



CODE OF
CONDUCT
Uninter



**CICRM - COMPLIANCE, INTERNAL
CONTROLS AND RISK MANAGEMENT**

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MESSAGE FROM THE PRESIDENT



Prof. Wilson Picler
*Chancellor of the Uninter
International University
Center and president of the
UNINTER Group*

Some will say, under their breath, that the world belongs to the “sly ones”, those who “get ahead” by taking advantage of every opportunity. This is a big lie. The world is not, nor has it ever been, for the sly ones. The world belongs to honest, simple, truthful people. The “cunning” based on selling somebody down the river only corrupts and destroys. Acting with honesty strengthens the soul and elevates our true values.

Honesty is guided by ethics and proper conduct. It forges and builds future generations. It builds and dignifies the history of our civilization.

For over 27 years, UNINTER Group has been the result of the daily work of thousands of collaborators. People from all backgrounds, social classes, and places in Brazil. In more than 750 support centers throughout the country and abroad, we serve more than 500,000 students. We have already graduate more than 620,000 students. And the number of courses offered continues to grow. There are more than 400 options in undergraduate, graduate, master’s, doctorate, technical and extension courses offered via distance-learning, live, face-to-face and in blended models and methodologies.



UNINTER is respected across the whole of Brazil. We are a reference in distance-learning (EAD). We have the best virtual platform. Several of our courses have received the Ministry of Education's (MEC) maximum score. It is because we cultivate values within our organization, including ethics, integrity, love of neighbor and honesty.

All of this was achieved without "slyness". It was achieved through hard work, unity, creativity and motivation to do even better. We continuously innovate and provide our students with the best support materials and the best professors and courses. We do so so that they are able to leave our organization prepared for life and for success.

This is our mission and our commitment to humanity. You, collaborators, suppliers and partners, are major agents of this transformation.

Our Code of Conduct is like a compass: it serves to guide and preserve us. Our true north is work and respect.

Join us. We are all UNINTER.

The logo for Wicen, featuring the word 'Wicen' in a stylized, handwritten script font.



ORGANIZATIONAL IDENTITY

The organizational identity of UNINTER Group consists of four categories: business (with which we operate); mission (reason for our existence in the market and in society); vision (purposes and objectives to be achieved); and values (ethical conduct consistent with the ideals of our brand). Through them, we govern the work and the definition of the Organization's strategies. The organizational identity must guide the daily actions of everyone who is part of the UNINTER Group.

Business

Education.

Mission

**Develop and transform people
through education.**

Vision

**Be recognized as an
organization of excellence to
study, work and invest.**





VALUES

Respect for people

People are the reason for our business. We act to promote inclusion, well-being, personal and professional development, and transformation, with authority, responsibility and respect for diversity.

Integrity

Act with honesty and fairness.

Responsibility

Commitment to ethical, moral and legal conduct.

Excellence

Relentless pursuit of quality and innovation in everything we do.

PRINCIPLES OF THE UNINTER GROUP

Dignity, diligence, efficiency, and awareness of moral principles must guide UNINTER Group collaborators in the exercise of their activities, in order to ensure always upstanding behavior and actions, aimed at the effective social contribution, growth and perpetuity of the Organization.

It is expected that the products and services of the UNINTER Group are offered with quality, within ethical principles and integrity, with the objective of achieving the Organization's vision: to be recognized as an organization of excellence in which to study, work and invest.



OUR BELIEFS

We believe that education positively transforms people's lives. Therefore, we assume the responsibility of offering an inclusive and high-quality education, at affordable prices, both in Brazil and internationally.

Our brand seeks recognition and excellence in teaching, scientific development, work and investment, at world class levels.

We invest in the personal and professional development of our collaborators. We encourage self-development, recognizing merits and valuing the results produced, with fair and market-appropriate remuneration, in healthy and safe environments. We share experiences and knowledge, giving collaborators freedom to make suggestions and complaints.

We also value our suppliers, service providers and business partners. Commitments to ethical, moral and legal conduct are the basis of our relationships with people and organizations (governmental and non-governmental).

In addition, we recognize our environmental responsibility and support inclusive and voluntary actions, encouraging civic spirit and solidarity in all communities where we are present.

We use the most current technologies, promoting research and academic extension – something that is in our DNA.

We optimize all management and educational processes to ensure the sustainability and perpetuity of our business and the quality of services offered by the UNINTER Group. All this to ensure a fair reward for our students, collaborators, partners, and society in its entirety.

SCOPE AND APPLICATION

The Code of Conduct applies to everyone who works for the companies of the UNINTER Group, including its directors, collaborators, interns, and young apprentices, regardless of the type of relationship.

All those who are linked to the UNINTER Group must base their conduct and behavior on the premises established here, both in labor relations and in the conduct of the Organization's business, to promote and disseminate the culture of integrity in all environments of the Organization.

