This Code of Conduct is available for consultation on the intranet and on ELDORADO’s official website - eldorado.org.br
For over 20 years, ELDORADO Research Institute has contributed to Brazil’s technological development.

The first step was taken in 1999 and today the Institute already has more than 1,000 employees in its four units distributed throughout Brazil, in the cities of Brasília, Campinas, Manaus and Porto Alegre. The institute works in the areas of software, hardware, microelectronics, trials and tests, education, and consultancy. It creates, executes projects and solutions with a focus on technology and innovation.

In addition to contributing to the companies' digital transformation, ELDORADO aims to develop the country’s technological ecosystem, focusing on open innovation projects.

ELDORADO creates disruptive solutions for several markets, such as IT/ telecom, energy, agribusiness, oil and gas, health, automotive, among others. Furthermore, in all its areas of activity, it presents successful cases that rely on the use of innovative technologies, such as artificial intelligence, computer vision, virtual reality, virtual assistants, big data, IoT, 5G, analytics, microelectronics, and more.

Over the years, ELDORADO formed and strengthened an extensive client portfolio, which concentrates large national and international companies, and was constantly present in the rankings of best companies to work in Brazil.

ELDORADO recognizes that integrity and transparency are fundamental to continue developing and standing out. Thus, its Code of Conduct was developed so that everyone is aware of the ethics and conduct guidelines that shall guide ELDORADO’s business. This is ELDORADO way to build the future!

Mission
Research and develop innovative, comprehensive, competitive, and impactful solutions for society.

Vision
Be the reference for new information of technologies, communication, and microelectronics.
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1. ELDORADO’s Code of Conduct

1.1. Objective

This Code of Conduct reflects ELDORADO’s commitment to the development of its activities in an integral, transparent, and ethical manner, a commitment that shall also be assumed by all those who are related to ELDORADO.

In this context, ELDORADO presents in this Code the guidelines that shall guide the conduct of its employees, members of Top Management, and associates, in all activities performed at ELDORADO, with ELDORADO, for ELDORADO or on behalf of ELDORADO.

Naturally, due to the variety and complexity of day-to-day relationships, this Code and ELDORADO’s policies will not cover all possible situations, so it is up to each one to use common sense and ethics, and to seek help whenever having doubts or being not sure about the right way to act. Omission or allegation of ignorance are not acceptable conducts.

ELDORADO believes that ethical behavior, moral integrity, respect, responsibility, trust and transparency are fundamental for the development not only of the Institute, but of society as a whole!

How to know if a conduct is ethical?

If you face this doubt on a daily basis, ask yourself the following questions:

- Is the conduct lawful?
- Does the conduct comply with ELDORADO’s policies?
- Does the act reflect ELDORADO’s ethical principles?
- Does the attitude respect employees, members of top management, associates, business partners and the community?

If the answer to any of these questions is ‘no’, then don’t carry out the conduct!

If you still have any questions, seek help from your manager or the Compliance Officer.
1.2. Application

The guidelines of this Code of Conduct are mandatory for all employees, members of the Top Management, and ELDORADO associates. Business partners are expected to maintain equally high standards of ethics and conduct in their activities.

These different audiences, when making their daily choices, reinforce the standards of integrity that shall guide ELDORADO’s business.

The term “employee” includes all persons who have a job or employment relationship with ELDORADO, which means all its employees, interns, apprentices, researchers, and advisors from all units of the Institute, including its Executives and Superintendent.

“Business partners” comprise all clients, service providers, and suppliers of ELDORADO.

The “associates” are companies (and their respective representatives) that join ELDORADO, under the terms of its Bylaws, for having affinity and commitment to the Institute objectives.

“Top Management” comprise the members of the Administration Board, Fiscal Board, and Technical and Scientific Board.
2. Human resources

2.1. Work environment

ELDORADO is committed to comply with labor legislation and believes that a healthy and respectful work environment is essential for the development of its activities.

