

CODE OF ETHICS AND CONDUCT¹

SÃO JOSÉ DOS CAMPOS TECHNOLOGY PARK ASSOCIATION

Message from the Directors

Integrity and compliance with the laws in effect in our country are intrinsic elements of the day-to-day activities of the São José dos Campos Technological Park Association (APTSJC).

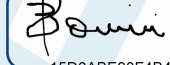
We are solidly committed to performing our activities under the guidance of decisions that are made exclusively in accordance with current laws, our code of ethics and conduct, and other internal rules.

Our concern for ethical and legal compliance also applies to our suppliers and service providers and all those who act on our behalf, thus making clear the APTSJC's position in repudiating all forms of corruption, bribery, graft, conflict of interest, money laundering, and other conduct contrary to the law and the principles of good governance.

The Association's administrators are fully committed to fostering a culture of ethics and integrity, recognizing this as our obligation to society.

BOARD OF DIRECTORS

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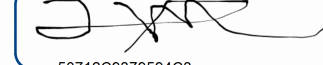


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Eduardo Bonini Santos Pinto

President

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Daniel Moczydlower

President Vice

EXECUTIVE BOARD

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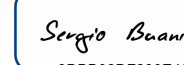


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Marcelo Nunes da Silva

General Director

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Sergio W V Buani Filho

Director of Operations

¹(Version approved in a meeting of the Board of Directors on 05/11/2021)

1. DEFINITIONS

1.1. The following definitions shall be considered for the purposes of this Code of Ethics and Conduct (“Code”):

- a) Administrators: members of the APTSJC’s Executive Board and Board of Directors;
- b) Public Agent: (i) agent, authority, staff member, worker, employee or representative of any government entity, department, agency or public office, including any entities of the Executive, Legislative, and Judiciary branches, direct or indirect public administration entities, including public companies, joint capital companies, and public foundations, national or foreign; (ii) any person exercising, even temporarily and without remuneration, a position, function or employment in any entity of a State and its instrumentalities; (iii) director, board member, employee or representative of a public international organization; and (iv) director, board member, or employee of any political party, as well as candidates running for public office or political appointment, in Brazil or abroad;
- c) APTSJC: São José dos Campos Technology Park Association;
- d) Associates: members of the APTSJC, as set forth by its articles of incorporation;
- e) APTSJC’s Ethics Channel: communication channel open to anyone, to clarify doubts, question omissions, and send reports on any non-compliance with this Code, other APTSJC policies and procedures, or applicable current legislation;
- f) Collaborators: all employees and other collaborators of the APTSJC, including members of the fiscal council and any committees with technical functions and/or intended to advise administrators, as well as interns and trainees;
- g) Code: this APTSJC Ethics and Conduct Code;
- h) Ethics and Conduct Committee: the APTSJC’s Ethics and Conduct Committee;
- i) Suppliers: Suppliers of products and/or services to the APTSJC; and
- j) Partners: Signatories and participants in terms of agreement or partnership agreements, protocols of intention, memoranda of understanding, or related instruments, as well as individuals and legal entities that become associated with the programs managed by the APTSJC.

2. SCOPE

2.1. This Code applies to all APTSJC employees, administrators, and suppliers, including the Association's intermediary agents, such as, but not limited to, attorneys, consultants, brokers, and travel agents.

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3. COMPLIANCE WITH AND APPLICATION OF THE CODE

- 3.1. Everyone shall read and fully understand the provisions of the Code with which they are required to comply.
- 3.2. The coordinators of each area shall ensure the implementation of the values and standards contained in this Code and in other APTSJC policies and procedures applicable to the environment and day-to-day activities of their respective practices and responsibilities, as they set an example to be followed by their subordinates and collaborators.
- 3.3. APTSJC administrators and employees shall participate in periodic training events regarding the provisions of this Code and, when necessary, other APTSJC policies and procedures.
- 3.4. Furthermore, those who become aware of any irregularity, whether it is an outright violation of the Code or APTSJC policies and procedures or of a mere suspicion of violation, shall promptly report it through the APTSJC Ethics Channel.

4. WORK ENVIRONMENT

- 4.1. The APTSJC values a pleasant work environment, where all administrators and employees, regardless of their position, closely share an elevated level of cooperation.
- 4.2. Therefore, the APTSJC rejects any form of discrimination and prejudice exercised in internal or external relations, whether by race, color, gender, religion, sexual orientation, political party, age, social status, or physical or mental restrictions, and commits to respecting all conventions and treaties on this subject, especially with regard to the equality of all before the law.
- 4.3. Affective relationships that occur between Employees are respected by the APTSJC, provided there is no relationship of subordination between those involved and that one of the employees is not part of the Legal, Financial or Human Resources Department. This includes affective relationships that may exist between employees within and between these sectors. However, in order to minimize the occurrence of conflicts of interest, such relationships shall be communicated to the immediate superior(s) and the Human Resources department.
- 4.4. The APTSJC encourages the professional development and quality of life of its administrators and employees, with safe and healthy working conditions, free from threats, acts of violence, discrimination, bullying (cyber, physical or moral), sexual harassment, or any other conduct that may constitute a human rights violation.

