



**bluebenx**

**Ethical Code  
e Behavior**

[bluebenx.com](http://bluebenx.com)

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## Document Control Sheet

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## Vocabulário

### **Background Check**

Analysis of reputational information to identify indications of misconduct performed on data from Individuals, while Due Diligence is carried out with information from Legal Entities.

### **Code of Conduct:**

It is a set of internal rules specific to each company, where some guidelines are established on the behavior and conduct of all those who have a relationship, or who will have a relationship, with the organization.

### **Ethics Committee:**

A group of people related to the institution, whose main objective is to evaluate conduct and identify if, in any way, it contravenes the legislation with the internal rules.

### **Compliance**

The term derives from the verb "to comply", means to act in accordance with one or a set of rules, including international treaties, legislation, internal controls and others.

### **Unfair competition:**

Use of illicit practices to attract customers or business, whether through the use of untrue information, tied sales, or even an attempt to diminish or attack a competitor.

### **Collaborator:**

Generic term to cover all people who directly carry out activities with the companies, regardless of the type of contract, and may be employees, regular service providers and interns.

### **Due diligence**

Analysis of reputational information to identify indications of misconduct, normally performed on data from Legal Entities, while the Background check is carried out with information from Individuals.

### **Facilitation (payment of)**

This is the payment of amounts or the offer of advantages to a public agent to speed up a process, which would happen, but with longer deadlines.

### **Monopoly/Cartel:**

Monopoly is the dominance of a single company in a given territory, injuring free competition. Monopoly can also indicate the existence of a cartel. It occurs whenever a set of competing companies adjust prices, conditions, restricting or even harming free competition.

### **Bribery or Bribery:**

Bribe is the informal term for a bribe, which is the act of offering or promising an advantage or value for someone to do or not do something, with the intention of obtaining an undue advantage.

### **Money laundering:**

Attempt to appear lawful origin of illicitly acquired values.

### **Misconduct:**

Disrespect for justice and morals. It is everything that is contrary to honesty, good faith, honesty, correctness of attitude.

## Introduction

Ethical and upright conduct must be the basis of all our actions. The BlueBenx Code of Conduct expresses our core principles and defines the meaning of integrity.

However, it is not expected, with it, to cover all everyday situations, so, when in doubt, the employee should consult the organization's Compliance Committee.

All employees must be familiar with this Code and with the complementary procedures, available on the institution's website:

**[www.bluebenx.com](http://www.bluebenx.com)** \* 

\*  redirected to the link

The governing body has the obligation to ensure compliance, transmit the content and serve as an example for the entire organization.

The requirements of this Code must be followed by all employees. If you identify, suspect or learn of deviations or violations related to any of its requirements, the employee must immediately inform the relevant channels, which will provide the verification of the reported facts.

If proven, they will be evaluated by the BlueBenx Ethics Committee and will have, as a consequence, corresponding disciplinary measures, in addition to the punishments provided for by law.

# Integrity Mechanism and Compliance System

Our Integrity Mechanism and Compliance system are established with the purpose of contributing to meeting the guidelines of this Code of Conduct. Therefore, it is the duty of all employees to support and engage in the activities, processes and controls of this system, in order to keep it effective at all times.

In particular, it emphasizes the prohibition of granting or offering a bribe, facilitation payment and any other benefit that constitutes an undue advantage, either directly or through third parties. Any type of fraud, disclosure of false information, monopoly or cartel formation and engaging in illicit activities, such as money laundering, unfair competition and non-compliance with current laws and codes, is also prohibited. Sensitive cases related to Compliance are treated with confidentiality and retaliation of any kind is prohibited. Only people who necessarily need to know the information should access it. For complaints, the principle that the content is important and not the source is always adopted.

## Violations of the Code of Conduct

Violations of this Code will be subject to disciplinary action and/or penalties based on applicable law. It is up to each employee to formally notify their immediate superior or through the Whistleblower Channel whenever they become aware of a possible violation of the terms of this Code. All complaints received will be treated with confidentiality and secrecy, with the exception of those where there is a legal obligation to inform government authorities.

The denunciation may be made, for the time being, in the following ways:

1. Communicated to your immediate superior
2. Direct email to compliance \*[↗](#)  
(in the person of the Compliance Officer - [debora@bluebenx.com](mailto:debora@bluebenx.com))
3. Using the Whistleblower Channel \*[↗](#)  
<https://www.contatoseguro.com.br/>.

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## Compliance with Laws

- Fully comply with applicable laws and other regulatory requirements.
- Respect the diversity of all nature and the personal dignity, privacy and rights of all human beings. Therefore, any type of discrimination, racism, moral or sexual harassment is prohibited.

## Reputation Promotion

- Strive to maintain and promote our company's good reputation.
- Act transparently, honestly and in the interests of the company and the well-being of society.

## Competitors

- Ensure fair competition and not engage in activities or businesses that are harmful to the consumer, the public administration or society.
- Do not relate to competitors, aiming at agreements regarding prices, production capacities, market sharing, sales territories or production programs and attitudes that eliminate healthy competition.
- Do not enter into agreements with competitors in order not to compete, restrict business with suppliers, present fictitious offers within the scope of proposals or allocate customers, markets, territories or production programs.
- Do not obtain and do not use confidential information from competitors.



## Providers

- We expect our suppliers to act in accordance with the principles outlined below and our employees to assist in monitoring them.
- Comply with all applicable laws.
- Prohibit acts of corruption.
- Engage in the implementation of mechanisms to combat corruption, fraud, money laundering, cartel and other illicit acts against the public administration.
- Respect the basic human rights of employees.
- Prohibit slave labor and child labor.
- Assume responsibility for the health and safety of its employees.
- Act in accordance with applicable local and international standards relating to environmental protection.
- Promote, within its supply chain, the fulfillment of these requirements.

