



Unicamp Development Foundation

Code of Ethics and Conduct

CODE OF
ETHICS AND CONDUCT



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1. INTRODUCTION

Funcamp was established in 1977 by the then Dean of the State University of Campinas (Unicamp), Zeferino Vaz, with the purpose of, according to its Statute, “providing Unicamp, as possible, with the necessary means for the adequate mobilization of its human and material resources to meet the community's economic, social, pedagogical, assistential, social security and cultural needs and goals, collaborating in the performance of scientific research, teaching and institutional development at the State University of Campinas”.

MISSION

"To assist Unicamp in its development and commitment to society, acting with excellence and respecting ethical, moral and legal principles".

VISION

“Funcamp is a modern institution, recognized for its excellence, present in the development of Unicamp, acting with agility and efficiency, being a national reference”.

PRINCIPLES AND VALUES

Funcamp fulfills its mission, meeting the following principles: honesty, respect for the individual, commitment and ethics; always seeking to work with dynamism and efficiency.

2. PURPOSE OF THE CODE OF ETHICS AND CONDUCT

This Code of Ethics and Conduct aims to highlight and reinforce the Foundation's ethical values and the principles that guide the conduct of its activities, in line with the mission, values and vision that define Funcamp's identity, reinforcing its commitment with innovation and excellence in all its activities. All other commitments made by Funcamp, through rules, statutes, regulations and policies, are in line with and inspired by this set of values.

3. SCOPE

This code is intended for counselors, deans, employees, individuals and companies that have a relationship with Funcamp, either to meet its needs, or to sign administrative agreements and contracts in which it participates.

4. ETHICAL CONDUCT

In order to ensure that ethics is the basis of the conduct of the recipients of this code, everyone should:

- act with respect for human rights and the environment;

- act ethically;
- repudiate any form of harassment;
- repudiate any fraudulent or corrupt practices (bribery, influence peddling, money laundering, concealment of assets, undue advantages and others), or any illegal or criminal acts of any kind;
- condemn unlawful conduct such as forgery of documents, tax evasion, misappropriation, among others;
- act in accordance with internal or external applicable laws and regulations;
- repudiate the use of unlicensed software.

5. COMMITMENT TO STANDARDS

The laws and regulations applicable to the Foundation must be complied with in all segments and by all recipients of this code.

This code will be available on the Funcamp website and can be delivered to any interested party, by oral or written request.

The recipients of this code must fully understand its content and undertake to act in accordance with the rules and policies adopted internally.

6. CONFLICT OF INTERESTS AND INCOMPATIBILITIES

To avoid conflicts of interest¹, the recipients of this code must:

- exercise activities in an impartial manner;
- accept no favors and/or courtesies;
- communicate the Ethics Committee when identifying a situation of conflict of interest with them or with another person;
- do not carry out other professional activities during working hours, with or without profit, or occupations that may interfere, harm or represent direct or indirect competition with Funcamp's work, as well as using its facilities for trade and sale of products or services of personal interest (exclusive obligation for Funcamp employees);
- decide, in accordance with its professional competence, the hiring of any nature, definition of salary, concession of promotion of position and/or benefit,

¹ A conflict of interest is when the recipient of this code influences or makes decisions motivated by personal interests or the interests of third parties related to them, resulting in their own benefit and/or benefiting people connected to them.

prevailing the meritocracy and not any type of favor related to the conduct of nepotism;

- avoid the embarrassment of colleagues and maintain a friendly atmosphere;
- never use Funcamp's name, brand and logos without prior authorization;
- refrain from disseminating content, especially on social media, which are not in line with FUNCAMP values.

7. GUIDELINES FOR PROCUREMENT AND HIRING

The selection and contracting of suppliers shall follow the criteria and procedures defined in [Funcamp's Procurement and Hiring Regulation](#). All intentions and purposes shall be explained in the notices and contracts, so that suppliers can assess the risks inherent to the business itself in their decision making.

Freelancers shall be hired according to rules previously defined in Resolutions [No. 02/2007](#) and No. [02/2008](#).

Funcamp encourages the exchange of good business practices with its suppliers, in order to promote the improvement of relations between the parties.

8. HIRING EMPLOYEES

The selection and hiring of employees shall comply with the rules provided for in the [Personnel Hiring Regulation](#), available on Funcamp's website.

9. BENEFITS AND GIFTS

Employees shall not be allowed to use their positions to incite, demand, accept, obtain or receive promises of benefits of any kind.

Any other gifts, meals or entertainment events must be refused and returned to the sender.

The prizes, gifts or presents that, directly or indirectly, represent distinction or tribute to Funcamp, must be forwarded to the dean's Council.

10. DONATIONS AND SPONSORSHIPS

Donations related to Funcamp's institutional purpose shall be allowed.

Funcamp shall not be able to make donations or grant sponsorships for:

- political parties, political organizations and religious entities;
- for-profit organizations and people;

- recipients incompatible with Funcamp's statutory objectives, or that could damage its reputation.

