

Code of Ethics and Conduct

Created in 2023 and approved by the
Board of Directors on 10/27/2023.

Resolution No. 02/2023

The Board of Directors of the Arthur Bernardes Foundation (Funarbe), in exercise of its legal powers, in accordance with the Statute and with what was deliberated in a meeting held on October 27, 2023, resolves to approve the Code of Ethics and Conduct of the Arthur Bernardes Foundation (Funarbe).

Viçosa, October 27, 2023.



Giovana Figueiredo Rossi
Chairman of the Board of Directors

BOARD OF DIRECTORS ¹

EXECUTIVE BOARD

CEO

RODRIGO GAVA

DIRECTOR OF SCIENCE, TECHNOLOGY AND INNOVATION

OLINTO LIPARINI PEREIRA

OVERSIGHT

SUPERINTENDENT

MILTON MILER VIANA LOURENCO

BOARD OF DIRECTORS

PRESIDENT

GIOVANA FIGUEIREDO ROSSI

EFFECTIVE

ADRIANO NUNES NESI

RUBENS ALVES DE OLIVEIRA

ISRAEL TEOLDO DA COSTA

TEREZA ANGELICA BARTOLOMEU

SUBSTITUTES

ALAN FERREIRA

CRISTINA MATTOS VELOSO

LUIZA CARLA VIDIGAL CASTRO

RAFAEL FARIA DE ABREU CAMPOS

EXTERNAL MEMBER

JOSE FRANCISCO GONÇALVES DE
CARVALHO

FISCAL COUNCIL

PRESIDENT

WENDER FRAGA MIRANDA

EFFECTIVE

LAYON CARLOS CEZAR

GABRIEL TEIXEIRA PEA

SUBSTITUTES

LUCAS SERGIO NOGUEIRA

REPRESENTATIVE OF THE TECHNICAL COUNCIL FOR RESEARCH OF THE FEDERAL UNIVERSITY OF VIÇOSA

DENISE MARA SOARES BAZZOLLI

1. Governing Body responsible for approving the Code of Ethics and Conduct on October 27, 2023.

SUMMARY

WORD FROM THE BOARD OF DIRECTORS.....	4
PRESENTATION.....	5
CHAPTER I - OBJECTIVE.....	6
CHAPTER II - ORGANIZATIONAL PRINCIPLES	6
CHAPTER III - DISCRIMINATION, MORAL AND/OR SEXUAL HARASSMENT .	7
CHAPTER IV - COMMUNICATION	7
CHAPTER V - ENVIRONMENT.....	8
CHAPTER VI - WORK ENVIRONMENT	8
CHAPTER VII - CONFLICT OF INTERESTS.....	9
CHAPTER VIII - RECEIVING GIFTS, PRESENTS AND HOSPITALITY	9
CHAPTER IX – RELATIONSHIP WITH PUBLIC AGENTS.....	11
CHAPTER X - ELECTRONIC MEDIA, TELEPHONES AND USE OF THE FUNARBE BRAND	13
CHAPTER XI – RECRUITMENT AND SELECTION	14
CHAPTER XII – CUSTOMERS	14
CHAPTER XIII – SUPPLIERS	15
CHAPTER XIV - ADVISORS, DIRECTORS, SUPERINTENDENTS AND MANAGERS	16
CHAPTER XV – CONTRIBUTORS.....	17
CHAPTER XVI - PROHIBITION OF BRIBERY OR CORRUPTION PRACTICES	18
CHAPTER XVII - VIOLATION OF THE CODE.....	18
CHAPTER XVIII - ETHICS AND CONDUCT COMMITTEE	19
CHAPTER XIX – FINAL PROVISIONS.....	20

WORD FROM THE BOARD OF DIRECTORS

Rodrigo Gava
CEO for the 2022-2026 term

The Arthur Bernardes Foundation is nothing more than those who are part of it, who continually dedicate themselves to the pursuit of excellence and sustain the set of relationships it establishes with other organizations, keeping it firm in fulfilling its purposes and mission.

Basing our conduct on Funarbe's essential principles is the justification for our efforts to harmonize the diversity of values and cultural influences that shape us and with which we interact. This harmonization not only reinforces our identity and cohesion, but also respects our differences and reduces potential divisions.

