



**FIOTEC
FIOCRUZ**

CODE OF ETHICAL CONDUCT



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1. Presentation

1.1 Message from the Board of Directors

The Fiotec's Code of Ethical Conduct has the purpose of defining the attitudes of all those involved, directly or indirectly, with the Foundation. Therefore, everyone shall know it and publicize it, observing and defending its compliance.





The Institutions are a significant part of a society, and it's up to them a special responsibility. Thus, the way our employees behave has a major influence on how the Foundation is perceived and accepted. As a result, it is of vital importance to raise the level of our social responsibility, to assume it consciously, and to act in a sustainable way to produce a benefit in the community in which we are inserted. It is not only about economic empowerment for the foundation, the way in which the result is achieved is equally important. Thus, we at Fiotec seek to adhere to the highest ethical and moral standards in the conduct of our health projects and research, aiming at a delivery of excellence in the shared management of programs and projects, for the quality of life of society. In view of this, Fiotec also keeps the commitment to extend the Code of Ethical Conduct to its relationship chain, with the purpose of making its positioning explicit and, thus, contributing to the construction of relationships based on trust, integrity and respect.

And this is a duty that is up to all of us at the Foundation - no matter what the project is. After all, we represent the Fiotec in all its forms, at all times and wherever we are.

You have in your hands the Fiotec's Code of Ethical Conduct Its content was created from our values, which shall be shared by everyone. The directives of the Code of Ethical Conduct establish the fundamental principles and standards that govern our actions inside and outside the Foundation and in relation to our partners, suppliers, and the general public.

Executive Board





1.2 How can this code help you?

The Code of Ethical Conduct is the starting point for seeking guidelines, recommendations and answers to several questions that arise in Fiotec's daily routine, such as

- Practical recommendations on compliance with legislation and regulations;
- Requirements, guidelines, and in some cases specific rules about relationships with colleagues, customers, suppliers, partners, government agencies, society, and the environment;
- Guidelines to help you reflect on and resolve questions about ethical and professional conduct;
- Identify situations of conflict of interest;
- Establish the ethical and formal principles of conduct to be followed by the Foundation's stakeholders.

1.3 Who is Fiotec?

The Foundation for Scientific and Technological Development in Health (Fiotec) was established in 1998 as Fensptec - Foundation for Teaching, Research, Technological Development and Cooperation with the National School of Public Health, and changed two years later to become the Support Foundation for the entire Fiocruz.

As a support foundation, the Fiotec was constituted in the form of the Brazilian Civil Code and is a private, non-profit institution, with administrative and financial autonomy and its own assets. It is governed by a special law that regulates the relationship between the foundations of support and their supported institutions. It is also subject to the supervision of the Public Prosecution Service, under the terms of the Civil Code and the Code of Civil Procedure, to the labor legislation and, especially, to prior registration and accreditation with the Ministry of Education and the Ministry of Science, Technology, and Innovations.

In light of this, the Fiotec complies with all laws, rules and regulations applicable to its business, including its internal policies. All employees shall know the legislation and



regulations applicable to the professional activities they perform, the internal policies and directives, and act in accordance with them.

1.3.1 Business

Innovative solutions for shared management of programs and projects in health.

1.3.2 Mission

To participate in the scientific, technological development and innovation in health, through shared management of programs and projects, for the life quality of society.

1.3.3 Vision

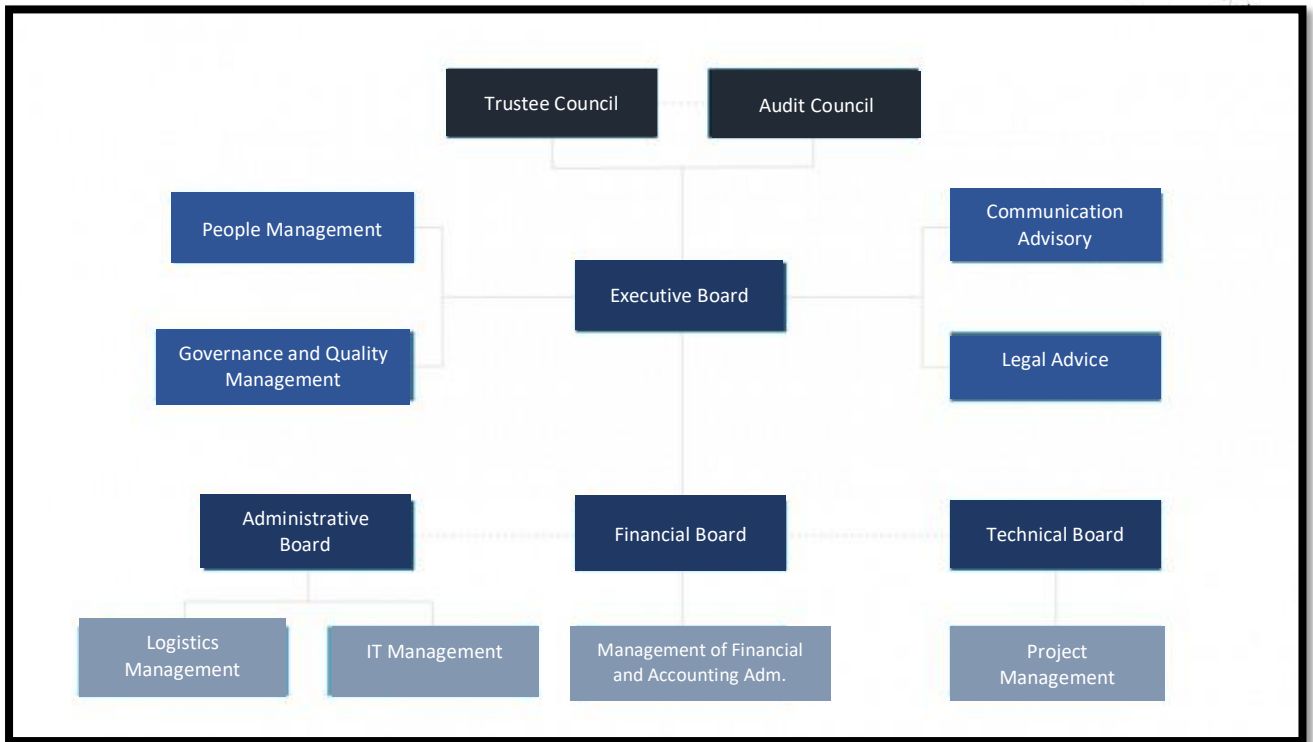
To be recognized by the coordinators as a reference institution in program and project management, through the best governance practices, and to be a source of pride for our employees.

