

CODE OF ETHICAL CONDUCT



Brazilian National Confederation of Industry
THE FUTURE OF INDUSTRY



Brazilian Social Service for Industry
THE FUTURE OF WORKFORCE



Brazilian National Service for Industrial Training
THE FUTURE OF WORKFORCE



Euvaldo Lodi Institute
THE FUTURE OF INDUSTRY

CODE OF ETHICAL CONDUCT

Approved by CNI's Council
of Representatives during
the meeting on
July 27th, 2021.



Brazilian National Confederation of Industry
THE FUTURE OF INDUSTRY



Brazilian Social Service for Industry
THE FUTURE OF WORKFORCE



Brazilian National Service for Industrial Training
THE FUTURE OF WORKFORCE



Euvaldo Lodi Institute
THE FUTURE OF INDUSTRY

Brasília, 2021

BRAZILIAN CONFEDERATION OF INDUSTRY (CNI)

COUNCIL OF REPRESENTATIVES

INDUSTRY FEDERATION OF THE STATE OF ACRE

José Adriano Ribeiro da Silva
João Paulo de Assis Pereira

INDUSTRY FEDERATION OF THE STATE OF ALAGOAS

José Carlos Lyra de Andrade
José da Silva Nogueira Filho

INDUSTRY FEDERATION OF THE STATE OF AMAZONAS

Antonio Carlos da Silva
Nelson Azevedo dos Santos

INDUSTRY FEDERATION OF THE STATE OF BAHIA

Antonio Ricardo Alvarez Alban
Marcelo de Oliveira Cerqueira

INDUSTRY FEDERATION OF THE STATE OF CEARÁ

Jorge Alberto Vieira Studart Gomes
José Ricardo Montenegro Cavalcante

INDUSTRY FEDERATION OF THE FEDERAL DISTRICT

Jamal Jorge Bittar
Elson Ribeiro e Póvoa

INDUSTRY FEDERATION OF THE STATE OF ESPÍRITO SANTO

Cristhine Samorini
Leonardo Souza Rogério de Castro

INDUSTRY FEDERATION OF THE STATE OF GOIÁS

Sandro da Mabel Antônio Scodro
Paulo Afonso Ferreira

INDUSTRY FEDERATION OF THE STATE OF MARANHÃO

Edílson Baldez das Neves
Francisco de Sales Alencar

INDUSTRY FEDERATION OF THE STATE OF MATO GROSSO

Gustavo Pinto Coelho de Oliveira
Jandir José Milan

INDUSTRY FEDERATION OF THE STATE OF MATO GROSSO DO SUL

Sérgio Marcolino Longen
Claudia Pinedo Zottos Volpini

INDUSTRY FEDERATION OF THE STATE OF MINAS GERAIS

Flávio Roscoe Nogueira
Edwaldo Almada de Abreu

INDUSTRY FEDERATION OF THE STATE OF PARÁ

José Conrado Azevedo Santos
Fabio Ribeiro de Azevedo Vasconcelos

INDUSTRY FEDERATION OF THE STATE OF PARÁIBA

Francisco de Assis Benevides Gadelha
Roberto Cavalcanti Ribeiro

INDUSTRY FEDERATION OF THE STATE OF PARANÁ

Carlos Valter Martins Pedro
Virgílio Moreira Filho

INDUSTRY FEDERATION OF THE STATE OF PERNAMBUCO

Ricardo Essinger
Armando de Queiroz Monteiro Neto

INDUSTRY FEDERATION OF THE STATE OF PIAUÍ

Antônio José de Moraes Souza Filho
Francisco Reinaldo Rebelo Sampaio

INDUSTRY FEDERATION OF THE STATE OF RIO GRANDE DO NORTE

Amaro Sales de Araújo
Flavio José Cavalcanti de Azevedo

INDUSTRY FEDERATION OF THE STATE OF RIO GRANDE DO SUL

Gilberto Porcello Petry
Gilberto Ribeiro

INDUSTRY FEDERATION OF THE STATE OF RIO DE JANEIRO

Eduardo Eugenio Gouvêa Vieira
Luiz Césio de Souza Caetano Alves

INDUSTRY FEDERATION OF THE STATE OF RONDÔNIA

Marcelo Thomé da Silva de Almeida
