensure that all personal data involved in its activities are adequately treated and are not transferred, sold or disclosed irregularly, in accordance with the General Data Protection Law ;
- i) They must not engage in activities that create or appear to create a conflict among their interests and those of Funep;
- j) Maintain strictly commercial relationships with Funep Employees;
- k) Offer gifts, hospitality and similar benefits to Funep's Executive Board and Employees, complying with the following rules:
 - k.1 Suppliers must ensure that no offer is interpreted as a bribe or undue attempt to guarantee preferential treatment;
 - k.2 Never offer commissions, bonuses or money;
 - k.3 Only offer institutional gifts (notebooks, diaries, pens, etc.), with no commercial value, which contain the Company's logo and which merely constitute a practice of kindness and cordiality between the parties.

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- l) Comply with all fair trade practices and applicable fair competition and antitrust laws;
 - m) Keep any type of information related to business partnerships signed with Funep confidential;
 - n) In case of doubts or if you are aware of practices or behaviors that could be considered a violation of this Code of Ethics and Conduct, the Supplier must report to the Funep Ethics Channel, at <https://www.funep.org.br/ethical-channel/>. Reports may be made anonymously and are confidential, with no retaliation, discrimination or sanctions against the whistleblower in good faith.

IX. General Provisions

- a) The rules and principles of ethical conduct of this Code applies to social networks;
- b) Funep's Internal and External Stakeholders assume the individual and collective commitment to comply with this Code and to promote its fulfillment;
- c) The non-compliance or non-application of the rules contained in this Code will subject the violator to the application of administrative and disciplinary measures and those provided in labor, civil or criminal legislation;
- d) The awareness of non-compliance of this Code and the deliberate omission are also considered infringements;
- e) This Code of Ethics and of Conduct will be reviewed regularly, when and if necessary;
- f) The Executive Board and the Compliance Officer are is responsible for checking the fulfillment of this Code and answering any questions regarding its application, submitting it to analysis by the Trustees Board, when necessary;
- g) Funep constituted the Ethics and Conduct Committee to analyze and take the appropriate measures whenever the Code is disrespected. Includes: the Compliance Officer, a member of the Executive Board, a member of the Board of Trustees, the Legal Adviser and the Administrative Manager.

X. Report Channels

- a) Funep maintains the Ethical Channel, destined to receive doubts, suggestions, accusations and complaints. The contacts are as follows:

Website - www.funep.org.br/ethical-channel



- b) Boxes are placed in several Funep's locations to receive questions, suggestions, denounces and complaints;
- c) In complaints and claims, there is a guarantee of absolute confidentiality, preserving the anonymity of the whistleblower and the accused of the breach of ethics;
- d) The whistleblower in good faith will not suffer any kind of retaliation or sanctions.



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