

# Code of Conduct

2.0



## Message from the Superintendency

The history of Atlântico has always been guided by non-negotiable ethical principles. From the very beginning, we have believed that acting with integrity is the path to generating positive impact and building relationships founded on trust. This is how we advance, strengthening our culture each day and reaffirming that ethics is not merely a guideline, it is an integral part of who we are. This Code of Conduct is the expression of that commitment. It brings together the guidelines that inspire us to go further, making transparent, responsible decisions that are aligned with the values that drive us. Complying with this Code is a duty shared by all of us. More than an obligation, it is an invitation for each of us to take an active role in building an Atlântico that is increasingly ethical, fair, and inspiring. Together, we shall continue writing a story that makes us proud and serves as an example for the ecosystem in which we operate.



**José Francisco Moreto Franco**  
Superintendent

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# Purpose and Scope



## **1 PURPOSE**

The Code of Conduct of Instituto Atlântico establishes fundamental guidelines that shall govern the behavior of all employees and their respective stakeholders. It reflects our commitment to integrity, anti-corruption, transparency, and responsibility, ensuring an environment of respect and ethics in business and organizational activities. The values and principles set forth herein do not

exhaust the rules of conduct applicable to the various audiences covered by this Code. They are further detailed and supplemented by the Institute's additional internal policies.

## **1 SCOPE**

This Code of Conduct applies on a mandatory basis to all employees, directors, managers, and all individuals who engage with or act on behalf of

Atlântico, including suppliers, partners, government entities, and other stakeholders.

# Strategic Direction and Values



## 2 STRATEGIC DIRECTION AND VALUES

### Our strategic direction



#### Mission

To promote the advancement and well-being of society through science, technology, and education.



#### Values

Ethics, Excellence, Innovation, Collaboration, and Valuing People.



#### Vision

To be a reference in Brazil's innovation ecosystem.



#### Purpose

To transform people's lives through knowledge and innovation.

Figure 1: Strategic Direction of the Instituto Atlântico

## 2 STRATEGIC DIRECTION AND VALUES

### Our values



#### Ethics

We operate under the highest ethical standards, ensuring integrity in all interactions and decisions.



#### Excellence

We pursue excellence at every stage of our work to ensure that our contributions have a positive impact.



#### Innovation

Our commitment to innovation drives us to constantly seek new ideas and solutions, leading initiative that not only propel technological advancement but also promote sustainable and socially responsible practices.



#### Collaboration

We recognize that the most complex challenges require collective efforts, and therefore we foster a culture of collaboration, both internally and with external partners.



#### Valuing people

We believe in valuing people as drivers of meaningful change, recognizing human potential in all our actions, both internal and external.

# Responsibilities



### 3 RESPONSIBILITIES

#### Managers and leaders

Members of governance, directors, managers, and leaders shall act as exemplars of integrity and responsibility, fostering an environment that encourages compliance with the Institute's principles and the adoption of good conduct practices. These individuals are expected to fully adhere to the guidelines of the Bylaws, this Code of Conduct, internal policies, and other regulations of the Institute, promoting their dissemination and encouraging the ethical engagement of all related parties.

#### All other employees

All employees shall maintain a respectful, ethical posture consistent with institutional values, contributing to strengthening the reputation and credibility of the Institute in all settings. Compliance with the principles of this Code of Conduct, internal policies, and other regulations is expected. When necessary, employees should seek guidance from their immediate supervisors.

# Standards of Conduct, Ethics, and Transparency



## 4 STANDARDS OF CONDUCT, ETHICS, AND TRANSPARENCY

All employees, partners, and other stakeholders who engage with or act on behalf of Instituto Atlântico commit to:

Acting in compliance with applicable regulations, respecting the laws and regulations in force, as well as this Code of Conduct, institutional guidelines, internal policies, and organizational decisions of Instituto Atlântico;

Promoting and incorporating the principles of good governance, adopting, whenever possible, best practices in ethics, transparency, equity, accountability, and corporate responsibility;

Preventing, rejecting, and combating illicit practices, such as any form of fraud, corruption, bribery, or undue favoritism, acting with integrity in all interactions and processes;

Acting with ethics, responsibility, and respect, guiding their actions by values such as integrity, inclusion, innovation, sustainability, and commitment to the public interest.