The underlying reason for our efforts in creating this document is to seek to anchor our conduct in the fundamental principles of Funarbe. This effort aims to balance the multiplicity of values and cultural influences that shape us and with which we encounter. In doing so, we strengthen our identity and cohesion, while respecting the differences that distinguish us, thus providing coherence to this guiding document.

Therefore, we hope that everyone can be inspired by what makes us Funarbe, helping each person to have guidance on their behavior and decision-making, acting with integrity, responsibility and focused on the sustainability of the Foundation's business. We understand that here we form more solid foundations for our organizational culture, strengthening our trust and reputation, encouraging our engagement with work and minimizing our exposure to risks. This is a guideline that will help to reinforce Funarbe's presence in society, after all, we are all ambassadors of the Funarbe way of supporting projects through resource management and being a reference in the provision of quality services and products and for academic support.

This Code represents a crucial investment in the company's future, ensuring that its operations are guided by responsibility, ethics and sustainability, generating benefits that are not limited to the organization, but extend to society as a whole.

PRESENTATION

This Code of Ethics and Conduct represents a strategic and transparent guide with the role of aligning conduct and procedures, in an ethical and moral manner, within the scope of the activities and actions of the Arthur Bernardes Foundation (Funarbe).

In this sense, the participation of all agents involved in the Foundation's activities is essential: advisors, directors, superintendent, employees, customers and suppliers, hereinafter referred to as recipients, so that the mission and values protected by this institution are increasingly present in its activities.

Therefore, all these agents must know and apply the guidelines contained in this Code, so that they can contribute to an environment of respect and understanding and ensure that the Foundation's actions value people's dignity and ensure loyalty and transparency, seeking to preserve the credibility and good faith of this Institution.

CHAPTER I - OBJECTIVE

Art. 1 This Code of Ethics and Conduct aims to define a standard of conduct for its recipients. To this end, this document presents the basic rights and obligations to ensure respect for and commitment to the Foundation's purpose, mission, vision and values.

Sole paragraph. The Arthur Bernardes Foundation is guided by:

- I. Purpose: Contribute knowledge that makes a difference to society
- II. Mission: To enable our clients and partners to dedicate themselves to academic, scientific and technological development;
- III. Vision: To be the Foundation of excellence for our clients and partners and a reference school in the businesses in which we operate;
- IV. Values: The values that guide the Foundation's attitudes and decisions are:
 - a. Reference;
 - b. Reciprocity;
 - c. Respect;
 - d. Cooperation.

CHAPTER II - ORGANIZATIONAL PRINCIPLES

Art. 2 As a support Foundation, Funarbe is subject to the principles of legality, impartiality, morality, publicity, economy and efficiency.

Sole paragraph. The conduct of the recipients in the exercise of their functions shall comply with the following principles:

- I. Good faith;
- II. Honesty;
- III. Impersonality;
- IV. Decorum;
- V. Human dignity;
- VI. Politeness;

- VII. Efficient communication;
- VIII. Promptness; and
- IX. Punctuality.

CHAPTER III - DISCRIMINATION, MORAL AND/OR SEXUAL HARASSMENT

Art. 3 Abuse, intimidation, lack of respect or any other type of physical or verbal aggression, practiced by any of the recipients of the Code are unacceptable and will not be permitted or tolerated by the Foundation. All such subjects, and especially those who exercise leadership functions, will promote at all times and at all professional levels, relationships based on respect for the dignity of others, participation, equity and mutual collaboration, contributing to a good work environment, with the objective of achieving an organizational climate consistent with the values and principles of the Foundation.

CHAPTER IV - COMMUNICATION

Art. 4º The Foundation's official statements and positions will be made by the Institutional Communications department, previously aligned with the institution's leaders. These departments are responsible for initiatives to disseminate messages to the external environment, as well as Funarbe's values and purposes, strengthening relationships with diverse audiences.

Art. 5. Employees are transmitters and replicators of the Foundation's identity and positioning and, therefore, must strengthen and protect its image among internal and external audiences. Therefore, it is extremely important that they are aligned with the institution's purpose, attentive to information for public purposes, sharing true, solid, clear and transparent messages, in accordance with the identity constructed and valued.

Art. 6 In the case of institutional representations, the collaborator must be indicated and authorized by the leadership and, thus, safeguard the image of the Foundation, expressing only the official and public position, in a precise and truthful manner, as long as it does not violate any confidential information.