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- 4.5. The APTSJC encourages and ensures the right to freely associate with unions and to collective bargaining. In addition to dialoguing with unions, the APTSJC maintains direct contact with its employees, while seeking to improve labor relations.
- 4.6. All persons have the power to make their own decisions on whether or not to comply with orders that contravene compliance with the principles and guidelines established in the Code and other APTSJC policies and procedures.
- 4.7. No one has the right to require an APTSJC administrator, employee, supplier, or partner to commit illegal acts or violations of the principles and guidelines set forth herein. It is their right to obtain clarification and express their concern regarding inappropriate behavior that jeopardizes their integrity or that of third parties, or that could cause damage to the APTSJC, its image, its assets, or the environment.
- 4.8. The APTSJC respects the political freedom of its administrators, employees, suppliers, or partners, but prohibits holding political party campaigns or spreading propaganda on its premises and/or using APTSJC resources and/or its name.
- 4.9. The APTSJC respects the religious freedom of its administrators, employees, suppliers or partners, but prohibits preaching, ceremonies, or religious services on its premises and/or using APTSJC resources and/or its name.

5. THE APTSJC'S RELATIONSHIP WITH STAKEHOLDERS

- 5.1. The APTSJC is committed to maintaining the highest standards of ethical conduct and requires that its administrators, employees, suppliers, or partners always act in line with the Association's vision and objectives.
- 5.1.1. The APTSJC's administrators and employees are required to know and comply with all legislation (laws, regulations, and rules in general) applicable to the Association's areas of activity, including all those that could make the APTSJC responsible for the acts of its administrators, employees, suppliers, or Partners, such as Law no. 12.846/2013 (Anti-Corruption Law) and Law no. 8.429/1992 (Administrative Misconduct Law) and its amendments, as well as this Code and other APTSJC policies and procedures intended to ensure compliance with applicable legislation, good corporate governance practices, and ethical conduct.
- 5.1.2. Furthermore, suppliers are also required, with regard to the APTSJC, to comply with all relevant legislation within the scope of the professional activities they perform for the Association.

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5.2. RELATIONSHIP WITH ASSOCIATES

5.2.1. The terms of this Code focus on guiding the relationship between Associates and the APTSJC, in order to facilitate the development of the Association's mission and further improve the integrity policies and practices of those Associates. Thus, the Associate, when a legal entity, cannot, at any time, under penalty of exclusion from the APTSJC: (a) be included in the Register of Employers who have submitted workers to a condition analogous to slavery; (b) appear in the Register of Disreputable and Suspended Companies (CEIS); and (c) be included in the Register of Legally Impeded Private Non-Profit Entities (CEPIM).

5.2.2. Furthermore, Associates shall sign the attached Acceptance Agreement, as a condition for maintaining Member status, under penalty of suspension of their rights as Associates.

5.3. RELATIONSHIP WITH SUPPLIERS

5.3.1. The APTSJC's purchasing processes are based on integrity and competitive equality to ensure the best quality and cost-effective supply of materials and services. Suppliers are expected to be committed to APTSJC's policies and procedures in competition processes, as well as to comply with this Code, acting in accordance with legal requirements of health, safety, and work environment, respect for data privacy, treatment of confidential information, competition laws, anti-corruption, and money laundering prevention.

5.3.2. The APTSJC reserves the right to replace and/or terminate relationships with any and all suppliers that do not comply with integrity, environmental, labor, tax, and labor health and safety legislation, or that are in conflict with the APTSJC's interests. The Association does not tolerate the use of child labor, slave or slave-like labor, and any violation of human rights by its suppliers.

5.3.3. Travel and expenses with transfers, accommodations, meals, and other related expenses, incurred by administrators and employees in activities of interest to the APTSJC, shall not be paid for suppliers, except with the express prior approval of the Association's Executive Board.

5.3.4. The APTSJC shall make every effort for potential suppliers located in the communities where it operates to be included in selection processes, provided that technical and financial criteria are met.

