



Fundação de Desenvolvimento da Unicamp

CODE OF ETHICS AND CONDUCT

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Summary

1. INTRODUCTION.....	4
2. PURPOSE OF THE CODE OF ETHICS AND CONDUCT	4
3. COVERAGE	4
4. ETHICAL CONDUCT.....	4
5. COMMITMENT TO STANDARDS.....	5
6. CONFLICT OF INTEREST AND INCOMPATIBILITIES	5
7. GUIDELINES FOR ACQUISITIONS AND CONTRACTINGS	6
8. HIRING OF EMPLOYEES	6
9. TREATS, GIFTS, HOSPITALITIES AND ENTERTAINMENT.....	6
10. DONATIONS AND SPONSORSHIPS	7
11. RESPONSIBILITIES OF UPPER MANAGEMENT AND SUPERVISION	7
12. TEAMS RESPONSIBILITIES.....	7
13. CONDUCT CRITERIA FOR FUNCAMP AND ASSOCIATES, PARTNERS AND SUPPLIERS.....	8
14. CONDUCT CRITERIA FOR EXECUTORS/SUBEXECUTORS.....	9
15. PRIVACY AND PROTECTION OF PERSONAL DATA	10
16. RELATIONSHIP CONDUCT WITH THE GOVERNMENT/PUBLIC AUTHORITY	10
17. ACCOUNTING RECORDS.....	10
18. SOCIO-ENVIRONMENTAL RESPONSIBILITY	11
19. COMPLIANCE COMMITTEE.....	11
20. DOUBTS OR COMPLAINTS	11
21. FINAL DISPOSITIONS.....	12

1. INTRODUCTION

FUNCAMP was established in 1977 by the then Dean of the State University of Campinas (Unicamp), Zeferino Vaz, with the objective of, according to its Statute, “providing to Unicamp, according to its possibilities, the necessary means for the adequate mobilization of its human and material resources to meet the economic, social, pedagogical, assistance, social security and cultural needs and objectives of the community, to collaborate in carrying out 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 effectiveness, and being a national reference”.

PRINCIPLES AND E VALUES

FUNCAMP fulfills its mission, by obeying 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 reinforce the Foundation's commitment to its ethical and moral values and to the principles that guide the conduct of its activities, in line with its mission to act with excellence and innovation.

All other norms, policies and procedures issued by FUNCAMP are in accordance with this Code.

3. COVERAGE

This code is intended for advisors, directors, employees, individuals, and legal entities that have a relationship with FUNCAMP.

4. ETHICAL CONDUCT

In order to ensure that ethics are the basis for the conduct of the recipients of this Code, everyone must:

- Act ethically;
- Repudiate and report any form of harassment;
- Respect human rights;
- Preserve the environment;
- Repudiate any act of corruption (bribery, money laundering, influence peddling, etc.);
- Condemn unlawful actions of any nature or criminal, such as tax evasion, concealment of goods, forgery of documents, evasion, among others;
- Comply with and respect the internal and external laws that guide the Foundation's activities;
- Not accept or promote the use of unlicensed or piracy software.

5. COMMITMENT TO STANDARDS

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

Recipients of this code must fully understand its content and commit to acting in accordance with the norms and policies adopted internally.

This Code of Ethics and Conduct will be available on the FUNCAMP website and may be delivered to any interested party, upon oral or written request.

6. CONFLICT OF INTEREST AND INCOMPATIBILITIES

To avoid conflicts of interest¹, recipients of this Code must:

- Carry out the activities inherent to your function in an impartial manner, committed to ethics and transparency;
- Not accepting favors and/or courtesies that are intended to obtain an undue advantage;
- Communicate the Compliance Committee when identifying a situation of conflict of interest with the person or others;
- 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 the works of FUNCAMP, as well as use its facilities for trade and sale of products or services of personal interest;

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

- Decide, in accordance with your professional competence, hiring of any nature, granting of promotion of function and/or benefit, prevailing meritocracy and not any type of favor related to nepotism;
- Ensure a cordiality and respect environment;
- Not use FUNCAMP's name, brand and logos without prior authorization;
- Not propagate content, especially on social networks, that do not meet Funcamp's values and principles.