Sole paragraph: Institutional representations occur when the employee participates in activities in external environments, as set out below:

- I. Events;
- II. Press interviews;
- III. Institutional or technical presentation meetings;
- IV. External meetings for decision-making and/or discussion of matters that directly affect the Foundation;
- V. Technical visits; and
- VI. Practical and theoretical classes.

CHAPTER V - ENVIRONMENT

Art. 7º In carrying out the activities developed by the Foundation, actions aimed at the rational use of energy, water and other natural resources, the recycling of materials and the reduced use of disposable products and others that generate waste must be encouraged.

Sole paragraph. In projects for new facilities and renovations, priority must be given to preserving environmental balance and using raw materials to minimize negative impacts on the environment. Likewise, Funarbe values that the activities to be carried out in its clients' projects comply with environmental legislation, always seeking to save non-renewable resources, encourage the use of renewable energy sources and preserve the environment.

CHAPTER VI - WORK ENVIRONMENT

Art. 8º The Foundation prioritizes the establishment of good internal management practices and the promotion of a good organizational climate, for which it undertakes to:

- I. Ensure working conditions that promote a balance between professional and personal life;
- II. Encourage and promote professional development and a corporate culture of knowledge dissemination;
- III. Ensure safety and health at work, providing the necessary safety conditions and equipment;
- IV. Make available information that affects employees, preserving the right to privacy in the processing of functional and personal information;

V. Respect and promote diversity, in addition to combating discrimination in all its forms and manifestations, creating admission, promotion, remuneration, performance evaluation and dismissal policies, based on objective and transparent criteria of professional merit;

VI. Protect the confidentiality of all those involved in complaints, aiming to safeguard rights and neutrality of decisions;

VII. Create institutional channels and guide managers to receive and analyze suggestions aimed at improving internal management processes;

VIII. Respect labor and social security rights.

CHAPTER VII - CONFLICT OF INTERESTS

Art. 9º A conflict of interests is characterized by the possibility of a direct or indirect confrontation between the personal interests of some member of the target audience, the recipients and those of Funarbe, which results or may result in some type of advantage in favor of themselves or third parties, such as relatives and friends.

Sole paragraph. To protect the Foundation from real or apparent conflicts, some conduct is required:

I. *know-how* confidentially ;

II. Do not use privileged information for your own interests or those of third parties;

III. Refrain from taking a position in situations that may involve a conflict of interests;

Art. 10 Employees may not accept paid external work that may give rise to a conflict of interest, as well as directly affect their performance and judgment at work. And they must, without fail, inform their hierarchical superior about any paid external activity or shareholding.

CHAPTER VIII - RECEIVING GIFTS, PRESENTS AND HOSPITALITY

Art. 11 Employees are permitted to receive gifts that have no commercial value or that are distributed by entities of any nature for the purpose of advertising, regular publicity or on the occasion of special events or commemorative dates, such as diaries, calendars, notepads and pens, which may be accepted.

Art. 12 The Supermercado Escola is allowed to receive occasional prizes from suppliers, as a form of recognition for sales performance and as a way of promoting *marketing actions*, as long as these prizes are sent to Funarbe accompanied by an invoice. The Supermercado Escola management will be responsible for the destination of the prizes received and ensure that they will be donated or raffled.

Art. 13 The employee must consult his/her immediate superior about the possibility of offering or accepting any type of gift or present.

Art. 14 The following are prohibited forms of receiving gifts, presents and hospitality by employees:

- I. Request favors or gifts from third parties with whom you do business, whether for your own benefit or for members of your family, and it is also prohibited to give the impression that a transaction, contract or decision depends on a favor, gift or hospitality;
- II. Accept any kind of cash or equivalent as a gift, regardless of the amount;
- III. Receiving gifts, presents and hospitality at their homes. Should this occur, the employee must declare that they received it at their home, for analysis by the Funarbe Board of Directors.

Art. 15 The following constitute restrictions in relation to Public Power:

- I. Employees, partners and suppliers are prohibited from accepting, offering or giving, directly or indirectly, favors, money, gifts and hospitality to a public agent or third party related to him/her, in order to obtain advantages, influence or compensate their decisions for their own benefit or that of the company;
- II. All gifts, presents and hospitality must be declared and only promotional gifts without commercial value will be permitted;
- III. Gifts to be distributed to public officials must be given as a courtesy, advertising, regular publicity, on the occasion of special events or commemorative dates, offered in a diffuse manner, without being aimed at specific bodies or authorities;
- IV. If an employee has any doubts about the possibility of offering or accepting any type of gift or present in their relationship with the Public Authorities, they may contact their immediate superior, their manager or the Board of Directors.

