

Integrity Program



Photo with blue background of the hand of a white man wearing a red plaid blouse. He holds a booklet with a beige cover and orange spine. On the cover, we see the Atlântico brand symbol in blue and orange.

Summary

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- 2.** Objectives and Scope of our Code of Conduct
- 3.** Code of conduct
- 4.** Detection and Communication
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Introduction

Integrity Program



Atlântico

Atlântico is a non-profit, private civil association, dedicated to research and development in the area of information and communication technology, and we are proud to be considered a reference among the science and technology institutes in Brazil for our quality and efficiency in supporting the innovation of our customers and society in general.

Atlântico has always guided its conduct in an ethical and responsible way, with a strong focus on compliance with law. In order for employees, suppliers and partners to be well aligned, Atlântico implemented its integrity program, based on the anti-corruption law (No. 12,846 / 13), which was regulated in 2015. The practices shown here are mandatory knowledge for, and must be followed by, all employees of Atlântico and by all those related to Atlântico, including suppliers, partners, commercial representatives, companies in which Atlântico has some participation, among others, and observed especially in the relationship with the public administration and its agents. This booklet presents our code of conduct, a tool that aims to orchestrate the different instruments and practices that exist within Atlântico, aligning them with the requirements and regulations set in law.

*Photo of the facade of the
Instituto Atlântico headquarters,
in Fortaleza - CE.*



Objectives and Scope of our Code of Conduct



Employees must be made aware of the code of conduct as soon as they enter Atlântico, and this is done through our welcome kit. For those already working at Atlântico, an annual training is given to assure that everyone is kept up to date. The code of conduct is communicated to suppliers and partners when formalizing the relationship. Atlântico does not encourage nor tolerate any of its employees, suppliers and/or partners the offering of an advantage of any nature to the public administration or its agents, as well as to the representatives of private institutions, with the purpose of creating any benefit for Atlântico.

Code of Conduct

Code of Conduct

Atlântico's code of conduct is based on ethical principles and has the role of guiding employees, suppliers and partners, in their relationships with clients and society in general.

To build longevity for Atlântico, based on productivity and quality, in accordance with the law and creating value for society, we believe in: the adoption of principles that are non-discriminatory in any nature, respect for human dignity and rights, sensitivity to customer needs, preservation of the environment and ethical commitment.



Ethics



Excellence



Innovation



Collaboration



Valuing people



Professional and Personal Integrity

Whilst exercising their functions, Atlântico employees are expected to employ the same attitude and honesty that any upright person would apply when dealing with another person, also while managing their own, personal business. Everyone should remember how they would like to be treated, and therefore treat their co-workers and clients in the same way. We understand that employees represent our institution through their attitudes.

Employees must be careful not to enter into situations that characterize conflict between their interests and those of Atlântico, or to conduct themselves in ways that are not ethically acceptable.



Photo of a white person's hand making a "thumbs up" sign with the thumb. The image has a light background.



Relationships in Atlântico

Our relationships are based on respect and credibility, with no preference, prejudice, or discrimination based on race, color, nationality, religion, sex, age, marital status, sexual orientation, physical disability or social position. We require interns to respect their level of experience and stage of development.

Moral harassment, intimidation, or threats are examples of abusive or offensive behavior that must not be practiced, whether through gestures, words, or behavior.



Photo of a group of diverse people spreading their hands together in a gesture that refers to unity and respect.



Atlântico should

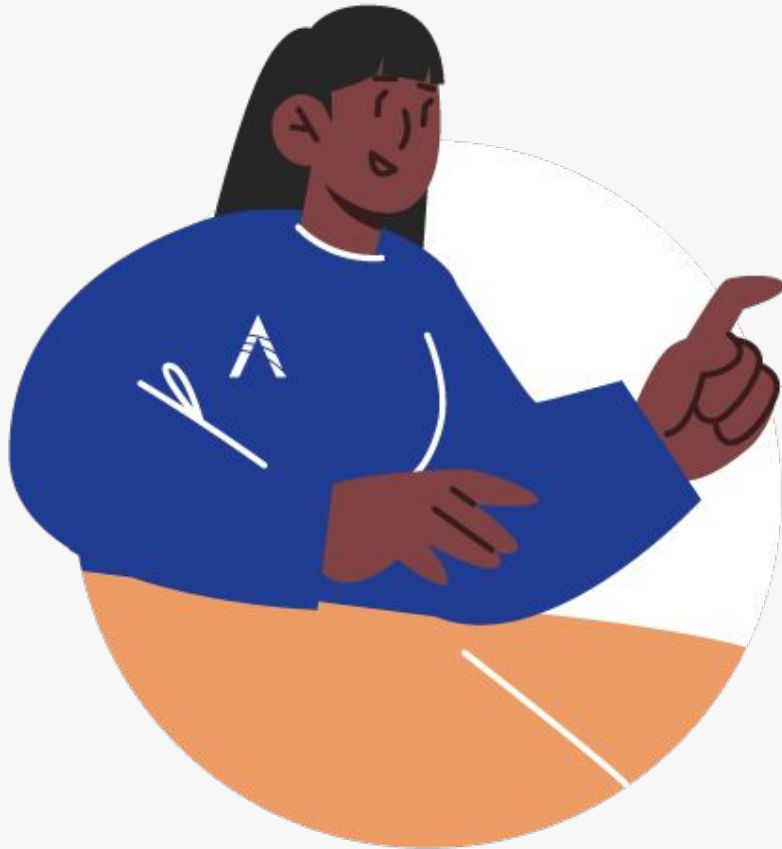


Illustration of a white circle with the Atlântico brand symbol in blue and orange in the center.

