



# Code of Conduct Business Ethics

Grupo



**Innovatech**

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# Summary

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# Corporate values

At Innovatech Group, we believe that a dense corporate culture brings identity to the group members and, through sharing a similar vision of the future and the expected behaviors. This way, together we focus on successfully reaching our objectives and goals, as challenging as they might be.

Our values guide our posture, work as the foundations that govern our performance and guide our behavior. Values represent our most valuable attributes and underpin our day-to-day decisions.

**INNOVATION** - We seek conditions for improving ideas through cooperation, strategic alliances, new technologies and new applications to evolve into raising organizations values and competitiveness.

**TEAMS OF EXCELLENCE** - Are trained and motivated professionals with common goals, focused on the customer and with balance between young talents and experienced professional executives.

**QUALITY RELATIONSHIPS** - We build quality relationships between people, as to know: customers, collaborators, partners, community and shareholders. What we think, talk and agree on.

**SUSTAINABILITY** - We go beyond financial results; we have commitment with the society and the environment. We conduct our business in a sustainable way, with a broad view of economic, environmental and social aspects, agile management and communication permeate our actions.



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# Ethical Principles

Throughout its existence, Innovatech Group has earned a solid reputation with its professionals, customers and suppliers.

This reputation results directly from the actions and daily decisions of each and every one of us and by conducting business, according to our ethical values and principles of **Trust, Integrity, Professionalism and Respect.**

For this reason, it is mandatory to follow the guidelines described in this Code of Conduct at all times, and incorporate you to our daily routine.

**TRUST** is the starting point to build rectitude and good quality relationships. Our customers trust us with their information, which is treated in accordance with the General Data Protection Law and its variables.

We guarantee care and confidentiality of the data both internally as well as externally, as we work with different customers, different segments at the same time.

**INTEGRITY** for us is to do what is right. Following this path of success based on the decisions that we all make on a daily basis. To act in the right way in each and every situation, is everyone's responsibility, as it is to exercise good judgment, and restrain outdated conduct within the group's principles, always questioning whenever in need of help or in any doubt.

**PROFESSIONALISM** goes beyond technical knowledge. It imprints an ethical sense to our actions in line with the commitments to our customers, practices and socially agreed values.

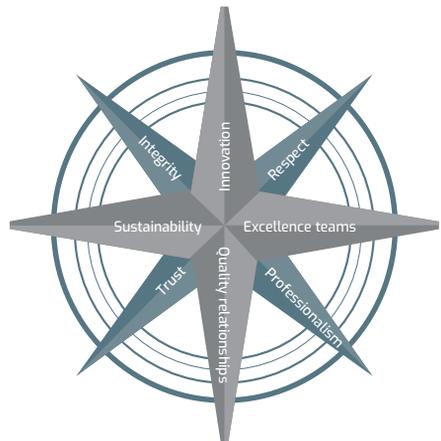
**RESPECT** is the basis for all our relationships. We treat all our employees, customers and business partners with dignity and respect. We compose our relationship with respect and professionalism and accept diversity in our workplace.

The ethical principles described above guide all our relationships .

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# Symbology

Together, ethical principles and corporate values make the basis of our corporate culture. This is essential to guide our actions, establish behavior standards and substantiate our decisions aiming success.



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# 1. Relationship with employees

## 1.1 Health and Safety:

We practice active and genuine care taking of ourselves and of the others. We collaborate to promote a safe and healthy work environment, both physically and mentally. We prioritize health and safety in detriment of production when in face of situations that might impose risk on anyone.

In the work environment, we must always present ourselves in a normal state (without any influences such as drunkenness, drug use, among others); The use of any illicit drugs is a crime and it compromises professional performance, by seriously harming the lives of its users, disrupting the work environment and it may lead to risky situations for other people.

We must report to the leadership any unsafe act or condition in the work environment, as well as accidents or work-related illnesses. In order to guarantee the necessary approach and actions regarding any risk, unsafe situation or occurrence, we use the form available on Innovatech Website for event registration and action plan.

## 1.2 Conflict of Interest:

In order to keep harmony in the workplace, making it balanced and healthy, personal interests must be consistent with the interests of the Innovatech group and vice versa. Any situation other than this context jeopardizes our reputation and therefore needs to be administered with transparency and should be promptly communicated to the leadership.

## 1.3 Hiring Family Members and Relatives:

We allow the hiring of active collaborators relatives in related job positions, and in the same area, as long as there is no conflict of interest. This will be analyzed by the company's management, and provided there is not a subordinate relationship, direct or indirect, between the professional and his family or companion. At the time of this indication, administrators and collaborators should inform the relationship to their manager and the person in charge for hiring. Hiring will be always based on personal qualifications, performance, capabilities and experience, following the same recruitment process and selection applied to everyone.

