



Funep

commitment to

integrity

in processes

Code of Ethics and of Conduct



General Index

I. Introduction	4
II. What is an ethical decision?	6
III. From the object of Funep's code of ethics and of conduct	7
IV. Funep principles	8
V. Mission, vision and values	9
VI. Respect as pillar of all relationships	10
VII. Working Environment	10
VIII. Employment equality	11
IX. Data Privacy Honest relationship between Funep's	12
X. employees	12
XI. Honest Relationship with Customers	14
XII. Honest relationship with suppliers and service providers	14



XIII. Sustainability (Conduct)	16
1. Human working conditions	16
2. Proper use of resources	17
3. Protection of foundation assets	17
4. Preservation of the environment	18
5. Compliance with laws and regulations	18
VIII. General Provisions	19
IX. Dialogue Channels	20





I. INTRODUCTION

The Code of Ethics and Conduct of Funep, is intended to mark out the attitudes of all those involved, directly or indirectly, with the Foundation, which are: members of Trustee and Fiscal board and Executive Board, Employees, Customers (Professors / Researchers), 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 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 probably exist to ensure compliance with the external rules imposed by these Regulatory Agencies.

The success of a 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 training, the reporting channel, the activities monitoring, the performance evaluation, the need for continuous improvement and the required corrections.

Funep works according to the Brazilian Laws that rule a Compliance Program, because it established and implemented an effective Anti-Bribery Management System, based on the requirements of the ABNT NBR ISO 37001 standard, always seeking high standards of management quality, according to the NBR ISO 9001:2015, respecting the transparency and veracity of its accounting and financial information, which are audited annually, by the state of São Paulo Accounting Courts.

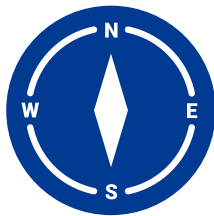
It is important to highlight that Funep has a Personal Data Privacy Policy, which is in accordance with the General Personal Data Protection Law (LGPD), Law No. 13,709, from August 14, 2018, and subsequent amendments. Our Information Technology policies and procedures seek to comply with good data governance practices.

Executive Board



II. What is an ethical decision?

The parameters to be considered:



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

In order to make any decision, the members of the Trustee and Fiscal Board, the Executive Board and the Collaborators must analyze, reflect and positioning themselves 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 Trustee and Fiscal Boards, the Executive Board, the Professors/Researchers, including the ones involved in the Research Projects, Events and Publishing, Financing Companies, Collaborators (Staff), Suppliers, Service Providers and Trainees. From now on, all these agents will be called "partners" and will be subject to the rules detailed below.

Funep doesn't agree or participate in any kind of fraud, bribery or corruption, as well as, doesn't practice harmful acts to public and private administrations, and search 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, economicity and efficiency, and it's your responsibility:

- a) Encourage respect as a pillar of 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 a efficient management results for its co-workers.
- e) Contributing to society by developing products and providing services that 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 compromised 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 responsibility, impartiality, commitment and transparency
- b) Respect the hierarchy, the institutional rules and the values for which Funep stands, not taking ideological, religious, political or racial preferences, as well as gender and origin
- c) Do not publicly use the Funep name without the permission of its legal representatives;
- d) Use Funep's Dialogue Channels to report any irregularity, illegality or violation of the present Code which they have gained access.
- e) Respect and promote the Funep mark

- f) 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;
- g) Do not use your social networking profile on behalf of Funep and its partners, except for sharing Institutional news;
- h) Contracting 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 selection 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.

2. EMPLOYMENT EQUALITY



Funep members of Trustee and Fiscal board, Executive board, the Collaborators and the Trainees must:

- a) Seek mutual respect and equal treatment in all relationships
- b) Demand equality of treatment between all Collaborators, discrimination of any kind will not be allowed, regardless of its type (ethnic, racial, gender, cultural, religious or because of age, marital status, disability or sexual preference).



3. DATA PRIVACY



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

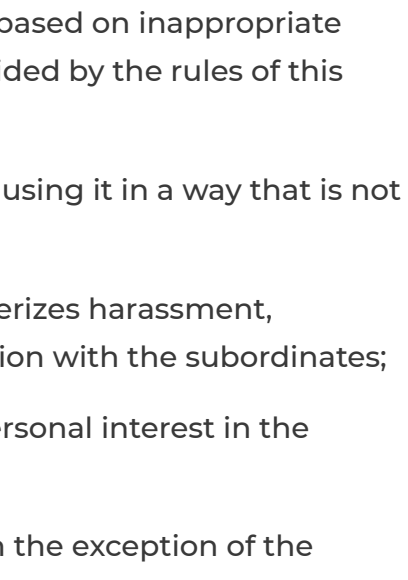
- a) The information about the Funep contracts with Financing companies, Teaching Staff / Researchers, suppliers and service providers must be treated confidentially, as well as the results of these contracts;
- b) Search for reliability and integrity of suppliers and, wherever possible, purchases must be negotiated;
- c) Keep confidential any information that you have access to as a result of your functions, even after your dismissal, under penalty of prosecution for loss or damages caused;
- d) Comply with Funep 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 BETWEEN 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) Must be familiar with and also shall refer those standards and principles contained in this Code

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- b) When required, manifest impartially and based on inappropriate postures of your commanded, always guided by the rules of this Code;
 - c) Do not misuse the power given to you, by using it in a way that is not compatible with Funep's goals;
 - d) Do not practice any conduct that characterizes harassment, embarrassment or other form of oppression with the subordinates;
 - e) Do not let you be guided by feelings or personal interest in the decisions inherent to the function;
 - f) Do not hire people under 16 years old, with the exception of the Program Jovem Aprendiz
 - g) Do not use child or slave labor in all its service sector;
 - h) Do not use illegal means to create political influence and also do not allow the use of benefits to achieve your 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 responsibility of the Funep's Executive Board members and Collaborators:

- 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.

6. HONEST RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS



It is the responsibility of Funep's Executive Board members, Customers and Collaborators:

- a) Hiring suppliers and service providers that fulfill legal, technical, quality and ethical criteria;
- b) Reject suppliers who show evidence of illegal, unfair or fraudulent practices;
- c) Reject 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) Prevent suppliers and service providers who commit violations against Anti-Bribery Policy and this Code from signing new contracts of any type with Funep.



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 the work atmosphere is free from criticism or rumors that might damage Funep professionals' image and those associated with it;
- 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 FOUNDATION 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



The members of the Executive Board and Collaborators are responsible for:

- 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. General Provisions

- a) The rules and principles of ethical conduct of this Code applies to social networks;
- b) Funep partners assume a commitment, individually and collectively, to follow 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 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.

IX. Dialogue 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) In reports and complaints, here is a full guarantee of confidentiality, with the anonymity of the whistleblower of ethics violations being preserved.



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