7. GUIDELINES FOR ACQUISITIONS AND CONTRACTINGS

The selection and hiring of suppliers will follow the criteria and procedures defined in the [Acquisitions and Contracts Policy - ACP](#), available on the FUNCAMP website at: <https://www.funcamp.unicamp.br/portal/Home/Publicacoes>.

All intentions and objectives will be explained in the notices and contracts, so that suppliers can assess the risks inherent to the business itself, in their decision making.

The contracting of services by self-employed individuals will be carried out in accordance with the procedure defined and disclosed through the [Circular Letter D.E. No. 08/2019](#), without prejudice to future changes/adjustments to be published on the FUNCAMP website.

FUNCAMP encourages the exchange of good business practices with its suppliers, aiming promoting the improvement of relations between the parties.

8. HIRING OF EMPLOYEES

The selection and hiring of employees by FUNCAMP will follow the rules and criteria established in its [Personnel Hiring Policy – PHP](#) and in the Public Notices published in the means of communication defined by the Foundation.

For more information about the [Personnel Hiring Policy - PHP](#), access: www.funcamp.unicamp.br/portal/Home/Publicacoes.

9. TREATS, GIFTS, HOSPITALITIES AND ENTERTAINMENT

It is expressly prohibited to grant and/or receive treats, gifts, hospitality and entertainment that aim to influence any decision that may result in an undue advantage for FUNCAMP, or for any other person, whether physical or legal.

Awards, gifts or treats that represent, directly or indirectly, distinction or tribute to FUNCAMP, must be forwarded to the Governance for the appropriate measures to be taken.

In any event, it will always be necessary to observe the rules provided for in the [Treats, Gifts, Hospitalities and Entertainment Policy](#), available on the FUNCAMP website at: www.funcamp.unicamp.br/portal/Home/Publicacoes.

10. DONATIONS AND SPONSORSHIPS

Donations related to the institutional purpose of FUNCAMP will be allowed, including those destined to [Unicamp's Heritage Fund \(LUMINA\)](#).

FUNCAMP cannot make donations or grant sponsorships for:

- Political parties, political organizations, and religious entities;
- For-profit organizations and individuals;
- Recipients that are incompatible with FUNCAMP's statutory objectives or that may harm its reputation.

11. RESPONSIBILITIES OF UPPER MANAGEMENT AND SUPERVISION

It is incumbent upon the Advisors, Directors and other FUNCAMP's Managers:

- To act in accordance with the obligations and responsibilities inherent to the role;
- To know, adopt and disseminate, through your own attitudes, the values and principles contained in this Code;
- To remain impartial and grounded through professional postures that violate the guidelines of this Code of Ethics and Conduct;
- To direct, inform, organize, guide, supervise and manage team members, according to each Manager's role;
- To continuously monitor the compliance with the law, rules and procedures;
- To clearly communicate to team members the importance of integrity and compliance in day-to-day activities, as well as inform them that violations of the law, rules and internal procedures are unacceptable and will entail legal consequences.

12. TEAMS RESPONSIBILITIES

Funcamp's Employees must adhere to the following conduct criteria:

- Respect differing opinions and act to solve conflicts;
- Ensure a work environment free from any form of discrimination, moral or sexual harassment, any act that harms people's dignity, the dissemination of rumors that affect the reputation of FUNCAMP employees or any individual or legal entity with whom it has ties;

- Promote synergy between FUNCAMP's areas, in favor of the institution's interests, through effective communication and process improvement;
- Be helpful and receptive with colleagues from the team itself, as well as with those from other areas, sharing your knowledge and professional information whenever necessary;
- Watch over the internal assets and the proper use of all material resources available for the execution of your activities, avoiding damage, loss and misplacement;
- Attend work appointments with appropriate clothing for the exercise of your activities;
- Absence from work with the prior authorization of your immediate superior.