The Code of Conduct also extends to suppliers, service providers, business partners and third parties that relate to the UNINTER Group, regardless of the link, in what is applicable to them.



ARAUCÁRIAS Unit



Headquarters



MOSSUNGUÊ Unit



CAMPO LARGO Unit



GARCEZ Campus



DIVINA PROVIDÊNCIA Campus



CARLOS GOMES Unit



CIC Unit

PURPOSE OF THE CODE OF CONDUCT

- 1** Make it clear that the exercise of professional activity in the UNINTER Group has as its mission to develop and transform people through education, assuming, therefore, the full adherence of its collaborators to the ethical and legal norms and to the rules of conduct provided for in this Code.
- 2** Establish rules inherent to directors, collaborators, interns, and young apprentices, regardless of the type of relationship, who carry out activities on behalf of the UNINTER Group, making it clear that everyone is responsible for being guided and respecting the provisions of this Code, both in the internal interactions and relationships with students, business partners, service providers and public agents.
- 3** Preserve the image and reputation of the UNINTER Group and of all those professionally linked to it, whose conduct must be in accordance with the rules established in this Code.
- 4** Avoid the occurrence of situations that may elicit conflicts between individual interests and the interests and objectives of the UNINTER Group.
- 5** Create a consultation mechanism, intended to enable the prior clarification of questions regarding the integrity and standards of ethical conduct expected by the UNINTER Group.
- 6** Provide transparency to the activities of each collaborator in his/her labor activities, especially the one who has any relationship with Public Agents, striving for honest conduct in any environment and instance.

PROPERTY, WORKER SECURITY, AND OCCUPATIONAL HEALTH

The UNINTER Group maintains security procedures in recognition of the importance of protecting property against theft and robbery, guaranteeing actions that ensure continuous process and service improvement, ensuring the safety of collaborators, students and third parties.

Security measures range from physical and electronic barriers to access control for people and vehicles. They also include safety standards for collaborators, teachers, students, visitors, and service providers.

The use of the badge is essential in any Organization's premises, in situations where the collaborator is representing the Organization and on external visits, such as meetings with suppliers or technical visits.

The disappearance of assets, whether private or belonging to the UNINTER Group, must be immediately communicated to the manager of the collaborator who noticed the occurrence of the fact, as well as the property security area.

Similarly, collaborators who find objects that have been forgotten by colleagues, students or visitors on the Organization's premises must hand them over to property security collaborators.

PROTECTION OF PEOPLE AND ASSETS ON GRUPO UNINTER'S PREMISES

- * It is the responsibility of individual collaborators to store their belongings in a safe place, keeping their drawers and/or cabinets locked.
- The UNINTER Group is not responsible for valuables or personal equipment brought into the corporate environment.
- Employees are prohibited from bringing electrical or electronic equipment into the corporate environment, such as refrigerators, heaters, microwaves, and fans.
- In locations where there is parking, spaces are made available in accordance with internal policies, preserving spaces for people with disabilities and the elderly, as determined by law.
- The maximum speed limit on company premises and in parking lots is 10 km/h or 6mph.
- The collaborator must respect the traffic signs, as well as the guidelines of the property security area.
- Collaborators or visitors who make use of the internal parking lot must park their vehicle (car) backwards, using the area of a parking space, and park motorcycles and bicycles only in the permitted places.
- It is not allowed to obstruct side passages and central rows in parking lots.

The UNINTER Group is committed to providing a safe and healthy work environment in its operating units and for its visitors, by valuing health, safety, and quality of life. The Organization ensures compliance with processes and procedures in the fields of medicine and occupational safety.

It is the collaborator's duty to communicate any threat to the physical integrity of people on the Organization's premises. The communication can be made directly to the immediate manager, it can also be forwarded to the Service, Safety and Occupational Medicine area (SESMT) or to a representative of the Internal Commission for Occupational Safety (CIPA) of your unit.

For areas and activities in which uniforms and protective equipment are mandatory, the instructions for use and conservation must be respected, without exceptions.

Collaborators who use a fleet vehicle must act with the utmost care, observing the safety rules established in the Fleet Use Policy, available on the electronic document management portal (GED), as well as traffic laws.

The UNINTER Group values and encourages its collaborators to maintain healthy habits and an environment of well-being. Therefore, the use and entry of alcoholic beverages and legal or illegal narcotic substances on the company's premises is expressly prohibited.

Smoking is prohibited on the premises of the UNINTER Group, in compliance with national legislation.

The UNINTER Group repudiates any form of physical or moral violence. Carrying weapons on its premises is strictly prohibited, with the exception of qualified professionals hired to ensure the safety of the spaces.



INFORMATION SECURITY AND CONFIDENTIALITY



INFORMATION SECURITY

Information is any flow of communication or representation of knowledge, such as data, facts and opinions, conveyed in any medium or format (for example, textual, numerical, graphic, narrative and audiovisual information).

