

CODE OF CONDUCT



ELDORADO way of building the future



For over 20 years, ELDORADO Research Institute has contributed to Brazil's technological development.

The first step was taken in 1999 and today the Institute already has four units distributed throughout Brazil, located in Brasília, Campinas, Manaus and Porto Alegre, with activities in the areas of software, hardware, microelectronics, trials and tests, education and consultancy. It creates, executes projects and solutions with a focus on technology and innovation.

In addition to contributing to companies' digital transformation, ELDORADO has the purpose of developing the country's technological ecosystem, focusing on open innovation projects.

ELDORADO is prepared to create and innovate for several markets, such as energy, agribusiness, oil & gas, health, automotive, ICTs (information and communication technologies), among others. In addition, in all its fields of activity, ELDORADO presents cases of success that rely on the use of innovative technologies, such as artificial intelligence, computer vision, virtual reality, virtual assistants, big data, IoT (internet of things), 5G, microelectronics, among others.

Over those years, ELDORADO has formed and strengthened a broad portfolio of clients and partners, which concentrates major companies, both national and international, universities and other institutes. It also had a constant presence in ranks of best companies to work in Brazil.

ELDORADO recognizes that integrity and transparency are fundamental to continue developing and standing out. Thus, its Code of Conduct was created so that everyone is aware of the ethics and conduct guidelines that shall guide ELDORADO's business. This is ELDORADO way of building the future!



Mission

Research and develop innovative, comprehensive, competitive, and impactful solutions for society.



Vision

Be a reference for new information, communication and microelectronic technologies.

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ELDORADO Code of Conduct

1.1 – Objective

This Code of Conduct translates ELDORADO's commitment with the development of its activities in an honest, transparent and ethical manner and in compliance with the ESG agenda, a commitment that shall also be assumed by all those who have relationships with ELDORADO.

In that context, ELDORADO hereby presents the guidelines and ethical principles that shall steer its collaborators and business partners in all activities carried out in ELDORADO, with ELDORADO, for ELDORADO or on behalf of ELDORADO.

Naturally, due to the variety and complexity of daily relations, this code may not exhaust all potential situations, therefore it is up to each person to use common sense and ethics, and seek help whenever having doubts or being uncertain about the proper way to act. Omission or allegation of ignorance are not acceptable conducts.

ELDORADO believes that ethical behavior, moral integrity, respect, responsibility, trust and transparency are key for the development not only of the Institute, but also of society as a whole!

How to know if a conduct is ethical?

If you face this doubt on a daily basis, ask yourself the following questions:



Is the conduct legal?



Does the conduct comply with ELDORADO's policies?



Does the act reflect ELDORADO's ethical principles?



Does the attitude respect collaborators and stakeholders?

If the answer to any of these questions is 'no', then don't carry out the conduct!

If you still have any questions, seek help from your manager or the Compliance Officer.

1.2 – Application

The guidelines of this Code of Conduct are mandatory to all collaborators of all ELDO-RADO'S business units, being extended to councilors and representatives of ELDORADO'S associated companies. Business partners are also expected to maintain equally high standards of ethics and conduct in their activities. .



The term “collaborators” encompasses all people that have a work or employment bond with ELDORADO, i.e. all its employees, interns, apprentices, researchers, advisors, including top management and the Superintendent.



“Business partners” comprise all clients, service providers, suppliers and other partners of ELDORADO.

These different groups, when making their daily choices, reinforce the standards of integrity that shall guide ELDORADO'S business.

The application of this Code has an educational and a disciplinary nature, reinforcing the importance of ethics in everything we do and providing guidance on how to put it into practice through appropriate attitudes consistent with our mission.



2. Human resources

2.1 – Work environment

ELDORADO is committed to comply with labor laws and it believes that a safe, healthy and respectful work environment is essential for the development of its activities.

Thus, cordiality, respect for others and professionalism shall be maintained in all interactions between collaborators, regardless of any hierarchical position, role or occupation, as well as between collaborators and business partners. Any type of abusive behavior, such as moral or sexual harassment, physical or verbal aggression, threat of aggression or other forms of abuse of power, is not tolerated.