Edmilson Matos Cândido

INDUSTRY FEDERATION OF THE STATE OF RORAIMA

Izabel Cristina Ferreira ItiKawa
Clerlânio Fernandes de Holanda

INDUSTRY FEDERATION OF THE STATE OF SANTA CATARINA

Mário Cezar de Aguiar
Gilberto Seleme

INDUSTRY FEDERATION OF THE STATE OF SÃO PAULO

Paulo Antonio Skaf
Carlos Eduardo Moreira Ferreira

INDUSTRY FEDERATION OF THE STATE OF SERGIPE

Eduardo Prado de Oliveira

INDUSTRY FEDERATION OF THE STATE OF TOCANTINS

Roberto Magno Martins Pires
Sérgio Carlos Ferreira Tavares

BOARD OF DIRECTORS

PRESIDENT

Robson Braga de Andrade

EXECUTIVE VICE-PRESIDENT

Paulo Antonio Skaf

EXECUTIVE VICE-PRESIDENT

Antônio Carlos da Silva

EXECUTIVE VICE-PRESIDENT

Francisco de Assis Benevides Gadelha

EXECUTIVE VICE-PRESIDENT

Paulo Afonso Ferreira

EXECUTIVE VICE-PRESIDENT

Glauco José Côte

VICE-PRESIDENTS

Sergio Marcolino Longen

Eduardo Eugenio Gouvêa Vieira

Antonio Ricardo Alvarez Alban

Gilberto Porcello Petry

Olavo Machado Júnior

Jandir José Milan

Eduardo Prado de Oliveira

José Conrado Azevedo Santos

Jorge Alberto Vieira Studart Gomes

Edson Luiz Campagnolo

Leonardo Souza Rogerio de Castro

Edilson Baldez das Neves

1ST CFO

Jorge Wicks Côte Real

2ND CFO

José Carlos Lyra de Andrade

3RD CFO

Alexandre Herculano Coelho de Souza Furlan

1ST SECRETARY OFFICER

Amaro Sales de Araújo

2ND SECRETARY OFFICER

Antonio José de Moraes Souza Filho

3RD SECRETARY OFFICER

Marcelo Thomé da Silva de Almeida

DIRECTORS

Roberto Magno Martins Pires

Ricardo Essinger

Marcos Guerra

Carlos Mariani Bittencourt

Pedro Alves de Oliveira

Rivaldo Fernandes Neves

José Adriano Ribeiro da Silva

Jamal Jorge Bittar

Roberto Cavalcanti Ribeiro

Gustavo Pinto Coelho de Oliveira

Julio Augusto Miranda Filho

José Henrique Nunes Barreto

Nelson Azevedo dos Santos

Flávio José Cavalcanti de Azevedo

Fernando Cirino Gurgel

FISCAL COUNCIL

HOLDERS

João Oliveira de Albuquerque

José da Silva Nogueira Filho

Irineu Milanese

SUBSTITUTES

Clerlânio Fernandes de Holanda

Francisco de Sales Alencar

Célio Batista Alves

CODE OF ETHICAL CONDUCT



Brazilian National Confederation of Industry
THE FUTURE OF INDUSTRY



Brazilian Social Service for Industry
THE FUTURE OF WORKFORCE



Brazilian National Service for Industrial Training
THE FUTURE OF WORKFORCE



Euvaldo Lodi Institute
THE FUTURE OF INDUSTRY

© 2021. CNI – Confederação Nacional da Indústria.

© 2021. SESI – Departamento Nacional.

© 2021. SENAI – Departamento Nacional.

© 2021. IEL – Núcleo Central.

This document may be reproduced partially or fully with proper sources.

CNI

Superintendency of Compliance and Integrity

CATALOGING IN PUBLICATION

C748c

Confederação Nacional da Indústria.

Code of ethical conduct / Brazilian Confederation of Industry, Industrial Social Services, Brazilian Industrial Learning Service, Instituto Euvaldo Lodi. – Brasília : CNI, 2022. 47 p. : il.