1.3.4 Values

- We respect life, human dignity and the environment;
- We value people and encourage proactivity;
- We encourage an integrated, participatory, collaborative and innovative environment;
- We believe in the strength of our work to carry out our actions with excellence;
- We act ethically and transparently in the organizational processes;
- Our institutional relationship is based on respect for diversity, trust, cordiality and a responsible attitude.

1.3.5 Organizational structure

Fiotec's organizational structure involves the Trustee and Audit Councils, the board of directors, managers and advisors, in order to qualify the institution for its purpose.



The description of the Trustee Council, Audit Council and Executive Board is available in Fiotec's Bylaws, available on our website (www.fiotec.fiocruz.br).

1.4 Governance

Fiotec's Governance, Risks, and *Compliance* model was designed in alignment with the nature of its operation and specificities, so as to offer a set of mechanisms, both for incentives and monitoring, in order to ensure that the behavior of the players involved contributes to the quality of the organization's management, its longevity, and the common good. For Fiotec, this architecture also comprises the staves of transparency; social responsibility; environment, sustainability; data protection and privacy.



1.5 Policies and practices

Fiotec's activities are guided by several institutional policies, elaborated by themes that together with this Code of Ethical Conduct guide the relations with the public of interest of the Foundation.

The institutional policies, as well as the other normative documents, go through the respective approval instances, are translated into English and Spanish, when necessary, and they are available to all the institution's employees, on the intranet or institutional site, or even in the automated documented information tool, according to its document classification policy.

2. Purpose

It establishes the ethical principles and conduct directives that shall be present in the institution's relations with its different publics: clients, partners, employees, suppliers, service providers, governments, community, and society.

3. Applicability

This Code applies to all Fiotec professionals, whether they are directors, officers, employees (administrative or for projects), interns, scholars, young apprentices, service providers, outsourced, hired via RPA, understood in this document as employees and that make up the Fiotec community.

The Fiotec understands that its suppliers and partners have autonomy to determine their own rules of conduct, however, these may not contradict this Code of Ethical Conduct. This Code is also applied to third parties that are not members of the groups mentioned above, but that maintain other forms of relationship with the institution.

This document is considered "alive" and reflects the cultural identity of Fiotec, and is therefore subject to periodic reviews with the participation of stakeholders to ensure a permanent process of evolution, modernization, and legitimization.





4. Content

4.1 Communication channels for denunciations, questions, complaints, compliments and suggestions

All Fiotec employees shall watch over the principles established in this document, reporting to channel of suggestions, compliments, complaints and denunciations of Fiotec, to their immediate superior or directly to the Board of Directors, People Management and Governance and Quality, and the Ethics and Integrity Committee whenever they come across conducts that may violate this code.

Fiotec's channel for suggestions, compliments, complaints and denunciations

Suggestions, compliments, questions, complaints and denunciations can be sent to the specific outsourced channel, disclosed on the site and intranet. All referrals will be evaluated with the assurance of confidentiality and anonymity. This channel can also be used to help with ethical dilemmas.

Reports regarding fraud and/or illicit, or improper conduct, made anonymously or not, will be treated confidentially, to protect the author of the communication and the quality of the investigations.

Identification will not be necessary, but it is primordial and fundamental to act responsibly when communicating any situation, remembering that the reports shall always be made in a consistent and truthful manner. Manifest yourself (non-retaliation commitment).



Do the right thing!

When you speak up, it helps to avoid mistakes, misconduct, assists in establishing corrective actions; as well as being a practical way of applying the ethical and moral values that shall be preserved. The Fiotec is committed to protecting its employees from retaliation.



4.2 Integrity, compliance, and the responsibility to the code of ethical conduct

4.2.1 Fiotec Integrity

What you shall know and evaluate

Ethics is an expression originated from the Greek term "ethos" that means "good customs" or "bearer of character" and IT can be defined as the set of principles that discipline or guide the behavior regarding moral aspects.

No code of ethical conduct is able to cover all situations. Therefore, when faced with difficult ethical issues to resolve, ask yourself the following questions that will help you "do the right thing":

Do the right thing!

Keep asking questions until you are sure you will "do the right thing".

- Is it within the law?
- Do you agree with Fiotec's policies and procedures?
- Is it aligned with Fiotec's values and what is in the code?
- Could it negatively affect one or more of Fiotec's stakeholders?
- Could it negatively affect people's safety, quality of service, or Fiotec's reputation?
- If my actions at Fiotec were shared on social networks, in the media, or with third parties, would I be proud?
- Would I feel comfortable telling and talking to my family about the way I act inside and outside the institution?
- Would acting this way risk my job, as well as, my reputation?

What not to do!




Move on and do not seek guidance if you still have questions about the ethics or legality of an issue.

4.2.2 Responsibility to the Code

No code or policy can by itself guarantee compliance with the law or ethical decision-making. Everyone needs to do their part.

Fiotec expects that the professionals, third parties, and stakeholders that have some kind of bond established with the Foundation, respect and act in compliance with the provisions of this code, as well as with all the policies and normative instruments of the institution.

4.2.3 Responsibility of the management

 What you shall know and evaluate

Fiotec's leaders are an important channel of communication and dissemination of the content of this document, and shall be contacted whenever necessary to clarify any questions related to the code.

These professionals also have additional responsibilities, as they have the role of ensuring that the principles and directives permanently guide the decisions and teams in their respective areas. In light of this, it is important that the commitments to Fiotec's values are demonstrated by each person's attitudes and behavior on a daily basis.