CHAPTER IX – RELATIONSHIP WITH PUBLIC AGENTS

Art. 16 Any and all interactions with public agents must be guided by the following fundamental principles :

- I. Commitment to the provisions of the *Compliance Policy* and this Code of Ethics and Conduct;
- II. Knowledge and full compliance with policies, regulations and codes, among others;
- III. Transparency in interaction with public agents;
- IV. Knowledge of the provisions contained in current legislation.

Art. 17 It is expressly forbidden for Funarbe advisors, directors, superintendents and employees to interact with business partners and the Public Authorities with the intention of giving, offering or promising, directly or indirectly, undue advantage to any public agent or person related to him, especially for the purpose of:

- I. Influence any act or decision of that public agent or induce him to perform, omit, delay or expedite any act in violation of his legitimate or official duty;
- II. Inducing a public agent to use his/her influence due to his/her role to affect or influence any act or decision of the Public Administration;
- III. Frustrating or defrauding the bidding process with or without the purpose of benefiting the agent;
- IV. Obtain the granting of an administrative or tax benefit without observing the applicable legal or regulatory formalities;
- V. Committing an unlawful act of any nature or improper act against the Public Administration in collusion with a public agent;
- VI. Obtain or retain business for Funarbe.

Art. 18 Meetings , gatherings and communications with the Public Authorities will be guided by a high standard of integrity, transparency and formality, observing such conduct in transactions, bids, negotiations requiring inspections and fines, tax discussions, negotiation of tax incentives, terms of conduct adjustment, commercial relationships/negotiations, demonstration

of products or services, fairs and events, collections for default, among others.

Sole paragraph. Requests should preferably be addressed to the main authority of the Public Administration body or entity and should not suggest the name of the specific public agent to attend the meeting.

Art. 19 Routine activities of relationship with public agents, such as: serving inspectors, counter contacts, employment terminations, obtaining guides or certificates, notary transactions and protocols, obtaining permits, provision of contracted services, do not require any communication and must be carried out by Funarbe team members or their representatives, who must strictly observe the provisions of the applicable rules, as well as follow the indicated legal procedures.

Sole paragraph. Funarbe employees or their representatives are prohibited from offering undue advantage with the aim of accelerating the obtaining of licenses, authorizations, permits and certificates or inducing a public agent to perform, omit or delay an official act.

Art. 20 The hiring of representatives to assist in obtaining licenses , authorizations, permits and certificates from the Public Authority must be done cautiously. If necessary, the hiring will be preceded by a prior verification procedure in accordance with the *Due Diligence Policy*. Integrity *Due Diligence* .

Sole paragraph: Funarbe employees must reject any and all requests for undue advantage from public agents.

Art. 21 In inspections of any nature, employees responsible for interacting with the public agent must act cordially and respond promptly and objectively to questions raised by the public agent, in accordance with applicable legislation.

Art. 22 Inspections carried out by public agents on Funarbe premises must be accompanied, whenever possible, by at least two employees of the Foundation. If the public agents do not provide the inspection reports, a report must be prepared by the employees, with a complete description of the inspection and duly forwarded to the immediate superior and to *compliance officer* of the Foundation.

Art. 23 It shall not be admissible for Funarbe employees or their representatives to commit acts with the intention of hindering or defrauding investigation or inspection activities by government agencies. Likewise, Funarbe employees and their representatives are prohibited from soliciting fraudulent actions from anyone.

Art. 24 All of the above guidelines serve to guide all relationships between

Funarbe employees and their representatives with public agents. However, other atypical situations may occur. In this case, in case of any doubts about such situations, *compliance officer* should be consulted immediately.

CHAPTER X - ELECTRONIC MEDIA, TELEPHONES AND USE OF THE FUNARBE BRAND

Art. 25 Electronic media are made available for exclusive work use. Each employee is responsible for using the company's technological resources appropriately and ethically.

Art. 26 It is prohibited to send information with illegal, pornographic, racist, political or religious content or any other information of a discriminatory nature that violates human dignity.