1. Code of Ethics 2. Ethical Conduct 3. Principles I. Title.

CDU: 174:658

CNI

Brazilian Confederation of Industry

Headquarters

North Bank Sector

Quadra 1 – Bloco C

Edifício Roberto Simonsen

70040-903, Brasília, Federal District, Brazil

<http://www.portaldaindustria.com.br/cni/>

Customer Service

Phones: +55 61 3317-9989 / 3317-9992

sac@cni.com.br

SUMMARY

MESSAGE FROM THE PRESIDENT	11
1 INTRODUCTION	13
2 MISSION, VALUES AND OBJECTIVES OF THE INDUSTRIAL SYSTEM	17
3 ETHICAL DECISION-MAKING GUIDE	21
4 RELATIONSHIP WITH STAKEHOLDERS	23
4.1 General principles for all audiences	23
4.2 Relationship between the entities and bodies of the Industrial System.....	26
4.3 Relationship with internal audiences	26
4.4 Relationship with external audiences	27
4.4.1 Relationship with the industry and its workers	27
4.4.2 Relationship with labor unions.....	27
4.4.3 Relationship with partner institutions.....	27
4.4.4 Relationship with suppliers and service providers.....	28
4.4.5 Relationship with the press and social media	28
4.4.6 Relationship with the government	28
4.5 Representation and influence	29
5 INFORMATION SECURITY AND DATA PROTECTION	31
6 COMMUNICATIONS CHANNELS	33
6.1 Ombudsman	33
7 INSTANCES IN CHARGE OF COMPLIANCE AND INTEGRITY	37
7.1 Technical Compliance and Integrity Unit Manager	37
7.2 Ethics Committee.....	38
8 APPLICABLE MEASURES AND SANCTIONS	41
GLOSSARY	43
APPENDIX A - TERMS OF AGREEMENT	47

MESSAGE FROM THE PRESIDENT

Dear employees and partners from entities and national bodies of the Industrial System,

By reiterating their role as national representatives and leader of the Brazilian industry, the entities and national bodies of the Industrial System - CNI, SESI/DN, SENAI/DN and IEL/NC made the first update to the Code of Ethics 2017. The code was adopted in 2011 and was reformulated, modernized and conceptually changed into a Code of Ethical Conduct.

The document was constructed through intense participation and structured according to broadly accepted social values. This new Code is extremely important to implement the Compliance Program.

In the context of the program, another important action involved making changes to the Articles of Incorporation of the Brazilian Confederation of Industry (CNI), incorporating compliance and integrity policies, as well as the Ethics Committee.

This Code maintained relevant precepts to fulfill the demands of a democratic, lawful society and the duties of all citizens. Moreover, the Code incorporates universal principles of public and private management, promoting economic and political freedom with accountability.

This version was provided with important conceptual additions, including in its simple language and structure based on the best market practices.

The institutions making up the Industrial System play an important role for the industry and Brazilian society in the pursuit of continuous improvements to fulfill the aspirations of businesspeople and workers in the sector. This is the direction this Code is taking.

We would like to thank everyone who contributed to creating and writing this important document for our activities.

Robson Braga de Andrade
President of CNI



1 INTRODUCTION

This Code of Ethical Conduct shows the primary guidelines regarding ethical principles and expected conduct both in internal activities and in relationships with external audiences: CNI and the Central Hub of IEL - IEL/NC; as well as international bodies, National Department of SESI - SESI/DN and the National Department of SENAI - SENAI/DN.

CNI, IEL/NC, SESI/DN and SENAI/DN are part of the Industrial System, which is also made up of Industrial Federations and unions, SESI and SENAI's Regional Departments and Councils and of the State Hubs of *Instituto Euvaldo Lodi*.

The stipulations of this Code are recommended to other entities and bodies of the Industrial System.

WHO IS THIS CODE OF ETHICAL CONDUCT APPLICABLE TO?

In order to ensure the Compliance and Integrity Program is effective, all of those who act in or on behalf of CNI, IEL/NC, SESI/DN and SENAI/DN in some way shall comply with this Code of Ethical Conduct, as well as all institutional policies and particularly compliance policies, such as the Anti-Corruption Policy, the Gifts and Hospitality Policy and the Information Security Policy, among others that may be approved.

Therefore, this code is also applicable to officials, employees, representatives designated by CNI, IEL/NC, SESI/DN and SENAI/DN in internal acts, as well as in relations with the industry, unions, employees, partnered institutions, the government, the press, partners, associates, third parties and society in general.

HOW TO USE THIS CODE?

This Code constitutes an important consultation tool and should be used whenever there are questions regarding ethical conduct during activities by the Industrial System's entities and national bodies.

The idea is that this Code should act as a guide for the ideal ethical conduct in day-to-day activities.

This Code is not expected to cover all subjects and recommendations that may emerge regarding corporate ethical conduct, but it shall indicate a set of guidelines that promote harmonious values and conduct inside and outside the institutions.

The Code shall not serve as a replacement for obligations and responsibilities that everyone should undertake to act with common sense and to find guidance on the most adequate conduct, either by consulting with a hierarchical superior, the Technical Compliance and Integrity Unit, the Ombudsman or the Ethics Committee, who shall be ready at all times to provide support.

WHAT IS THE COMPLIANCE AND INTEGRITY PROGRAM?

The Compliance and Integrity Program consists in a set of tools, procedures, standards and internal structures, including this Code of Ethical Conduct, with the goal of ensuring that CNI, IEL/NC, SESI/DN and SENAI/DN, through their officials, employees, designated representatives and third parties act ethically and in compliance with current standards.