 **Do the right thing!**

- Lead by example by serving as a positive role model and encouraging others to comply with this code and Fiotec's policies. Remember that your example encourages others to do the same;
- Take steps to prevent violations and harassment of any kind in the area you manage;
- Promote a culture of *compliance* and ethics through personal leadership;






- Demonstrate the highest standards of ethics and quality in your daily work, and expect the same from your subordinates;
- Don't create or tolerate an environment where people feel pressured to bend the rules for their own or another's benefit;
- Make sure that your direct subordinates participate in all the awareness and training actions about this code, other normative instruments, and those specific to their functions;
- Review regularly, together with your subordinates, the policies, standards, and rules applicable to your functions;
- Encourage the reading of the contents, communications, and materials published internally, as well as the constant search for keeping informed about what happens in the institution;
- Make sure that contractors, consultants, contract and temporary workers in your area are aware of and act in a manner consistent with this code and applicable policies;
- Be proactive and take steps to prevent problems before they happen. Do not be complacent when these problems occur and report them to the channels mentioned in this document;
- Respond to employees who raise concerns, so that they feel safe and comfortable sharing those issues.

4.3 Conduct in the work environment

4.3.1 Respect and work environment

 What you shall know and evaluate


Any and all forms of harassment, prejudice, discrimination, *stalking*, *bullying*, or physical and/or verbal violence, whether isolated or repetitive, are repudiated. Fiotec assumes the commitment to investigate and confront situations of inequity, humiliation, exposure to ridicule, intimidation, hostility and embarrassment, as a result of color, race, gender, ethnic origin, language, age, economic condition, nationality, place of birth, physical, mental or psychological condition, kinship, religion, sexual orientation, union ideology or political position.



 **Do the right thing!**

In case you feel discriminated, humiliated or a target of prejudice, pressure, abusive practices, or in any disrespectful situation, and feel embarrassed to deal with the subject with your hierarchical superior, report the fact to Fiotec's channel for suggestions, compliments, complaints and denunciations.

4.3.2 Moral or sexual harassment

 What you shall know and evaluate

Harassment is characterized when someone in a privileged position uses this advantage to humiliate, disrespect, or embarrass.

The Moral Harassment consists of the deliberate repetition of gestures, words (oral or written) and/or behavior that expose the employee to humiliating and embarrassing situations, capable of causing offense to the personality, dignity, or psychological integrity, with the objective of creating an intimidating, hostile, degrading, and destabilizing environment that affects the employee's dignity. Most common examples of moral harassment:

Take workers' functional autonomy or depriving them of access to work tools;	Systematically contest all your decisions and criticize your work in a way exaggerated or unfair;
Withhold information useful for performing their tasks or misleading them;	Deliver, on a permanent basis, a quantity of tasks compared to their colleagues or require them to perform tasks urgent on a permanent basis;
Purposely and frequently assign inferior or superior tasks that are different from your assignments;	Control the frequency and time of bathroom use; press them not to exercise their statutory or labor rights;
Hinder or prevent promotions or the exercise of differentiated functions; invade a person's private life with phone calls, letters or e-mails;	Segregate the harassed person in the work environment, either physically or by refusing to communicate;





Verbally assault, direct contemptuous gestures, alter tone of voice, or threaten with other forms of physical violence;	Criticize a person's private life, personal preferences or beliefs of the one harassed;
Spread rumors or gossip about harassed person, or make jokes, seeking to discredit or embarrass them in front of superiors, colleagues or subordinates;	Disregard health problems or medical recommendations in the distribution of tasks;
Isolate the harassed person from get-togethers, lunches, and activities held with other colleagues.	Perform vexatious dynamics and presentations and/or inappropriate comments in training sessions, lectures, and institution parties.

Source: Moral and Sexual Harassment Primer - Standing Committee for the Promotion of Gender and Race Equality, Federal Senate, 2017-2019.

Specific examples of moral harassment against women:

- Make it difficult or impossible for pregnant women to attend medical appointments outside of the organization;
- Interfere with women's family planning by requiring or suggesting that they not get pregnant;
- Disregard medical recommendations for pregnant women in the distribution of tasks;
- Summarily disregard a woman's technical opinion in her area of expertise.

Sexual harassment is defined by law as the act of "embarrassing someone, with the intention of obtaining sexual advantage or favor, when the agent takes advantage of his condition of hierarchical superior or ascendancy inherent to the exercise of employment, position or function" (Penal Code, art. 216-A). This is, in words, behavior of a sexual nature deserving of disapproval, considered unpleasant, offensive and impertinent.

Attention:





- To characterize sexual harassment, the "non-consent" of the harassed person and the objective - on the part of the harasser - of obtaining sexual advantage or favoritism are necessary. Non-consent shall be interpreted broadly, as non-adherence to the sexual onslaught of the abuser;
- Non-sexual compliments, singing, flirting or flirtation do not necessarily constitute sexual harassment, although they are considered inappropriate in the work environment or may even be typified in other crimes or misdemeanors, such as sexual importunity;
- Unlike moral harassment, the conduct in sexual harassment can be repeated, or not.

Most common examples of sexual harassment:

Insinuations, explicit or veiled, of a sexual nature;	Gestures or words, written or spoken, of sexual nature;
Promises of differential treatment; Blackmailing for staying or promotion on the job;	Threats, veiled or explicit, of reprisals, such as losing your job;
Disturbance, offense to the dignity of the human person;	Unwelcome conversations about sex, inappropriate invitations, including by digital means or made in person or by third parties;
Narration of jokes or use of expressions of sexual content;	Unwanted physical contact;
Solicitation of sexual favors;	Impertinent invitations; pressure to participate in "dates" and outings;
Exhibitionism;	Creation of a pornographic environment;
Using people's characteristics to make fun of or embarrass them;	Humiliating jokes or nicknames with a sexual content;
Forcing and/or suggesting that women wear necklines, shorts, and other types of	





inappropriate clothing for the work environment.

Source: Moral and Sexual Harassment Primer - Standing Committee for the Promotion of Gender and Race Equality, Federal Senate, 2017-2019.

Fiotec is committed to promoting a work environment free from any kind of harassment, exploitation, abuse, or gender-based violence.



Do the right thing!

If you are aware that someone is experiencing harassment of any kind, contact Fiotec's channel for suggestions, compliments, complaints and reports.



What not to do!

Be silent. Don't be afraid to take action and find help.

4.3.3 Diversity and social inclusion



What you shall know and evaluate

Fiotec seeks to be an inclusive institution that distributes opportunities with equity, offers development conditions for all, recognizes people and appreciates diversity to the point of considering it in its choices, in decision making in relation to all its audiences and activities.

The Foundation is committed to promoting a good work environment. Thus, we do not condone with any kind of discrimination.



Do the right thing!

Respect differences, value diversity, and act proactively for social inclusion.