# Anti-Corruption Policy



## 5 ANTI-CORRUPTION POLICY

We adopt a zero-tolerance stance toward corruption, bribery, and any illicit practices. All institutional interactions, whether with public or private entities, are conducted in an ethical and transparent manner, in compliance with national and international anti-corruption legislation, particularly Law No. 12,846/2013 (Anti-Corruption Law) and international best practices.



# Ethical Commitments



## 6 ETHICAL COMMITMENTS

### Gifts, presents, and undue advantages

It is not permitted to offer, solicit, or accept gifts, presents, hospitalities, or any advantages that may represent, or be construed as, attempts to unduly influence decisions, activities, or institutional relationships. As an exception, invitations to meals, institutional events, business meetings, or relationship-building activities with a legitimate work, networking, or partnership purpose are permitted, provided they do not compromise the independence, integrity, or image of Instituto Atlantico, and do not involve consideration or favoritism.

Institutional gifts with a value not exceeding US\$100.00 (one hundred dollars) may also be accepted, provided they do not constitute a conflict of interest.

### Expected Conduct

Accept low-value institutional gifts  
(e.g., pens, notebooks)

Declare received gifts to the relevant  
department when necessary

Decline courtesies that  
may influence decisions

Attend collective sponsored events,  
provided they are approved by the institution

### Conduct Not Expected

Accept money or high-value  
gifts from suppliers

Receive trips, accommodations, or tickets  
paid for by partners under negotiation

Offer expensive gifts to influence  
third-party decisions

Fail to declare gifts that may cast doubt  
on the integrity of a decision

## 6 ETHICAL COMMITMENTS

### Conflict of interest

A conflict of interest arises when personal, financial, or professional interests may compromise impartiality or integrity in the performance of one's duties. Whenever a potential conflict exists, the employee must formally report it to the competent bodies.

### Expected Conduct

Decline participation in decisions where personal interest exists

Report potential conflicts to the Ethics Committee

Use confidential information solely for the benefit of the institution

Always prioritize the Institute's interests above personal ones

### Conduct Not Expected

Use time, resources, or equipment of the Institute for personal business

Use insider information for personal gain (e.g., investments)

Favor business partners in exchange for personal advantages

Favor friends or family members in hiring, promotions, negotiations, or supplier selection

## 6 ETHICAL COMMITMENTS

### Harassment and Discrimination

Under no circumstances do we tolerate moral or sexual harassment, violence, or any disrespectful, discriminatory, offensive, humiliating, or embarrassing conduct, whether among employees, partners, suppliers, or other parties with whom the Institute engages. This directive applies to both in-person and virtual or technology-mediated interactions.

**Sexual harassment:** Any unwanted conduct of a sexual, physical, or verbal nature that causes embarrassment or intimidation.

### Expected Conduct

Treat colleagues with respect,  
maintaining professional boundaries

Commend professional performance,  
never physical attributes

Request clear consent and  
respect a refusal

Keep personal conversations in appropriate  
settings without causing discomfort

### Conduct Not Expected

Make sexually suggestive jokes  
about colleagues

Touch someone without consent

Send unsolicited intimate messages

Offer benefits in exchange  
for sexual favors

**Moral harassment:** Repeated exposure of an individual to humiliating, vexatious, or abusive situations in the workplace.