Art. 27 Funarbe may monitor communications and information transmitted, received, created and stored, which use its information technology resources.

Art. 28 All information technology products and systems developed by employees, during the course of the employment relationship, are the exclusive property of Funarbe.

Art. 29 Employees must use Internet access and e-mail services only for corporate purposes. In order to preserve these resources, Funarbe reserves the right to control and monitor their content and forms of use.

Art. 30 The systems (programs, spreadsheets, controls or routines) developed, under development or to be developed by employees constitute the exclusive property of Funarbe, and it is Funarbe's responsibility to make decisions regarding their commercialization, reproduction and use.

Art. 31 The copying, sale, use or distribution of information, *software* and other forms of intellectual property is prohibited without the prior written consent of Funarbe.

Art. 32 For security reasons, it is prohibited *to download* any program without prior authorization from the person responsible for the IT area.

Art. 33 The use of the network to store corporate files must be done judiciously so as not to accumulate unnecessary files. It is recommended that each employee performs periodic checks to delete these files, thus making the allocation of available memory on Funarbe servers more efficient.

Art. 34 Employees must use Funarbe's landlines and cell phones exclusively for corporate matters. For control and security purposes, all calls may be

controlled, monitored and even recorded.

Sole paragraph: The use, by any employee, of their own devices (cell phones, tablets, notebooks, computers, etc.) for the development of work activities, at Funarbe, must observe the safety standards and policies established by the Foundation.

Art. 35 Funarbe understands the occasional need for private telephone calls. These will be permitted, as long as they are made with common sense and kept to a minimum.

Art. 36 Every employee is responsible for the accuracy of the information contained in the documents produced under their responsibility.

Art. 37 The use of the Funarbe logo must be prioritized in all documents prepared for third parties, especially for its clients. It is essential that it is correctly applied, in accordance with the guidelines defined in the Identity Manual, and its use for non-corporate matters or after the termination of the relationship with the company is prohibited.

Art. 38 All documents developed by employees, in the performance of their duties, are the property of Funarbe and kept confidential.

CHAPTER XI – RECRUITMENT AND SELECTION

Art. 39 The criteria used for the recruitment and selection of professionals are always based on the technical and professional qualifications of the candidate for the position. Discriminatory attitudes of any nature or choices based on personal relationships are not permitted. The selection of candidates also takes into account the ethical profile of the candidate, aiming to strengthen the organizational culture.

Sole paragraph. In order to ensure impartiality, the selector is prohibited from acting in the selection processes in cases where a spouse/partner or relatives up to the fourth degree in a direct line, collateral line or by affinity are competing for the vacancy. The same prohibition applies to cases of admission in relation to the hierarchical superior.

CHAPTER XII – CUSTOMERS

Art. 40 Funarbe customers must be treated with respect, cordiality and without discrimination of any kind.

Sole paragraph. Employees must strive to achieve efficiency and effectiveness, always prioritizing good communication when serving customers. In return,

our customers are expected to:

- I. Respect, that is, that our employees are treated with respect, ethics and dignity, in line with our commitment to promoting a safe and healthy work environment;
- II. Funarbe is governed by specific regulations. Therefore, clients are expected to act in full compliance with the relevant legislation, rules and regulations relevant to the services provided by the Foundation;
- III. Project coordinator clients, when assigned as expense coordinators for agreements and/or contracts signed through Funarbe, must not order expenses for a spouse/partner or relatives up to the fourth degree in a direct line, collateral line or by affinity or contract goods and services from a legal entity in which the previously related persons participate as partners or have a stake in the company.

CHAPTER XIII – SUPPLIERS

Art. 41 The hiring of suppliers and service providers will be based on legal and technical criteria of quality and cost. Funarbe expects its suppliers to:

- I. Respect, that is, that our employees are treated with respect, ethics and dignity, in line with our commitment to promoting a safe and healthy work environment;
- II. Respect the legislation, apply fair competition practices and maintain ethical conduct in management practices and social and environmental responsibility and respect the management practices and labor and employment rights of all employees;
- III. Demonstrate having processes and produce products and/or services that minimize the impact on the environment, provide a healthy and safe workplace, and promote the health and well-being of all employees;
- IV. Uphold the highest standards of professional ethics, respect the law and do not engage in any type of corruption, bribery, fraud or extortion. Any action in this regard by suppliers will be opposed and not accepted by Funarbe, resulting in the immediate termination of the commercial relationship;
- V. Do not, under any circumstances, offer favors, bonuses, commissions or any item of value to obtain favoritism from employees.