4.3.4 Safety, health and quality of life

What you shall know and evaluate

The performance of Fiotec's activities is unequivocally associated with the health, safety, and quality of life of its employees, which, in turn, requires actions aimed at valuing and caring for life. With this premise in mind, Fiotec is committed to providing safe working conditions and to promoting educational initiatives that broaden the perception and sensitivity of all employees regarding these issues that seek to contribute to the promotion of well-being in our internal environment.

Do the right thing!

Be sure to report if you identify unsafe conditions, disrespect for safety rules, or situations that could put anyone's life at risk.

4.3.5 Professional appreciation

What you shall know and evaluate

Fiotec believes that professional growth shall always be related to the degree of contribution and commitment of each one to achieve the objectives of the institution. Career advancement at Fiotec is based on individual merit. No favoritism or discrimination criteria are used. The employees' potentialities are valued by means of systematic training and professional development actions, as well as a remuneration system, in accordance with market practices.

4.3.6 Drug and alcohol use in the work environment

What you shall know and evaluate






Working under the influence of illegal drugs or alcohol is considered harmful to the work, since the consumption of illegal drugs or the harmful use of alcoholic beverages, inside or outside of Fiotec's premises, compromises the health and performance of the professional, damaging the work environment, generating risks and affecting the institution's image.

 **Do the right thing!**

If you identify that you, or a colleague, needs help with these issues, contact the social worker at the People Management department, who will offer specialized support, keeping the situation completely confidential.

 **What not to do!**

The use and possession of illicit drugs and staying in the work environment in a state altered by the use of these substances, which can affect the safety of the individual and everyone in the institution, are forbidden. Its practitioner is subject to the penalties of the legislation in effect, which can even lead to the termination of the employment contract for just cause.

4.3.7 Respect for privacy and confidentiality

 **What you shall know and evaluate**

Fiotec respects the personal life and privacy of its employees and the confidentiality of their personal information. Authority relationships at Fiotec may not restrict the right to freedom of expression and privacy, and may not be used to obtain personal information that has no direct bearing on the performance of employees or prospective employees.

4.3.8 Conflicts of interest

 **What you shall know and evaluate**





A conflict of interest is understood to be any situation in which the employee's personal interests influence, or may come to influence, inappropriately the judgment of value in relation to the business or are in conflict with his or her obligations to Fiotec.

It is not admissible for an employee to obtain any kind of personal advantage through his or her hierarchical position in the Foundation, and it is not tolerated that third parties offer compensations to employees in exchange for benefits in the hiring process.

Any kind of family relationship or personal relationship existing between members of the Board of Directors, managers, employees from the same area, or with third parties that have a contractual relationship with Fiotec, shall be declared by the employee to the People Management for the sole purpose of evaluating possible conflicts of interest.

Conflict of interest reports shall be forwarded to Fiotec's channel for suggestions, compliments, complaints and reports. For suspected cases, investigation processes will be opened and later analyzed by the Ethics and Integrity Committee and the Executive Board for the application of the necessary measures.



Do the right thing!

Be aware of the practices listed below that characterize conflicts of interest. This is a sample list and is only intended to demonstrate some practical cases. Situations will be evaluated according to the interpretation of the facts, based on the Code of Ethical Conduct and Fiotec policies:

- Seek, award or keep business opportunities for personal gain or for the benefit of close family or friends;
- Hire a supplier to the detriment of another with a better offer and technical capacity, due to friendship or kinship relations with the supplier's representatives;
- Receive money, property, services or other personal financial benefits and advantages directly or indirectly, from suppliers or third parties, who are doing business or proposing to do business with Fiotec;
- Influence the results of bidding/competition involving supply proposals;





- Direct or offer any kind of pressure on the recruitment and selection professional to favor the hiring of a new employee with whom you have a friendship or a family relationship;
- Favor a professional because of friendship or kinship, in promotion or merit events;
- Use institution resources for personal purposes (e.g., vehicles, fuel, office supplies/materials, raw materials or labor);
- Maintain relationships with colleagues for the purpose of favoritism or obtaining advantages;
- Engage in outside activity, professional or otherwise, that materially affects your obligations to Fiotec, that competes with the institution's activities, that jeopardizes reputation or work in progress, that involves Fiotec assets, or that suggests that Fiotec supports such activity;
- Take advantage of the position or position held at Fiotec to obtain favors or advantages inside and outside the institution.

4.3.9 Corruption and favoritism

What you shall know and evaluate

It is considered bribery or corruption to offer an undue advantage with the intention of speeding up or facilitating administrative processes, public or private contracting, licenses, judicial or competition decisions, or aiming at receiving improper favorable treatment.

Attention and commitment is maintained with all the practices that make it possible to comply with the national legislation against corruption and favoritism, as well as the globally recognized standards and pacts against these practices.

In this way, all and any form of corruption, favoritism, extortion, and bribery, at all levels, is totally repudiated by Fiotec.





 **Do the right thing!**

You are responsible for your actions and may not, acting on behalf of Fiotec, promise, receive, pay or offer any improper advantage for any purpose. It is everyone's responsibility to know and apply the rules and precautions that will be contemplated in the Integrity and *Compliance* Program, as well as to report, if they are aware of it, any doubtful conduct, using Fiotec's channel for suggestions, compliments, complaints, and denunciations.


4.3.10 Inside information

 **What you shall know and evaluate**

Strategic, secret or confidential information is that which is not known by the general public and whose disclosure, whether motivated by undue personal gain, or even out of context, as in a comment to a colleague, may affect the activities and/or image of Fiotec's activities and/or image and for this reason shall also be treated with due rigor. Examples of privileged or strategic information are: strategic planning, financial results, the institution's budget, investments, project reports, research results, as well as all related content and subjects.

 **Do the right thing!**

The confidentiality and privacy of Fiotec's information and that of everyone who relates to us shall be respected and not shared. Learn about Fiotec's documents related to confidentiality and privacy.

 **What not to do!**

- Do not make copies in any medium or transmit to any recipient, including your own personal addresses or profiles, documents that may contain confidential or sensitive information about customers, suppliers or any matter concerning the activities performed by Fiotec;





- Do not discuss Fiotec confidential or proprietary information in public places where third parties might overhear, including restaurants, elevators, hallways, or social areas;
- Do not work with documents that have Fiotec's confidential or sensitive information (hard or soft copy) in public places;
- The handling of Fiotec's confidential or sensitive information shall only occur among the relevant people, in an appropriate place, and when necessary;
- Restrict access to Fiotec's confidential or sensitive information available on servers or intranet to people for whom it is of real use and relevance.