2 MISSION, VALUES AND OBJECTIVES OF THE INDUSTRIAL SYSTEM

MISSION

Promote competition in the Brazilian industry, encouraging the creation of an environment that is favorable to businesses and stimulating human, technological and sustainable development.

VALUES

- **Democracy:** defend democracy as the best form of organization in a society of freedom, justice and solidarity that values human dignity and labor and looks to develop our country with sustainable means while fighting against social inequality and promoting wellness for all.
- **Freedom of initiative:** work a business-like vision and attitude, strengthening, promoting and defending freedom of initiative, competition and ownership.
- **Ethics:** always do what is right and in good faith, respecting ethical standards and morality.
- **Transparency:** communicate with all stakeholders using clear, open dialog. Adopt procedures to ensure stakeholders have access to relevant information on the Institution's activities in a timely, complete, accurate manner.
- **Value our professionals:** promote professional and personal development and recognition among employees through management that values results, goals, talents and technical and emotional skills.
- **Innovation:** encourage technological development across Brazilian industries.

OBJECTIVES

- Contribute towards the future of labor and of the industry: assess the demands of the industrial sector and society and develop solutions that fulfill their expectations and interests of our country.
- High performance: carry out all activities according to the highest human, ethical, technical, efficiency, excellence and professional standards.



3 ETHICAL DECISION-MAKING GUIDE

This Code can be fulfilled through daily activities. For this reason, before taking any actions, ask yourself:

- Am I breaking any laws, rules or standards of the Institution and/or the institutional policy or this Code of Ethical Conduct?
- Am I insecure about how I should behave or wondering about what ethical procedures should be followed?
- Is my attitude contrary to the mission, values and objectives of the Industrial System?
- Would I feel frustrated when explaining my decision to society or family members?
- Have I analyzed all nuances involved in the questions being made so that I can make a more assertive decision?
- Have I analyzed whether the risks involved in the decisions to be made represent the most adequate result for the Institutions?

If you answer “yes” to any of the questions above, your behavior or activity in question may be inadequate.

If you are still not sure, ask yourself:

- Have I looked for alternatives in the Code of Ethical Conduct or in policies and/or institutional standards?
- Have asked for guidance from my hierarchical superior, members of the Technical Compliance and Integrity Unit or the Ombudsman or Ethics Committee?

Follow these procedures and you will certainly be able to take the best course of action.



4 RELATIONSHIP WITH STAKEHOLDERS

This chapter describes the principles and conduct to be observed during relations with all stakeholders.

The Industrial System's entities and national bodies adopt, in the work environment, integrity and preventive measures that safeguard the safety of its officials, employees and third parties.

4.1 GENERAL PRINCIPLES FOR ALL AUDIENCES

All conduct and actions must be based on ethical principles and on compliance with the law, standards, institutional policies, the Code of Ethical Conduct and organizational guidelines.

Corruption shall not be tolerated in any circumstance. Officials, employees, representatives designated by CNI, IEL/NC, SESI/DN and SENAI/DN may not request, receive or offer favors, donations, loans, services or improper payments of any kind.

There are many tools and internal instances to prevent and detect corruptive actions, such as: The Transparency Portal, audits, the Technical Compliance and Integrity Unit, Ombudsman and the Ethics Committee.

If you have any questions, please consult our institutional policies adopted by the entities and national bodies of the Industrial System.

Gifts, presents and hospitality may only be accepted or offered by officials, employees and designated representatives when they can be publicly revealed without causing issues for the institution and the individual in question.

Offering and receiving gifts, presents and hospitality is a common practice in the corporate and political world, but this can also be used to abuse and deviate from processes.

If you have any questions, please consult our institutional policies adopted by the entities and national bodies of the Industrial System.

Conflicts of interest must be avoided, but if a potential conflict of interest is identified, it must be reported to the hierarchical superior, to the Technical Compliance and Integrity Unit, to the Ombudsman or to the Ethics Committee. The official, employee or designated representative must step away from the activity that is potentially generating a conflict of interest until he or she receives the institution's position regarding the matter.

The institutional programs and projects must adhere to the principles of ethics, transparency, efficiency, efficacy and economics.

Conflicts of interest consist in situations in which personal interest could interfere with the objectivity and quality of the decisions to be taken on behalf of the Institution.

There are numerous situations where conflicts of interest can occur. Below are a few examples:

- Subordination between family members and people whose relationship could influence the other person's activity.
- Participation of officials or employees in contract processes for companies in which an individual may have equity, or in which family members may have equity or a position of influence in negotiation processes.
- Preferential treatment to family members in employee hiring processes, adhering to the institutional standards on the subject.
- Exchanges or retribution of favors between entities.
- Retribution of contract for family members between entities.