Art. 42 Funarbe's contracting procedures must observe the principles of legality, reasonableness, impartiality, morality, publicity, economy and efficiency.

Sole paragraph: Funarbe does not hire third parties that refuse to observe anti-corruption laws, the general law on the protection of personal data, the provisions of this Code or equivalent principles.

CHAPTER XIV - ADVISORS, DIRECTORS, SUPERINTENDENTS AND MANAGERS

Art. 43 The counselors, directors, superintendents and managers, to whom the powers of direction, regulation, supervision and discipline are conferred by the legal system, must:

- I. Use the above powers with equity and proportionality;
- II. Act in the dissemination of Funarbe's mission and values;
- III. Lead by good example at all times, ensuring that team members carry out their activities with a high level of performance and professionalism;
- IV. Provide support and guidance on incorporating the Code of Ethics and Conduct into employees' daily lives and ensure its application;
- V. Encourage employees under your supervision to raise doubts and questions, creating a culture of transparency and trust;
- VI. Make efforts to maintain a good organizational climate, committing to promoting a diverse, inclusive and productive work environment, which is defined by mutual respect;
- VII. Conduct all procedures involving the evaluation of people, such as hiring, promotion, performance evaluation and dismissal, with impartiality and fairness. Under no circumstances will opinions motivated by situations of personal appreciation or discrimination and that are not based on objective criteria of merit and professionalism be tolerated;
- VIII. Do not conduct business that distorts Funarbe's mission and that poses risks of economic-financial imbalance or loss of credibility;
- IX. Present your reports and balance sheets in a correct, consistent, accurate and complete manner, without ambiguity of information, and make available, with complete transparency, documents requested by internal and external audits and competent public bodies;
- X. Act in strict compliance with all applicable laws, including anti-bribery and anti-corruption laws, which apply to the management of public resources and those of international partners, arising from agreements and contracts managed by the Foundation, including the provisions of Law No. 12,846/2013

and its regulatory decrees, as well as personal data protection regulations, such as Law 13,709/2018 (General Personal Data Protection Law – LGPD).

CHAPTER XV – CONTRIBUTORS

Art. 44 Employees are all individuals who have some type of work or employment relationship with Funarbe, such as: employees (under CLT), interns, scholarship holders and service providers without an employment relationship.

Sole paragraph. Collaborators undertake to:

Promote professional development and act efficiently to achieve the institutional mission;

- I. Use the above powers with equity and proportionality;
- II. Maintain confidentiality regarding operations and information of the Foundation, clients, suppliers and third parties that may become known due to their professional activities, as well as guide their behavior by discretion and moderation in public statements;
- III. Show up for work wearing clothing compatible with the institutional environment;
- IV. Report to work in a state of complete physical and mental health;
- V. Report to your superiors any pressure or intimidation from clients, suppliers and others, which aims to obtain undue advantages or favors;
- VI. Do not use Funarbe equipment and resources for personal purposes, nor remove them from the establishment without authorization from your immediate superior;
- VII. Question guidelines that are contrary to the Foundation's standards, principles and values;
- VIII. Seek clarification from your immediate superior or the Ethics Committee when there are doubts related to the understanding or application of the provisions of this Code of Ethics and Conduct, as well as in situations not expressly provided for;
- IX. Avoid situations that may characterize a conflict between personal interests and those of the Foundation;
- X. Inform your immediate superior before assuming participation in profit-making entities and/or other remunerated activities;
- XI. Do not use information and position to promote any facility, influence or obtain an advantage for yourself or others;

XII. Do not harm the reputation of colleagues, superiors or third parties linked to work at Funarbe;

XIII. Do not alter or distort the content of information and documents to which you have access, in physical or digital media;

XIV. Meet work demands promptly and in a timely manner;

XV. Safeguard Funarbe's material and immaterial heritage;

XVI. Do not use Funarbe's image, name or brands, except for the appropriate development of your professional activity.

CHAPTER XVI - PROHIBITION OF BRIBERY OR CORRUPTION PRACTICES

Art. 45 As an institution with national and international partnerships, Funarbe is subject to various anti-corruption laws around the world. Funarbe practices a zero-tolerance policy for any form of corruption, not allowing any type of fraud, and maintaining adequate procedures to identify and prevent the risks of fraud or bribery in our activities.