ELDORADO also does not admit situations of slave labor or analogous to slavery, the use of child labor and the work of young people under 18, except as an Apprentice, as provided by law.

2.2 – Diversity, inclusion, equal opportunities and respect

ELDORADO adopts principles of equal opportunity, inclusion, diversity and respect, and recognizes that a diversified workforce is essential to success. Thus, ELDORADO does not allow in its work environment and in the execution of its management policies any discriminatory conduct based on personal characteristics, such as: race, ethnicity, nationality, gender, sexual orientation, age, disability, religion, union affiliation or political-party position.

All decisions related to hiring, performance evaluation and promotion shall be taken based on job/position requirements and on individual technical skills and qualifications.

In addition, ELDORADO values dialog and the opinion of each of its collaborators, encouraging them to communicate ideas or concerns to their managers, without fear of discrimination or retaliation.



3. Health, safety and environment

ELDORADO is committed to comply with occupational health and safety standards, as well as to improve continuously its processes and facilities in order to ensure the safety of its activities.

Their commitment also extends to conducting its activities with socio-environmental responsibility, encouraging the sustainable use and without wasting natural resources.

It is everyone's duty to comply with the laws and regulations relating to health and safety at work, respect the warnings and recommendations provided, and promptly inform managers about any situation that may affect, directly or indirectly, physical integrity, health or ELDORADO's assets.



4. Transparency, ethics and integrity in business

4.1 – Fighting corruption and bribery

ELDORADO does not admit any form of corruption or bribery, whether in the public or private sector, in a way that all collaborators shall comply with applicable laws and ELDORADO's procedures for conducting business with transparency and integrity.

Therefore, it is not allowed to accept, demand, offer, promise or grant, either directly or indirectly, any amount of money, valuable item or other type of benefit in exchange for influence or in order to facilitate business in an inappropriate manner.

ELDORADO's collaborators shall also decline invitations to non-work-related events, such as shows, sporting events, concerts, among others.

The receipt of souvenirs by ELDORADO's collaborators is limited to promotional items, which do not have a commercial value or do not exceed R\$ 100.00 (one hundred Reais), such as:



Pens



Notebooks



Caps



Calendars



Planners

Also, a collaborator shall refuse a souvenir, even if it is within the limits established by this Code, when he/she has already received another item from the same company in the last six months.

4.2 – Conflict of interests

In daily work activities, collaborators shall make decisions in the best interest of ELDORADO, avoiding external influences and situations that may generate a conflict of interests, even if only apparently.

A conflict of interests occurs when an interest or benefit in particular, whether direct or indirect, interferes or has the potential to interfere in professional decisions.

It is not possible to reflect in this Code all the situations or relationships that may generate a conflict or the appearance of a conflict of interests. However, the situations below are the most common examples, and they shall be avoided:

Having kinship or affective relationship with:



- Collaborator who has the power to make or influence decisions about your activities, salary, performance evaluation or promotion; or
- Public agent or politically exposed person who exerts influence or has decision-making power within the scope of ELDORADO's activities;

Participating or influencing in:



- Selective process involving a candidate with whom you have a degree of kinship or affective relationship; or
- Hiring process of a supplier or service provider (whether an individual or a legal entity) whose partner, manager, director or other representative is your relative or a person with whom you have an affective relationship;



Performing a secondary activity (paid or not) that may conflict with your work at ELDORADO or that is contrary to ethical principles, guidelines of secrecy and confidentiality, and intellectual property regulations;



Accepting a job position, task or responsibility, or receive some kind of payment from an ELDORADO's competitor or business partner;



Using ELDORADO's assets, images, confidential and privileged information, or other resources to carry out a personal activity or to obtain a private or third party advantage/ gain;



Being a relevant shareholder or an investor partner in an ELDORADO's competitor or business partner.