## Business partners

In addition to supplier requirements, our employees must:

- Assess the qualifications and reputation of these third parties before contracting (through 'due diligence' and 'background check').
- Ensuring that partners adhere to and align with our company principles.
- Monitor the activities of partners, in order to ensure that they comply with the principles of ethics and integrity.
- Do not use partners, under any circumstances, to carry out any illegal activity or that contravenes the requirements of this Code of Conduct.
- Not to fix or exert influence on resale prices and not to impose unlawful restrictions on commercial counterparties.



## Granting or Receiving Benefits

- Not to offer or grant undue advantages, directly or indirectly, to any person or organization.
- Gifts may only be given if they comply with applicable laws and do not give the appearance of impropriety or bad faith.
- Do not take advantage of your position to demand, accept, seek or promise undue advantages.

## Donations, Contributions and Sponsorships

- Donations and/or sponsorships can only be made if they comply with applicable laws and our company's internal rules.
- Donations and Sponsorships must be transparent and not give the appearance of impropriety or bad faith.
- You may not promise, offer or make contributions for the purpose of securing unjustified competitive benefits.
- Contributions cannot be made to events organized by people or organizations with purposes that are incompatible with our business principles and/or that could damage our company's reputation.

In addition:

- 1.** Reputational criteria for making a donation will be evaluated.  
Tax deduction is not a choice factor for campaigns and institutions, however, it must be possible to prove the motivation and destination of the donation/sponsorship;
- 2.** A sponsorship will only be allowed if formalized in a written contract and appropriate to the consideration offered
- 3.** Donation or sponsorship cannot be made in cash or through deposits in private accounts, the amounts must be transferred within the banking system, always in favor of a bank account in the name of the beneficiary institution.



## Conflict of interests

Avoid conflicts of interest, such as:

1. In remunerated activity that may harm professional performance or represent competition for our company.
2. In decision making, which may be of personal interest, to the detriment of the company's interest. Inform management, through formal processes, of the existence of a potential conflict of interest.

## Use of Company Assets and Information

- Use company assets (assets, properties, equipment, software, hardware, etc.) exclusively for professional purposes and in the company's interest.
- Do not generate or transmit information that incites racial prejudice, the glorification of violence or other criminal acts or sexually offensive content.
- Do not make video or audio recordings, which are related in any way to the company, without the superior's consent.
- To ensure the security of information and the conscientious use of the data at its disposal, so as not to infringe on the corporate rights of each individual.
- Handle personal data only when necessary and only for legitimate, clear and predetermined purposes.
- Maintain confidentiality with respect to internal business matters that have not become public knowledge.
- This obligation will continue to apply even after the end of the relationship, whether employment, internship or service provision.
- Not to use privileged confidential information for personal purposes, such as buying or selling company stock based on such information, or making recommendations to third parties for that purpose.
- Generate accurate and truthful records and reports, whether for external or internal purposes, always respecting the BlueBenx Privacy Policy . ([https://bluebenx.com/en/compliance/\\*](https://bluebenx.com/en/compliance/*))

\*[↗](#) redirected to the link



## Accounting Records

- Ensuring that our company's documents and accounting records, created by you or under your responsibility, are complete, accurate, honestly reflect each transaction or expense, and are generated in a timely manner and in accordance with applicable accounting rules and standards.

## Money Laundry

- Not to promote or engage in any activity that could be characterized as money laundering, in accordance with Bluebenx's Anti-Money Laundering Policy.
- (<https://bluebenx.com/politica-de-prevencao/>)\*<sup>↗</sup>

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## Relationship with Government and Political Parties

Contacts with the government on behalf of the company will be coordinated exclusively by the Board. The duties of management and employees are:

- Respect applicable legislation and the ethical principles of this code in relationships established with public bodies in general.
- Establish a relationship with authorities, politicians and public agents guided by ethics, professionalism and transparency, immediately reporting to the company any form of pressure, offer or request by a public agent contrary to these principles.
- Do not offer gifts, presents or any kind of financial or non-financial advantage to any public or political agent, to people related to them, in exchange for private benefits or for the company.
- Do not use an individual or legal entity to hide or disguise the interests or identity of those who may benefit from any illicit acts committed. It is expressly prohibited for company employees in contracts and bids with the Government.
- Prior agreements or arrangements with competitors, which aim to defraud the competitive nature of the bidding procedure established by Law 8666/93 and other applicable rules.



- Defrauding the execution of any bidding or contract resulting therefrom, including practices that aim to unlawfully alienate competitors, including by offering any kind of advantage.
- Make it difficult to investigate or supervise public bodies, entities or agents, or interfere in their performance.

## Environmental protection, health and safety at work

- Contribute to the protection of the environment and the preservation of its resources. Be constantly attentive to work safety and occupational health, both for your own benefit and that of your colleagues.

## Additional requirements for occupying leadership or supervisory positions

- Select professionals based on their qualifications and suitability for the role. Provide accurate instructions (especially in compliance with the law).
- Clearly communicate the importance of ethics and integrity and encourage employees to use the code of conduct as a reference in their daily lives, as well as communicate that violations of the code are unacceptable and will result in disciplinary measures, in addition to legal consequences.
- Set challenging and at the same time attainable goals.
- Monitor compliance with company guidelines, compliance with laws and the requirements of this code.
- Evaluate the performance of its employees and apply the principle of meritocracy.
- Lead your team with candor, professionalism, education, respect and fairness.
- Be accessible and willing to engage in frank and constructive dialogue.





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