### Expected Conduct

Provide feedback in a constructive and respectful manner

Value ideas and contributions from different individuals

Support colleagues facing difficulties at work

Seek conflict resolution in a mature and professional manner

### Conduct Not Expected

Intentionally isolate an employee from meetings

Set impossible targets to punish a colleague

Spread rumors or gossip to harm someone

Issue abusive or unjustified dismissal threats

**Inappropriate Behavior:** Attitudes or conduct that disregard standards of coexistence, ethics, and professionalism.

### Expected Conduct

Collaborate with colleagues and offer assistance when requested

Use official communication channels for work-related matters

Resolve conflicts through respectful and constructive dialogue

Maintain the confidentiality of strategic or sensitive institutional information

### Conduct Not Expected

Interrupt or disrespect colleagues during meetings or discussions

Use corporate email or systems for personal or illegitimate purposes

Ridicule, mock, or minimize the contributions of colleagues

Disclose confidential information without authorization or through inappropriate channels

## 6 ETHICAL COMMITMENTS

### Independence, impartiality, and impersonality

#### **Prevalence of institutional interest**

In all activities carried out within the scope of Instituto Atlantico, employees, partners, and other stakeholders are expected to prioritize the institution's objectives and values, placing the common good above individual, commercial, or personal interests.

#### **Impartial and transparent decision-making**

Our decisions are conducted with impartiality, equity, and transparency, ensuring they are always guided by the legitimate interest of Instituto Atlantico, free from external influences or undue favoritism.

## Independence, impartiality, and impersonality

### **Financial, accounting, and tax records**

Instituto Atlantico shall maintain all financial, accounting, and tax records in compliance with applicable legislation and accounting and auditing standards.

All recorded information must be complete, accurate, consistent, and supported by proper documentation, enabling the traceability of operations and ensuring the transparency of the Institute's activities.

The creation of any false, inaccurate, incomplete, or misleading accounting record intended to conceal, disguise, or facilitate the practice of illicit acts including corruption, money laundering, fraud, misappropriation of funds, or influence peddling is expressly prohibited.

## 6 ETHICAL COMMITMENTS

### Political activity

We respect the individual political and partisan preferences of each employee; however, the use of Atlantico's reputation and resources to promote political activities or interests is not permitted. For example: using work hours, corporate email, or Atlantico's name to support electoral campaigns or candidacies of oneself or third parties. Should an employee intend to run for office or accept a political position, they must notify the Ethics Committee in advance so that a thorough assessment of potential conflicts of interest may be conducted.

### Partisan contributions

We maintain a neutral and non-partisan stance in all our institutional actions and positions. We do not make, directly or indirectly, any type of financial contribution, support, promotion, or institutional declaration in favor of political parties, candidates, or elected officials at any local, regional, or national level.

### External activities and concurrent employment

Involvement in external activities that compromise one's responsibilities, interfere with working hours, or represent a potential conflict of interest is not permitted. During working hours, all employees are expected to dedicate themselves fully to Atlântico's activities.

## 6 ETHICAL COMMITMENTS

### Collaborative work

The culture of Instituto Atlantico is founded on cooperation, networking, and trust among individuals and teams. Collaboration is essential for fulfilling the institutional purpose and generating positive impact through science, technology, and innovation.

### Building a collaborative network

All employees, partners, and stakeholders of Instituto Atlantico are expected to contribute to strengthening an integrated, collaborative, and synergistic network, based on mutual respect, trust and loyalty in relationships, sharing of knowledge and experiences, and commitment to strategic objectives and the institutional purpose.

**Constructive conflict management**

In cases where disagreements, tensions, or conflicts of opinion arise among individuals or bodies within the Institute, the following is expected: amicable and respectful resolution; open and constructive dialogue as the primary mediation tool; and preservation of the institution's image, reputation, and cohesion. Collaboration and active listening shall always prevail over personal disputes or isolated positions, promoting an environment where collective interests take precedence over individual ones.

## 6 ETHICAL COMMITMENTS

### Donations

Donations shall only be permitted when made in a transparent manner with a clear justification regarding their purpose and destination. Donations to individuals, organizations that may compromise the reputation of Instituto Atlantico, political parties, candidates, religious institutions, labor unions, or entities at risk of misuse of resources, as well as deposits into personal accounts, are prohibited.