Information security aims to preserve the properties of confidentiality, integrity and availability of information, not limited to computer systems, electronic information and/or storage systems, including physical documents and/or paper records.

Confidentiality ensures that information is not made available or disclosed to unauthorized persons, entities or processes.

Integrity, meanwhile, prevents unauthorized modifications to software, hardware or data, so that they remain internally and externally consistent. For its part, availability ensures that authorized users gain access to information and corresponding assets whenever needed.

As a complement to what is exposed in this Code of Conduct, every collaborator must be aware of the Information Security Policy (PSI) and Privacy Policy, both published on the electronic document management portal (GED).



CORPORATE RESOURCES

The various resources that are made available to collaborators to perform their duties, such as a computer/notebook, printer, telephone (landline and cell phone), internet and chartered vehicle/transport, must be used with caution, exclusively for professional purposes, that is, related to the activities of the Organization. It is everyone's duty to ensure the conservation of these resources, protecting them against loss, damage and diversion.

The UNINTER Group solely owns all files, documents, communications, and information (digital or electronic) from and/or transmitted by systems and technological means made available by the company, such as corporate e-mail, landline and corporate cell phone.

Thereby, the UNINTER Group monitors and inspects the use of all equipment, electronic or digital, at any time, without the need for prior notice.



E-MAIL

The corporate e-mail must only be used to deal with professional matters, related to the activities of the position.

It is a working tool and means of professional communication, being, therefore, under continuous monitoring.



TELEPHONE

When using the corporate phone, collaborators must be objective in order to avoid long calls. For private calls, the rule is to practice common sense: use it only when necessary and be brief.

The use of a private cell phones during working hours should occur sparingly and in cases that are necessary. The use of cell phones in meetings should also be avoided, to maintain maximum attention to the subject matter and respect for other co-workers.



PASSWORDS

System access passwords are individual and non-transferable. Borrowing, sharing or disclosing usernames and passwords is prohibited.



CONFIDENTIALITY

The external disclosure or use of classified, confidential, strategic or privileged information about the UNINTER Group, with deviation from purpose or for the benefit of oneself or third parties, is prohibited. The Organization's information is a valuable asset, and all collaborators have a responsibility to protect and manage it effectively.

For the purpose of this Code of Conduct, "classified, confidential, strategic and privileged information" shall mean any and all information of the UNINTER Group, in written or verbal form, tangible or intangible, patented or not, of a technical, operational, commercial, legal nature, including, but not limited to, trade secrets, know-how, patents, research, business plans, marketing information, client and student information, financial situation, accounting methods, techniques and accumulated experience, and any other technical, commercial and/or financial information, whether expressed in notes, letters, faxes, memos, agreements, terms, analyses, reports, minutes, documents, manuals, compilations, software code, e-mail, studies, specifications, drawings, copies, diagrams, models, samples, flowcharts, computer programs, disks, floppy disks, tapes, opinions and research, or verbally disclosed, whether or not identified as confidential.

All directors, collaborators, business partners and third parties who have a relationship with the UNINTER Group have a duty to protect the information relating to it, even after the end of their professional relationship.

Confidentiality also applies to the disclosure of strategic and confidential information of the UNINTER Group, in any way and by any means, even in academic works, theses and dissertations (authored by the collaborator who is a student or third parties), which can only contain information that has been officially disclosed by the company to the external environment. Trabalhos de interesse da organização poderão conter determinadas informações, desde que estas tenham sido prévia e expressamente aprovadas pela diretoria da(s) área(s) envolvida(s), bem como pela assessoria interna de imprensa.

To deliver a lecture or similar on behalf of the UNINTER Group and present internal company information, the employee must have the prior and express approval of the director of his area.



PERSONAL DATA PROTECTION

It is the responsibility of all collaborators to use, guard, secure and store personal data, to ensure both their own protection and the protection of students, customers, suppliers, shareholders, service providers and business partners.

The UNINTER Group is committed to sound information security governance practices and the privacy of personal and sensitive data, in compliance with current legislation and the determinations of regulatory/supervisory bodies on the matter, in particular Law 13,709/2018 ("General Data Protection Law" - LGPD).



INTELLECTUAL PROPERTY

Intellectual property is one of a company's most valuable assets. Thus, all brands, innovations, improvements, processes or products, projects or models, techniques, trade secrets, logos, design, diagrams, financial, commercial or market information, ideas, know-how, formulations, business processes, research, methods or any other activity of a non-material nature that are developed for the UNINTER Group, whether by its employees or third parties contracted by it, are the exclusive property of the Organization and must be protected.



BEHAVIOR ON SOCIAL MEDIA

The UNINTER Group respects the individuality and freedom of expression of its collaborators and business partners. However, the publication on social media, even if personal, of any statements on behalf of the organization, which violate its image, or the third parties' image, related to it, or which contain confidential and/or privileged information is prohibited.