Sponsorship actions are important opportunities to aggregate value to the brand while also supporting activities related to the institutional objectives, without causing conflicts of interest. However, sponsorships must comply with the Sponsorship Policy and other internal rules of the institution.

The use of confidential Information accessible by officials, employees and designated representatives to benefit themselves or third-parties due to activities in CNI, IEL/NC, SESI/DN and SENAI/DN is prohibited.

The resources, as well as the name, brand and image of CNI, IEL/NC, SESI/DN and SENAI/DN may only be used to fulfill the interests and goals of the Institutions.

All individuals who participate in events and discussion forums as representatives of CNI, IEL/NC, SESI/DN and SENAI/DN shall express their represented institution's position. However, freedom of expression will still be respected. The official, employee or designated representative may request to be replaced due to potential close relationships.

CNI, IEL/NC, SESI/DN and SENAI/DN do not make donations to political parties or candidates.

Cordial actions, transparency and mutual respect must be the foundation for all relations with internal and external audiences. Offensive, intimidating, hostile behaviors shall not be allowed.

Diversity and human dignity shall be valued and respected. Discrimination, insults, intimidation and offensive behavior due to gender, ethnicity and sexual orientation, behaviors that can be deemed racist or against age, religion, physical appearance, geographical origin, social-economic condition and disabilities as legally defined.

Our entities and national bodies do not tolerate or practice, under any circumstance, forced and/or child labor, and we refused to maintain relations with anyone who engages in these practices.

CNI, IEL/NC, SESI/DN and SENAI/DN strive to promote development, well-being and quality of life for workers and their families, driving social responsibility, as our institutions believe this can be transformative and inclusive.

Sustainability is a key matter in Brazilian industrial strategy. The conservation of natural resources must be prioritized and aligned with the social-economical development needs of our country.

The Industrial System's entities and bodies aim towards continuously improving processes, promoting the rational use of natural resources, conscious consumption and reduced impacts against the environment.

The production and/or disclosure of messages that are known to be false (i.e., fake news), disinformation, lies and rumors is prohibited by the Industrial System's entities and national bodies.

4.2 RELATIONSHIP BETWEEN THE ENTITIES AND BODIES OF THE INDUSTRIAL SYSTEM

The relationship of CNI, IEL/NC, SESI/DN and SENAI/DN with other entities and bodies of the Industrial System shall be maintained at an equal level, considering their specific conditions, needs and particularities.

The entities and national bodies act in a coordinated manner. Moreover, they also respect the administrative and financial autonomy of the entities and regional bodies and look to continuously improve their governance practices.

4.3 RELATIONSHIP WITH INTERNAL AUDIENCES

CNI, IEL/NC, SESI/DN and SENAI/DN are committed towards promoting a safe, health work environment based on:

- cordiality, transparency and mutual respect;
- compliance with the Institution's individual and collective values;
- listening to opinions and collaborative attitudes and promoting a cooperative work environment;
- ensuring transparent, accessible dialog with everyone, including officials, employees and partners;
- respecting the religious beliefs and political opinions of officials, employees and third parties, while prohibiting any manifestations of this kind in the work environment with the purpose of influencing others;
- repudiating behaviors that may lead to an offensive, intimidating or hostile work environment that may be considered moral, sexual or religious harassment;
- respecting gender equality and repudiating discrimination;
- respecting the cultural and social diversity of officials, employees and third parties;

- repudiating all discriminative attitudes; and
- repudiating all abusive attitudes and those that provide improper benefits to people or groups.

4.4 RELATIONSHIP WITH EXTERNAL AUDIENCES

4.4.1 RELATIONSHIP WITH THE INDUSTRY AND ITS WORKERS

The Brazilian industry is the reason why the Industrial System exists. Thanks to actions and services provided by CNI, Industrial Federations and Unions, SESI, SENAI and IEL, the Systems strives to promote a favorable environment for businesses, competition, sustainable development, education, innovation, technology, businesspeople and workers while also promoting the growth of our country.

4.4.2 RELATIONSHIP WITH LABOR UNIONS

The Industrial System's entities and national bodies defend the process of collective negotiation as the best instrument to improve labor relations and develop more dignified, collaborative, respectful relationships between employers and employees.

The System's entities and national bodies are founded upon transparency and responsibility in negotiations with unions representing their members.

The System's entities and national bodies respect the right to free membership to unions and does not allow any discrimination against employees that are unions members.