Thus, cordiality, respect for others, and professionalism shall be maintained in all interactions between employees, members of Top Management, associates, and business partners, regardless of any hierarchical position, role or function.

Any type of abusive behavior, such as moral or sexual harassment, physical or verbal aggression, threat of aggression or other forms of abuse of power, is not tolerated.

Still following the principle of respect for others, ELDORADO also does not admit situations of slave labor or analogous to slavery, the use of child labor and the work of young people under 18, except as an Apprentice, as provided by law.

2.2. Diversity, equal opportunities and respect

ELDORADO adopts principles of equal opportunity, inclusion and respect, and recognizes that a diverse workforce is fundamental to success.

Thus, ELDORADO does not allow in its work environment and in the execution of its management policies any discriminatory conduct based on personal characteristics, such as: race, ethnicity, nationality, gender, sexual orientation, age, disabilities, religion, union affiliation or political-party position.
All hiring, performance evaluation and promotion decisions shall be made based on job/position requirements and individual technical skills and qualifications.

In addition, ELDORADO values the dialogue and opinion of each of its employees and encourages them to communicate ideas or concerns to their managers, without fear of discrimination or reprisal.

3. Health, safety and environment

ELDORADO is committed to comply with health and safety standards at work, as well as continuously seeking to improve continuously its processes and facilities in order to ensure the safety of its activities.

The commitment also extends to the conduct of its activities with socio-environmental responsibility, encouraging the sustainable use and without wasting natural resources.

It is everyone’s duty to comply with the laws and regulations relating to health and safety at work, respect the warnings and recommendations provided, and promptly inform managers about any situation that may affect, directly or indirectly, physical integrity, health or ELDORADO’s assets.
4. Transparency, ethics, and integrity in business

4.1. Fighting corruption and bribery

ELDORADO does not admit any form of corruption or bribery, whether in the public or private sector, so that all employees, members of Top Management, and associates shall comply with applicable laws and ELDORADO’s procedures for conducting business with transparency and integrity.

Therefore, it is not allowed to accept, demand, offer, promise or grant, directly or indirectly, any amount of money, item of value or other type of benefit in exchange for influence or in order to facilitate business in an undue manner.

The receipt of souvenirs by ELDORADO employees is limited to promotional items, which do not have a commercial value or does not exceed R$ 100.00 (one hundred reais), such as:

- Pens
- Notebooks
- Caps
- Calendars
- Planners

Also, the employee shall refuse a souvenir offered, even if it is within the limits established by this Code, when he/she has already received another item from the same company in the last six months.

Any gift offered in the form of an invitation to concerts, shows, sporting events or concerts shall also be declined.
4.2. Conflict of interests

In the daily work activities, employees, members of Top Management, and associates shall make decisions in the best interest of ELDORADO, avoiding external influences and situations that may generate conflicts of interest, even if in a perceptual way.

Attention! A conflict of interest occurs when an individual interest or benefit, whether direct or indirect, interferes or has the potential to interfere with professional decisions.

It is not possible to reflect in this Code all situations or relationships that may generate a conflict or the appearance of a conflict of interest. However, the situations below are the most common examples, and they shall be avoided:

- Having kinship or affective relationship with:
  - Employee who has the power to make or influence decisions about your activities, salary, performance evaluation, and promotion; or
  - Public agent or politically exposed person who exerts influence or has decision-making power within the scope of ELDORADO’s activities;

- Participate or exert influence in:
  - Selective process involving a candidate with whom you have a degree of kinship or affective relationship; or
  - Process of hiring a supplier or service provider (whether an individual or a legal entity) whose partner, manager or representative is your relative or a person with whom you have an affective relationship;

- Perform secondary activity (paid or unpaid) that may conflict with your work at ELDORADO or that is contrary to the objectives, principles, work practices, guidelines for the preservation of information confidentiality and intellectual property;

- Accept a position, task, responsibility or receive any type of remuneration from a competitor or an ELDORADO business partner;

- Use ELDORADO’s confidential and privileged assets, resources or information to obtain a private or third party advantage/ gain;

- Make investments in ELDORADO’s competitors or business partners that may influence your decisions in relation to them.
If an employee, member of Top Management or associate faces a situation of real or potential conflict of interest; he/she shall promptly report the case to the Compliance Officer so that the best way to deal with such conflict is evaluated.