This prohibition extends to the use of technological resources made available by the UNINTER Group (cell phone, notebook, among others) to share, use, obtain, store or elaborate content that contains pornography, apology for crime, racism, prejudice of any kind, or that causes damages to third parties, even if exclusively moral.

Collaborators are advised to exercise prudence and caution when expressing themselves on the internet, as collaborators eventually involved in negative publications to the image or reputation of the UNINTER Group may be held liable under the terms of the law and the company's internal policies, even if the publications have occurred in personal profiles.

For more information, access the Resource Usage and Technological Information Manual, available on the electronic document management (GED) portal.



PHOTOS, FILMING AND RECORDINGS

Any type of transmission or capture of audio or images (photos, filming, or recording) of collaborators or students is expressly prohibited, with the exception of promotional or institutional materials, promoted by the marketing area.

Similarly, the recording of any meeting or gathering, in person or online, as well as any type of image capture, without prior information to all participants is prohibited.



USE OF THE BRAND

The use of brands, logos, insignias, and other signs of the UNINTER Group can only occur with prior authorization from the marketing area, always respecting the brand manual, available on the intranet.

APPROPRIATE CONDUCT



COMPLIANCE WITH LEGAL PRINCIPLES

All collaborators, regardless of their position, must comply with the principles of this Code, the laws, and regulations applicable to the UNINTER Group, as well as its internal processes and policies.

KNOWLEDGE AND COMPLIANCE WITH INTERNAL RULES

The Code of Conduct, policies, and standard procedures of the UNINTER Group are published on the electronic document management portal (GED), as well as information and internal changes are disclosed through internal communication (e-mail, intranet) and must be known to all collaborators.

The UNINTER Group Code of Conduct can also be consulted on its own website: uninter.com/compliance, available for both internal and external audiences.

It is imperative that all collaborators carefully read the information and documents made available on the company's communication channels.

EQUAL OPPORTUNITY

The UNINTER Group respects and values diversity in all its relationships and is committed to ensuring equal employment opportunities for all people, regardless of their gender, race, religion, political or sexual orientation, disability, age or any other condition.

The Organization recognizes the individuality of its collaborators, ensuring a safe, healthy, and fair work environment, where everyone has equal opportunities to develop their potential.

ACCESSIBILITY

The UNINTER Group spares no efforts to offer all the necessary tools and conditions for collaborators to carry out their activities.

It is the responsibility of the human resources management area to assist collaborators who need any support, in terms of accessibility.

JURISDICTION

It is the limit of competence and authority assigned to collaborators and administrators of the UNINTER Group, in line with the position held and with their attributions and responsibilities. Its purpose is not only to prioritize organizational decisions, but also to determine the approval of investments, payments, generation of costs and expenses and other decisions involving budgetary and financial resources.

It is the responsibility of all collaborators to conduct their actions in accordance with the authority established and indicated in the specific policies of each process.

It is strictly forbidden to fractionate or subdivide amounts to adjust approval levels different from those applicable to the total amount.

SUSTAINABILITY

Sustainable attitudes, such as the correct disposal of garbage and the conscientious use of resources (water, energy, paper, printer ink, among others), are part of the philosophy of the UNINTER Group, and senior management must reinforce the culture of preserving the environment with its collaborators, students, business partners, service providers and suppliers.

PROFESSIONAL ETIQUETTE AND CLOTHING

Clothing is also a form of communication and the UNINTER Group emphasizes the importance of clothing being consistent with corporate and academic environments.

Dressing appropriately does not mean giving up comfort or individual style, but it is essential to always wear appropriate clothes to represent the UNINTER Group to students, suppliers, business partners, service providers and public agents.

Collaborators should contact the human resource management area if they have any questions about clothing suitable for the UNINTER Group environments and, whenever necessary, the human resource management area will make the appropriate recommendations, directly to collaborators, managers and/or senior administration.

PARTICIPATING IN MEETINGS

Meetings should be productive and, if possible, conclusive – and respecting them is essential.

We share below general guidelines on how they should be conducted in the UNINTER Group:

- When convening, the agenda and/or subject of the meeting must be presented in an objective and clear manner;
- The organizer must be punctual with the start and end time of the meeting;
- Guests are expected to be punctual and contribute to the purpose of the meeting. If external people are invited, the organizer must introduce them in advance to the other participants;
- The parallel use of cell phones and other electronic devices, unrelated to the subject discussed, should be avoided;
- Upon being invited, the participant should only forward the invitation to another person, if they have prior consent from the meeting organizer;
- Invitees must understand the scope/objective of the meeting and prepare themselves for it, in order to effectively contribute to the topic of the agenda;
- The organizer must schedule the meeting in advance and, beforehand, check the availability of all participants;
- If the meeting is online, all participants must keep their cameras open, out of respect for others, except in cases of technical problems. Participating collaborators must be appropriately dressed and in an appropriate place to hear and be heard by others.
- People should not be randomly invited. The invitation must take into account the real contribution and involvement with the theme, in order to optimize the collaborators' time;
- Every meeting must have a record, through minutes, and/or explanatory email and/or recording, describing what was defined, such as deadlines and responsible for each task;
- Ideals are expected to be discussed, in order to favor open, transparent and respectful dialogue, so that everyone feels safe to express his/her points of view;
- The organizer must ensure that everyone is treated with respect and cordiality.