- Treat everyone fairly and maintain work practices based on equal opportunities, respecting the diversity and privacy of each one;
- Provide safe and healthy working conditions, with quality of life, supporting the professional and personal development of its employees, promoting teamwork as a determining factor for success.
- Guide its leaders to recognize the merit of each employee and provide equal access to the opportunities available for professional development, according to the characteristics, skills, and contributions of each employee.



The employee should



- Be courteous. Collaborate so that team spirit is always present, so that loyalty, trust, and their conduct are always aligned with the values of the Institution.
- If one is a manager or leader, be aware that those whom you lead will take you as an example. One's actions, therefore, must become a model of conduct for one's team.

White circle as background for illustration with a black woman, pointing towards the text, on the right. She wears a blue shirt with the Atlântico white brand symbol.



Relationship with clients

The relationship with the client is based on professionalism, transparency, quality, and cordiality. Atlântico is committed to:

- Complying with legal requirements.
- Guiding clients on the characteristics of their products and services.
- Demanding from its employees respect no matter the: race, color, nationality, religion, sex, age, marital status, sexual orientation, physical disability or social position of their clients, not accepting any type of discrimination or prejudice.



Cutout of a photo of a white person holding hands with a black person, referring to the idea of union.





Cutout of a photo of a white person holding hands with a black person, referring to the idea of union.

- Be diligent in customer service, passing confidence to the client with an attentive, helpful and cordial attitude with a sense of urgency.
- Not offering advantages in business relations under any circumstances.



Relationship with suppliers

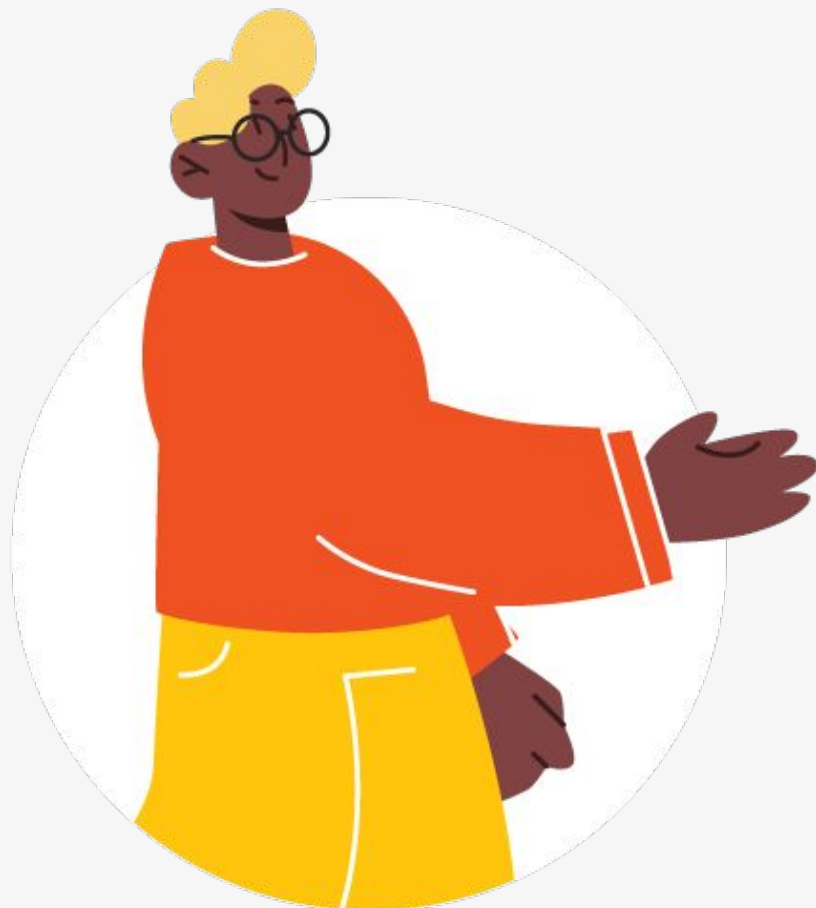
The choice and contracting of suppliers must always be based on technical, professional, ethical and economical criteria that fit the needs of the Institution. Business with suppliers of dubious reputation will not be accepted in the organization.



Photo of two hands, of different white people, completing a puzzle together, referring to the idea of construction and partnership.



Contracting mandatory criteria



White circle as background for illustration with a black man, with his hand extended towards the text, on the right.