If a collaborator finds himself/herself facing a situation of real or potential conflict of interests, he/she shall promptly report the case to the Compliance Officer so that the best way to deal with such conflict will be evaluated.

Everyone shall respect the conditions or restrictions imposed by ELDORADO for managing or eliminating a conflict of interests, be it real, potential or apparent.

4.3 – Accounting and resource management

ELDORADO shall comply with all applicable accounting standards, especially those that refer to the use of resources arising from tax incentives.

In that sense, everyone shall provide accurate and complete evidence/records of expenses and revenues, and obtain all the approvals required to make financial transactions resulting from ELDORADO's activities, as demanded by the institutional policies and procedures.



4.4 – Quality and accuracy of information

Any and all information issued by ELDORADO and its collaborators, whether verbally or written, shall reflect the commitment with ethics and integrity, and be characterized by cordiality, clarity, veracity and completeness. ELDORADO does not allow the issuance of institutional information with offensive, false, manipulated or distorted content.

Also, ELDORADO does not allow its collaborators or business partners to present false or misleading personal or corporate documents, notably because it is a dishonest and, above all, an unlawful conduct. Thus, ELDORADO reserves its right to check the veracity of data or documents presented, if necessary.

4.5 – Use of resources and assets

Everyone shall take care of the resources, facilities, equipment, machinery, furniture, among other work materials, whether they are ELDORADO's or business partners' property. Assets and resources shall not be used for illegal or improper purposes, nor to obtain personal advantages or for third parties.

ELDORADO installations shall only be used for professional purposes, thus it is forbidden to sell any type of product or service for personal gains at the Institute's premises.

Likewise, access to internet as well as the use of telephones, e-mail, software, hardware, equipment and other assets of ELDORADO shall be restricted to professional activities. The use for private purposes shall occur as an exception, with common sense and moderation. It is not allowed to access websites with illegal and/or pornographic content, as well to use chat rooms, on-line games and to download songs/movies.

ELDORADO has the right of accessing information stored in the Institute's devices and consulting records of internet use and corporate phone and communication app accounts, including e-mail.



4.6 – Fair competition

ELDORADO is committed to the promotion of free competition, market evolution and complying with competition laws.

Due to the Institute’s nature, its collaborators may interact legitimately with companies that compete among themselves. However, there shall be attention to such interactions since it is not allowed to share strategic information that may harm free competition, such as: new products to be developed, technologies deployed or in research stage, among others.

It is also not allowed for a collaborator to act as a link for exchanging strategic information between competing organizations.

4.7 – Responsible use of social media

Social media profiles associated to ELDORADO shall be registered in reputable platforms and be only used by Communication Department. Information disclosed and interactions carried out with third parties from such platforms, shall always be guided by ethics.

Collaborators, when using their own profiles on social media in relation to ELDORADO and/or its information, shall also adopt an ethical conduct and be guided by this Code’s guidelines. Thus, they shall not disclose ELDORADO’s or business partners’ confidential information, nor shall publish opinions or statements on behalf of ELDORADO or in a way that they may be taken as the Institute’s official opinion.

Furthermore, collaborators shall not publish statements that are contrary to the ethical principles adopted by ELDORADO or that offend the Institute’s credibility and reputation.



5. Security and protection of data and personal information

5.1 – Confidential information and privacy

It is not allowed to disclose or forward to third parties ELDORADO’s technical or management information, as well as personal data obtained at the Institute, be it from a coworker or a business partner.

If you need to send ELDORADO’s confidential material (information, images, documents, objects, etc.) to third parties, make sure that the recipient has a non-disclosed agreement/clause (“NDA”) signed with ELDORADO and that the information to be made available is relevant and strictly necessary to the relationship between ELDORADO and the recipient.

In order to preserve secrecy, disclosing confidential information to collaborators allocated in other projects is also forbidden, as well as forwarding ELDORADO’s data and documents to your private e-mail account.