### Sponsorship

All sponsorships must be conducted with transparency, formalized through contracts, serve legitimate purposes, and maintain an appropriate proportion between investment and return.

## Stakeholder relationships

We recognize that the manner in which we engage with our stakeholders directly impacts our reputation, sustainability, and capacity to generate value. Accordingly, we must ensure interactions based on respect, responsibility, and compliance with the law and the principles of Instituto Atlântico.



Figure 2: Stakeholders of the Instituto Atlântico

## 6 ETHICAL COMMITMENTS

### **Associations**

Our relationship with industry associations is grounded in cooperation and the exchange of best practices. Participation in events and forums contributes to strengthening innovation and sustainable development.

### **Clients**

Our clients are the reason for our existence and shall be treated with ethics and commitment. We deliver reliable services, meet deadlines and commitments, ensure the confidentiality of their information, and respect their rights.

### **Associates**

Associates play an essential role in the governance and strategic development of Atlântico. Our relationship is grounded in transparency, accountability, and respect for institutional guidelines.

## 6 ETHICAL COMMITMENTS

### **Community**

We contribute positively to the communities where we operate, promoting initiatives that generate social, educational, and environmental impact. Open and constructive dialogue with the community is essential for fostering long-term partnerships and generating shared value.

### **Executive board**

The Executive Board, as a governance and strategic guidance body, is responsible for decisions that shape the future of Atlântico. All information and decisions are grounded in ethical principles and aligned with institutional values.

## 6 ETHICAL COMMITMENTS

### **Suppliers**

Suppliers Suppliers and service providers are strategic partners. Selection and contracting follow technical and ethical criteria, without undue favoritism or conflicts of interest.

### **Government**

Our relationship with governmental bodies strictly follows compliance, transparency, and integrity standards.

## 6 ETHICAL COMMITMENTS

### **Innovation agents**

Innovation agents drive technological development and the generation of knowledge. We ensure a collaborative environment that fosters the exchange of ideas, the protection of intellectual property, and the recognition of each party's contributions.

### **Partner institutes and companies**

Institutional and business partnerships are based on trust, mutual benefit, and the fulfillment of commitments made.

## 6 ETHICAL COMMITMENTS

### **Labor unions**

Labor unions represent the interests of employees, and our relationship with these entities is conducted with respect, open dialogue, and good faith.

### **Universities**

Universities are fundamental partners in research and the development of innovative solutions. We encourage the exchange of knowledge and best practices with respect for academic ethics, scientific integrity, and the protection of intellectual property rights.

**Media**

The media plays an essential role in the dissemination of information. We are committed to providing accurate and transparent information.

**Competitors**

Competition shall be guided by principles of fairness and respect for regulatory standards. Respect for the market is essential to strengthening our credibility and reputation.

**Environment**

Our commitment to environmental sustainability is aligned with responsible technological development. As a science and technology institution, we seek to minimize environmental impacts through energy efficiency, process digitization, selective waste collection, and the promotion of sustainable technological solutions.

# Duties and Care



## 7 DUTIES AND CARE

### Sustainability and social-environmental responsibility

Instituto Atlantico adopts a committed stance toward sustainable development and social-environmental responsibility in all its activities, decisions, and relationships. All individuals acting on behalf of the Institute must contribute to promoting a fair, inclusive, and environmentally responsible environment, adopting practices that reduce negative impacts and strengthen positive actions for society and the environment. This commitment is aligned with the Sustainable Development Goals (SDGs) and global best practices in sustainability.

### Human rights and labor rights

We repudiate any form of child labor, forced labor, slave labor, or labor under degrading conditions, as well as any practices that violate fundamental rights and guarantees.

## 7 DUTIES AND CARE

### Commitment to people

We are committed to building a space that values diversity, promotes respect for fundamental rights, and encourages coexistence based on empathy, dialogue, and collaboration. Discriminatory, offensive, disrespectful attitudes or conduct that in any way compromise the dignity of individuals shall not be tolerated, whether among employees, partners, or external audiences, in any sphere of the Institute's operations.