Price

Term

Compliance with technical specifications

In relation to suppliers, all employees are prohibited from:

- Using their position to access privileged information or using the Atlântico name inside or outside the work environment to obtain personal benefits or advantages of any kind for themselves or any third party.
- Receiving or paying commissions to customers or suppliers.



Relationship with competitors

The relationship with competition must always be based on loyalty, honesty, and respect. Competitors must be treated with the same respect that we expect from them.

Employees must not release any unauthorized comments or publications of any kind, including but not limited to social networking apps, that may affect their image or contribute to the proliferation of rumors or misinformation.



Photo of a black person's hand, with the palm facing down, above the hand of a white person, with the palm facing up, referring to the idea of respect and mutuality.



Relationship with partners

The relationship with our partners is fundamental to the conduct of our business. We seek to establish relationships exempt from unlawful favoring, and we demand reciprocity from our partners in the following situations:

- Relationships will always be formalized in contracts.
- Legal requirements must be met.
- Confidentiality of data and information must be respected, especially those established in contracts.



Cut out of a photo of a group of diverse people forming a link with their arms while holding each other's wrists, referring to the idea of support and partnership.





Cut out of a photo of a group of diverse people forming a link with their arms while holding each other's wrists, referring to the idea of support and partnership.

- Compliance with the obligation of confidentiality, secrecy and total discretion regarding the data and information that you may have access to by any means, as provided in the contract.
- Relationships will be based on people, and intolerances, discrimination or prejudices based on race, color, nationality, religion, sex, age, marital status, sexual orientation, physical disability or social position, will not be accepted.



Relationship with Government

Agencies and Federal Institutions

Atlântico does not adopt, encourage or condone any conduct that constitutes or results in an act harmful to the public administration, namely:

- Promising, offering or giving, directly or indirectly, undue advantage to a public agent or to third parties related to them.
- Financing, funding, sponsoring or subsidizing the practice of illegal acts shown within the anti-corruption law.
- Using third parties to hide or conceal the identity of Atlântico or the beneficiaries of any acts performed.



Photo of a black person's hand, shaking a white person's hand, referring to the idea of respect.



- Obstructing, preventing or defrauding, through manipulation, agreements or any other means, the competitive nature of the public bidding procedure or the contract resulting from it.
- Removing or seeking to remove a bidder, by means of fraud or offering an advantage of any kind.
- Creating, in a fraudulent or irregular manner, a legal entity to participate in public bidding or to enter into an administrative contract.
- Obtaining an improper advantage or benefit, in a fraudulent manner, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the call for tenders or in the respective contractual instruments.
- Manipulating or defrauding the economic-financial balance of contracts entered into with the public administration.
- Hindering of investigations or inspection activities by public bodies, entities or agents, or intervening in their performance, including regulatory agencies.
- Offering payments for routine acts, understood here as those type of acts that can accelerate, facilitate or bring some advantage in the clearance of bureaucratic tasks typical of the public administration.



Important!

Atlântico does not authorize a person or company to intermediate business or offer advantages to the public administration or its agents on their behalf under any circumstance.

In addition to the above, this set of guidelines and procedures complements the provisions of the procurement management process.



Relationship with media

Contacts with the press will be made exclusively by a spokesperson appointed by the presidency, director, superintendent, or manager of Atlântico's public relations and communications department.

If any professional is approached directly by the press on any matter pertaining to Atlântico, including but not limited to customers, partners, suppliers and employees, and does not have the proper authorization to talk to said press, they will not be able to discuss any matter and must immediately report the fact to the manager of the public relations and communications department. That way, the manager will be allowed to properly and institutionally analyze the possibility of authorizing said communication.



Photo of a block of blue and white cubes, with corporate symbols, floating between the hands of a white man wearing a blue suit.



Social Media

Participation in social media and other forms of social interaction have been increasingly present in the lives of both professionals and companies. The dissemination of photos and videos related to Atlântico, their customers, suppliers, and social media partners (Facebook, Twitter, LinkedIn, YouTube, among others) must be aligned with the following premises:

- The dissemination of information on official social media platforms in Atlântico should be performed by the communications department, upper management of the commercial area or persons formally appointed by them only.



Cropped photo of a person in a yellow coat, holding a cell phone in both hands. Above, there are social media symbols coming out of the device on a blue background.





Cropped photo of a person in a yellow coat, holding a cell phone in both hands. Above, there are social media symbols coming out of the device on a blue background.

- Under no circumstances may internal and confidential information be exposed on any of these media platforms.
- One must express oneself in an ethical and respectful way, being sure to be free from prejudice and discrimination when involving colleagues, employees, and employees of customers, suppliers and partners, even if said people are from your close circle of friends.
- All Atlântico employees authorize the display of their image in any publication involving the Institute, customers or partners, without such placement giving rise to the pursuit of image-related rights. Such authorization takes effect at the exact moment in which the employee accepts the charge of working for Atlântico, having previously been informed of the possibility.



Allowed

Collaborators are allowed to publish content on their social media containing citations of the names of internal projects, development projects, the Atlântico name or names of internal areas or groups in the following situations:

- Moments of work, coffee breaks and integration, recreation or events of celebration on the premises of Atlântico.
- External events of celebration or integration.