4.4.3 RELATIONSHIP WITH PARTNER INSTITUTIONS

The relationship with partner institutions strengthens and empowers the actions of the Industrial System's entities and national bodies and shall promote synergy with partners' values, institutional objectives, strategic goals and technical skills.

4.4.4 RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS

The relationship with suppliers and service providers shall be founded upon:

- corporate standards and best practices;
- efficiency and excellence in results;
- selecting the most advantageous proposals according to pricing and quality;
- promoting sustainable, socially responsible corporate practices; and
- respecting intellectual property rules.

All of those who wish to maintain relations with the Industrial System's entities and national bodies must be committed to ethics and integrity.

Please refer to the internal rules and/or institutional compliance policies if you have any questions.

4.4.5 RELATIONSHIP WITH THE PRESS AND SOCIAL MEDIA

Relations with the press and social media are maintained according to the following criteria:

- Strategic information from the Industrial System's entities and national bodies shall be provided by their officials, executives and, when authorized, employees and designated representatives.
- Using technical parameters to fulfill the Institution's strategic goals.
- Respecting the freedom of expression of officials, employees and designated representatives from CNI, IEL/NC, SES/DN and SENAI/DN, who shall nonetheless comply with the values and principles of this Code of Ethical Conduct in public environments and in personal social media accounts.

4.4.6 RELATIONSHIP WITH THE GOVERNMENT

The Industrial System's entities and national bodies maintain a collaborative relationship with the government in order to promote prosperity, justice, ethics and sustainability in Brazil while also promoting the competitiveness of the Brazilian industry in an environment that stimulates the development of society.

The relationship with the government is founded upon:

- maintaining ethical, open, active, consistent, transparent dialog;
- disallowing the use of these relations for personal benefit; and
- the autonomy, impartiality and independence of officials, employees and representatives from CNI, IEL/NC, SESI/DN and SENAI/DN whose actions involve government bodies in charge of judging administrative processes, while also comply with this Code of Ethical Conduct, legal standards and principles and rules of their respective bodies.

4.5 REPRESENTATION AND INFLUENCE

The actions of representation and influence with government agencies and organizations in civil society, both nationally and internationally, have the goal of contributing towards the progress of our country by developing the industrial sector and improving the living conditions of Brazilian workers.

These activities are founded upon:

- open dialog that is transparent, ethical and technical;
- contributing towards public debates in an unbiased manner, defending proposals aligned with institutional values and objectives;
- providing information that contribute towards creating public policies and deepening the understanding of the industry's legitimate needs; and
- promoting engagement of the industrial sector in political discussions.

For further information about what conduct is adopted by those working in government relations on behalf of the Industrial System's entities and national bodies, refer to our internal norms and/or institutional compliance policies.



5 INFORMATION SECURITY AND DATA PROTECTION

We live in an increasingly digital, connected world, where information security plays a key role in fully developing activities and maintaining a positive reputation for any institution.

Our information treatment activities are founded upon:

- proactivity, recommending that information be shared only with authorized personnel and employing the utmost care to prevent leaks;
- using computer software and hardware in the Institution only for its operations and activities; and
- disallow any means of sharing, storing or using obscene, false, pornographic, discriminatory and defamatory content, as well as any content that goes against the values of our Institution.

If you have any questions, please consult our institutional policies adopted by the entities and national bodies of the Industrial System.

They provide guidance on how to handle confidential information, how to properly discard information, data privacy, among other matters.

These policies follow international security standards and comply with the Brazilian General Data Protection Law (LGPD, *Lei Geral de Proteção de Dados*).



6 COMMUNICATIONS CHANNELS

Our Ombudsman is an important tool to detect deviations and ensure they are correct. As such, the entities and national bodies of the Industrial System encourage and promote responsible, conscious communications based on facts and real information that describe harmful situations, ensuring the notifying party remains anonymous for individuals that are not part of the investigation process.

Our Institutional shall not tolerate any kind of retaliation against individuals who use these channels to communicate in good faith.

In case the author of the communication feels like him or herself is being the target of retaliation, he or she shall communicate this situation to his or her immediate superior, the Ombudsman or the Technical Compliance and Integrity Unit.

6.1 OMBUDSMAN

The purpose of the Ombudsman is to mediate dialog between entities and national bodies and all interested audiences, ensuring its services always adhere to ethical standards with the best possible quality and efficiency.

Any individual who has become aware of a deviation from this Code or laws, standards, institutional policies or values of the Industrial System's entities and national bodies may use the Ombudsman to report the event.

The Ombudsman allows individuals to provide feedback, suggestions and complaints, ask questions or report violations.