## 1.4 Confidential Information:

Relationships between Innovatech group and its service providers / employees are based on the principle of Trust, also understood as protection of all trade secrets, confidential terms or group owned information regarding Innovatech, as well as suppliers and current or prospective customers.

"Confidential Information" includes, but is do not limit the results of customers research, research plans or projects or development, customer information, research reports - both from Innovatech Group or its customers; materials related to computing, such as programs, instructions, codes, printed versions of files, digital data; formulas, inventions, developed items and discoveries; information arising from product testing; business management improvements, processes, advertising and sales; business plans (adopted or not);



budgets; unpublished financial data, banking access (tokens and passwords); accounting, tax and financial information; licenses; price estimates, pricing strategies and costs information; registration of suppliers; the identity of Innovatech Group's customers and potential customers ; potential main account identities ; Innovatech Group suppliers and consultants identities , any information about these suppliers and consultants, such as contacts, prices and others; and, if applicable, information

referring to customers of Innovatech group, notably contacts and addresses.

Add the clause "non competes ", for the entire term of the relationship provision of services and up to 02 (two) years after its completion.



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## 2. Relationships with partners / Shareholders and advisory board

The relationship between the partners / shareholders and the advisory board is based on empathy, convergence of interests and transparency of relationships. Resolutions are always done in writing, in compliance with the decision of the majority, taken at a meeting and formalized in the business minutes. Any divergence is always resolved bearing in mind Innovatech Group's best interest.

We follow the corporate governance

structure based on the principles of IBGC - Brazilian Institute of Corporate Governance, which specifies duties and responsibilities distributed among different stakeholders, such as directors and shareholders, in addition to explaining the rules and procedures for making decisions about corporate matters. We consider these principles to be essential, as they guarantee a complete business management, without illicit practices, in addition to protecting the interests of internal and external stakeholders.

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## 3. Relationships with customers and suppliers

The relationship between the professionals that are part of Innovatech group's work team, excels in ethics and fairness, discarding any practice that may violate national rules / protection against terrorism and corruption, with this same principle being observed in our relationship with all other publics.

### 3.1 Gifts and Presents:

We will never offer our customers, potential customers, government officials, public officials or any representatives of such entities, rewards or benefits for violating applicable laws.

We do not accept or offer gifts or

entertainment in exchange for favors, benefits or advantages when such behavior may create an appearance of inappropriately influencing the respective business relationship.

We can offer or accept symbolic gifts such as: pens, calendars, cards, diaries, etc., as long as they are appropriate in the face of circumstances and in a transparent, non-secret and timely manner.

We refuse and do not offer hospitality in kind or equivalent, such as gift cards or vouchers to or from external parties.



### 3.2 Interactions with customers

We can offer or accept reasonable meals, in a transparent manner with our customers, not secretly and in a timely manner.

In moments of interactions with our customers, we do not consume alcohol, always keeping ourselves in a normal state

and thus avoiding situations of risk to the business or any sort of inadequacy due to posture in the presence of potential business partners . We do not condone illegal activities with the client.

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## 4. Relationships with the public sector

Integrity is an ethical principle that sustains us in our relationships with public authorities. In our relationships with the public authorities, the principles of legality, impersonality, morality, publicity and efficiency are observed, guaranteeing that the contracts express the transparency and real coherence with the public interest sought when contracting our services / products.

We do not promote any act that violates

public morality, always being guided by the applicable legislation, in particular Law 12.846, of August 1, 2013, its regulations and amendments: nor admitting or promoting any form of distortion, widening of content or extension of understanding of the strict anti-corruption rules.



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## 5. Relationships with the competition

Our commercial relationships are based on the principle of free competition, respecting the legal limits that prohibit the abuse of economic power and market domination. In other words, in the presentation of any project, product or service, we analyze all aspects capable of guaranteeing free initiative, guaranteeing economic efficiency in an equitable way with the market parameters.

In view of the ethical principles that govern this Code of Conduct, which are Trust, Integrity, Professionalism and Respect, towards all, employees and suppliers or

service providers must look after the interests of the group, not promoting and, at the same time, avoiding competition with companies, whether competition is promoted by direct or indirect means, preventing conflict of interests.

We emphasize that price quotations, pricing strategies and cost information are considered confidential information and cannot be shared, and competitors' approaches to this need should be notified to the Innovatech Group's leadership.

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## 6. Relationship with the community

We support the development of the communities around us, actively contributing to the construction of a more fair and egalitarian social dynamic.

We have Education as Innovatech Group social vocation, for believing that this is the only way to have a more fair and equal society, therefore, our support and contribution efforts will be directed towards actions in this sense, together with reputable institutions located close to the community where we operate.