Everyone shall respect the conditions or restrictions imposed by ELDORADO regarding the management or elimination of a conflict of interest, be it real, potential or apparent.

4.3. Accounting and resources management

ELDORADO shall comply with all applicable accounting standards, especially those that refer to the use of resources arising from tax incentives.

In this sense, it is mandatory that everyone provide accurate and complete evidence/records of expenses and revenues, and obtain all the approvals necessary for the execution of financial transactions resulting from the activities of ELDORADO, as required by institutional policies and procedures.

4.4. Quality and veracity of information

Any and all information issued by ELDORADO, whether verbal or written, shall reflect its commitment to ethics and integrity, and shall be characterized by cordiality, clarity, truthfulness and completeness. ELDORADO does not allow its employees and members of the Top Management to issue institutional information with offensive, false, manipulated or distorted content.

Likewise, ELDORADO does not allow its employees, members of Top Management, associates or business partners to present false or misleading personal or corporate documents, notably because it is dishonest and, above all, an unlawful conduct. Thus, ELDORADO reserves the right to check the veracity of data or documents submitted, if necessary.
4.5. Use of resources and assets

Everyone shall take care of resources, facilities, equipment, machinery, furniture, among other work materials, whether from ELDORADO or from business partners.

Assets and resources shall not be used for illicit or improper purposes, either for obtaining personal benefits or for third parties.

ELDORADO's facilities shall be used for professional purposes only, so it is forbidden to sell any type of product or service on the Institute's premises for personal gain.

Likewise, access to the internet, as well as the use of telephone, e-mail, software, hardware, equipment, and other assets of ELDORADO shall be restricted to professional activity. The use for private purposes shall occur as an exception and with common sense and moderation. Access to websites with illegal and/or pornographic content is prohibited, as well as the use of chat rooms, online games and downloading of songs/movies.

ELDORADO has the right to access information storage and telephone, internet, and e-mail records from the Institute's devices.

4.6. Fair competition

ELDORADO is committed to the promotion of free competition, the market evolution, and compliance with competition legislation.

Due to the Institute nature, its employees and members of Top Management will be able to interact legitimately with companies that compete with each other. However, attention shall be paid to such interactions, as it is not allowed to share strategic information and business secrets that may harm free competition, such as:

- Values and margins practiced,
- Terms and conditions of sale (promotions, discounts, subsidies),
- Capacity level or expansion plans,
- New products to be developed,
- Technologies used, among others.

It is also not allowed for an employee, member of Top Management or associates of ELDORADO to act as a link for the exchange of strategic information between competitors.
4.7. Responsible use of social networks

Social Media profiles associated with ELDORADO shall be registered in qualified networks and used only by the Communication Department. The information disclosed and the interactions carried out with third parties, from such platforms, shall always be guided by ethics.

Employees, members of Top Management and associates, when using their own profiles on social networks, with regard to ELDORADO and/or its information, shall also adopt ethical conduct and be guided by this Code.

Therefore, they shall not disclose confidential information about ELDORADO or its business partners, nor shall they publish opinions or statements on behalf of ELDORADO or in a way that may be confused with the Institute official opinion.

Furthermore, they shall not publish statements contrary to the principles adopted by ELDORADO or that offend the Institute’s credibility and reputation.
5. Security and protection of data and personal information

5.1. Confidential information and privacy

It is strictly forbidden to disclose or pass on to third parties any technical and management information about ELDORADO, as well as any personal data obtained at the Institute, be it from a co-worker or a business partner.

In order to preserve confidentiality, disclosure of confidential information to employees allocated to other projects is also prohibited, as well as the forwarding of ELDORADO data and documents to your private email box.