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

FUNCAMP employees, suppliers and partners (consultants, commercial agents and affiliated) must follow the conduct criteria, specified below:

- Refrain from participating in the hiring processes of individuals or legal entities with which you have some type of personal relationship (relatives up to the 3rd degree), or in any situation in which you perceive the possibility of a conflict of interest; as well as communicate the fact to the FUNCAMP Compliance Committee;
- Comply with the guidelines set out in the rules, internal and external procedures, in order to guarantee processes guided by ethics and legality;
- Refuse, either the payment or the receipt of money or good, or benefit, tangible or intangible, that may be offered with the objective of influencing or rewarding any act or decision related to the celebration or maintenance or guarantees of hiring individuals or legal, or for the signing of partnerships, agreements and projects;
- Abhor illegal and fraudulent business practices;
- Act in full compliance with the laws and rules that regulate the activities of FUNCAMP;
- Comply with FUNCAMP's internal rules, applying the principles, values and rules of conduct established in this Code;
- Avoid situations that may characterize a conflict of interest in the relationship with FUNCAMP or on its behalf;
- Ensure working conditions in accordance with the legislation, free from discriminatory behavior and harassment;
- Collaborate with the inspection and investigation activities of public bodies, entities or agents and immediately notify FUNCAMP if they undergo investigations that are related to any provision contained in this Code of Ethics and Conduct;

- Require from partners and suppliers complete secrecy and confidentiality regarding data and information obtained at any time, as a result of the execution of activities with FUNCAMP, even in phases before and after contracting the services;
- To not enter into partnerships or contracts with suppliers that demonstrate evidence of the use of slave or child labor or the practice of any illicit act;
- Require that partners and suppliers acting on behalf of FUNCAMP carry out activities respecting the principles and values of FUNCAMP, as well as its operational norms, using the available resources properly.

14. CONDUCT CRITERIA FOR EXECUTORS/SUBEXECUTORS

The Executors and their substitutes must follow the conduct criteria below:

- Act transparently and ethically;
- Evaluate the possible risks arising from the execution of contractual instruments with the purpose of establishing partnerships for the execution of projects and agreements, aiming to ensure the integrity of FUNCAMP and other parties involved;
- Comply with the legal provisions applicable to the activities carried out, including but not limited to the rules 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 environmental protection;
- Treat all private and/or individual information regarding participants in projects managed by FUNCAMP confidentially; the respective disclosures may only occur with the express authorization of its holders, or in the cases provided for by the legislation on ethics in scientific and technological research, or that are requested by the control/inspection bodies;
- Respect the relevant legal and regulatory provisions, in particular, the resolutions and norms issued by the National Health Council, for any project involving human beings, given that the research procedures cannot be started without the favorable verdict issued by the Ethics Committee in Research (ECR) / National Research Ethics Council (NREC);
- Comply with the provisions of Law No. 11.794/08 and other legal norms relevant to projects that use animals;
- Accurately and completely record data and information collected, procedures performed and partial results obtained in the course of carrying out a project;
- Maintain or retain records of a project in respect of which questions of scientific or ethical correctness have been raised, until such discussions or conflicts are fully resolved;

- Each of the authors must be responsible for the quality of the work developed as a whole, unless the limits of their scientific contribution to obtain the exposed results are expressly and precisely defined;
- When communicating the results of a project, through scientific work, the Executor and/or Subexecutor must accurately expose them, as well as all data, information, and procedures that they deem relevant for their scientific achievement and justification. In situations where this exposure is unfeasible for ethical or legal reasons, this fact must be expressly mentioned in the work;
- Any researcher who publishes scientific work that is identical, or substantially similar to one already published, is responsible for mentioning, expressly and prominently, this fact in the executed text;
- Assume that, in a scientific work, every idea or formulation, oral or written, used in it and not in the public domain in the research area in question, is an original contribution of the researchers indicated 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;
- Allow other researchers, after the publication of the results of a research, access to its records, so that they can question the correctness and veracity of the study, replicate it or continue it. Such accessibility may only be limited for ethical or legal reasons.