FINANCIAL AND ACCOUNTING RECORDS

The financial and accounting records must completely and accurately reflect the operations of the UNINTER Group: their bookkeeping must be carried out in accordance with current legislation and accounting principles and must be supported by appropriate documentation.

Inappropriate, ambiguous, or fraudulent accounting entries are prohibited, as well as any other procedure, technique or accounting artifice that may hide or cover up illegal payments, or that aim at fraud or manipulation of any level.

TRAVEL AND REIMBURSEMENT OF EXPENSES

Travel and work trips must be justified and previously approved by the respective responsible decision maker. All collaborators who need to travel or request any type of reimbursement must observe the guidelines contained in the Travel and Displacement Manual and the Advance Payment and Rendering of Travel Accounts Manual, available on the electronic document management (GED) portal.

HARASSMENT AND DISCRIMINATION

The UNINTER Group prohibits all forms of harassment, prejudice and discrimination by its employees and business partners.

The Organization recognizes and values individualities, prohibits unequal, prejudiced, and discriminatory treatment in relation to its collaborators, students and other people who have a relationship with it, and seeks to maintain an inclusive, harmonious, respectful, safe and pleasant work environment, where everyone is treated with courtesy and education, ethically and with the utmost respect for social diversity.

Any expression or behavior of hostility, psychological or moral violence, humiliation, embarrassment, social, cultural, and ethnic discrimination or referring to gender, age, financial condition, religion, political position, sexual orientation, physical, psychological and mental condition, among others, will not be tolerated due to any reasons.

The UNINTER Group expects that such respectful conduct will also be adopted by its business partners, not allowing the use of the position of hierarchical superior or the ascendancy inherent to the exercise of a certain job, position, or function to commit any type of harassment, discrimination or any other type of aggression, explicit or implicit.

The practice of improper conduct, contrary to the above, will be subject to disciplinary action in accordance with internal policies and applicable laws, and may even lead to the termination of commercial contracts or partnerships, or dismissal for cause, or breach of contract, in the case of business partners or service providers.

INTERPERSONAL RELATIONSHIPS AND WORK ENVIRONMENT

The UNINTER Group values an environment of respect, harmony, safety, and health. Therefore, all interpersonal relationships must be based on mutual respect, courtesy, politeness, positive and kind attitudes.

It is up to everyone to take care of the cleanliness, organization, and safety of the work environment.

It is important for everyone to exercise constructive feedback at all levels, respect the space of colleagues, avoid inappropriate vocabulary and subjects, collaborating with the maintenance of a safe, healthy, and clean environment.

In the UNINTER Group, everyone will have their personal positions respected, especially regarding political party and sports preferences, sexual orientation, religion, and any other intimate matter that may affect the work environment.



ACADEMIC RELATIONSHIP

In the academic environment, we rely on the collaboration of the rector, faculty, coordinators, and other collaborators involved in the process of direct and indirect assistance to students, so that legal norms and guidelines are fully complied with, notably those issued by the Ministry of Education (MEC).

Students and clients of the UNINTER Group must always be treated with respect, courtesy, efficiency and transparency, and the work must be guided by the quality delivery of all services offered, with the objective of full satisfaction and customer loyalty.

Any preferential treatment is prohibited, to anyone, for personal interest or even with the intention of circumventing academic rules and procedures.

RELATIONSHIP WITH AGENTS AND MANAGERS OF THE PRESENTIAL SUPPORT CENTER

The process of choosing and contracting business partners to open a face-to-face support center must follow the rules, policies, and internal processes, carefully and based on technical, commercial, ethical, and professional grounds, always meeting the needs and interests of the UNINTER Group.

The management of on-site support centers by collaborators, former collaborators, family members and/or friends, indicated by collaborators, must be previously evaluated by the Governance, Risks and Compliance Committee, which will issue its opinion expressly and formally.

Managers of on-site support centers are expected to know and enforce the determinations of this Code of Conduct, in their relations with their collaborators, business partners, third parties and students of the UNINTER Group.

RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

The process of choosing and contracting suppliers of goods and services for the UNINTER Group must be careful and transparent, based on technical, commercial, ethical, and professional grounds, always seeking to meet the needs and interests of the institution, such as: quality, performance, conditions and guarantees, according to predetermined processes. It is strictly forbidden to contract suppliers with a questionable reputation, so as not to characterize favoritism of any kind, putting the integrity of the company's commercial relations in doubt.