Quoting the names of clients is only allowed if one is expressly authorized to do so.



Illustration of a black person's hand, holding a white sign containing a green "on" symbol, indicating the idea of "allowed".



Not allowed

It is not permitted to publish content on social media involving:

- Specific names of customer projects.
- Specific and confidential information about projects (citation of algorithms, architectures, etc.).
- Inappropriate gestures or situations that compromise the image of Atlântico.

Atlântico demands from its partners and suppliers reciprocity of the above conduct.



Illustration of a white person's hand, holding a white sign containing a red "off" symbol, indicating the idea of "not allowed".



Parallel Activities

Atlântico employees are prohibited from carrying out any parallel activity during their work hours. Outside of work hours, employees are responsible for avoiding conflicts of interest with the organization.



Photo of a white man's arm, wearing a colorful plaid shirt, emerging from the bottom and holding a red alarm clock with white hands.



Conflicts of interest

All employees must be sure to avoid or carefully deal with situations that have a potential for conflict of interest. They must analyze the situation ethically and impartially, and voluntarily forward their questions and doubts to the ethics committee through our transparency channel.

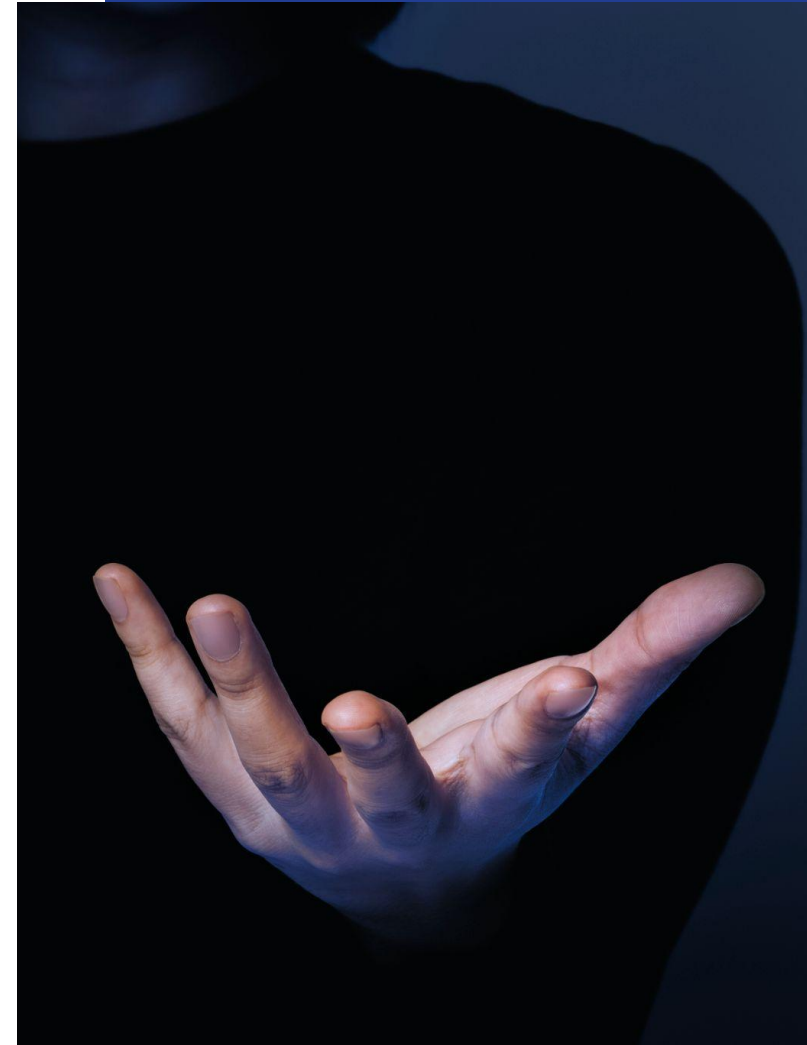


Photo of an outstretched hand in front view. The person wears dark clothes and the image brings an idea of mystery due to the lighting focused on the hand.



Offering and receiving of gifts and hospitality

Atlântico does not offer gifts or hospitality (meals, travel, accommodation, or entertainment) to influence public or private administration. The offer of gifts and hospitality, as a courtesy, should not exceed the limit of the equivalent of \$100.00 (one hundred dollars) per person, as long as authorized by the immediate manager and registered with Atlântico's corporate tool. To make sure the provision of amenities and hospitality is reasonable, the frequency of handouts must be observed.



Photo of an outstretched hand of a white person spread upwards, in side view. The image has a light background.



Activities of Political Parties

Atlântico does not make contributions, of any nature, to political parties, elected politicians or candidates for elective positions, at any time, or in any instance: local, regional or national. Atlântico also does not promote nor publicize any bias towards political parties, elected politicians or candidates for elected office. Also, although Atlântico respects the political position and partisanship of its employees, suppliers and partners, it does not allow its infrastructure or name to be used for promotion for or retaliation to political parties, elected politicians or candidates for elected office.



Photo of a female hand holding a paper flag and wooden stick, which has a pattern with blue and white diamonds, which is repeated in the background of the image.