Besides that, to avoid undue access to ELDORADO’s information, employees shall adapt the content of their messages as strictly necessary for the recipients and use with moderation the electronic resources of “mass distribution lists” and “responding to all”.

In addition, it is prohibited to use confidential and privileged information obtained from ELDORADO to gain personal advantage.

To comply with the applicable legislation on data protection and to protect the subjects’ privacy, the personal data obtained from ELDORADO shall be used only for legitimate purposes in a manner limited to the minimum appropriate for the accomplishment of its purposes. It shall be deleted as soon as it is no more useful, in order to avoid the unnecessary use and storage of personal data, and to protect the privacy of the subjects.

For clarification on its privacy, data protection policies, and practices, ELDORADO makes available an email for direct contact with its Data Protection Officer: privacy@eldorado.org.br
5.2. Information security

To preserve the confidentiality, availability, integrity of institutional information, and to ensure the safe treatment of personal data, ELDORADO has strict security rules, which are based on the international standards of ISO27001, that are provided in the policies and procedures of the Information Technology Department.

Thus, prior to the disclosure of confidential information, the employee shall obtain the approval of his immediate manager and disclose the information in the strict terms of the Confidentiality Agreement or similar document signed between ELDORADO and the business partner.

In addition, the following rules shall be observed:

- Password for accessing devices, software, and internal systems shall be used in a very personal way, that is, they shall not be informed to third parties;
- For laptops, the security lock and the screen lock shall be used whenever the user is absent from his workstation;
- Cabinets and drawers shall remain locked;
- Printed documents shall not be left on the work tables and, after use, shall be destroyed; and
- Photographs and filming of projects, laboratories or other ELDORADO’s restricted areas are not allowed.

Everyone shall ensure the security of ELDORADO’s data, information, and devices, even if working remotely or on a business trip.

Any incident or activity that affects the security of ELDORADO’s information shall be promptly reported through the channel support@eldorado.org.br
5.3. Intellectual property and brand use

Intellectual property means: brands, products, processes, innovations, improvements, projects, documents, financial, commercial or market information or any other non-material activity developed at ELDORADO or by contracting it.

Intellectual property rights over the results obtained from activities of employees will belong exclusively to ELDORADO, in accordance with the applicable national legislation. Thus, employees shall provide ELDORADO with all documents and information necessary for the legal protection of these rights.

ELDORADO brand shall be also protected, especially because it causes damage to the Institute’s image if used inappropriately or unethically. Thus, any and all external or third party use of ELDORADO’s logo shall be previously analyzed by the Communication Department and formally authorized.

Likewise, ELDORADO employees shall not mention the name of the business partners or use their logos on social media, events or documentation aimed at the external public without due formal authorization.
6. Relationship with stakeholders

6.1. Associated companies
Companies that have affinity and commitment to the objectives of ELDORADO may join the Institute under the terms of its Bylaws.

Representatives of associated companies are not allowed to take advantage of the activities carried out and the contacts obtained in ELDORADO to get confidential and strategic information from competitors, neither to practice acts that prevent free initiative and fair competition.

Employees and Top Management members are forbidden to share information on ELDORADO’s confidential projects with associates, unless there is a legitimate reason for doing so.

6.2. Clients
When entering into scientific and technological cooperation agreements, ELDORADO understands that its activities effectively contribute to the success of its clients, whether they are public or private organizations, valuing a relationship of trust and harmony, as well as excellence in the execution of services, emphasizing quality, productivity, and innovation. The Institute is committed to observe ethical principles and to comply with applicable laws, especially those referring to the use of resources from tax incentives.

ELDORADO does not allow preferential or privileged treatment to any client. It is also not allowed to promise, offer or give, directly or indirectly, advantages, favors, gifts, entertainment or anything of value to employees or people who represent ELDORADO’s clients for the purpose of obtaining an undue advantage or to influence, ensure or reward them for a decision of interest to ELDORADO.
ELDORADO reserves the right to terminate the relationship with clients that do not comply with the guidelines of this Code, the applicable legislation or that contradict ELDORADO’s interests of scientific and technological cooperation.