### Respectful, inclusive, and safe environment

We contribute to building an organizational culture based on transparency in relationships, appreciation of diversity and inclusion, respect for individuality and privacy, and open dialogue, active listening, and the freedom to express opinions, disagreements, and constructive criticism in an environment of mutual trust.

## 7 DUTIES AND CARE

### **Diversity and inclusion**

We promote diversity, equity, and inclusion, contributing to a fair, welcoming, and representative environment that values different social groups and respects the plurality of gender, race, ethnicity, sexual orientation, gender identity, persons with disabilities, age, social class, religion, and life experiences.

### **Pluralism and cognitive diversity**

We encourage the embrace of diverse ideas, worldviews, experiences, and perspectives. Active listening and respect for dissent are pillars of a plural and innovative culture. However, such respect and freedom of expression find their limits when there is a violation or threat to human rights; discriminatory speech, hate speech, or speech that undermines the dignity of individuals is not permitted.

## 7 DUTIES AND CARE

### **Comprehensive health and safety**

We are dedicated to the physical and psychological health and safety of all individuals directly or indirectly affected by the activities of Instituto Atlântico. We actively promote healthy working conditions, risk prevention, and support for situations that require attention to the well-being of teams and communities involved.

## 7 DUTIES AND CARE

### Communication

Only individuals expressly authorized may make public statements on behalf of Instituto Atlântico, whether on social media, in interviews, at events, or through any other communication channels.

### Citations and references

When mentioning Instituto Atlântico or its content, including on social media and in public statements, one must act in a constructive and respectful manner, aligned with institutional principles and this Code, disseminating truthful and evidence-based information, and avoiding any hate speech, misinformation, or misuse of freedom of expression.

## 7 DUTIES AND CARE

### **Use of personal image**

Upon joining Instituto Atlantico, all employees authorize the gratuitous use of their image in institutional materials for internal and external dissemination, including photographs, videos, social media, and presentations. The authorization is formalized upon admission, in compliance with the LGPD (Brazilian General Data Protection Law), ensuring that usage is always tied to institutional purposes, preserving integrity and privacy.

# Confidentiality, Secrecy, and Personal Data Protection



## 8 CONFIDENTIALITY, SECRECY, AND PERSONAL DATA PROTECTION

We handle strategic and sensitive information that requires ethical, responsible treatment in accordance with applicable legislation, such as the General Data Protection Law (LGPD). Our commitment is to ensure that all individuals adopt practices that safeguard the confidentiality, integrity, availability, and privacy of information, protecting both institutional assets and the personal data of clients, partners, suppliers, and colleagues.



### Information security

The protection of digital assets and information of Instituto Atlantico is the responsibility of all. All employees are expected to act with diligence and follow information security best practices, such as maintaining secure passwords, avoiding improper data sharing, refraining from accessing suspicious links or files, and using only authorized channels and systems.

### Secrecy and discretion

All individuals acting on behalf of Instituto Atlantico must exercise discretion and preserve the confidentiality of strategic, confidential, or sensitive information relating to the Institute, its clients, partners, and other involved parties. It is prohibited to use or disclose such information for personal benefit or the benefit of third parties, or in a manner that may cause harm, compromise the integrity of institutional relationships, or affect the image of Instituto Atlantico.

## 8 CONFIDENTIALITY, SECRECY, AND PERSONAL DATA PROTECTION

### Personal data protection

All individuals acting within Instituto Atlantico must protect the personal data of employees, clients, partners, and other audiences, ensuring its confidentiality, integrity, and security, using it solely for institutional purposes and in compliance with the LGPD and the Institute's internal policies.

### Use of social media

We value freedom of expression but also recognize our collective responsibility regarding confidentiality, image protection, reputation, and organizational integrity. Therefore, all employees must use social media in an ethical, responsible manner aligned with our values and principles. After all, we are seen as representatives of the organization, and our actions may impact the image of Instituto Atlantico.