11. MANAGEMENT, RESPONSIBILITY AND SUPERVISION

Funcamp's Deans, Officers and other Managers are responsible for:

- acting according to the responsibility of the position;
- knowing, adopting and disseminating, through their own attitudes, the values and principles contained in this Code;
- manifesting, in an impartial and reasoned manner, in relation to professional attitudes considered inadequate in view of the principles contained in this Code;
- directing, informing, organizing, guiding, supervising and managing staff members, according to the role of each Manager;
- ensuring that compliance with the law is continuously monitored;
- communicating clearly to staff members the importance of integrity and compliance in daily activities, as well as inform that law violations are unacceptable and shall entail legal consequences.

12. STAFF

Funcamp's Employees must follow the following conduct criteria:

- respecting divergent opinions and act to resolve conflicts;
- keeping the work environment free from embarrassment resulting from the formulation of criticism or the reproduction of rumors and the spreading of gossip, which tarnishes the reputation of FUNCAMP's employees and those with whom it has links;
- promoting the union of internal efforts between FUNCAMP's areas, in favor of its interests, seeking to share information and optimize actions whenever possible;
- being willing, in joint work, to share their knowledge and information with professionals from other teams, according to the required needs and established agreements;
- caring for the internal patrimony and the material resources made available, using them correctly, legally and for the performance of the tasks that favor FUNCAMP, protecting it from damages, improper handling or losses;
- attending to any work commitment at the established time, prepared to meet expectations and dressed appropriately;

- obtaining prior authorization to be absent from work, whether to deal with personal matters or to exercise any type of activity, whether paid or not, even without using FUNCAMP's information or resources.

13. CONDUCT CRITERIA FOR FUNCAMP AND COVENANTORS, PARTNERS AND SUPPLIERS

Funcamp's employees and partners (consultants, commercial agents and partners) must follow the conduct criteria, specified below:

- renouncing participation in the hiring process of business partners and suppliers, indicated or not, who are related to them (up to 3rd degree relatives), and in any situation that may have conflict, it must be submitted to the FUNCAMP's Ethics Committee;
- maintaining standards and procedures that guarantee processes free from unethical and illegal practices;
- rejecting and not offering any payment or improper advantage, for any reason, aimed at entering into, maintaining or guaranteeing a business relationship with or for FUNCAMP;
- abominating deceptive, unfair and fraudulent business practices;
- acting in full compliance with the laws, rules and regulations applicable to the conduct of activities with FUNCAMP;
- complying with the accounting and tax rules established in the applicable laws and regulations;
- complying with FUNCAMP's internal rules, applying the principles, values and rules of conduct established in this Code;
- avoiding any interaction with or on behalf of FUNCAMP that is characterized as a conflict of interest;
- Ensuring working conditions consistent with the law, free from harassment and discrimination;
- collaborating with the inspection and investigation activities of public agencies, entities or agents and immediately inform FUNCAMP when under investigations regarding this Code of Ethics;
- demanding from business partners and suppliers confidentiality and secrecy when handling data and information to which they may have access at any time, including the phases before and after contracting the services;
- objectively rejecting business partners and suppliers that show any evidence of the use of slave, child or forced labor and illegal practices such as fraud, bribery and corruption and, if any irregularity is detected, submit it to the competent authority;
- requiring that, when carrying out activities on behalf of FUNCAMP, business partners respect its identity, values and operational rules, not unduly appropriating the resources made available to them.

14. CRITERIA OF CONDUCT WITH EXECUTORS/SUB EXECUTORS

Executors and their Substitutes shall follow the criteria of conduct below:

- acting in a transparent and ethical manner;
- carefully analyzing all the risks involved in creating projects, studies and solutions to third parties, in order to protect, above all, the reputation of FUNCAMP and the other parties involved;
- complying with the legal provisions applicable to the activities carried out, including, but not limited to, the standards of intellectual property law, ethics in scientific and technological research, ethics involving research with human beings, the use of animals in scientific research and the protection of the environment;
- treating confidentially all private and/or individual information regarding the participants of the projects managed by Funcamp; the respective disclosures may only occur with the express authorization of their holders, or in the cases provided for by the ethics legislation in scientific and technological research, or that may be requested by the control/inspection agencies;
- respecting the relevant legal and regulatory provisions, in particular the resolutions and standards issued by the National Health Council, for any project involving human beings, ensuring that the research procedures cannot be initiated without the favorable opinion paper issued by the Committee for Ethics in Research (CEP) / National Commission of Ethics in Research (CONEP);
- obeying the provisions of [Law No. 11.794/08](#) and other legal standards, pertinent to the projects that use animals;
- precisely and completely recording data and information collected, procedures performed and partial results obtained when carrying out a project;
- maintaining or preserving the records of a project in relation to which issues of scientific or ethical correctness have been raised, until these discussions or conflicts are completely resolved;
- each one of its authors being responsible for the quality of the work developed as a whole, unless the limits of its scientific contribution to obtain the exposed results are expressly and precisely defined therein;
- when communicating the results of a project, through scientific work, the Executor and/or Substitute Executor must accurately expose them, as well as all the data, information and procedures deemed relevant for its achievement and scientific justification. In situations where this exposure is not feasible for ethical or legal reasons, this fact must be expressly mentioned in the work;
- any researcher who publishes an identical scientific work, or substantially similar to a scientific work already published, is responsible for mentioning, expressly and prominently, this fact in the executed text;
- assuming that, in a scientific work, any oral or written idea or formulation used therein and not in the public domain of the research area in question, is an