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5.4. RELATIONSHIP WITH PUBLIC AGENTS

- 5.4.1. It is strictly prohibited to promise, offer or deliver, directly or indirectly, any undue advantage (in cash or anything of value) to a public agent or a third party related to a public agent.
- 5.4.2. The APTSJC does not tolerate acts of corruption by its administrators and employees, or even by its suppliers. Any violation of this Code or of the APTSJC's policies or procedures that has originated in an act of corruption will subject violators, in all cases, to the termination of their employment contract or contractual relationship with the Association.
- 5.4.3. The APTSJC shall not tolerate any form of active or passive corruption, such as extortion or bribery, in an attempt to influence business dealings, or to obtain any undue advantage.
- 5.4.4. Relations between the APTSJC and public agents shall always be based on transparency and integrity, as well as on the other principles set forth in Laws no. 9637/98 and no. 12846/13.
- 5.4.5. There is a chance that situations constituting a conflict of interest with public bodies could occur, and that fact shall be immediately reported to the APTSJC Ethics and Conduct Committee.
- 5.4.6. Meetings between APTSJC representatives and public agents must be held on the premises of the appropriate public offices and/or buildings. The APTSJC shall keep clear and accurate records of those meetings.
- 5.4.7. The hiring of public agents is prohibited.

5.5. PRESS RELATIONS

- 5.5.1. Press relations shall only be performed by agents expressly appointed and authorized by the Executive Board of the APTSJC.

6. CONFLICT OF INTEREST

- 6.1. All who work at the APTSJC shall act with integrity, in the exercise of their duties, avoiding conflicts of interest, whether potential, real or apparent, in their personal and professional relationships, as follows:
- 6.1.1. Administrators and employees shall not use the prestige of their positions or the name of the APTSJC, in either internal or external relations, to influence any decision

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that may favor their own interests or those of third parties, thus harming the interests of the APTSJC.

6.1.2.No favoritism of any kind shall be exercised between administrators and employees.

6.1.3.The private interests of all who work at the APTSJC shall not interfere with the interests of the Association.

6.1.4.Any and all relationships that present, or appear to present, or might present a conflict of interest between the APTSJC and its members shall be avoided, including conflicts of interest involving their family members or people in close relationships with them, whether professional or personal.

6.1.5.The admission of a candidate who is a spouse of or holds a family relationship up to thrice removed with APTSJC Administrators, members of the Legal, Financial or Human Resources Department, or with a person who works in the same functional area of the APTSJC is prohibited.

6.1.6.APTSJC administrators and employees shall not, under any circumstance, hold commercial, economic and/or monetary interests with competitors, customers, or suppliers.

6.1.7.Members of the Board of Directors of the APTSJC shall abstain from voting on decisions in which they may have any type of conflict of interest with the APTSJC, under penalty of the respective decision being nullified.

7. GIFTS, GIVEAWAYS, AND HOSPITALITY

7.1. Offering and receiving gifts, giveaways, and hospitality is prohibited, with the exception of those that have no commercial value or are distributed as a courtesy, advertising, customary disclosures, or on the occasion of special events or commemorative dates, always ensuring that its evaluation is not compromised and that there is no understanding, expressed or implied, that somehow something must be done in return for the offer made.

7.2. Any negotiation, relationship, offer, or promise to public or private agents shall strictly comply with the laws and internal policies of the APTSJC, especially with regard to the provisions of the Association's Anti-Corruption Policy.

7.3. Gifts and hospitality shall be of modest and reasonable value, without extravagance, offered or accepted in connection with the promotion, demonstration, or explanation of the company's products and services. Gifts and hospitality are considered to be modest and

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reasonable if their value does not exceed 9% (nine percent) of the current Federal minimum wage.

7.4. When it is not possible to refuse receipt, the administrator or employee must send the gift, giveaway, or hospitality to the Human Resources department, which shall preferably forward it to a charitable institution chosen by the APTSJC or, if this is not possible, to a drawing among APTSJC Employees.

8. DONATIONS AND SPONSORSHIPS

8.1. So that there are no issues of non-compliance with anti-corruption laws, the APTSJC shall only donate products or financial resources to the support of scientific research activities, art and culture, and social and educational projects. The principle is that all donations must comply with transparency requirements, having clear and objective purposes, without the expectation of something in return or special consideration, and shall be supported by proper documentation, with proper accounting records, and in accordance with relevant laws and regulations.

8.2. Sponsorships are monetary contributions, in terms of products or services of the APTSJC, on behalf of an action organized by a third party for the purpose of advertising and/or publicizing the APTSJC brand.

8.3. Those who are responsible for donations or sponsorships shall ensure that the activities are transparent, conducted by means of a written agreement, for legitimate business purposes, and in accordance with the proposal of the host of the event.

9. PROHIBITION OF POLITICAL DONATIONS

9.1. Donations, in the name of the APTSJC, to political parties or candidates running for public office are prohibited.

9.2. Furthermore, APTSJC administrators and employees are also prohibited from donating, even in their own name, to political parties and/or candidates running for public office, when the purpose of that donation is intended to be in the interests of the APTSJC.

10. CONFIDENTIALITY AND PRIVACY OF INFORMATION AND DATA

10.1. The administrators and employees of the APTSJC shall know and comply with the legislation regarding the protection of confidential data and information, as well as

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undertake to maintain the confidentiality of any and all information to which they may have access as a result of performing their activities at the APTSJC.