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## 7. Relationships with the media

We provide internet connection and e-mails only for communication and work information. We do not allow the use of electronic systems, the internet, e-mail or social media to transmit, receive or download content that impairs work activities.

Social media, at work or in any other environment, should not be used to expose private or confidential information about the group or our clients, and the insertion of content that exposes the image of companies or their professionals is not allowed. Participation in events or lectures by professionals representing any of the group companies, must be aligned with the Communication area. We do not use information and content for any use other

than the company's objectives and without due approval. We authorize the sharing of institutional information only. For other more specific information, alignment and approval with the leadership will be required.

We take care of our personal image by being careful with the content we share on social networks. We do not dispute or argue about issues such as politics, religion and sport in work groups.

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## 8. Sustainability

Sustainability is one of Innovatech Group values and is based on three pillars: the social, the environmental and the economic.

**SOCIAL:** through quality relationships based on trust and respect that we develop with our employees, customers and partners and social responsibility with the communities where we operate.

**ENVIRONMENTAL:** we operate responsibly with the current environmental legislation and follow the principles of environmental management. We are committed to complying with the highest ethical standards and integrity in our environmental responsibilities.



**ECONOMIC:** we are committed to our business plans and work on high performance to achieve results as an excellence team.



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## 9. Data protection

All information brought to the attention of any and every professional assigned to the Innovatech Group is treated with complete privacy, in compliance with the principles of the General Data Protection Law, as well as with international anti-terrorism and corruption regulations, ensuring the best treatment of data, while at the same time, preserving privacy and image rights for all purposes. In addition, all information accessed by Innovatech Group is protected by the principle of Trust.

No data obtained within the company can be shared with third parties, free or for a fee. When any employee, service provider, partner, shareholder or director of the Innovatech group leaves, no data can be saved in an electronic or printed file for use other than the internal interests of the Innovatech Group.

To ensure confidentiality, we take steps such as: avoiding the use of flash drives or other external devices to computer equipment; use cloud for storage and file sharing; ensure the care and confidentiality of printed materials, the use of printed material as a draft being expressly prohibited; no login /password sharing (personal and non-transferable information, in addition to locking the computer in case of temporary absence).

All virtual environments are monitored by the company (internal / external), which is known and agreed by all employees and service providers.



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## 10. Company inputs

We are responsible for protecting the inputs which are made available by the company. We ensure that the company's resources are used responsibly and for the legitimate purposes of our business. We are careful with the physical work environment, ensuring constant maintenance, cleaning and keeping of our offices, work equipment

and communication, vehicles and operations. We adopt the principles of conscious consumption: we do not waste water, energy, paper, plastic objects, office supplies, etc.

We must use the corporate card in accordance with the company rules and keep accountability up to date.

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## 11. Respect in the workplace

Based on the ethical principle of Respect, we cultivate cordiality in relationships and in dealing with our co-workers, customers and suppliers. We seek to resolve disagreements with care, respect and acceptance, directly with the person involved and without triangulations.

We practice dialogue and do not impose a point of view, we listen and respect the opinion of others, even if different from ours. We maintain balance and impartiality in the work environment, always trying to keep it healthy.

An intimate relationship with any of your co-workers and / or third parties is not permitted during work hours and at any of the company's facilities.

We ensure the personal dignity, privacy

and personal rights of all our professionals and are committed to maintaining a work environment free from discrimination and harassment. We do not practice or accept discrimination based on origin, nationality, religion, race, sex, age or emotional orientation, nor do we agree with any type of verbal or physical harassment, for any reason.

We preserve our personal image by being careful with language and exposure through the content we share on social networks and work groups.



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## 12. Transparency

We work for the continuous search for excellence, but we know that we can make mistakes. When we make mistakes, we are transparent and true, we bring the problems

to the leadership awareness without ever hiding them. Always striving to mitigate the consequences and learn from our mistakes.

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## 13. Channel for suggesting or reporting nonconformities

Suggestions for improving this content will always be welcome. Feel free to take part in this construction.

Whenever you see or suspect a violation of the code, it is your responsibility to report it to the leadership or to the Human Resources area.

If you are uncomfortable using these paths or consider that the issue has been resolved properly, you can use an electronic questionnaire available on the Innovatech Website to contribute with suggestions or

report violations anonymously.

The investigation of the claims and complaints will be conducted carefully, respecting local laws and protecting the rights of both the complainant and the accused, without any retaliation against the person who reported a concern in good faith, through the channels available.

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## 14. Compliance and penalties

Violations of this Code of Conduct and other policies, rules, procedures and guidelines of the Innovatech Group subject violators to the consequences. The consequences are

applied considering the type of violation and its severity, the guidelines of the Group's management and applicable legislation.





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