If you'd like to contact our Ombudsman, please check the best intranet option available to you or the Industrial System's entities and national bodies' websites (CNI, IEL/NC, SESI/DN AND SENAI/DN).

Confidentiality

All reports and complaints shall be handled with secrecy and access will be restricted to the individuals in charge of the case. The actions and investigations will be carried out under the necessary discretion, preserving the identity of the notifier, as per the Internal Rules of the Ethics Committee.

Anonymous reports or reports whose author cannot be identified shall not be accepted, as well as reports made in a generic manner or that are incoherent, inaccurate or with an unknown notified parties (or if there is not enough information to identify this party).



7 INSTANCES IN CHARGE OF COMPLIANCE AND INTEGRITY

All officials, employees and designated representatives shall be responsible for the integrity of activities at CNI, IEL/NC, SESI/DN and SENAI/DN, and shall strive to ensure ethical commitment continues to be an institutional characteristic.

Special mention goes to the Technical Compliance and Integrity Unit, the Ombudsman and the Ethics Committee, which help every achieve this common goal and conduct Compliance and Integrity activities in the Industrial System's entities and national bodies.

7.1 TECHNICAL COMPLIANCE AND INTEGRITY UNIT MANAGER

The Technical Compliance and Integrity Unit structures and manages the Compliance and Integrity Program for CNI, IEL/NC, SESI/DN and SENAI/DN, supporting officials, employees, designated representatives and third parties in carrying out their activities with ethics and integrity.

Its roles include:

- Diffusing and provide clarifications for officials, employees and third parties about the Compliance and Integrity Program.
- Communicate with the Industrial System's entities and national bodies' organizational units to permanently improve the Compliance and Integrity Program and the management processes.
- Regularly update risk analyses at CNI, IEL/NC, SESI/DN and SENAI/DN.
- Receive and provide follow-up to reports received through the communication channels.
- Take internal measures to assess potential breaches to the Code of Ethical Conduct or institutional policies.
- Provide its opinion on situations of conflict of interest.

7.2 ETHICS COMMITTEE

The Ethics Committee shall be in charge of:

- Assess reports of situations that appear to breach the Code of Ethical Conduct and institutional policies involving officials, employees, interns, designated representatives from CNI, IEL/NC, SESI/DN and SENAI/DN, as well as third parties, providing suitable measures to be taken.
- Provide advisory to CNI's Council of Representatives and Board of Directors on matters related to the Code of Ethical Conduct and the institutional compliance policies.
- Propose updates to the Code of Ethical Conduct and answer questions about its interpretation.
- Prepare and submit the approval of its internal rules (and any changes applied to them) to the Board of Directors;
- Issue guidelines regarding the dissemination of the Code of Ethical Conduct and of the institutional compliance policies, while monitoring its fulfillment by the target bodies.
- Investigate or obtain testimony from directors, employees and designated agents from CNI, SESI/DN, SENAI/DN and IEL/NC and third parties that may be required for the assessment procedures.

MEMBERS OF THE ETHICS COMMITTEE

The members and operations of the Ethics Committee, which shall be presided by a member of the Council of Representatives, shall comply with the stipulations of CNI's Articles of Incorporation, approved by the Council of Representatives, as well as complementary instruments that may be approved by the entity's Board of Directors, including the Internal Rules.

The members of the Ethics Committee, except for CNI's 1st secretary officer and the Technical Compliance and Integrity Unit manager, will be chosen by the Council of Representatives upon proposal by the President of CNI.

In case a situation that appears to breach the Code of Ethical Conduct or institutional policies is reported, the Ethics Committee shall assess the facts and potentially recommend, with proper justification, what measures the competent parties should take, including:

- Clarification, education and training.
- Adjustments to processes, situations or conducts.
- Application of disciplinary sanctions.
- Introduction of a process to apply disciplinary sanctions, in cases involving an elected official.





8 APPLICABLE MEASURES AND SANCTIONS

In cases involving an elected official, the Ethics Committee may propose to the Council of Representatives the introduction of a process to apply the penalties outlined in the Entity's Articles of Incorporation.

In cases involving employees, designated representatives and third parties, the Ethics Committee may propose to the competent parties that sanctions be applied to the case, as follows:

- Verbal warning.
- Written warning.
- Suspension.
- Discharge.
- Termination of the Internship Commitment Terms.
- Destitution of the designated representative
- Termination of contract (in case of a legal entity)
- Disassociation of service providers and suppliers.



GLOSSARY

The purpose of this glossary is to clarify the terms used by the entities and national bodies of the Industrial System's Code of Ethical Conduct.