Not allowed

Members of Atlântico are not allowed to:

- Exercise political activities on any of Atlântico's properties.
- Use Atlântico's assets or resources for political causes or campaigns.



Illustration of a white person's hand, holding a white sign containing a red "off" symbol, indicating the idea of "not allowed".



Protection of the Physical Environment

The physical environment includes facilities, goods, equipment and any other form of asset made available to employees with the sole purpose of meeting the physical needs and comfort of all employees.

It is everyone's responsibility to protect and preserve Atlântico's heritage and physical environment as well as to perform any necessary care, maintenance or conservation, in accordance with information technology procedures.



Photo of two hands spread out, one above the other, with the Atlântico brand symbol in blue and orange in the middle. The image has a clear background and refers to the idea of care and protection for the Institute.



Environmental Protection

All employees must maintain their vigilance and respect for the environment, contributing to internal campaigns in favor of helping the environment and encouraging ideas.



Photo of three hands protecting a blue and green paper ball, which represents the Earth. The image has a light background and refers to the idea of care and protection for the environment.



Confidentiality and Secrecy of Information and Intellectual Property

In order to safeguard the privacy of customer and client information, the confidentiality of data, information, communications, positions and any other types of information relating to clients that are not known to the public, will prevail.

Authorized employees or partners of Atlântico must preserve the confidentiality of any information related to clients, obtained in the development of activities related to Atlântico, during and after the finalizing of the connection with Atlântico. Failure to observe confidentiality will be subject to the determination of responsibilities in the civil and criminal spheres.



Image with a blue background containing the hand of a white person touching an open illustrative padlock, in white, with closed illustrative padlocks, in blue, next to it.



Not allowed

Unauthorized disclosure of information regarding management, customer portfolios or strategies for any and all products analyzed, administered and / or managed by Atlantico to anyone who is not an Atlantico employee is entirely prohibited.

- The appropriate authorizations will be given by the respective managers.
- Again, failure to comply with this item will be subject to verification of responsibilities in the civil and criminal spheres.

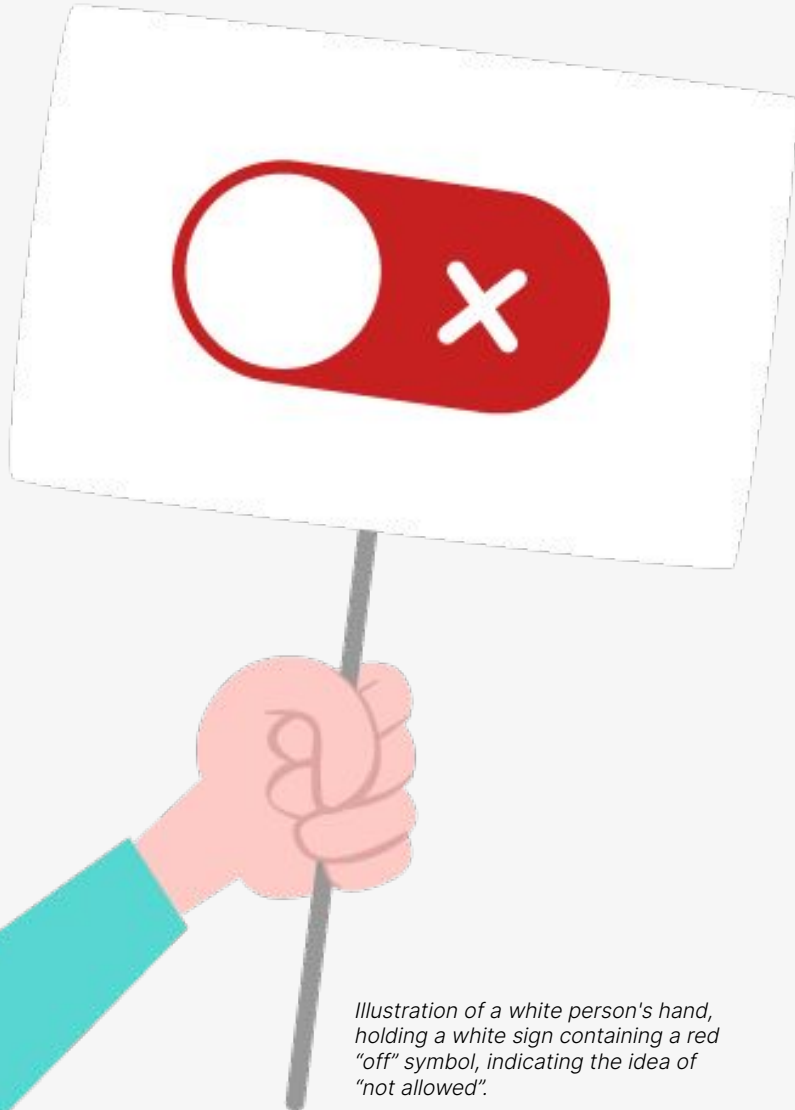


Illustration of a white person's hand, holding a white sign containing a red "off" symbol, indicating the idea of "not allowed".