Upon using the e-mail or another communication app to share institutional information, collaborators shall restrict the content of messages as strictly necessary to the public, and carefully and reasonably use electronic resources of “mass distribution lists”, “groups” and “reply all”, thus preventing undue access or disclosure of ELDORADO’s information.

In addition, it is prohibited to use confidential and privileged images and information obtained in ELDORADO for a private activity and/or to obtain personal gains or advantage, including the use for academic papers, lectures or classes.

In order to comply with data protection applicable laws and to preserve subjects' privacy, the personal data obtained in ELDORADO shall only be used for legitimate purposes and in a manner limited to the minimum appropriate for the accomplishment of its purposes. Also, the personal data shall be deleted as soon as they are no more useful, in order to avoid the illegal use and storage.

For further information about its privacy and data protection policies and practices, ELDORADO offers an e-mail for direct contact with its Data Protection Officer:

privacidade@eldorado.org.br.

5.2 - Information security

Aiming to preserve confidentiality, availability and integrity of institutional information, and to ensure a safe personal data processing, ELDORADO has strict security rules, which are based on ISO27001 international standards and are provided by the Information Technology Department's policies and procedures.

Thus, all collaborators shall comply with the following rules:



Passwords for accessing ELDORADO's or business partners' devices, software and internal systems/platforms shall be used in a very personal way, that is, they shall not be informed to third parties.



Screen lock resource shall be used whenever the user leaves his/her workstation;



Printed documents shall not be left over desks and, after use, shall be destroyed;



Filming or photographing projects, labs or other ELDORADO's restricted areas is not allowed.



Cabinets and drawers shall remain locked;

Depending on your job position, stricter information security rules may be requested.

Everyone shall ensure the security of ELDORADO's data, information and devices, even if working remotely or on a business trip.

Any incident or activity that affects the security of ELDORADO's information shall be promptly reported through channel cybersecurity@eldorado.org.br.



5.3 – Intellectual property and brand use

We can exemplify intellectual property as brands, patents, confidential information (process information, customer lists, methods), know-how, industrial designs, industry and trade secrets, topography of integrated circuits, among others, developed at ELDORADO or by hiring it.

By definition, intellectual property is the possibility of obtaining exclusivity of information, including those resulting from the research and development process, aiming monetization—whether by economic exploitation or as a business asset.

Intellectual property rights over the results obtained from collaborators' activities belong exclusively to ELDORADO in accordance with applicable national legislation. Therefore, collaborators shall provide ELDORADO with all the documents and information required for the legal protection of those rights.

ELDORADO's brand shall also be protected, especially because it may cause damage to the Institute's image if used inappropriately or unethically. Thus, the use of ELDORADO's brand, even by third parties, shall be previously analyzed and authorized by the Communications Department.

Likewise, ELDORADO collaborators shall not use any partner's intellectual property, nor mention the name of business partners or use their brands on social media, events or on any documentation directed to external public without the due formal authorization.



6. Relationship with stakeholders

6.1 – Associated companies

Companies with affinity and commitment with ELDORADO's objectives may become associated to the Institute, within the terms of its Bylaws.

Representatives of associated companies are not allowed to take advantage of the activities carried out and the contacts obtained in ELDORADO to get confidential and strategic information from competitors, neither to practice acts that prevent free initiative and fair competition.

Collaborators are prohibited from sharing ELDORADO's projects confidential information with the representatives of associated companies, unless there is a legitimate reason for doing so.

6.2 – Clients

Upon signing partnerships, ELDORADO understands that its activities effectively contribute to its client's success, whether they are public or private organizations. In this sense, ELDORADO values a relationship of trust, harmony and excellence in service execution, placing emphasis on quality, productivity and innovation, committing to ethical principles and compliance with applicable laws, especially those referring to the use of resources from tax incentives.

ELDORADO does not allow preferential or privileged treatment to any client. It is also not allowed to promise, offer or give, either directly or indirectly, advantages, favors, benefits, gifts, entertainment or any valuable item to ELDORADO's clients representatives with the purpose of obtaining an improper advantage or influencing, ensuring or rewarding them for a decision within the interest of ELDORADO. Likewise, ELDORADO's collaborators shall not accept any amount of money, gift, advantage or another benefit that may be offered by a client.