4.3.11 Teleworking (home office)

What you shall know and evaluate

The International Labor Organization (ILO) defines telework as an activity carried out through the use of technology resources that facilitate information and communication, provided from a distant place from the company or establishment, which allows physical separation between the place of production or service provision and the place of operation of the company.

Do the right thing!

It is allowed to work outside Fiotec's premises, as a telecommuter (*home office*), as needed and authorized by the Board of Directors. In this case, you shall continue to comply with the conduct provided in this document.

Fiotec reinforces that the peripherals supplied for use in the telecommuting modality shall be for the exclusive use of the professional and the tools shall be used in a rational way, exclusively for purposes related to Fiotec, or in other circumstances permitted by the Foundation.

4.3.12 Religious, trade union and political party activity

The Fiotec respects and guards everyone's rights. However, it requires that its employees do not promote or participate in religious, union, and political activities





during working hours, or make use of the institution's resources for this purpose, or even the association of its brand, except in cases authorized by Fiotec.



What not to do!

The employee is not allowed to campaign for religious, political party and/or public office candidates using any of Fiotec's resources, such as, for example, but not restricted to: sending e-mails related to the topic(s) and raising financial resources.

4.3.13 Freedom of association and collective negotiation

Fiotec seeks constant dialogue with the entities that represent the employees, guaranteeing the right to collective negotiation and freedom of association.

4.3.14 Indication of professionals



What you shall know and evaluate

The Fiotec encourages indication of future hires through the following directives:

The work of employees related to each other is allowed, and the hiring will always be preceded by a selection process, in order to ensure equity, impartiality, and transparency in the processes of attracting employees to work in the institution. However, it is recommended that if family ties between employees are proven, that they do not work under direct supervision between them.

Fiotec's hiring processes allow the participation of family members (indicated by the employee himself or not), emphasizing that:

- All candidates are submitted to all stages of the selection process, without exception;
- There will be no favoritism or privilege, regardless of the degree of kinship with the Fiotec employee;
- It is not allowed to appoint and hire for positions/functions that may suggest or promote conflict of interest;





- Professionals with family ties to the candidate may not participate in, or influence, any decision in the selection and hiring process;
- Relatives may participate and work in the same area as long as there is no conflict of interest.



Do the right thing!

Inform the nominee that during the recruitment and selection process he will be asked about his relationships with Fiotec employees and that when hiring he shall sign a declaration to this effect, as this is a way to identify family relationships and any conflict of interest.

4.3.15 Dress code

Fiotec's image is formed both by its services and by the people who work there. For this reason, it is of fundamental importance that each one of us is attentive to maintain a proper posture with regard to our attitudes, behavior, and dress.

The use of informal dress is allowed on Fiotec premises or in institutional events of the Foundation, according to specific internal communication on the subject.

4.4 Conduct with external audiences

4.4.1 Conduct outside Fiotec



What you shall know and evaluate

Whether in an internal or external environment, such as participating in training sessions or events, using Fiotec vehicles, or in other situations that allow the institution to be identified, conduct in work situations shall be compatible with institutional values, thus, contributing to the recognition of the good image and reputation of the employee and the foundation.

4.4.2 Work outside Fiotec

Fiotec establishes for administrative employees assigned to its headquarters or office a task workday regime, that is, without the obligation to fulfill the workday by hours but



by accomplishing a task. An hourly work contract is also adopted, depending on the position and the needs of the job, respecting the limit established by law.

In both shifts, performance of other work activities by Fiotec employees is allowed as long as it does not generate incompatibility with carrying out the task and/or working hours, causing possible damage to professional performance or conflict with the institution's business and interests.

4.4.3 Customer Relations

What you shall know and evaluate

Fiotec's customers are understood as partners, and satisfying them is a daily commitment made by all employees. Therefore, the Fiotec serves its partners with an emphasis on quality, productivity and innovation, with social, community and environmental responsibility, and with full respect for the laws and regulations in force.

Do the right thing!

Partners shall be served courteously and efficiently, and offered clear, accurate, and transparent information. They shall get answers, even if negative, to their requests, in an adequate manner and within the expected timeframe.

4.4.4 Relationship with business partners

Business partners are present in many of Fiotec's activities and operations. Commercial partners or business partners are all contractors, directly or indirectly. This includes agents, brokers, intermediaries, advisors, consultants, representatives, travel agents, customs or visa agents, tax consultants, lawyers, solicitors, accountants, etc. Any inappropriate conduct on their part could have a negative impact on Fiotec's image and reputation, with the risk of potential exposure to civil or criminal liability or other penalties. For that reason, this Code shall serve as a reference to partners in conducting activities with or on behalf of Fiotec as and when to proceed.





 **Do the right thing!**

When selecting a business partner, make every effort to ensure that he or she knows Fiotec's values and acts in a manner consistent with the principles of this Code of Conduct.

Make sure that the business partner is reputable, competent, and qualified to perform the work for which you are being hired, and that the remuneration requested is appropriate. To this end, a thorough analysis of the partner shall be carried out, including a possible due diligence process, prior to contracting, in order to ensure that it is a suitable partner, and its performance shall be monitored and evaluated. Check invoices carefully and expose any suspicious or excessive charges.

4.4.5 Relationship with suppliers and service providers

 **What you shall know and evaluate**

The relations of Fiotec with its suppliers of inputs, materials or service providers, shall contemplate the legitimate interests of those involved, not being admitted improper advantages, obtained by means of manipulation of information, intimidation, coercion, coercion, embarrassment or the artificial creation of situations of dependence of the other party involved, unfair competition practices or situations characterized as conflict of interest with the performance of the institution.

 **Do the right thing!**

It is everyone's duty to act with integrity, avoiding, in the exercise of their duties, real or apparent conflicts of interest in their personal and professional relationships. The pertinent laws and standards shall be followed, and the regulations and procedures that determine the actions about the commercial negotiations shall be maintained. These shall always be primed by the impartial selection of suppliers and the use of decision criteria supported by legislation, strictly technical and commercial in the purchasing processes.





What not to do!