Not allowed

Authorized employees and suppliers are strictly prohibited from using any confidential information from Atlântico, its customers and partners, such as: intellectual property, copyrights, etc., for the benefit of others. The offenders will be subject to the expertise and determination of liability in the civil and criminal spheres.



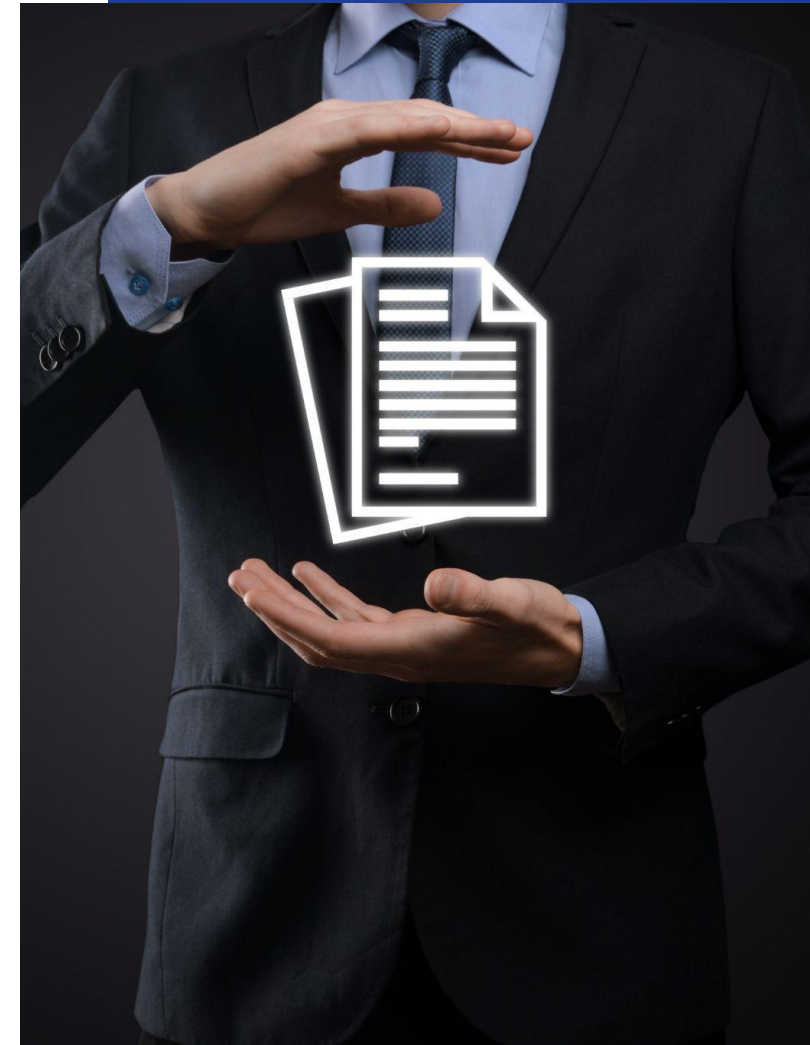
Illustration of a white person's hand, holding a white sign containing a red "off" symbol, indicating the idea of "not allowed".



Intellectual property

All documents developed whilst carrying out the activities of Atlântico or directly related to them are the intellectual property of the organization. These include but are not limited to: files, models, methodologies, formulas, projections, analysis, and reports. The use and disclosure of any item subject to being Atlântico intellectual property, can only be carried out with the express written authorization of the immediate manager or superintendent of Atlântico.

Once the employment relationship is broken, the former member of Atlântico remains obliged to observe the restrictions mentioned here. Failure to comply with this item will be subject to verification of responsibilities in the civil and criminal spheres.



Cropped photo of the outstretched hands of a white man, wearing a black jacket, with the documents icon in white between his hands.



Ethical Culture

Employees are expected to behave ethically and appropriately, so as not to compromise the image of the organization.

Improper attitudes will not be tolerated, such as: gambling or consumption of alcohol or drugs on the organization's premises.