Visits by suppliers to the premises of the UNINTER Group are only allowed during regular office hours and visitors must be received and accompanied during the entire visit by an authorized collaborator.

The organization does not admit, under any circumstances, that suppliers, service providers, third parties and business partners exercise any type of illicit and illegal conduct on behalf of the company, which is why all signed contracts must contain, mandatorily, anti-corruption clauses (Law n.12.846/2013) to ensure compliance with this Code of Conduct.

Friendship or any form of relationship between a collaborator and a supplier or business partner can be interpreted as a conflict of interest.

In these cases, the collaborator is not allowed to participate in the contracting process, nor to influence the selection process for choosing a supplier or partner, according to the contracting guidelines in the Purchasing Manual. If the Governance, Risks and Compliance Committee deems it appropriate, the conflicting collaborator may be heard about the contracting, if he has relevant technical information about it.

When faced with a case of conflict, the collaborator responsible for the negotiation must report it to the immediate leadership, for the purpose of reporting to the Governance, Risks and Compliance Committee.

RELATIONSHIP WITH PUBLIC AGENTS

The UNINTER Group's relationship with public agents is guided by strict compliance with the law, integrity, and ethical conduct, as well as obedience to what determines the Policy of Integrity and Relationship with Public Agents of the UNINTER Group.

It is expressly prohibited to accept, offer or commit to any advantage that may constitute an illegal practice or active or passive corruption, public or private, under the national laws or of the country with which the institution is related. It is also not allowed to incite, demand, accept, obtain, or receive promises of benefits, even if not pecuniary.

The prohibitions also apply to the UNINTER Group's business interlocutors, both in relation to public agents and in the private sphere.

The UNINTER Group conducts its activities in a lawful and ethical manner, regardless of local customs and practices. Therefore, no collaborator will be penalized due to delay or loss of business resulting from his/her refusal to commit an act of corruption.

The Organization obeys, unconditionally and unrestrictedly, the national and international laws applicable to it, including anti-corruption legislation.

RELATIONSHIP WITH THE PRESS AND MEDIA

The UNINTER Group carries out institutional communications through its press office and/or through other collaborators authorized by senior management, as determined by the Spokesperson Policy, available on the electronic document management portal (GED). Therefore, other collaborators and managers are prohibited from granting interviews and communications with the press, on behalf of the Group, without prior authorization from the press office and senior management.

RELATIONSHIP WITH THE COMPETITION

The UNINTER Group respects its competitors and the relationship with them must be healthy and respectful, with collaborators and managers being forbidden to offend and defame products and services offered by them.

RELATIONS WITH TRADE UNION AND OTHER REPRESENTATIVE BODIES

To represent the UNINTER Group in unions or other representative bodies, whether formal or informal, collaborators must have the prior and express approval of senior management.



GIVEAWAYS AND GIFTS

Collaborators are prohibited from offering or receiving giveaways, gifts, hospitality and favors for the purpose of obtaining personal benefits or advantages for third parties.

This prohibition does not apply to occasional gifts of symbolic value, which do not present a personal nature to certain collaborators, which have no commercial value, or which are distributed as a courtesy, advertising, or usual disclosure, such as pens, calendars and diaries, up to BRL 200.00, per occasion and per supplier (limited to BRL 600.00 per year).

Giveaways and gifts offered and received in excess of the limit or that may present or indicate any conflict of interest, within the limits presented, must undergo a formal donation process in favor of the UNINTER Group and be forwarded to the human resource management area, for raffle among collaborators.

For the offer of gifts in higher amounts, the area's immediate Board must previously communicate to the compliance area and obtain approval from the Governance, Risks and Compliance Committee.

A giveaway/gift given as a function of the position held by the recipient is considered a conflict of interest, whenever the giver:

- has a personal or professional interest in a decision that may be taken by the collaborator due to their position;
- is participating or about to participate in a contracting process or maintains a commercial relationship with the UNINTER Group;
- represents the interest of a third party that is included in the previous hypotheses.

No area of the Organization is authorized to request gifts from suppliers, service providers, business partners and the like, current or in the process of being negotiated, for projects, events, promoted and/or organized by the companies of the UNINTER Group.

CONFLICTS OF INTEREST

GENERAL RULES

The UNINTER Group expects its directors, collaborators, and business interlocutors to behave with integrity and honesty, always aiming at the interests of the Organization to the detriment of any personal interest.

A conflict of interest is considered to be any situation that generates a conflict between the interests of the UNINTER Group and the particular interests of collaborators and third parties acting on behalf of the company.

Any and all conflict of interest situations, or even the appearance of a conflict, must be promptly communicated to the compliance area, which, upon becoming aware of the occurrence, will report the case for deliberation to the Governance, Risks and Compliance Committee, and if necessary for the final decision of the Board of Directors.