CHAPTER XVII - VIOLATION OF THE CODE

Art. 46 Violation of any of the rules will result in disciplinary measures appropriate to the role performed and will occur in the following ways:

I. Penalties of warning, suspension and dismissal may be applied to employees, depending on the severity of the conduct and the previous history;

II. For advisors and directors, the penalties will be those provided for in the Legislation, the Statute and the Internal Regulations of Funarbe;

III. Suppliers are subject to exclusion from the registry and customers are subject to Funarbe's unilateral decision to correct any inappropriate acts that may have been committed;

IV. Anyone who becomes aware of a violation of any aspect of this Code must bring the matter to the attention of the Ombudsman. The Foundation undertakes to maintain confidentiality regarding the identity of the whistleblower.

V. Employees, directors and advisors who become aware of inappropriate behavior on the part of suppliers or other Funarbe employees must notify the Ombudsman.

VI. No retaliation will be permitted against any member who, in good faith, reports a concern about illegal/immoral conduct, or conduct that is not in accordance with the provisions of this Code of Ethics and Conduct.

CHAPTER XVIII - ETHICS AND CONDUCT COMMITTEE

Art. 47 The Ethics and Conduct Committee shall be composed of a representative of the Board of Directors and a representative of the following areas, preferably: Legal Advisory and Human Resources. The appointment of the Committee shall be made *ad hoc*, in accordance with the subject of discussion and deliberation.

Art. 48 If it is impossible for any appointed member to perform the function, the responsible body will be responsible for reconstituting the Committee.

Art. 49 The Executive Board will appoint an Ombudsman, subject to the approval of the Board of Directors, who will provide support to the *ad hoc* Ethics Committee, when necessary.

Sole paragraph. The Ombudsman may be external.

Art. 50 The Board of Directors, the Executive Board and the Superintendence must promote the dissemination, evaluation, guidance and updating of this Code, as well as be responsible for clarifying doubts, instituting disciplinary proceedings, assessing and deciding on the merits.

Art. 51 The decision on the merits involving employees at the tactical and operational levels will be the responsibility of the Board of Directors, together with the Superintendence, and the Board of Directors will be informed. The decision involving people in strategic/managerial positions will be made together with the Board of Directors.

§1º The members of the Committee will not be entitled to any remuneration for their role, nor to job stability.

§2º Members of the Ethics and Conduct Committee are prohibited from:

- I. Act in disciplinary proceedings against spouses/partners, relatives up to the fourth degree in a direct or collateral line or in any case in which they have an interest and cannot act impartially and without bias;
- II. Disclose information about disciplinary proceedings without prior authorization from other members;

Art. 52 In cases of conduct not covered by this Code of Ethics and Conduct, it will be up to the Board of Directors and the Executive Board to determine whether the fact violates the ethical and moral principles of conduct

advocated by Funarbe and, likewise, to determine, if applicable, the corrective and punitive measures.

CHAPTER XIX – FINAL PROVISIONS

Art. 53 Funarbe must disseminate the culture of control and compliance through institutional actions, which include lectures, campaigns, communications and publications, which contain topics common to employees, at all hierarchical levels, and specific to those who carry out activities with greater exposure to the risk of fraud, corruption and incidents of personal data leaks.

Art. 54 Funarbe must provide training, on an annual basis, on this Code of Ethics and Conduct to all its employees, as well as on the Personal Data Protection Policy.

Art. 55 Funarbe must encourage and provide employees with knowledge and employees regarding legal requirements and responsibilities, as well as corporate guidelines, enabling them to identify, prevent, treat and communicate risk situations or situations with signs of fraud and corruption.

Art. 56 Funarbe must promote the wide dissemination of this Code of Ethics and Conduct, also providing it to new employees and collaborators.

FUNDAÇÃO ARTHUR BERNARDES
WWW.FUNARBE.ORG.BR

Av. Peter Henry Rolfs, s/nº - Campus
Universitário - Edifício Sede da Funarbe
Viçosa/MG

 /company/fundacao-arthur-bernardes

 /Funarbe

 /ouvidoria.funarbe.org.br