### 6.3. Suppliers and service providers

Relationships with suppliers and service providers shall be based on discipline, respect, and trust, serving the best interests of both parties.

The hiring process shall be guided by ethics, fairness, and transparency. In all its stages, employees shall work diligently and seek the best interest of ELDORADO, acting based on technical and professional criteria (such as competence, quality, compliance with deadlines, prices, financial stability, reputation, among others), valuing good social and environmental responsibility practices.

In order to avoid conflict of interest, even if it is apparent, it is not allowed to contract a supplier or service provider (whether an individual or a legal entity) whose partners, managers or representatives are related to employees or members of the Top Management who are involved in contracting or in the service provision/supply management processes.

All contracts shall be formalized by means of a written negotiation document, which shall be clear and objective, with no margin for ambiguities or omissions.

ELDORADO reserves the right to replace any and all suppliers or service providers that fail to comply with the guidelines of this Code, with the applicable legislation, or that are contrary to the interests of the Institute.
6.4. Public officials and politically exposed persons

To address issues related to ELDORADO’s activities and interests, its employees and members of the Top Management may have legitimate interactions with public agents or politically exposed persons, and such interactions shall occur in an ethical, integral and transparent manner and in accordance with the laws, regulations and best practices.

Any expenses (with meals, hospitality, etc.) resulting from interactions with public agents or politically exposed people shall be guided by common sense and reasonableness, and shall also respect the controls and limits imposed by ELDORADO’s policies and procedures. Hearings or meetings with public officials or politically exposed persons shall be preceded by a formal written request, which shall include at least the following information: date, time, and place; identification of participants and the subject to be addressed.

The meetings shall be held primarily in public agencies, offices or buildings, during business hours or during shifts duly provided for in the agency’s operating rules. Having virtual hearings or meetings by using digital applications or platforms is also permitted. Such formal meetings, whether face-to-face or virtual, shall have the participation of at least 2 (two) employees or members of ELDORADO’s Top Management, and the negotiations held shall be formalized in written, through minutes.

It is prohibited to promise, offer, give or authorize, directly or indirectly, donations to political parties, politically exposed persons, occupants or candidates for public offices, leaders, members or affiliates of political parties using the resources of ELDORADO or on behalf of the Institute. The prohibition is extended to the provision of any service for the benefit of political parties or electoral campaigns of any nature.

It is also not acceptable to carry out any type of political propaganda on the premises of ELDORADO or with the use of its name, logo or assets. When participating in political-party activities, employees and members of Top Management shall act on their own, never giving the impression, however veiled, that they do so on behalf or in the interest of ELDORADO.
6.5. Press and external public

ELDORADO values the reliability of the information transmitted to the external public. Its representation and contact with the press are restricted to the Superintendent, the Executives or to those formally authorized by them.

Thus, any employee who is approached by journalists or representatives of media outlets shall inform his/her manager and the Communication Department (comunicacao@eldorado.org.br) before providing any information.

Likewise, the representation of ELDORADO in conferences, lectures or meetings organized by business associations, educational institutions or governmental entities shall be authorized in a formal and prior manner, especially when there is coverage and disclosure by the press.

6.6. Local community

ELDORADO seeks to contribute to the economic development and social well-being of the community in which it operates, partnering with local entities and encouraging its employees to dedicate their time to worthy causes.

In charity actions, if the employee has the desire to use ELDORADO’s time and materials, he/she shall request prior approval from the Institute’s Executives.

ELDORADO is allowed to make charitable contributions to cultural, social, environmental or sports development, directed to philanthropic entities or other entities in the community, provided that contributions are in compliance with applicable laws and regulations, that they are not used as a way to improperly influence decisions and that they are previously approved as required by institutional policies and procedures.
7. Management of ethics and conduct guidelines

7.1. Ethics and Compliance Program

Reinforcing its commitment to the integral, ethical, and transparent development of its activities, ELDORADO established the Ethics and Compliance Program to foster an ethical culture among its employees, members of Top Management, associates, and business partners, and also to ensure that its policies and procedures comply with applicable laws, regulations and integrity standards.