- Hiring suppliers who disobey any national or international legislation, use child, slave, forced, compulsory or illegal labor, and supply unsafe products or services is forbidden;
- The relationship of kinship or friendship between Fiotech professionals and their customers can in no way generate situations of privilege or differentiated treatment;
- It is forbidden to directly hire, without public selection, a legal entity that has an administrator or partner with management power that maintains a family relationship, including by affinity, up to the third degree with the support foundation's manager;
- Other hypotheses of nepotism or favoritism not included in the document are forbidden, in attention to the principles of morality, impersonality, and isonomy.

4.4.6 Relationship with the Government

All of Fiotech's relations with governors or public authorities are always based on transparency, in order to ensure the construction of relationships of integrity, contribution, and sustainability with the constituted authorities of the three powers.



What not to do!

Do not make, in the name of Fiotech, improper payments to public agents. Donations are also prohibited, as is making payments as a gratuity or offering any advantage to audiences officials or government authorities to expedite routine services or administrative actions.

4.4.7 Relationship with the press and any means of communication

Contacts with the press are promoted, exclusively, by the Executive Board, the Communication Department and/or Fiotech's spokespersons, nominated by the Board of Directors and oriented by Ascom, if necessary.

As Fiotech operates in shared management of programs and projects, some issues are directly forwarded to Fiocruz, according to the subject and the direction of the Executive Board.



Do the right thing!

In case you are approached by a media professional, through any channel (e-mail, telephone, correspondence, etc.), forward it to the Communication Department, which will provide the necessary orientation or will attend directly.

Do not promote the disclosure of classified or untruthful information to the press, on websites or social networks.



What not to do!

- Unauthorized persons are forbidden to contact the press on behalf of Fiotec;
- Contact with press professionals shall not involve commercial aspects - so it does not involve payments of any kind or favors.

4.4.8 Relationship with society and the environment

Aware of the importance of its activity and the responsibility it has as a support foundation, acting in the shared management of health programs and projects, Fiotec is making efforts to adopt in its strategy the ESG management (environment, social, and governance), aiming to integrate its values and sustainability principles to its business strategy and daily routine. Thus, it seeks to minimize its impacts on the environment, to build a fairer and more responsible world for the people around it, seeking to provide a better future.



Do the right thing!

- Try to develop actions, inside or outside Fiotec, that preserve the environment;
- Know and apply, whenever possible, the 3 Rs principle (Reduce; Reuse and Recycle) internally and externally to Fiotec;
- Practice conscious consumption and learn about the 12 principles of conscious consumption.





What not to do!

- Leave monitors and printers on and the room light on at the end of the workday;
- Print extensive personal documents;
- Discard papers without checking whether they can be reused for drafts;
- Use plastic cups at Fiotec;
- Discard the residues without considering the selective collection of solid residues, developed at Fiotec in partnership with Fiocruz;
- Discard of batteries (highly toxic residues) in the regular trash, and not in the collectors indicated for this purpose.

4.4.9 Visual identity and image



What you shall know and evaluate

The Fiotec's visual identity and image have strategic and economic value, because they translate technical quality and a culture guided by joint effort. Add to this the fact that visual identity is essential to the formation of a brand. It is the first communication with the public, and because of this it is so important that it deserves care and attention.

It is up to the Communication Department to elaborate and disseminate the customized institutional material and Fiotec's visual identity manual.

All Fiotec's employees shall watch over of this identity and respect it, using only the standard material made available. If you need additional material, please contact Ascom.



Do the right thing!

Respect Fiotec's principles and values within external communications and by any vehicle, including with regard to visual identity, and refrain from positions on behalf of Fiotec or its partners unless explicitly and legally authorized, in accordance with Fiotec's Communication Policy.



What not to do!

- Use the name of Fiotec with the intention of intimidating, threatening people or organizations, or obtaining personal advantages;
- Give lectures, seminars on Fiotec's business without prior authorization from the Executive Board;
- Elaborate materials that involve the image and visual identity of Fiotec without consulting the Communication Department.

4.4.10 Intellectual property and third-party copyright



What you shall know and evaluate

Intellectual property is understood as brands, patents, domain names, copyrights, innovations, improvements, processes or services, internal projects, conceptual models, financial information of the business, ideas, knowledge or any other non-material activity developed by the Fiotec's business, ideas, knowledge or any other activity of a non-material nature developed by the foundation or contracted by it, among other items that would benefit a competitor if they were known by the competitor.

Fiotec respects the copyrights and intellectual property rights of third parties in relation to various materials used in the development of activities. The reproduction, use or dissemination of unauthorized or illegally obtained copies of any materials, books, periodicals, systems and *software* produced by third parties is forbidden to any employee.



Do the right thing!

It is everyone's obligation, in the performance of their activities, to maintain the confidentiality and secrecy of work projects, matters and/or documents, as provided for in the relevant clause in the employment contract.





The result of the intellectual work and strategic information generated internally is the exclusive property of Fiotec.

You have to be careful, because using the intellectual property of third parties improperly can lead to civil liability.

4.4.11 Participation in political party activities

What you shall know and evaluate

The individual employee's right to get involved in civic affairs and participate in political processes is respected. As long as such participation occurs on your own time and with your own resources.

The Fiotec maintains a position of neutrality and exemption in relation to candidates, political parties or currents. The employees who work here, when participating in political party activities, do so on a strictly personal basis, outside of their working hours and locations.

And in such cases, the employee shall make it clear that the manifestations are his own, and not those of Fiotec.

Do the right thing!

The institution's resources, such as equipment, space, as well as Fiotec's image, cannot be used to serve personal or political party interests. It is forbidden to print, on Fiotec premises, political and/or party materials of any kind, and it is also forbidden for the employee to make any contribution in value, assets or services to political party campaigns or causes in the name of Fiotec.

4.4.12 Sponsorships and donations

What you shall know and evaluate

The Fiotec does not approve sponsorship or donations for campaigns, advertising pieces or events that encourage child, forced, compulsory or illegal labor; use of alcoholic beverages, tobacco and illicit drugs; generate prejudiced exposure of any





person; cause embarrassment, humiliation or exclusion; expose the vulnerability of individuals and groups; cause mistreatment to animals, or may stimulate and induce environmental damage.

 **Do the right thing!**

The Fiotec considers that sponsorships and philanthropic donations play an important role in the foundation's communication strategy and social responsibility stance. They shall be carried out transparently and in accordance with current local legislation and are decided by the Board of Directors.