11. RELATIONSHIP WITH THE COMMUNITY AND THE ENVIRONMENT

11.1. The APTSJC shall work to instill the concepts of respect for the environment in its administrators, employees, and suppliers and to participate in initiatives that contribute to the preservation of the environment in the community where it operates.

12. GOODS AND PROPERTY

12.1. Intellectual Property

12.1.1. The APTSJC's intellectual property shall be protected from misuse, diversion, or personal gain. The same care and respect shall be exercised with respect to the intellectual property of third parties.

12.1.2. The intellectual property of APTSJC's brands and its internet domain belong solely to the APTSJC, as well as its software, systems, applications, documents, and plans it has developed.

12.2. Electronic Resources

12.2.1. Electronic resources, including, but not limited to, computers, cell phones, emails, Internet access, and communication software, belong to the APTSJC and are made available strictly for business purposes. Therefore, it is prohibited, for example, to: (a) access websites having inappropriate content; (b) transmit messages or files with partisan political content, chain letters, racial intolerance, and others; (c) use unauthorized and/or pirated computer programs; and (d) perform any act prohibited in this Code or in the normative instruments of the APTSJC (bylaws, internal regulations, norms, and internal working instructions).

13. SOCIAL MEDIA

13.1. The dissemination of photos and videos related to the APTSJC or partners on social media is only allowed if the materials are already available on the APTSJC website.

14. ACCOUNTING BOOKS AND RECORDS

14.1. The APTSJC shall maintain adequate accounting systems and internal controls to ensure the veracity of the respective property and financial situations.

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14.2. All accounting records shall be supported by the respective documentation and be immediately entered in the official books and records, in compliance with the law and generally accepted accounting principles.

15. THE APTSJC ETHICS CHANNEL

15.1. The APTSJC has made the APTSJC Ethics Channel available to its administrators, employees, suppliers, and third parties in general for reporting conduct that violates this Code and other policies and ethical principles of the APTSJC and/or current legislation.

15.2. Access to the APTSJC Ethics Channel is free and available via the following means:

15.3. <https://www.helloethics.com/aptsjc/en/>

15.4. The Ethics Channel is a confidential means of communication.

15.5. The APTSJC tolerates no retaliation, veiled or outright, against any person who reports, through the channels provided by the APTSJC, a concern expressed in good faith. Furthermore, all reported matters, concerns, complaints, or violations shall be treated with the utmost confidentiality and anonymity.

15.6. This channel is managed by a specialized company, which guarantees the confidentiality of information and the possibility for employees to make anonymous reports, if they so wish. The investigation of reports received through the APTSJC Ethics Channel is performed by the Ethics and Conduct Committee.

16. VIOLATIONS OF THE CODE

16.1. The administrators, employees, and all individuals or legal entities carrying out activities for or on behalf of the APTSJC are subject to disciplinary measures in the case of violations of the principles and values established in this Code and other policies and procedures, including termination of employment or of the business contract; they are also subject to the following disciplinary measures: (i) oral and written warning; (ii) suspension; (iii) dismissal with just cause; (iv) legal action related to the restitution of damages; and (v) communication of the facts to the appropriate authorities.

16.2. The penalties set forth in the previous item have no specific order for being applied, with action taken at the discretion of the APTSJC according to the degree of violation of the principles established in this Code and other APTSJC policies and procedures.

17. TERMS OF COMPLIANCE

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- 17.1. The administrators and employees of the APTSJC, as well as its associates, without exception, shall sign the Acceptance Agreement found in the single attachment to this document, and shall be committed to ensuring the application of the rules and principles contained in this Code and other policies of the APTSJC.
- 17.2. Administrators and employees shall declare any conflicts or situations that qualify among those listed in this Code, including their possible participation in other companies or organizations, and the Ethics and Conduct Committee is responsible for guiding them in any actions required to adapt to this Code.

18. VALIDITY

- 18.1. This Code of Ethics and Conduct will go into effect on the date shown in the first clause of this instrument and may be amended at any time, as decided by the Board of Directors of the APTSJC.
- 18.2. A copy of this document can be found at <https://pqtec.org.br/en/integrity/>.

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ATTACHMENT

TERMS OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT

I, (full name, nationality, marital status, and profession), as (position held at the APTSJC), declare that I am aware of the APTSJC Code of Ethics and Conduct ("Code") and that I have received a full copy of it, also available in a digital version on the _____ website.

Therefore, I confirm that I understand the importance of the Code's content and declare my commitment to comply, without restriction, with the guidelines contained in this document when exercising my professional activities and/or in my relationship with the APTSJC.

São José dos Campos, _____ (month) _____ (day), 20__.

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