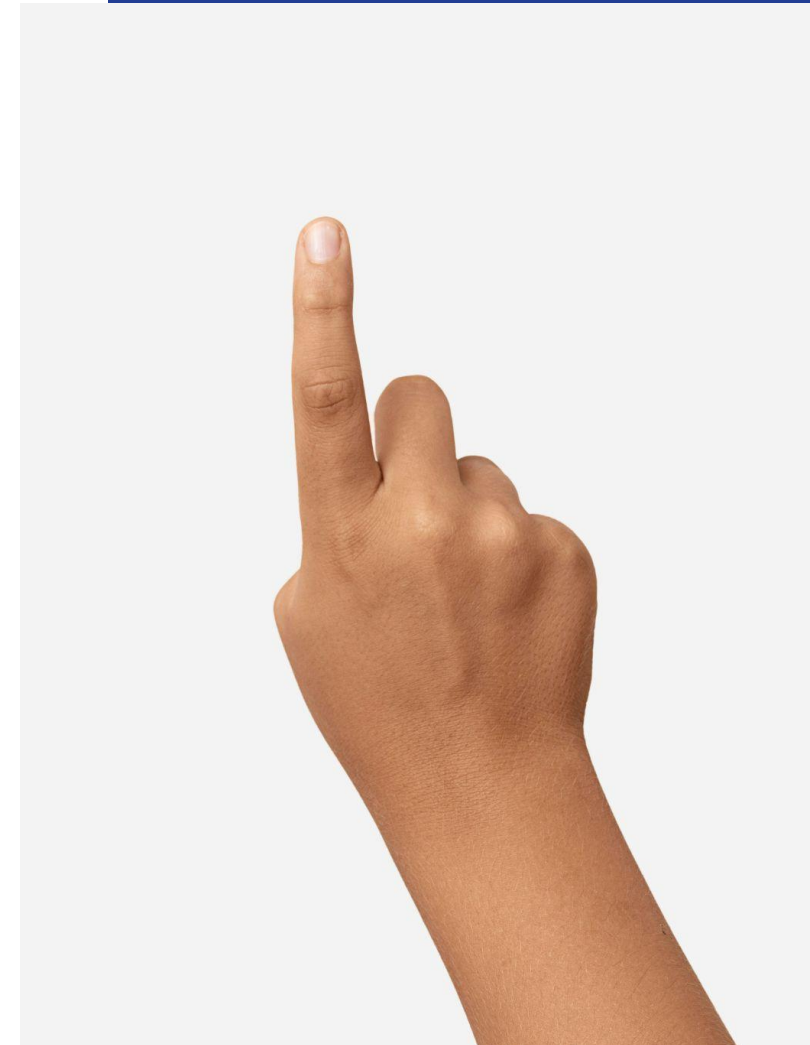


Photo with a light background of a hand emerging from the bottom of the image and pointing with the index finger upwards.



Software License

All employees are expected to follow the terms of use of any and all software licenses, the usage of non-authorized licenses will not be tolerated.

When appropriate, Atlântico or the client should acquire the software licenses needed for the development of activities and the employees are required to observe the type of license contracted in order to avoid misuse or sharing of access data.

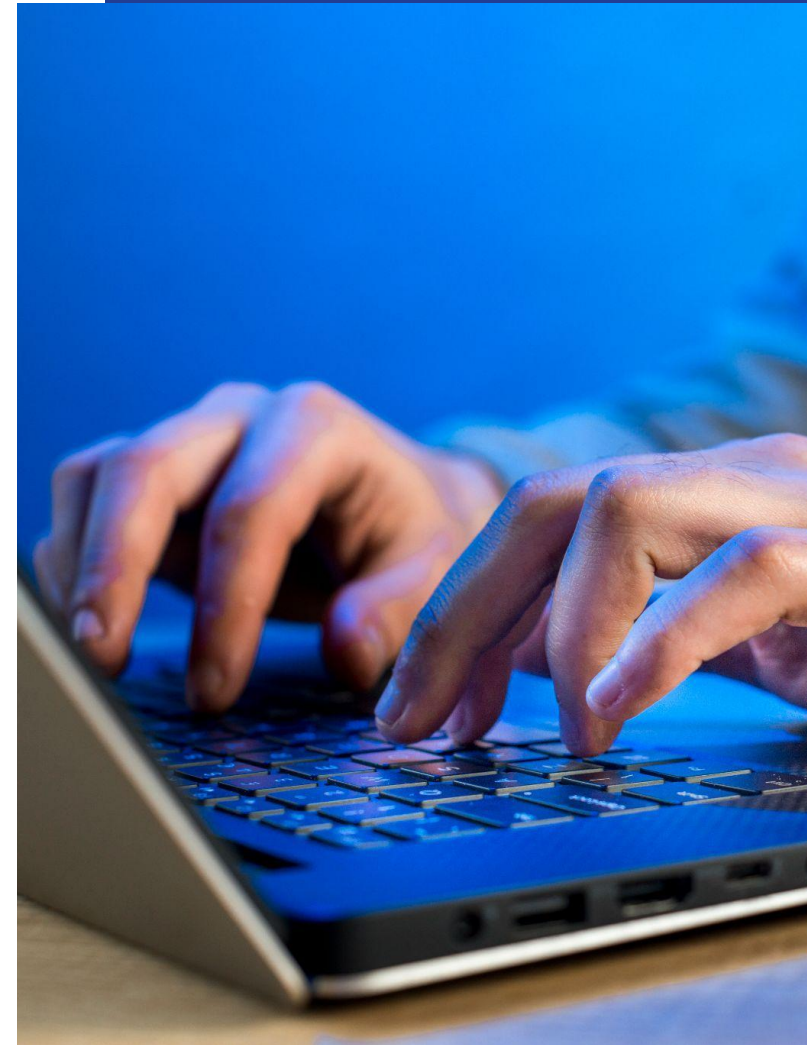


Photo with blue lighting, in detail, of the hands of a white man typing on a notebook.



Maintenance of Records and Accounting

Here we understand records as: correspondence, bills, electronic records and books. Atlântico keeps all records up to date. All information must be reliable, with sufficient detail so that registered actions are correctly tracked and demonstrate the transparency of these actions.