The Fiotec does not grant sponsorships or make philanthropic donations for actions of a political party or religious nature.

4.4.13 Prevention of money laundering and terrorism financing

 **What you shall know and evaluate**

Money laundering is the processing of profits from illicit sources as the proceeds of crime in order to disguise their origin, allowing the criminal to enjoy these benefits without making their source public.

"Terrorist financing" is understood to mean the pooling of financial assets or property to finance the carrying out of terrorist activities. The Fiotec always acts within the terms and limits established by the applicable laws and regulations in effect. Furthermore, the institution will act with transparency and based on ethical standards of conduct and will not collude with money laundering and the financing of terrorism.

It is strictly forbidden, within Fiotec, any payment that does not contain the identification of the beneficiary, with special attention to politically exposed persons (PEP).





4.4.14 Receiving gifts, entertainment and hospitalities

What you shall know and evaluate

Employees, partners and suppliers are forbidden to accept or offer any kind of advantage, such as gifts, presents and hospitalities, with the aim of influencing their decisions or obtaining their own benefit or that of any legal entity, including Fiotec. In order to avoid any situation of discomfort or distrust, it will only be allowed to receive gifts, presents, and hospitality, eventually, in the amount of up to R\$100 (one hundred reais).

If the employee has any questions about how to behave when receiving any kind of gift, present, meal, travel, accommodation, or entertainment, he or she can contact his or her immediate superior or manager.

Do the right thing!

Strictly refuse money, gifts, or favors that do not respect the values and principles of the institution and good business relationship practices. If gifts are offered that exceed the characteristics described above, you shall not accept them.

4.5 Conduct when using the resources of Fiotec

What you shall know and evaluate

Fiotec's goods, services, equipment, and facilities are intended for use in its work activities. Personal use of the equipment, assets and services is not recommended.

All forms of physical and intangible property, such as facilities, inventory, information technology, and intellectual property, as well as Fiotec's data and information, are included in institutional assets.

It is everyone's obligation to protect Fiotec's property, facilities, equipment, and services and to use them for their intended purposes.





Examples are:

- Internet access;
- E-mail;
- Phones and cell phones;
- Computers and laptops;
- Material in stock;
- Institutional cars;
- Corporate Transportation;
- Copying machines;
- Office Supplies;
- Information;
- Physical facilities;
- Name, brands, articles or subjects.



Do the right thing!

It is everyone's role to always be aware of and take measures to prevent theft, improper appropriation, damage, and misuse of any of the foundation's property, equipment, services, and facilities.

This includes not allowing physical assets to be destroyed, discarded, sold, loaned, or donated without the proper approvals, or "outside" the institution's Solid Residues Collection Action Plan.

The same is true for intangible assets, which cannot be supplied externally without the proper approvals.

Communicate any perceived risk to the immediate manager.





4.5.1 Use of Vehicle

What you shall know and evaluate

While using Fiotec's corporate transportation, always be cordial, kind, and polite to the driver and other colleagues who share the transportation with you. It is worth remembering that transportation is an extension of our work environment, and behavior compatible with it shall be maintained.

It is mandatory to use appropriate conduct so as not to violate the rights of third parties.

The Fiotec's institutional vehicles may only be driven in work activities by qualified drivers.

Do the right thing!

Know and apply the rules established while using the service.

Shall you need to drive one of Fiotec's vehicles, make a commitment to defensive, peaceful driving and full compliance with all traffic laws.

What not to do!

- Physical and verbal violence and inappropriate or indecent behavior in corporate transportation;
- The use of an institutional vehicle for personal purposes is not allowed;
- If you feel encouraged by third parties to disrespect traffic laws or to drive in a non-defensive manner, inform the responsible area immediately;
- Transgressions and imprudent attitudes in traffic are the driver's responsibility.

4.5.2 Protecting Fiotec's information

What you shall know and evaluate

Fiotec's information is considered active. In this way, Information Security practices and documents are maintained, with the objective of guaranteeing the correct use and adequate protection of its information base.



Username and electronic passwords to access the network, or other internal systems of Fiotec, are personal, private and non-transferable. The password is the key to your electronic signature, which means that any activity done with it is your responsibility. Access, transmission and archiving of inappropriate and illegal content is not allowed, including, but not limited to: pornography of any kind, gambling, discrimination, and activities against the property of the public or third parties.

It shall be noted that e-mail, systems, and equipment provided by Fiotec will be monitored. The information contained in the institutional e-mail and internet usage history are the property of Fiotec and can be consulted whenever necessary.

Any non-compliance may lead to strict disciplinary measures, including termination of employment.



Do the right thing!

The use, sharing, and disclosure of Fiotec's private information, partners, processes, technologies, and results, shall observe the appropriate levels of treatment, established in the normative documents made available in the institution.

The unauthorized use of any internal information is a serious offense.

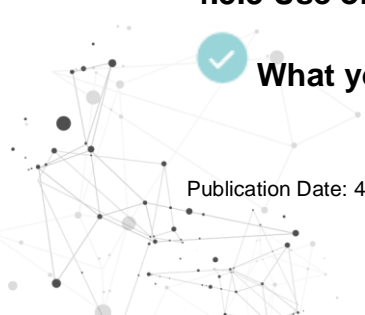
If an electronic device containing Fiotec information is lost, stolen, or misplaced, report it as soon as possible to Information Technology so that the necessary steps can be taken. In the case of cell phones, inform the Logistics area.

Keep the passwords secret and change them periodically to protect Fiotec data from unauthorized users.

4.5.3 Use of external social networks and instant messaging applications



What you shall know and evaluate





The Fiotec values individual rights, does not question the freedom of expression, but reminds us that a simple word, statement, or questioning can bring problems to you or to Fiotec, in the same way that the negative repercussion of an opinion published on social networks can make an employee's relationship with colleagues, clients, suppliers unviable, and even involve legal issues.

Consider that your social networks may be viewed not only by people in your family or close circle, but also by customers, suppliers, business partners, and other interested audiences.



Do the right thing!