Therefore, we do not allow our collaborators to associate and/or form a partnership with our competitors, suppliers, and service providers.

HIRING RELATIVES, FAMILY MEMBERS AND REFERRAL OF PROFESSIONALS

Family, kinship or friendship ties in the work environment are allowed as long as they do not generate favors of any kind.

For the purposes of this Code, the degree of kinship or family relationship is understood to be: father, mother, child, brother, sister, grandfather, grandmother, uncle, aunt, spouses (formally married or in a stable relationship), boyfriends, girlfriends, nephew, niece, cousin, father-in-law, mother-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, stepfather and/or stepmother and stepson.

At the beginning of the selection process, the candidate for the CLT vacancy must fill out the Term of Relationship or Kinship with another collaborator, and, if any family relationship is observed, prior approval from the Governance, Risks and Compliance Committee will be required. The area manager who identifies the possible conflict is also obliged to communicate it to the human resource management area.

In the case of contracts with legal entities, in a possible family relationship with a collaborator who will directly receive the services, it is up to the Purchasing Department to report the case for deliberation by the Governance, Risks and Compliance Committee.

Equally, CLT collaborators who in the future become family members working in the same department or who may have a direct subordinate relationship, must notify the human resource management area, which will report the fact to the Governance, Risks and Compliance Committee, which will analyze the possibility of relocating one of the collaborators in conflict.

Professional referrals are welcome. Recommended candidates will normally participate in the recruitment and selection process, and the collaborator who indicated/recommended cannot be the final decision maker, regarding whether or not to hire the participant.

It is forbidden to hire relatives of collaborators from areas with cross-cutting activities (legal, compliance, internal audit, personnel administration, human resource management and information security) in any area of the organization.

COMBATING CORRUPTION, BRIBERY AND MONEY LAUNDERING

According to Law No. 12,846 of August 1, 2013, also known as the Brazilian Anti-Corruption Law, the legal entity is liable for "acts against the public administration, national or foreign". It means that the UNINTER Group can be penalized even if it is proven that the collaborator acted alone, without the consent of the Organization. However, it is important to emphasize that the Organization's penalty does not exempt the collaborator who committed such an act from criminal liability.

THE DEFINITIONS ARE:

- **Corruption** is the act of soliciting or receiving, for oneself or another person, directly or indirectly, an undue advantage, or accepting a promise of such advantage. The most common forms of corruption are bribery and extortion, but acts of corruption are small actions such as presenting a false medical certificate, "punching the clock" for a colleague, etc.
- **Bribery** is the offer, promise, provision, acceptance, or solicitation of an undue advantage, as a form of persuasion or encouragement of an unethical action.
- **Money laundering** is the practice of concealing or disguising the nature, origin, location, movement or ownership of goods, rights or values arising, directly or indirectly, from a criminal offense.

The UNINTER Group does business only with previously approved business partners of good reputation, whose commercial activities are legal and whose funds come from legitimate sources. In support of this commitment, we must observe any signs of money laundering and terrorist financing, monitoring our business partners in relation to the indication of any illegal activity, as well as remaining constantly alert, observing possible operational inconsistencies that may appear in the course of service provision activities, signaling a problem. In addition, full and accurate records of all business transactions will be maintained and the necessary documentary requirements for reporting cash transactions will be followed.

POLITICAL-PARTY CAMPAIGNS AND ACTIVITIES

The UNINTER Group is prohibited from participating in campaigns and political party activities, through its directors, collaborators, or business interlocutors, in the internal work environment, and in the exercise of its functions or on behalf of the Organization.

SPONSORSHIPS AND DONATIONS

Any and all types of sponsorship or donation made by the UNINTER Group or the companies that compose it, must occur in accordance with this Code, as well as, through the formalization of an applicable legal document, with any exception subject to the prior opinion of the area of compliance and resolution of the Governance, Risks and Compliance Committee.

The initiatives to be sponsored must be organized and carried out by entities that are proven to be reputable, regularly established, that have no political-party ties (direct or indirect).



COMPLIANCE CHANNEL

0800 800 1800

WWW.CONTATOSEGURO.COM.BR/UNINTER



The UNINTER Group's Integrity Program (Compliance) provides collaborators and other business partners with the Reporting Channel, which allows anonymous manifestations related to misconduct or suspected occurrence.

This tool is linked to an independent and specialized company, ensuring absolute secrecy and confidentiality of the reports, so that good faith complaints are not the object of any type of retaliation.

Violations of this Code or any other policies, procedures, guidelines or resolutions of the UNINTER Group may result in disciplinary and legal actions, in accordance with the provisions contained in the Consequences Policy and/or the Consolidation of Labor Laws - CLT and others laws that apply.