The Program is supported by the Institute’s Top Management and is operated by the following agents:

**Compliance Officer:** ELDORADO’s employee who is at the front line of the Program. It is up to him to verify the need to update the Code of Conduct guidelines; develop and / or revise internal policies and procedures aiming ELDORADO’s compliance; receive suggestions, complaints, and grievances made through the contact channels; investigate possible misconduct; recommend corrective measures and disciplinary actions, when necessary.

**Governance and Evaluation Group:** its members, in addition to the Compliance Officer, are the Superintendent and the managers of the Legal and the Human Resources departments. It is up to this group to deliberate on the corrective and disciplinary actions indicated by the Compliance Officer, as well as on situations that are ambiguous or unforeseen.

**Audit Committee:** composed of members of the Top Management, in a representative and multisectoral manner. Its mission is to assist ELDORADO’s Administration Board regarding...
7.2. Violations and applicable disciplinary measures

Deviations in conduct, by action, omission or complacency, can cause financial and reputational damage to ELDORADO. Besides that, in certain cases, it violates the laws and negatively affects society.

Thus, an employee who violates the provisions of this Code of Conduct, or allows a member of the team to do so, or even who knows of a violation and fails to report it, will be subject to labor disciplinary measures provided by law (warning, suspension or dismissal for cause) without prejudice to the adoption, by ELDORADO, of legal or administrative measures, when applicable.

Top Management members and associates are subject to specific penalties, which are described in ELDORADO’s Bylaws.

All penalties and disciplinary measures will be applied in accordance with the law and ELDORADO’s policies, considering the seriousness of the infraction and the recurrence by the infringer.

7.3. Channels for grievances, complaints and suggestions

The following channels are available for employees, members of Top Management, associates, business partners, and other interested third parties to make anonymously or identified, complaints, suggestions, and grievances about possible non-compliance with this Code, ELDORADO’s policies or applicable laws:

- Personal assistance by the Compliance Officer
- Email: compliance@eldorado.org.br
- Toll free 24h call center: 0800 800 4747
- Website: contatoseguro.com.br/eldorado

In order to reinforce confidentiality, comfort and trust for the user, the call center and the website contatoseguro.com.br/eldorado are managed by an independent and specialized company.
All complaints received, regardless of the channel used, will be registered and analyzed independently and impartially by the Compliance Officer and by the Governance and Evaluation Group.

ELDORADO guarantees the secrecy and confidentiality of all information provided and prohibits any type of retaliation or punishment against whistleblowers who wish to identify themselves.

In addition, everyone involved in internal investigations will be treated with dignity and respect.

If any of the operating agents of the Ethics and Compliance Program is mentioned in a complaint, that agent will not participate in the investigations and deliberations on the facts.

Every employee, member of Top Management and associate, as part of the commitment to the ethical and transparent development of ELDORADO, shall report any violation of this Code of which they become aware.

Any attempt to obstruct or deter communication from possible violations of ELDORADO’s ethics and conduct guidelines is prohibited.
Pledge and commitment

I declare that I have received a copy of ELDORADO’s Code of Conduct and I am aware that this Code contains guidelines for ethics and conduct that shall be followed by all employees, members of Top Management and associates. Non-compliance may result in the application of a disciplinary measure.

In addition to having received a copy, I have acknowledged that the entire content of the Code is available for my consultation at any time, including in ELDORADO’s intranet and in its official website - eldorado.org.br.

Finally, I declare to be aware of the channels made available by the Ethics and Compliance Program to make grievances, suggestions or complaints about ELDORADO’s policies and practices, and it is my duty to report, immediately, any case of violation of the Code or applicable laws of the which I come to know about.

CITY: ___________________

DATE: ___________________

SIGNATURE: ___________________

NAME: ___________________
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