# Organizational Assets



## 9 ORGANIZATIONAL ASSETS

### Preservation of assets and intellectual property

All individuals who engage with or act on behalf of Instituto Atlântico commit to respecting, safeguarding, and preserving the tangible and intangible assets of the institution, recognizing their strategic value for the mission of promoting innovation, research, and development with social and technological impact. These assets include, but are not limited to:

- Equipment, facilities, systems, and physical and digital resources;
- Databases, methodologies, projects, trademarks, software, and other technical and scientific creations;
- Knowledge, confidential information, and research results;
- Intellectual property rights, whether registered or in the process of registration, authored by the Institute or developed within the scope of its activities.

## **9 ORGANIZATIONAL ASSETS**

The use of these assets must be oriented toward institutional interest and in compliance with internal policies, current contracts, and applicable legislation. These rules also apply to the assets of clients, suppliers, and other partners used in Atlântico's activities. The improper appropriation or use of any of these assets, including copying, commercialization, or distribution to third parties, constitutes a serious infraction and may result in the application of disciplinary measures, labor liability, or criminal prosecution.

# Ethics Committee



## 10 ETHICS COMMITTEE

The Ethics Committee is responsible for ensuring compliance with this Code and promoting a culture of ethics, transparency, and integrity throughout the organization. The Committee is tasked with evaluating situations involving conflicts of interest, deliberating on interpretive questions, analyzing cases of non-compliance, and recommending periodic improvements to the Code, ensuring that its guidelines remain current and aligned with the values of Instituto Atlântico.



# Transparency Channel



## 11 TRANSPARENCY CHANNEL

Instituto Atlantico provides a secure communication channel, administered by an external company, for the receipt of inquiries, reports, and complaints related to violations of this Code or practices contrary to ethics, legislation, or internal policies.

Contact may be made through:

**24-hour telephone line** +55 0800 880 1849

**E-mail** [canaldetransparencia.atlantico@e-denuncias.com.br](mailto:canaldetransparencia.atlantico@e-denuncias.com.br)

**Website** <https://denuncia.iauditcloud.com.br/atlantico>

All reports received are treated confidentially, and we do not tolerate any form of retaliation or reprisal against individuals who appropriately use the Transparency Channel. Reports may be submitted on an identified or anonymous basis. It is recommended that the report contain as much information and detail as possible, as vague, generic, or unsubstantiated communications may hinder or even prevent proper investigation. Upon registration, the author receives a protocol number that allows them to anonymously track the progress of the case and, when requested, supplement the report with additional facts and data necessary for the investigation.

# Disciplinary Sanctions



## 12 DISCIPLINARY SANCTIONS

Non-compliance with the guidelines set forth in this Code may result in disciplinary measures proportional to the severity of the conduct, including warnings, suspension, termination, and, where applicable, referral to the competent authorities. Furthermore, partners, suppliers, or service providers who violate this Code shall be subject to contract termination and other applicable sanctions.



# Declaration of Acknowledgment and Commitment



## 13 DECLARATION OF ACKNOWLEDGMENT AND COMMITMENT

I hereby declare that I have received and taken notice of the Code of Conduct of Instituto Atlantico, acknowledging that it establishes the ethical principles, values, and guidelines that govern expected conduct in professional relationships, both within the internal environment and in interactions with partners, suppliers, and clients..

I acknowledge that this Code is available for consultation at any time, including through Atlantepedia and the official website of Instituto Atlantico.

I further declare that I am aware of the institutional channels designated for submitting suggestions, inquiries, criticisms, or complaints related to the Institute's policies and guidelines.

I commit to acting in an ethical, transparent, and responsible manner, as well as to immediately reporting any violation of the Code of Conduct or applicable legislation of which I may become aware.

**Date:** \_\_\_ / \_\_\_ / \_\_\_      **Location:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Full Name:** \_\_\_\_\_

# Atlântico

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