All Atlântico accounting records are audited by independent auditors.



Cropped photo of a man's hand, wearing a white blouse, touching a virtual graphic in blue and yellow.



Detection and Communication

Detection and Communication

There are two ways of detecting possible deviations, practiced in Atlântico:

- 1. Internal audits;**
- 2. Transparency channel.**

Internal audits are intended to assess whether the procedures mentioned here are being followed and are part of an improvement plan - SPI.



Photo of a hand holding a magnifying glass. The image has a light blue background.



Detection and Communication

The transparency channel is a tool made available to Atlântico's internal and external public, managed by a specialized company that has been contracted exclusively for this purpose. Its main purpose is to preserve the confidentiality and identity of the whistleblower.

The transparency channel can be accessed through the specially dedicated telephone line (0800 880 1849), e-mail or Internet site. The investigation of complaints received will follow the procedure provided by the integrity program.

[E-mail](#)

[Site](#)



*Photo of a hand holding a phone.
The image has a light blue
background.*



Consequences for Inappropriate Conduct

Inappropriate conduct

Any improper conduct will be dealt with according to the severity and impact they cause or may cause. Once inappropriate conduct has been detected, the action in question must be interrupted immediately and taken to an ethics committee. They will then deliberate on the procedures to be adopted for the offender(s), as well as for the remediation of any damage that has occurred.

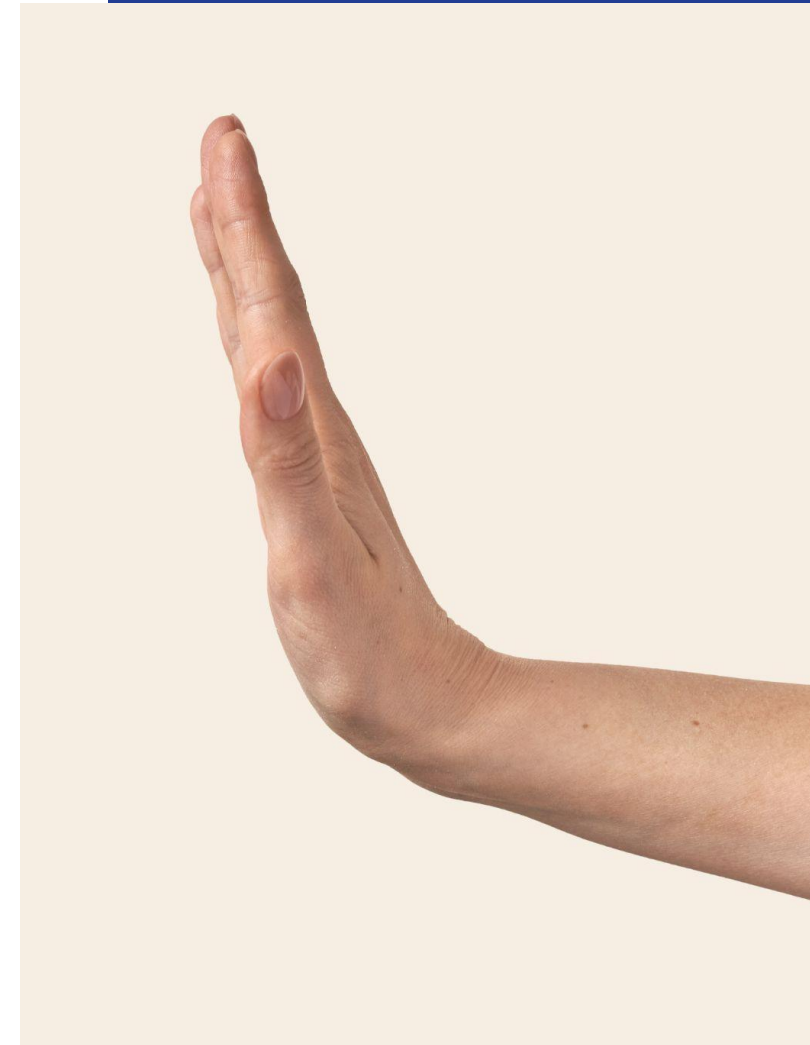


Photo with white background in side view of an open hand emerging from the right side of the image.



Final Provisions

Final Provisions

The set of procedures and guidelines described in this document undergoes periodic review, within the scope of the management process, and is the subject of discussion and proposal of improvement whenever necessary.



Photo with white background of a left hand emerging from the bottom of the image with the index finger up.



Ethics

Committee



Albert Schilling



Emanuelle Nogueira



Ana Sofia Marçal



Francisco Moreto

Substitute



Transparency Portal

0800 880 1849

[E-mail](#)

[Site](#)



The logo for 'Atlântico' features a stylized letter 'A' on the left, composed of an orange diagonal bar, a white diagonal bar, and a white triangle at the top. To the right of the 'A', the word 'Atlântico' is written in a white, sans-serif font. The 'l' has a small triangle above it, and the 'o' has a small dot above it.

Atlântico

7ª Edition - mar/2024

Last update: mar / 2024