Complaints involving misconduct and non-compliance will be received and analyzed by the Compliance area, which will verify the veracity of the case, prepare a treatment suggestion and, if necessary, forward it to the Governance, Risks and Compliance Committee for deliberation to the Board of Directors of the UNINTER Group. Depending on the severity and/or complexity of the case, it may be sent to the Board of Directors for knowledge and deliberation.

The guarantee of anonymity and protection of the identity of the whistleblower is ensured. Besides, the UNINTER Group undertakes not to carry out any discriminatory and retaliatory actions against collaborators or third parties, for reports of suspected non-compliance and complaints made in good faith, maintaining the confidentiality of the author of the complaints, of the people denounced and collaborators who eventually need to participate in an internal investigative procedure.

Acts of retaliation, promoted by the directors of the UNINTER Group and collaborators, against authors of complaints or collaborators who act in an investigative procedure, as long as proven, will result in liability, according to the Consequences Policy of the UNINTER Group.

Any violation or suspected violation of this Code must be promptly communicated through the Reporting Channel, by telephone **0800 800 1800**, website **contatoseguro.com.br/uninter** or e-mail: **compliance@uninter.com**

GOVERNANCE, RISK AND COMPLIANCE COMMITTEE

The Governance, Risks and Compliance Committee is an independent collegiate, linked directly to the Board of Directors of the UNINTER Group, with its members elected by it. It is in charge of supporting, deliberating and monitoring the activities carried out by the Compliance area, for the purposes of effectiveness of the UNINTER Group's Integrity Program.

The attributions and way of acting of the Governance, Risks and Compliance Committee are established in its own Internal Regulations.



PROHIBITED BEHAVIORS

- To use your position or function in the UNINTER Group to obtain any advantage, for yourself or for others.
- To deliberately damage the reputation of other collaborators or customers.
- To share, borrow or communicate your passwords.
- To allow personal annoyances to interfere with dealing with customers and subordinates or hierarchically senior collaborators.
- To request, promise, offer, give, suggest, or receive any type of financial aid, gratuity, premium, commission, donation, or undue advantage of any kind with the aim of obtaining benefits or facilitations for yourself, family members or anyone else.
- To alter or misrepresent the content of documents to which you have access by virtue of your duties.
- To request from other collaborators a different service than expected in order to meet particular interests.
- To withdraw from the sector or institution, without being legally authorized, any document, book or property belonging to the UNINTER Group.
- To make use of privileged documents and/or information, obtained as a result of functions performed in the UNINTER Group, for your own benefit or that of third parties.
- To offer, sell or use licit or illicit narcotic substances within the premises of the UNINTER Group.
- To support acts, behaviors and institutions that encourage prejudice of any kind.
- To disrespect customers and other collaborators, as the UNINTER Group expects everyone to be treated in a kind, attentive, respectful manner that is absolutely unrelated to any type of prejudice.
- To cause damage to any asset belonging to the UNINTER Group, deteriorating it through carelessness or ill will.
- To investigate, autonomously and without knowledge of the compliance area, alleged violations committed by colleagues, suppliers or business partners.
- To make false reports or committing acts of bad faith to a co-worker, supplier or business partner.
- To refuse, without plausible justification, to attend mandatory UNINTER Group training, especially those related to the Compliance area.



GENERAL PROVISIONS

Collaborators or any business partners of the UNINTER Group may not, under any circumstances or under any argument, claim ignorance of the provisions contained in this Code.

It is the obligation of all those referenced here to observe the provisions of this document, under penalty of applying the sanctions and penalties provided for in the Policy of Consequences, in the Consolidation of Labor Laws - CLT and other legislation that may be applicable.

The UNINTER Group is committed to promoting periodic training for all its collaborators and managers on topics related to the Code of Conduct, Risk Management and the Integrity Program.

Cases that are not provided for in this Code must be communicated to the compliance area and will be subject to deliberation by the Governance, Risks and Compliance Committee.


This Code will come into effect from the date of its publication, for an indefinite period, and will be available on the UNINTER Group website and on the electronic document management portal (GED).

HISTORY OF REVISIONS


Revisão n°	Data	Alterações realizadas	Aprovado por
00	09/01/2016	Document creation	Human Resource Management
01	03/01/2020	Document update	Ethics, Risks and Compliance Committee
02	01/12/2021	Document update	Ethics, Risks and Compliance Committee
03	11/17/2022	Document update	Ethics, Risks and Compliance Committee (current Governance, Risks and Compliance Committee)


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* Education institution re-accredited for EAD with maximum grade (PMEC No. 1378, of 12/19/2018, published in the D.O.U. on 12/20/2018 and corrected through publication on 12/27/2018. Opinion CNE/CES n.º 474/2018) by the Ministry of Education (MEC) assessment and General Index of Courses grade 4, published by Inep/MEC in D.O.U. on the 23/04/21.