15. PRIVACY AND PROTECTION OF PERSONAL DATA

Recipients of this Code, in the exercise of their activities and functions, must comply with the **General Law of Data Protection (GLDP)** and [FUNCAMP's Privacy and Personal Data Protection Policy](#), available on the Foundation's website.

16. RELATIONSHIP CONDUCT WITH THE GOVERNMENT/PUBLIC AUTHORITY

FUNCAMP's relationship with inspection, regulatory and governmental bodies is based on respect for legality, impersonality, morality, isonomy, publicity and efficiency, in accordance with the legislation in force.

The commitments signed with the Government are carried out, observing the current legislation, pertinent to the modality.

Within the scope of activities, projects and agreements managed by FUNCAMP, the provisions of the Anti-Corruption Law (Law No. 12.846/13) must be respected.

17. ACCOUNTING RECORDS

FUNCAMP's rights and obligations must be recorded in accordance with accounting principles, respecting the law in force.

FUNCAMP does not condone carrying out operations without proper legal documentation and registration.

18. SOCIO-ENVIRONMENTAL RESPONSIBILITY

FUNCAMP will conduct its activities, ensuring that the work plans seek to reconcile objectives of an economic, social, cultural and environmental nature, in order to harmonize them with the interests of society.

19. COMPLIANCE COMMITTEE

FUNCAMP's Compliance Committee, among other purposes, has the duty to investigate any unethical and illegal acts practiced within the scope of projects managed by it and other activities, taking, in the end, the relevant administrative and legal measures.

The Compliance Committee is permanent, its members are appointed by FUNCAMP's Executive Board, with a term for a determined period.

Its main responsibilities are:

- Enforce the provisions contained in this Code;
- Monitor the application of this Code;
- Ensure the full functioning of the “Complaints and Remediation Channel”, as well as procedures for the retention and treatment of said complaints;
- Deliberate on the results of investigations of complaints received through the “Complaints and Remediation Channel”, ensuring due confidentiality;
- Report the results of the analysis of the complaints to the Executive Board, which will be responsible for the decision-making on the sanctions to be eventually applied;
- Make the FUNCAMP's Board aware of situations that imply violations of this Code;
- Approve the revision of this Code of Ethics and Conduct whenever necessary.

20. DOUBTS OR COMPLAINTS

Anyone who has any questions or consider it necessary to report any situation or behavior that allegedly violates the provisions contained in this Code, must notify FUNCAMP through the email address: compliance@funcamp.unicamp.br or access the Governance page, available at: www.funcamp.unicamp.br/portal/Home/Governanca, click on “[Talk to Governança](#)” and fill in the Form.

The doubt or complaint may be anonymous and the confidentiality and secrecy necessary for the investigation/clarification are ensured.

Every complaint will be investigated and the ones that are justified will be processed by the Compliance Committee and will be treated under strict confidentiality.

When the violation of this Code of Ethics and Conduct simultaneously infringes legal provisions of a criminal, civil, labor or disciplinary nature, FUNCAMP will forward the occurrence to the competent authorities.

21. FINAL DISPOSITIONS

All recipients of this Code have a duty to comply with and disseminate the norms contained therein, denouncing any act or behavior that violates it.

All cases and situations not provided for in this Code will be dealt with by the Compliance Committee.

Anyone who has questions regarding this Code may send an email to: compliance@funcamp.unicamp.br or access the Governance page, available at: <http://www.funcamp.unicamp.br/portal/Home/Governanca>, click on “[Talk to Governança](#)” and fill in the Form.

FUNCAMP's Code of Ethics and Conduct was prepared in November 2018 and revised in August 2022.

This Code was approved by the Compliance Committee and is valid for an indefinite period.

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