ELDORADO reserves its right to terminate its relationship with clients that do not comply with its ethics and conduct guidelines, applicable laws, or that contradict the Institute's scientific and technological goals.

6.3 – Suppliers and service providers

Relationships with suppliers and service providers shall be based on discipline, respect and trust, serving the best interests of both parties.

The hiring process shall be guided by ethics, equity and transparency. At all stages of such process collaborators shall act diligently, seek the best interests of ELDORADO and make decisions based on technical and professional criteria (such as competence, quality, deadlines accomplishments, price, financial stability, reputation, among others), always valuing the good practices related to integrity, and social and environmental aspects.

In order to avoid a conflict of interests, even if only apparent, it is not allowed to hire a supplier or service provider (whether a natural person or legal entity) when its partners, managers or other leaders have a degree of kinship with ELDORADO collaborators who are involved in the contracting process or in the management of the service/supply.

All contracts shall be formalized through a written negotiating document, which shall be clear and objective, with no room for ambiguities or omissions. ELDORADO reserves its right to replace any supplier or service provider that does not comply with the guidelines of this Code and the applicable laws.



6.4 - Public agents and politically exposed people

In order to address subjects related to ELDORADO's activities and interests, its collaborators may have legitimate interactions with public agents or politically exposed people. Such interactions shall be ethical, honest, transparent and in accordance with applicable laws, regulations and best practices.

Therefore, it is not permitted to promise, offer or give, directly or indirectly, any amount of money, favor, benefit, gift, entertainment or other valuable item to public agents or politically exposed people with the purpose of obtaining an improper advantage or influencing, ensuring or rewarding them for a decision within the interest of ELDORADO.

Expenses resulting from interactions with public agents or politically exposed people shall be guided by common sense and reasonableness, and shall respect the controls and limits provided by ELDORADO's policies and procedures.



Hearings or meetings with public agents or politically exposed people shall be preceded by a formal request containing details about the encounter, such as: date, time, place, identification of participants and the topic to be addressed. In addition, they shall take place preferably in public agencies, offices or buildings, during regular business hours/shifts. Hearings or meetings held through digital platforms are also permitted.

Such meetings, whether in-person or remotely, shall involve the participation of at least 2 (two) ELDORADO collaborators, and verbal negotiations shall be duly formalized.

It is prohibited to promise, offer, give or authorize, directly or indirectly, donations to political parties, politically exposed people, candidates for or current occupant of a public agency, members or affiliates of political parties using ELDORADO's resources or on behalf of the Institute. The prohibition is extended to offering any service for the benefit of political parties or electoral campaigns of any nature.

It is also not acceptable to perform any sort of political advertising within ELDORADO's premises or using its name, logo or assets. While participating in a political activity, collaborators shall act on their own, never giving the impression, even if veiled, that they are doing so on behalf or within the interest of ELDORADO.



6.5 – Press and external public

ELDORADO values the reliability of the information transmitted to the external public. The Institute’s representation and contact with the press are restricted to the Superintendent and Executives or those previously and formally authorized by them.

Thus, any collaborator that is approached by journalists or media channels/platforms representatives shall inform his/her manager and the Communication Department (comunicacao@eldorado.org.br) before providing any information.

Likewise, representing ELDORADO in conferences, lectures or meetings organized by business associations, educational institutions or government entities shall be authorized previously and formally, particularly when there is press coverage.

6.6 – Local community

ELDORADO seeks to contribute to the economic development and well-being of the community in which it operates, establishing partnerships with local entities and encouraging its employees to dedicate part of their time to worthy community causes.

ELDORADO can make charitable donations for cultural, social, environmental or sporting development, contributing to philanthropic entities or other community organizations. Such donations shall comply with applicable laws and regulations, shall not be used to improperly influence decisions, and shall be approved in advance as required by institutional policies and procedures.