original contribution of the researchers appointed as authors of the work; if this is not the case, the idea or formulation must be expressly credited to its authors, regardless of whether it has already been disclosed by them in scientific work;

- making it possible for other researchers, after publishing the results of a research, to access their records, so that they can question the correctness and veracity of the study, replicating it or continuing it. Such accessibility can only be limited for ethical or legal reasons.

15. USE OF INFORMATION

The recipients of this code, in the exercise of their activities and functions, must observe the Law and the rules of Information Security of Funcamp, available on the respective Website.

16. STANCE TOWARDS THE GOVERNMENT AND PUBLIC PRESENTATIONS

Funcamp's relationship with inspection, regulatory and government agencies is based on respect for legality, impersonality, morality, equality, publicity and efficiency, in accordance with the legislation in force.

The commitments signed with the Public Power are made, observing the current legislation, pertinent to the modality.

In the scope of the Activities/Projects managed by FUNCAMP, the provisions of the Anti-Corruption Law (Law 12.846/13) must be respected.

17. ACCOUNTING RECORDS

Funcamp's rights and obligations must be registered in accordance with accounting principles, respecting the Law in force.

Funcamp does not agree with carrying out operations without proper legal documentation and respective registration.

18. SOCIO-ENVIRONMENTAL RESPONSIBILITY

Funcamp shall conduct its activities, ensuring that work plans seek to harmonize economic, social, cultural and environmental purposes, in order to harmonize them with the interests of society.

19. ETHICS COMMITTEE

The Ethics Committee, on a permanent basis, shall have its members appointed by FUNCAMP's Dean's Council, with a specific mandate, and composed of representatives from its various Areas.

Its main responsibilities are:

- enforcing the provisions contained in this Code;
- monitoring the application of this Code;
- clarifying doubts regarding the principles and rules contained in this Code;
- ensuring the assessment of situations of non-compliance with the provisions of this Code, submitted by reporting channels and conducting the appropriate measures;
- guaranteeing the anonymity of complaints submitted under these conditions;
- analyzing any situation out of the moral and ethical standards and, eventually, not provided for in this Code;
- informing Funcamp's Dean's Council of situations that imply violations of this Code;
- reviewing this Code of Ethics and updating it whenever necessary.

20. COMMUNICATION OF DOUBTS OR COMPLAINTS

Any recipient who has doubts or deems it necessary to report a concern or violation of the principles and criteria of conduct established in this Code must do so, using the **Citizen Information Service - SIC**, available on FUNCAMP's website:

Any complaint shall be investigated and, if justified, shall be processed and monitored by the Ethics Committee.

Any complaint shall be treated under strict confidentiality.

When the violation of this Code of Ethics and Conduct infringes, at the same time, matters of another nature, in the criminal, civil, labor or disciplinary fields, the channel receiving the complaint shall refer the situation to the competent authorities within the scope of FUNCAMP.

21. FINAL PROVISIONS

FUNCAMP must establish the Ethics Committee in order to investigate possible unethical and illegal acts practiced in the scope of projects managed by it, ultimately taking the relevant administrative and legal measures.

All recipients are obliged to follow and disseminate the rules contained in this Code, reporting any violations against its provisions.

The principles and criteria of conduct considered in this Code provide for all situations that may arise in the daily life of each relation. Omissions shall be dealt with by the Ethics Committee.

Any person (or employee or collaborator) who has doubts and uncertainties about the provisions of this Code should contact the Ethics Committee; if this is not possible, use the Citizen Information Service - SIC, available on FUNCAMP's website, when necessary.

This Code shall remain in force for an indefinite period and shall come into force as of the date of its registration in the civil registry office of legal entities.

22. STATEMENT OF RECEIPT AND COMMITMENT

You are receiving FUNCAMP's Code of Ethics and Conduct, and reading it is very important, as it contains rules of ethical conduct to be complied with and values that must be considered in all your relations with FUNCAMP.

By signing this Statement, you express your commitment to comply with it in full and to disseminate its content.

I state that I have received the Code of Ethics and Conduct and that I am aware of its content and its importance in the conduct of my relations with FUNCAMP.

Place and Date:

Full name:

Individual Taxpayers' Registry (CPF):

Signature: