

CODE OF CONDUCT AND INTEGRITY

IPT - INSTITUTE FOR TECHNOLOGICAL RESEARCH

UNIT IN CHARGE

**Compliance Management,
Risk Management and Internal Control Department
Presidency**

SÃO PAULO - SP 2024

CODE OF CONDUCT AND INTEGRITY 2024

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ABSTRACT

This document depicts IPT's Code of Conduct and Integrity, which is comprised in the Integrity Program and is also one of the main instruments that are used for the adaptation of IPT's activities according to good Corporate Governance practices.

The purpose of the Code is to address in a clear, broad and direct manner what is expected and also forbidden conduct based on IPT's values. According to the premises of these guidelines, not only those who work at the Institute, or on its behalf, but also all related parties can become aware of the principles, values, standards and conduct that streamlines its activities.

KEYWORDS

Practices inherent to non-discrimination, conflict of interest, compliance, consonance, corporate governance, code, ethics, research, technology, science, innovation and service provision, transparency, human resources relations, human rights, corporate risks, internal control, integrity, expected, forbidden and conduct, Whistleblower Channel, prevention, disciplinary measures, sanctions, corruption.

1. INTRODUCTION

The Institute for Technological Research of the State of São Paulo S.A. - IPT is a public company member of the Indirect Administration of the State of São Paulo, connected to the Secretariat of Science, Technology and Innovation, with the purpose to comply with science and technology requirements in the public and private sectors, in its field of activity and also to contribute towards the development of scientific and technological knowledge.

One of IPT's major assets is precisely its reputation in terms of credibility and impartiality, which was amassed throughout its trajectory and the conduct of its professionals and employees.

To continue to ensure practices of excellence in the sectors of science, technology and innovation to the State and the Country, the Institute envisages with this Code, to disseminate and consolidate a standard of behavior streamlined by ethics, transparency and integrity, to be observed by all those who are acting on its behalf, both in relations between people and in its transactions and business activities.

The preparation and frequent updating of this Code are under the responsibility of the Compliance, Risk Management and Internal Control Management – GECON within the scope of the IPT's Integrity Program. The Conduct and Integrity Committee will be consulted by GECON during periodic reviews of the document.

2. PURPOSE

The purpose of this Code of Conduct and Integrity is to ensure to its recipients that the requirements and expectations regarding their conduct will be used as guidelines regarding what is or is not acceptable for the IPT and also what should be done when faced with ethical predicaments and actions to be taken in case of doubts and/or suspicion of irregular conduct.

Its precepts fundamentally envisages to:

- 2.1. Translating IPT's commitment to ethical behaviour.
- 2.2. Raise awareness of universal ethical values and indicate IPT's expectations regarding these values.
- 2.3. To provide parameters for the performance of administrators, inspectors, Committee members, employees, interns, scholarship students, agents, partners, suppliers, third parties and all those who are working under the name or on behalf of IPT.
- 2.4. Reinforcing emphasis on the institution's good image in all aspects in society and the scientific and technological community.
- 2.5. Supporting attitudes to maintain society's trust in the services provided by IPT.
- 2.6. Encouraging working relationships based on respect, integrity, honesty, professionalism and responsibility.
- 2.7. Encourage the company to conduct its business with transparency, integrity, credibility and sustainability to protect public resources.
- 2.8. Disseminate and encourage the fight against all forms of prejudice and discrimination based on sex, gender, sexual orientation, gender identity or expression, age, colour, ethnicity, political or philosophical conviction, religious belief, physical or mental disability, origin or any other personal characteristic.

3. APPLICABLE LEGISLATION

This Code is based on the following standards:

- Constitution of the Federative Republic of Brazil dated of 1988
- Code of Ethics for the State Public Administration – state decree no. 60,428, of May 8, 2014.
- Protection and defense of the user of the State’s public service – state law no. 10,294, of April 20, 1999 and state decree no. 68,156, of December 9, 2023.
- Administrative process within the legal action of the State Public Administration - state law no. 10,177, of December 30, 1998.
- Anti-Corruption Standards – federal law no. 12,846, of August 1, 2013, federal decree no. 8,420, of March 18, 2015 and state decree no. 60,106, of January 29, 2014.
- Legal convention and rules inherent to state-owned companies – federal law no. 13,303 of June 30, 2016 and state decree no. 62,349 of December 26, 2016.
- Administrative Misconduct Law – federal law no. 8,429, of June 2, 1992, amended by the federal law no. 14,230 of October 25, 2021.
- Labor Laws Consolidation – decree-law no. 5,452, of May 1, 1943;
- Access to information laws – federal law no. 12,527, of November 18, 2011 and state decree no. 68,155, of December 9, 2023.
- General Personal Data Protection Law (LGPD) – federal law no. 13,709/2018 and state decree no. 65,347/2020.
- Program for the protection of whistleblowers who are reporting irregularities or administrative offenses and actions or omissions that are harmful to the state Public Administration - State Decree No. 68,157 of December 9, 2023.
- The application of the provisions of the Binding Abridgement No. 13 within the provisions of the Direct and Autonomous Administration, of the Federal Supreme Court (prohibition of nepotism) - State Decree No. 54,376, of May 26, 2009.

- Application of article 111-A of the Constitution of the State of São Paulo in the distribution of commissioned positions and functions or jobs of trust, within the scope of direct, autonomous and foundational Administration with related measures (hypotheses of ineligibility and hiring) – State Decree No. 57,970, of April 12, 2012.
- Application of penalties in the People Management process - IPT operational procedure 17499.
- Resolution of the State Capital Defense Council – CODEC n. 005/2017 – Guidelines for the preparation and updating of the Code of Conduct and Integrity.

4. VISION, MISSION, VALUES AND PRINCIPLES

IPT contributes towards the sustainable development, environmental protection and improvement of the quality of life of the population of the State of São Paulo and the country, producing knowledge in science, technology and innovation sectors, generating products and services and training human resources in many areas. The Institution's Vision, Mission, Values and Principles are depicted below:

MISSION

To overcome society's challenges through science, technology, and innovation applied to public policies and productive sectors.

VISION

To be a global reference in innovation and value creation for society by collaboratively developing technological solutions for a sustainable future.


VALUES

Connections, diversity, ethics, excellence, impact, innovation, people, and sustainability.

PRINCIPLES

- Respect for life in all its forms, manifestations and circumstances.
- Elaboration and application of cutting-edge technological knowledge for the benefit of society.
- Respect for the vectors of legality, impartiality, morality, publicity, efficiency, equality, reasonableness, proportionality, purpose, public interest, common good, legal certainty, motivation, due process, broad defense and adversarial proceedings.

As an executor of public policies on science, technology and innovation, the IPT will report its activities to civil society through the internal and external controls to which it is subjected and also through the dissemination of information and reports on its website, with the exception of information protected by secrecy and confidentiality.



“ONE OF IPT’S MAJOR ASSETS IS PRECISELY ITS REPUTATION IN TERMS OF CREDIBILITY AND IMPARTIALITY, WHICH WAS AMASSED THROUGHOUT IS TRAJECTORY AND THE CONDUCT OF ITS PROFESSIONALS AND EMPLOYEES.”

5. WHO SHOULD USE THIS CODE

These guidelines should be used by administrators, inspectors, members of Committees, employees, civil servants who are no longer regularly in their original entities and allocated to the Company, interns, apprentices, scholarship holders, agents, partners, suppliers and third parties working for IPT within the scope of the respective contractual and business instruments signed with the latter.

All recipients of this Code must be fully acquainted with it in order to apply these provisions in compliance with laws, culture and customs.

The compliance with this Code does not hinder or replace the application of other standards, rules of conduct of specific professional groups and councils, as well as other legal provisions that are applicable.

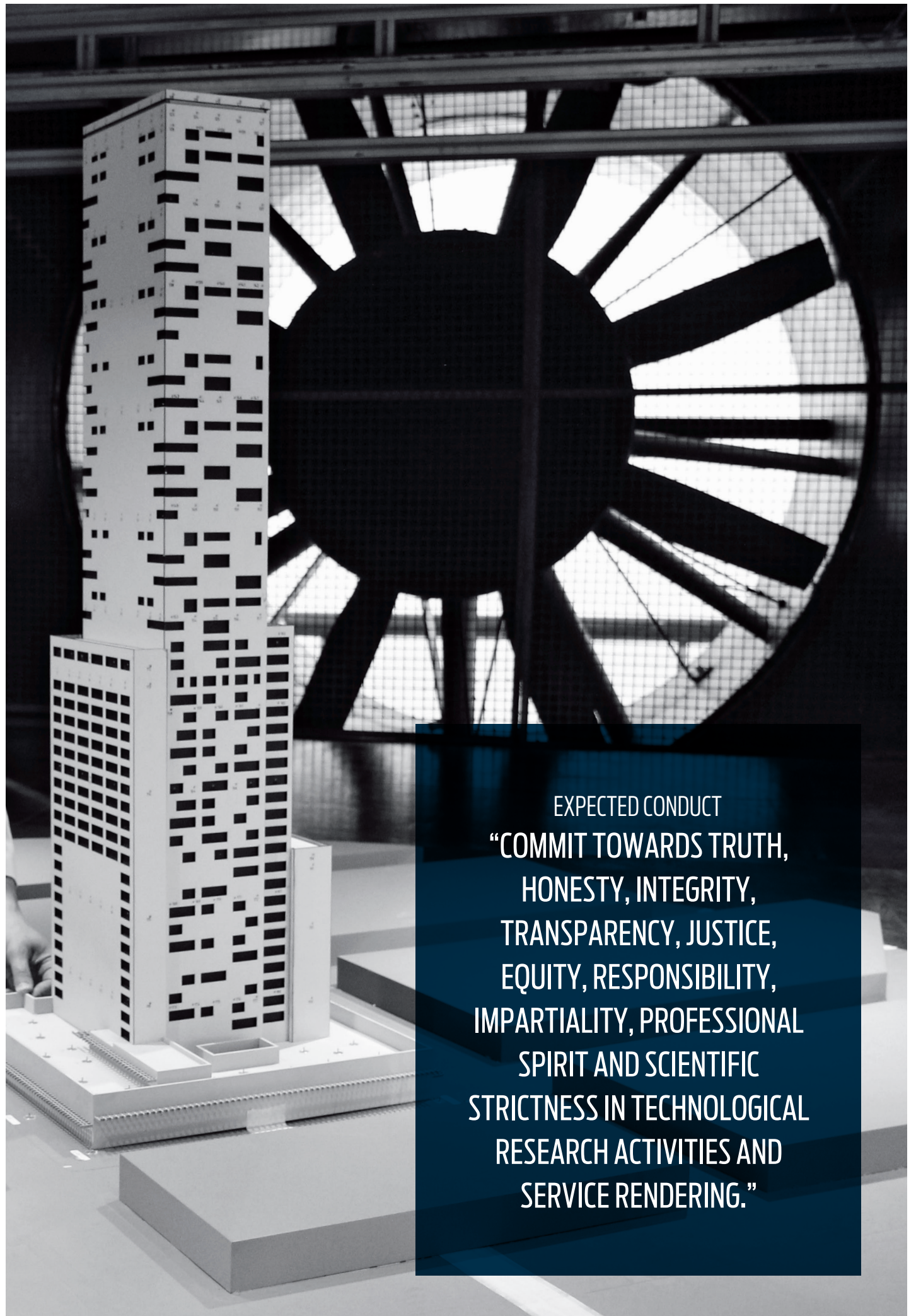
6. EXPECTED CONDUCT

The following conduct is expected of recipients of this Code:

- 6.1. Commitment towards IPT's mission, viewpoint, values and principles, complying with established standards, policies, processes and procedures.
- 6.2. Valuing synergy between areas, cooperation between employees, sharing knowledge as a way of learning and disseminating best practices.
- 6.3. Value people, contributing towards their personal, technical and professional development.
- 6.4. Seek towards the maintenance and improvement of their skills by means of their participation in training, studies, courses or professional development activities.
- 6.5. Value the company's actions envisaged at social development.
- 6.6. Act with reciprocal respect, loyalty, politeness, honesty, spirit of collaboration and solidarity, in professional and business relationships.
- 6.7. Reject any and all forms of rumors, malicious rumors or other types of embarrassment that create an environment that is offensive to individual rights.

- 6.8. Commit towards truth, honesty, integrity, transparency, justice, equity, responsibility, impartiality, professional spirit and scientific strictness in technological research activities and service rendering.
- 6.9. Commit to the truth, refraining from altering or distorting the content of any document, information or data under the responsibility of the company or third parties.
- 6.10. Respect the hierarchy, reporting any form of abuse of superior power.
- 6.11. Wear clothing appropriate to the corporate environment, to preserve personal and organizational image.
- 6.12. Ensure the organization, conservation and cleaning of the assets, objects, documents, tools and materials provided to them, in the performance of their work.
- 6.13. Exert diligence in the provision of response to regulatory bodies.
- 6.14. Observe, respect and comply with the rules relating to Occupational Medicine, regulatory standards inherent to work and legislation applicable to work activities.
- 6.15. Use the appropriate tools for each type of work and use Personal Protective Equipment – PPE and/or Collective Protective Equipment – CPE, when necessary or mandatory.
- 6.16. Respect contractual and business conditions, complying with administrative, labor, social security, tax and environmental requirements.
- 6.17. Observe timeliness and punctuality, respecting the established schedules for the performance of their work.
- 6.18. Carry out the activities assigned to them, in accordance with legislation, standards, regulations, contracts or superior orders and instructions, with zeal, promptness, speed, competence, diligence, perfection and efficiency.
- 6.19. Comply with the normative documents issued to regulate the internal activities of IPT.
- 6.20. Maintain discipline and refrain from carrying out activities unrelated to the service during the work shift.
- 6.21. Reject all forms of harassment, intimidation, prejudice and discrimination, valuing and promoting a harmonious, creative, positive environment that respects individual values.

- 6.22. Contribute towards the strengthening of the corporate identity, valuing, protecting and preserving the company's image and reputation.
- 6.23. Protect and adequately manage all information owned by IPT, its customers, citizens and suppliers, preserving its availability, integrity, confidentiality and authenticity, in compliance with regulations and technical and legal requirements.
- 6.24. Reject and report cases of fraud and corruption, in any form;
- 6.25. Report any risk to the integrity of the business, image, reputation and assets of IPT.
- 6.26. Be accompanied by another employee of the Institute in meetings or negotiations with a service provider, supplier or partner that may result in hiring by IPT, even if carried out with the aid of audio or videoconferencing tools.
- 6.27. Formalize, in writing, the negotiations done in meetings, even if carried out with the help of audio or videoconferencing tools.
- 6.28. Ensure that work and negotiations with related parties are conducted with utmost transparency and fairness and that they do not result in personal benefits for family members and friends, avoiding any conflict of interest.
- 6.29. Refrain from practicing or encouraging any act that, directly or indirectly, through carelessness, lack of zeal or ill will, causes damage or hinder IPT.
- 6.30. Respect copyright, not reproducing third-party intellectual works without authorization or citation of sources.
- 6.31. Refrain from incorporating authorship of articles and technical works done by third parties, regardless of the hierarchical relationship.
- 6.32. Use the "IT Department" provided by IPT, as defined in the normative document, only for work purposes related to IPT;
- 6.33. Keep IPT management systems up to date.



EXPECTED CONDUCT
“COMMIT TOWARDS TRUTH,
HONESTY, INTEGRITY,
TRANSPARENCY, JUSTICE,
EQUITY, RESPONSIBILITY,
IMPARTIALITY, PROFESSIONAL
SPIRIT AND SCIENTIFIC
STRICTNESS IN TECHNOLOGICAL
RESEARCH ACTIVITIES AND
SERVICE RENDERING.”

7. EXPECTED CONDUCT IN TECHNOLOGICAL RESEARCH AND SERVICE PROVISION

IPT shares with researchers the responsibility for the preservation of the ethical integrity in technological research and in the rendering of services, undertaking the dissemination of a culture of good conduct in research among researchers and students associated to such activity and also for the prevention, investigation and punishment of misconduct in technological research and in the provision of services that occur within its scope.

In the design, proposal and execution of technological research and in the rendering of services, in the communication of results and in the relationships of cooperation and mentoring with other researchers, the professional must conduct himself with intellectual honesty, objectivity and impartiality, truthfulness, legality and responsibility.

Misconduct in research is understood as any conduct by a researcher that, based on intention, incompetence or negligence, hinders the values that establishes the ethical integrity of technological research or in the provision of technical services and relationships between researchers.

The severity of misconduct in technological research or in the provision of services is assessed by the intent to defraud or the severity of the incompetence, imprudence or negligence that was committed; by how much it deviates from practices consensually considered ethically acceptable by the scientific community; and by the level of the potential harm regarding the reliability of researchers and research in general.

Everyone must collaborate with the investigation of possible cases of misconduct in technological research or in the provision of services conducted by IPT.

The IPT follows the code of Good Scientific Practices of the São Paulo Research Foundation – FAPESP.

8. PRIVACY AND PROTECTION OF PERSONAL DATA

The IPT is supposed to ensure that all data subjects with data that are being processed will have the right to privacy and protection of personal data, enabling them to exercise their rights. Based on this, the duties of all employees are:

- 8.1. Process personal data only for specific, required, defined and legitimate purposes.
- 8.2. Observe and comply with privacy and personal data protection standards and guidelines.

- 8.3. Ensure that personal data is proportional, not excessive, limited to the minimum amount required for the development of its activity and compatible with the purposes, before collecting, accessing, using, storing, disclosing or carrying out any other type of processing.
- 8.4. Protect and ensure the quality of personal data during all stages of its processing, with prevention and security mechanisms to avoid or mitigate damage to data subjects and the Institute.
- 8.5. Acknowledge that there should be no expectation of privacy when using the Institute's equipment and resources and the Institute may have access to the content produced or transmitted therein.

9. FORBIDDEN CONDUCT

- 9.1. Enter IPT's premises without being duly authorized or taking strangers to the works that are being conducted or the company's premises that are reserved exclusively for the use of the IPT without the authorization of the person in charge.
- 9.2. Distribute or fixate any communication, pamphlet, notice, advertisement or publication of any nature on the IPT premises without express authorization from the competent areas.
- 9.3. Being deliberately complicit, supportive or negligent in an infraction related to this Code.
- 9.4. Indulge in actions of infraction established in current internal regulatory documents.
- 9.5. Using an aggressive tone, foul or immoral words, provoking or bring about situations that deliberately cause emotional imbalance, leading to disagreements.
- 9.6. Cooperating with or making oneself available to any institution that violates the morality, honesty or dignity of a person and also engaging in immoral or unethical activities or associating one's name to doubtful undertakings.
- 9.7. Collaborate or enable persecutions, be sympathetic, demonstrate antipathies, passions or personal interests to interfere in relationships with any person.
- 9.8. Accepting or offering alcoholic beverages and controlled legal substances without a prescription, as well as using such products, inside or outside the IPT premises, during the execution of their activities.

- 9.9. Using cigarettes or any smoking product, whether or not a by-product from tobacco, in the closed areas of the IPT.
- 9.10. Perform an act that constitutes just cause under labor legislation.
- 9.11. Threaten, intimidate, humiliate and embarrass people during the conduction of their work, acting on behalf of IPT, putting their physical and moral integrity at risk.
- 9.12. Carry out acts that are offensive to morals and good customs.
- 9.13. Committing an act that is considered as crime.
- 9.14. Carry out acts that can be deemed as moral harassment.
- 9.15. Committing an act that constitutes sexual harassment.
- 9.16. Provide discriminatory treatment based on sex, gender, sexual orientation, gender identity or expression, age, color, ethnicity, political or philosophical conviction, religious belief, physical or mental disability, origin, or any other personal characteristic.
- 9.17. Hire a spouse, partner or direct relative, anyone who is a collateral line relationship or by affinity, up to the third degree, inclusive, of the appointing authority or of an IPT employee invested in a management, leadership or advisory position, to exercise a commission or trust position or, even, a paid function in the Institute or, even, indicate a person who fits into one of these conditions to act in a service provision contract hired by the IPT, in accordance with the provisions of federal decree no. 7,203, of June 4, 2010 in the explanatory table presented in Annex A.
- 9.18. Carrying out contracts without observing the IPT Bidding and Contracts Regulations.
- 9.19. Carry out other professional activities during working hours, either of profitable nature or not, or, during or out of working hours, any activities that may interfere with or hinder the aspects of non-suspicion and impartiality that should be the baseline of the company's work or that represent direct or indirect unfair competition to IPT's business, except for exceptions provided for by law.
- 9.20. Committing acts of corruption, fraud, illegal acts and irregularities that harm the assets and the reputation of IPT.
- 9.21. Carrying out acts of administrative improbity that result in illicit enrichment, that cause damage to the public purse and that violate the principles of Public Administration, as provided for in Federal Law No. 8,249 of 2 June 1992, as amended by Federal Law No. 14,230 of 25 October 2021.

- 9.22. Violate company confidentiality.
- 9.23. Disclose any confidential or sensitive information or strategy to IPT, unless previously authorized by the Board of Directors.
- 9.24. Use one's position or privileged information for personal benefit or that of third parties, or to the detriment of the Institute or third parties.
- 9.25. Disclose or disseminate, internally or externally, news that is knowingly false, slanderous or defamatory in relation to IPT, or also, insulting, in relation to its employees, clients, users and third parties in general.
- 9.26. Carry out political-partisan actions, as well as promote recruitment for this purpose, in the facility of the company.
- 9.27. Distribute or display symbols, emblems, ornaments, badges or advertisements to disseminate political and religious doctrines and/or promote meetings for this purpose in the company's grounds.
- 9.28. Use available communication systems to disseminate pranks, rumors, pornography, criminal content or content that incites crime, commercial propaganda, religious or political-partisan propaganda.
- 9.29. Submit a complaint to the Reporting Channel that is known to have a false nature.
- 9.30. Breach the confidentiality of the investigation process of complaints received through the Reporting Channel.
- 9.31. Any person who exercises, even temporarily or without payment, by election, appointment, designation, hiring or any other form of investiture or association, mandate, position, employment or function, at the IPT, who fails to provide, even after notification from the Human Resources Management Coordination Office – CGPe to do so, an updated declaration of assets, annually, as well as on the date on which he/she ceases to exercise the mandate, position, employment or position.
- 9.32. Reveal, by any means, the identity of the whistleblower who uses the Whistleblower Channel.

- 9.33. Failure to report to the competent bodies when required to do so.
- 9.34. Failure to comply with the policy inherent to gifts.
- 9.35. Hold paid public positions, except when there is compatibility of schedules, observing in any case the provisions of item XI of article 37 of the Federal Constitution.

10. FORBIDDEN CONDUCT IN TECHNOLOGICAL RESEARCH AND IN THE PROVISION OF SERVICES

- 10.1. Construing or claiming that data, procedures or results were obtained or conducted that were not.
- 10.2. Falsifying, or presenting data, procedures or research results in a significantly modified, inaccurate or incomplete manner, which may result in interference with the assessment of the scientific weight that they actually give to the conclusions drawn from them.
- 10.3. Plagiarizing or using verbal, oral or written ideas or formulations from third-parties without giving them, expressly and clearly, due credit, consequently generating the perception that they are ideas or formulations of one's own authorship.
- 10.4. Attribute participation in projects, patents, authorship of articles, works and technical documents to professionals, regardless of the hierarchical relationship, who have not in fact contributed to the development of such activities.
- 10.5. Failure to observing the secrecy of information as explained in IPT's regulatory documents.
- 10.6. Providing, in bad faith or by means of negligence, false information about the occurrence of possible misconduct in technological research or in the provision of technical services.
- 10.7. Facilitate, by action or omission, the occurrence of misconduct in technological research or in the provision of services and in some cases, with the concealment of the same.
- 10.8. Carry out or facilitate, by action or omission, any act that may reasonably be perceived as retaliatory towards anyone who reports, in good faith, the occurrence of possible misconduct in technological research or in the provision of technical services or collaborates with its investigation.

VALUES

“ETHICAL INTEGRITY,
PROBITY, IMPARTIALITY,
TECHNICAL COMPETENCE
AND QUALITY IN
PROCEDURES FOR
CONTINUOUS SEARCH FOR
IMPROVEMENTS.”



11. CONFLICT OF INTEREST

The recipients of this Code must maintain autonomy regarding matters whose decision involves some type of private interest and, in the event of a conflict of interest, must request their own exclusion from discussions and deliberations involving the matter.

It also constitutes a conflict of interest, at any time, to disclose or make use of privileged information, for one's own benefit or that of third parties, obtained as a result of the activities carried out.

12. GIFTS POLICY

Offering or accepting gifts, presents, invitations, favors, gratuities, are prohibited conduct. transportation, lodging or other types of courtesy as a form of privileged treatment that may result in obtaining undue advantages, or in failure to comply with functional duties. The following are considered as exceptions:

- Code of Conduct gifts.
- Institutional and promotional gifts that have no commercial value, distributed as a courtesy, advertising, regular publicity or on the occasion of events or commemorative dates, and that have a value of less than 5 (five) UFESPs.
- Sponsorships and donations, as long as they are related to institutional objectives and do not represent political or personal favoritism of any professional linked to IPT.
- The employee may take part in seminars, conferences and events, provided that travel expenses are not paid by a person who, directly or indirectly, may benefit from an act or decision within his/her functional position.

13. DUTIES TOWARDS CIVIL SOCIETY

As an executor of public policies on science, technology and innovation, the IPT will report on its activities to civil society by means of the internal and external controls to which it is subject, as well as through the dissemination of information and reports on its website, with the exception of information protected by secrecy and confidentiality. In their relationship with society, the recipients of this Code must:

12.1. Respect human rights and combat all forms of prejudice and discrimination based on sex, gender, sexual orientation, gender identity or expression, age, color, ethnicity, political or philosophical conviction, religious belief, physical or mental disability, origin, any other personal characteristic or any other forms of discrimination.

12.2. Respect the rule of law, culture and customs.

14. WHISTLEBLOWER CHANNEL

- 14.1. The IPT will maintain a Whistleblower Channel, through which it will receive reports of corruption, fraud, acts that cause or may cause harm to the IPT, crimes, unlawful acts or acts that are not compliant with this Code.
- 14.2. The complaint may or may not be identified, with assured secrecy.
- 14.3. Anonymous reports will be investigated, provided they contain sufficient data and information to allow for proper investigation.
- 14.4. The Whistleblower Channel will be operated by a third-party company, with the IPT Ombudsman's Office being responsible for receiving, analyzing, responding to and inserting the complaints received, through this channel, into the Integrated Ombudsman and Access to Information Platform of the State of São Paulo.
- 14.5. Complaints received through the Whistleblower Channel will be evaluated by the Ombudsman and immediately forwarded: to the Statutory Audit Committee in cases of complaints against Senior Management, or in other cases to the CEO, for investigation in accordance with the Internal Regulations for the Complaint Handling Process.
- 14.6. The Reporting Channel must enable the registration, monitoring and dissemination of the final result of the report.
- 14.7. The monitoring of the registered complaint must be made available to the complainant and also to the Conduct and Integrity Committee, the Board of Directors and the General Inspectorate of the Administration.
- 14.8. Every IPT employee has an ethical duty to report any acts of violation of this code and corruption of which are of their knowledge due to the performance of their duties through the Whistleblower Channel.
- 14.9. The process of receiving and handling complaints, in addition to the preliminary investigation and the disciplinary administrative process, must be approved by the Board of Directors.

15. WHISTLER PROTECTION

- 15.1. The anonymity of the whistleblower is guaranteed for an indefinite period and any retaliation against those who use the Whistleblower Channel and the Ombudsman's Office is forbidden.
- 15.2. The confidentiality of the process of establishing responsibilities must be maintained until the publication of the final administrative decision, that is, the decision of the Board of Directors.
- 15.3. The employee who uses the Whistleblower Channel and/or the Ombudsman is guaranteed job stability during the investigation process and up to 12 (twelve) months after the publication of the final administrative decision on the attribution of responsibilities, if the identity of the whistleblower is disclosed in advance to the person reported who is, directly or indirectly, his/her immediate superior.

16. CONDUCT AND INTEGRITY COMMITTEE

The Conduct and Integrity Committee reports to the CEO and is the body responsible for receiving complaints from the Whistleblower Channel, investigating, evaluating and assessing violations of this Code. The Committee's responsibilities are:

- 16.1. Abide with regulations that govern their duties and responsibilities.
- 16.2. Provide support to the Compliance, Risk Management and Internal Control Department - GECON in the encompassing dissemination of this Code.
- 16.3. Guide and advise professionals and those who maintain professional relationships with the Institute on professional ethics in dealing with people and public assets.
- 16.4. Act impartially and transparently when substantiating and judging ethical-professional misconduct, always observing the greater interests of IPT and society.
- 16.5. Evaluate the Preliminary Investigation report prepared by the Preliminary Investigation Committee to investigate allegations of violations of this Code.
- 16.6. Coordinate the Preliminary Investigation process to investigate allegations of violations of the Code of Conduct and Integrity and conduct the Administrative Disciplinary Process, forwarding the conclusive report to the competent decision-making entity.
- 16.7. Ensure the anonymity of the whistleblower for an indefinite period and confidentiality in the investigation of violations until the publication of the final administrative decision by the IPT Board of Directors.

16.8. Request, from the Board of Directors, personnel from different areas of the company to form a team to investigate complaints, when necessary.

16.9. Submit a half-yearly report on its activities to the CEO of IPT and/or whenever requested.

17. SANCTIONS

Violations to this Code will be classified as mild, medium and very serious, taking into account the offensive potential of the prohibited conduct, the economic and image impact on the IPT, the degree of participation and guilt, the offender's background and the notoriety and/or degree of proof of the event. The following sanctions apply for violations of this Code:

17.1. Warning: in the event of prohibited conduct being carried out which is classified as being of a less sensitive (minor) nature, consisting of a written notification being made to the offender based on the circumstances of the specific case.

17.2. Suspension: in the event of prohibited conduct being carried out which is classified as being of a sensitive (medium) nature, consisting of unpaid leave for a period of 1 to 15 (one to fifteen) consecutive days based on the circumstances of the specific case.

17.3. Dismissal for just cause: in the event of prohibited conduct being carried out which is classified as being of a very sensitive (serious) nature based on the circumstances of the specific case.

The dosimetry of sanctions will take into account the actuality of the punishment, the uniqueness and proportionality of the penalty to the conduct in breach of this Code.

Repeated violations of a less sensitive (mild) and sensitive (medium) nature may be considered a violation of a very sensitive (serious) nature.



WE WANT

“SPREAD AND ENCOURAGE THE FIGHT AGAINST ALL FORMS OF PREJUDICE AND DISCRIMINATION BASED ON SEX, GENDER, SEXUAL ORIENTATION, GENDER IDENTITY OR EXPRESSION, AGE, COLOR, ETHNICITY, POLITICAL OR PHILOSOPHICAL CONVICTION, RELIGIOUS BELIEF, PHYSICAL OR MENTAL DISABILITY, ORIGIN, ANY OTHER PERSONAL CHARACTERISTIC OR ANY OTHER FORMS OF DISCRIMINATION.”

18. ADMINISTRATIVE DISCIPLINARY PROCESS (PAD)

- 18.1. The application of sanctions for violations of this Code will depend on prior Administrative Disciplinary Proceedings, in which functional responsibility of any nature is determined and the constitutional rights of due process, adversarial proceedings and full defense of the accused are guaranteed.
- 18.2. In the event of non-existence or insufficient evidence of authorship and materiality of the infraction, a Preliminary Investigation must be instituted.
- 18.3. The Preliminary Investigation will be conducted by a Preliminary Investigation Committee with the participation of members of the Conduct and Integrity Committee. In the final report of the Preliminary Investigation, the Committee will decide whether to file the case, when it is found that the facts described in the complaint did not occur, or whether to initiate an Administrative Disciplinary Proceeding, when it is found that a violation of this Code has occurred.
- 18.4. The opinion report for the opening of Administrative Disciplinary Proceedings must indicate the facts on which it is based and the conduct of this code that was violated.
- 18.5. The conclusive report, whether it indicates archiving or initiation of a PAD, must be forwarded to the Conduct and Integrity Committee, which will send it to the Board of Directors, who may consult the Legal Advisory for examination and opinion.
- 18.6. The Administrative Disciplinary Process will be instituted when it is possible to identify the offender, individualize the infraction and classify it in this Code.
- 18.7. The Administrative Disciplinary Process will be conducted by a committee specially appointed by the Board of Directors. In the Administrative Disciplinary Process, the principles of due process, adversarial proceedings and full defense will be ensured.
- 18.8. The preliminary investigation and the disciplinary administrative process will be regulated by internal regulations approved by the Board of Directors and, in the absence of these, will observe the provisions of State Law 10,177/1998, where applicable.
- 18.9. The proposal for application of the penalty may be forwarded by the Board to the Legal Department for prior examination and opinion.
- 18.10. The application of any penalty will be the responsibility of the IPT Board of Directors;
- 18.11. The decision for the application of the penalty may be subject to a request for reconsideration by the Board of Directors itself, except in cases involving the Institute's administrators, when it will be addressed to the Board of Directors, through the Statutory Audit Committee.

18.12. The provisions set forth in this Code do not ensure to IPT employees any form of stability or job security, and do not prevent the Institute from exercising its right to dismiss them without just cause, at any time, in cases not related to a violation of this rule, without administrative proceedings, as long as they are motivated, with the exception of the provisions established in item 15.3 or expressly established by law.

18.13. Upon recommendation of the specially appointed Commission, the Board may, as a preventive measure, determine the precautionary removal of the accused, for the time necessary for the investigations.

19. DISCLOSURE AND TRAINING OF THE PROVISIONS OF THE CODE OF CONDUCT AND INTEGRITY

19.1. Each administrator, member of the Board or Committees, employee, intern, apprentice, scholarship holder, partner and agent will have access to this Code; and must also receive a copy of this Code of Conduct and Integrity and sign the Receipt Instrument, which must be forwarded to the Human Resources Management Coordination – CGPe.

19.2. Suppliers, service providers and their representatives and those who enter into any type of agreement with IPT will receive a copy of this Code at the time of signing the contract and are responsible for disseminating it to their employees.

19.3. The IPT will disseminate in all forms and fashion the Code of Conduct and Integrity and its subsequent amendments, via the internet, intranet and internal campaigns.

19.4. All administrators, members of statutory Boards and Committees, employees, interns, apprentices, scholarship holders and representatives will receive periodic training, at least annually, which will be carried out by the Compliance and Risk Management Management – GECON with the support of the Human Resources Management Coordination – CGPe, It is understood that third parties working for the company and suppliers must also receive training and/or dissemination materials on the Code.

19.5. Clarification of doubts and disagreements regarding the applicability of this Code will be done through prior consultation with the Compliance and Risk Management Department – GECON, and the Conduct and Integrity Committee may also be consulted. Responses to queries will always be formalized and prepared jointly by the Compliance, Risk Management and Internal Control Department and the Conduct and Integrity Committee, with supervision by the Board of Directors, whenever necessary.

20. VALIDITY

This IPT Code of Conduct and Integrity (revision 04) will be implemented on the date of its approval by the Board of Directors.

This Code may be amended at any time, based on the approval of the Board of Directors.

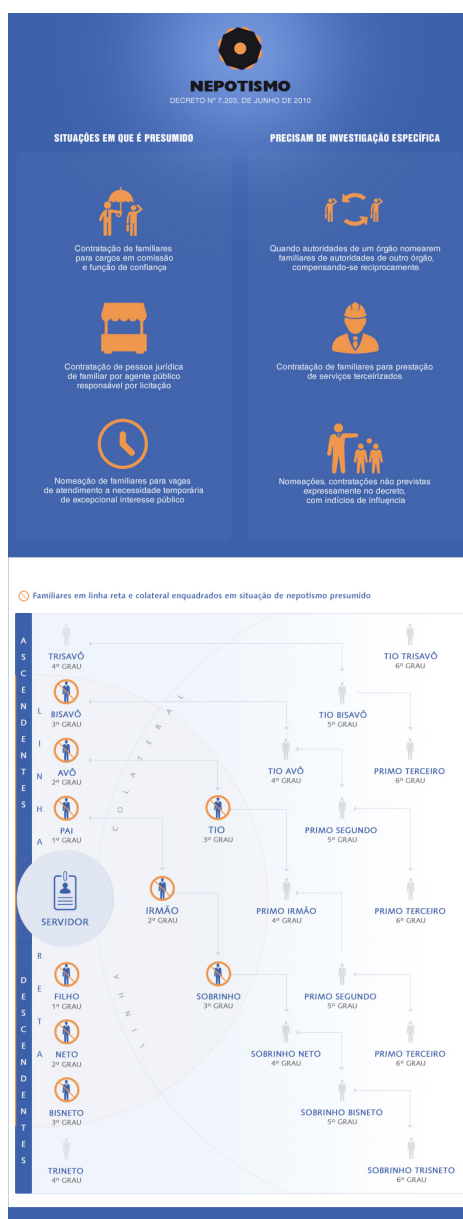
CODE OF CONDUCT AND INTEGRITY 2024

São Paulo, March 7, 2024.

ANNEX A – DEGREES OF KINSHIP CONSIDERED AS PRESUMED NEPOTISM

As provided for in federal decree no. 7.203, of June 4, 2010, a family member is understood to be a spouse, partner or relative in a direct or collateral line, by consanguinity or affinity, up to the third degree.

Regarding the degree of kinship, the following are considered:



Source: <https://www.gov.br/cgu/pt-br/assuntos/prevencao-da-corrupcao/nepotismo/perguntas-e-respostas#nepo3>, accessed on February 6, 2024.

“CODE OF CONDUCT AND INTEGRITY 2024” APPROVED BY THE IPT BOARD OF DIRECTORS ON ITS 251th MEETING, ON MARCH 7, 2024”.

São Paulo, March 7, 2024

Thiago Rodrigues Liporaci

Chairman of the Board

Liedi Légi Bariani Bernucci

Counselor

Fernando Andrade Starling

Counselor

Jorge Tatino Junior

Counselor

Sérgio Roberto Nobre

Counselor

Valmir Gomes Dias

Counselor

Levi Pompermayer Machado

Counselor

Ros Mari Zenha

Employee Representative

Jairo Klepacz

Independent Advisor

Antonio Edson Maciel dos Santos

Independent Advisor

Lea de Jesus Silva and Silva de Moraes Rego

Independent Advisor

Marcos Alberto Castelhana Bruno

Independent Advisor

INSTITUTIONAL MANAGEMENT DOCUMENT 18085

Approved by the Board of Directors

March 7, 2024

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