7. Management of ethics and conduct guidelines

7.1 – Ethics and compliance program

Reinforcing its commitment to developing its activities with integrity, ethics and transparency, ELDORADO has established the Ethics and Compliance Program to foster an ethical culture among its collaborators and business partners and to ensure that its policies and procedures comply with applicable laws, regulations and integrity standards.

The Program has the support of the Institute's top management and is operated by the following agents:

Compliance Officer

ELDORADO's collaborator who leads the Program, as it is his responsibility to verify the need to update the Code of Conduct guidelines; develop and/or review internal policies and procedures aiming for ELDORADO compliance; receive suggestions, doubts and complaints made through ombudsman channels and investigate possible misconduct, recommending corrective measures and disciplinary actions, when necessary.

Governance Group

In addition to the Compliance Officer, its members include the Superintendent and the managers of the Legal and Human Resources departments. The group is responsible for deliberating about corrective and disciplinary measures indicated by the Compliance Officer, as well as about ambiguous situations or those not provided by ELDORADO guidelines.

Ethics and Compliance Committee

Formed by members of ELDORADO's administrative councils, in a representative and multisector manner. Its mission is to advise the Board of Directors regarding ELDORADO compliance with laws and standards of ethics and integrity.

7.2 – Violations and application of disciplinary measures

Misconducts, by action, omission or complacency may cause financial and reputational damage to ELDORADO. In certain cases, a misconduct may also violate laws and negatively affect society.

Thus, any collaborator who violates the provisions of this Code of Conduct, allows a member of his/her team to do so, or fails to report a violation when aware of it, shall be subject to labor disciplinary measures provided by law (warning, suspension or dismissal with cause), regardless of his/her job or hierarchical position. ELDORADO may also take legal or administrative measures, when applicable.

All the penalties and disciplinary measures shall be applied in accordance with laws and ELDORADO's policies, and considering the seriousness of the violation and possible recurrence of the offender.

7.3 – Channels for grievances, complaints and suggestions

The following channels are available for collaborators, business partners and other third parties to make anonymous or identified grievances, complaints or suggestions about any violation of this Code, ELDORADO's policies or applicable laws:



E-mail: compliance@eldorado.org.br



24h toll free call center: **0800 800 4747**



Website: contatoseguro.com.br/eldorado

In order to reinforce confidentiality and provide comfort confidence for users, an independent specialized company handles the call center and the website

contatoseguro.com.br/eldorado

All reports received, regardless of the channel used, will be registered and analyzed independently and impartially.

ELDORADO guarantees secrecy and confidentiality regarding all information provided through ombudsman channels and prohibits any sort of retaliation or punishment against a whistleblower in good faith who identifies himself/herself.

Additionally, everyone involved in internal investigations shall be treated with dignity and respect.

If any agent who operates the Ethics and Compliance Program is mentioned in a complaint, that agent shall not participate in the investigations and deliberations on the facts.

As part of the commitment to the ethical and transparent development of ELDORADO's activities, every collaborator shall report any violation of this Code of which he/she becomes aware.

Any attempt to obstruct or dissuade reporting of potential violations of ELDORADO's ethics and conduct guidelines is prohibited.

Code of Conduct

Pledge and commitment

I hereby declare that I have received a copy of ELDORADO's Code of Conduct. I am aware that such Code contains ethics and conduct guidelines that shall be followed by all collaborators and non-compliance may result in the application of a disciplinary measure.

In addition to having received a copy, I am aware that the entire content of the Code is available for my consultation at any time on ELDORADO's intranet and on its official website – www.eldorado.org.br

Finally, I state that I am aware of the means made available by the Ethics and Compliance Program to report grievances, complaints or suggestions about ELDORADO's policies and practices. I know that I have to report timely any case of violation of the Code or the applicable laws that I may become aware of.

Location:

Date: / /

Signature

Full name





This Code of Conduct is available for consultation on the intranet and on
ELDORADO's official website

www.eldorado.org.br

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