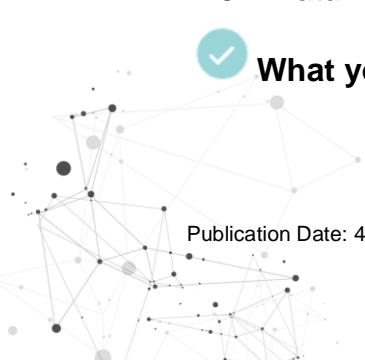
It is important to reinforce that protecting Fiotec's image is the responsibility of all employees. Thus, it is everyone's duty to:

- Know and follow the content of the institutional documents;
- Direct to the Ethics and Integrity Committee any customer complaint, related to this Code, that you have accessed or received through social media;
- Preserve non-public and undisclosed information. Such as: project data, postings, salary tables, employee dossiers, personal client information, contracts, etc.;
- Do not disclose or share images, videos or internal information about Fiotec that have not been authorized by the Communication Department;
- Do not share untrue, or unofficial, information about the institution, or its supported foundation.
- Do not express opinions implying or implying that these are the official positions of Fiotec;
- Evaluate what you want to communicate about yourself. Watch over of your personal information, because what is revealed about you on social networks affects your image and can affect that of Fiotec.

4.5.4 Data Privacy



What you shall know and evaluate





The Fiotec protects the security and privacy of the natural persons with whom it relates. In this context, and in order to affirm its commitment and respect for the rules of privacy and protection of personal data collected, in strict respect and compliance with the applicable legislation in this area, Fiotec is governed by the General Law of Protection of Personal Data - LGPD (13.709/2018).

The Fiotec seeks to meet what is regulated by data privacy laws:

- When and how much personal data can be collected;
- How they shall be used and when they need to be deleted;
- What notifications shall be provided;
- When and what types of consents shall be obtained;
- When they can be disclosed or shared with third parties;
- When they can be transferred outside the borders of a country;
- Individuals' rights related to their personal data.

When someone provides their personal data (data that can be associated with an identifiable person) to the institution, they are informed who is collecting or using the data, what the intended purpose is, and that individual rights to the data, including rights of access and correction, will be respected.



Do the right thing!

- You shall assume the role of custodians of the data collected. Therefore, it is important that all employees who may process or handle personal data are aware of the applicable requirements;
- When processing personal data about other people, you shall protect and limit unauthorized access and prevent accidental disclosure. In this context, "processing" means any operation or use of personal data, such as accessing, recording, collecting, storing, alteration, deleting, disclosing, and otherwise making available personal data;
- Personal data may only be used for specified, explicit and legitimate purposes. This means that as an employee of Fiotec, you may only collect, use or otherwise process personal and sensitive data for specified, explicit and legitimate purposes. These purposes shall be objectively justified by Fiotec's activities;





- Personal data that has been used for a specific purpose may only be used for a new secondary purpose if this new purpose is closely related to and not incompatible with the original purpose.

Questions regarding the information owner role shall be cleared with Fiotec's data privacy team.

5. General Provisions

All employees will take formal knowledge of this Code and shall sign, in free agreement, the Term of Receipt and Commitment to Fiotec's Code of Ethical Conduct, in which they declare that they have read and received the document, as well as being aware of its content and its importance to the performance of all of Fiotec's activities. This requirement extends to all other Fiotec employees. The signed Term of Receipt and Commitment will remain under the custody of People Management.

This document shall be read and considered in conjunction with the applicable and relevant policies, standards, and procedures adopted by Fiotec, and can be accessed through the intranet and institutional website.

Exceptions, eventual violations and cases omitted from this Code shall be submitted to the Ethics and Integrity Committee and forwarded for later decision to the Executive Board or Trustee Council.

This document will be in effect for an indefinite period of time, and the Ethics and Integrity Committee, with the support of the responsible areas, promoting updating and revising it when necessary or at least every two years, and it is applicable to any Fiotec work system.

The approval of this Code and its revisions are the responsibility of Fiotec's Executive Board and Trustee Council.

6. Normative References

It does not apply.





7. Reviews control

Review	Date	Summary of Alterations
0	4/2/2007	Creation of the Ethical Conduct and Information Security Policy. People Management and Information Technology.
1	1/2/2018	Review of the document and all content related to information security has been revoked. Information on this subject has been reviewed and made available in the following documents: Information Security Code and Information Security Policy.
2	9/26/2022	Review and alteration of the document from Policy of Ethical Conduct and Information Security to Code of Ethical Conduct, with an alteration in content and adaptation to institutional policies. Approved by the Board of Directors and Trustee Council.
3	4/10/2023	Compliance with the new institutional image and revision of the text in Item 4.4.2 requested by the Board of Directors and Legal Counsel, in view of the alteration of Fiotec's working hours, according to the current labor legislation.



8. Terms and definitions

CLT: Consolidation of Labor Laws;

CRE: Employee Representative Committee;

EN: English;

Ensp: Escola Nacional de Saúde Pública Sergio Arouca (Sergio Arouca National School of Public Health);

Fiocruz: Oswaldo Cruz Foundation;

Fiotec: Foundation for Scientific and Technological Development in Health;

IBGC: Brazilian Institute of Corporate Governance;

ICT: Institutions of Research, Science and Technology;

ISO: International Organization for Standardization;

IFES: Federal Institutions of Higher Education;

ILO: International Labor Organization;

WIPO: World Intellectual Property Organization;

PT: Portuguese;

SP: Spanish;

Sesmt: Specialized Service in Security Engineering and in Occupational Medicine;

MCTI: Ministry of Science, Technology and Innovations.



9. Attachment

TERM OF RECEIPT AND COMMITMENT TO THE FIOTEC'S CODE OF ETHICAL CONDUCT (Illustrative image of the form to be signed)

I hereby declare that

- I have received and read Fiotec's Code of Ethical Conduct;
- I have understood all the contents of this Code, as well as its importance for the exercise of the foundation's activities;
- I understand that when I have concerns about a possible violation of this Code, I shall report them to the Ethics and Integrity Committee, via Fiotec's channel for suggestions, compliments, complaints and denunciations, or those indicated in the Code;
- I have understood that I can use the Ethics Channel anonymously or identified;
- I guarantee my commitment to comply with all the directives of this Code, under penalty of being subject to the administrative measures and termination measures foreseen in the employment contract and in the Brazilian labor legislation.

(Place) _____/(State) _____, _____, _____.

Name of employee - Position

Attention: People Management is responsible for collecting the term and providing the subsequent filing in the functional file.