Moral harassment: exposure of one or more people to humiliating, frustrating situations that can negatively affect their mental well-being, especially when coming from a higher hierarchical position in the work environment.

Religious harassment: humiliate someone with the goal of imposing one's religious belief during work hours, especially coming from a higher hierarchical position.

Sexual harassment: humiliate someone verbally, non-verbally or physically with the goal of obtaining sexual favors.

Employee: employees or interns at CNI, SESI/DN, SENAI/DN or IEL/NC.

Conflict of interest: situations in which personal interest, even if indirectly, could interfere with the objectivity and quality of the decisions to be taken on behalf of the Institution.

Corruption: offering, authorizing, requesting, granting or receiving, direct or indirectly, improper advantages (monetary or otherwise) from a public or private agent.

Officials: members of the Council of Representatives, Board of Directors, Fiscal Council at CNI, director of SESI/DN, director of SENAI/DN and general director of IEL/NC, as well as these entities' consultant bodies.

Elected officials: members of the Council of Representatives, Board of Directors, Fiscal Council at CNI, director of SESI/DN and general director of IEL/NC.

Equality: refers to equal, unbiased treatment with balanced consideration of the substantive differences between the parties in question.

Ethics: the set of moral values, principles and attitudes that serve as a foundation for human conduct in society to maintain common wellness.

Preferential treatment: obtaining or offering improper advantages or benefits due to sponsorship, protection, friendship, family relations or other forms of illegitimate interest.

Suppliers: individuals and legal entities hired to provide goods and services of any kind.

Managers: individuals who exercise managerial roles, including officers/directors, superintendents, executive managers and managers themselves.

Strategic information: information that subsidizes the decision-making process.

Partner institutions: institutions with which the Industrial System's entities and national bodies maintain relations with the goal of carrying out joint cooperative actions motivated by common interests and goals, in which each party provides and mobilizes resources to achieve these goals and the desired results.

Members: officials and/or employees from the Industrial System's entities and national bodies.

Integrity: acting with honesty, ethics and impartiality according to internal rules and current laws.

Designated representative: an individual who may or may not be part of the Industrial System designated to act on the entity's behalf with public or private bodies, both nationally and internationally.

Third parties: individuals or legal entities who maintain relations, directly or indirectly, with any of the entities and national bodies of the Industrial System as a service provider, associate, supplier, consultant, business partner, assignee or distributor, regardless of the any formal contracts in place.



APPENDIX A - TERMS OF AGREEMENT

I have received this Code of Ethical Conduct of the National Bodies and Entities of the Industrial System (CNI, SESI/DN, SENAI/DN and IEL/NC) and am committed towards complying with it.

Name (legible):

Area/department:

Position/role:

Date:

Employee's signature

CNI

Robson Braga de Andrade
President

Glauco José Côte
Executive Vice-President of CNI
General Coordinator of the Implementation of the Compliance Program (CNI, SESI/DN, SENAI/DN and IEL/NC)

Multidisciplinary Committee to Restructure the Code of Ethical Conduct

President's Office
Teodomiro Braga da Silva
Head of Office - Director

Maria Beatriz Garotti
Advisor

Superintendency of Compliance and Integrity
Oswaldo Borges
Superintendent of Compliance and Integrity

Marcos Gambôa
Advisor

Ualger Luiz da Costa
Technical Team

Executive Management Unit of Control and Management Support
Giuliano Amato
Executive Manager of Control and Management Support

Executive Management Unit of Compliance and Process Development
Francisco da Justa
Executive Manager of Compliance and Process Development

Executive Management Unit of Risk Prevention and Monitoring
Carla Gonçalves
Executive Manager of Risk Prevention and Monitoring

Guilherme Salgado
Support and Monitoring Manager

LEGAL DIRECTORS - DJ
Hélio Rocha
Legal Director

Cássio Borges
Assistant Legal Director

Executive Management Unit of Legal Operations
Sidney Batalha
Executive Manager of Legal Operations

EXECUTIVE BOARD OF COMMUNICATIONS - DIRCOM
Ana Maria Curado
Communications Director

Julia Scheibel
Technical Team

Executive Management Unit of Public Relations
Isadora de Castro Selos
Executive Manager of Public Relations

External Communications Management
Alessandra Cristhinna Araujo Glerian
External Communications Manager

Superintendency of Journalism
Jose Edward Vieira Lima
Superintendent of Journalism

Andrea Matias Silva
Technical Team

EXECUTIVE BOARD INDUSTRIAL AND ECONOMIC DEVELOPMENT - DDIE
Vacancy

Monica Giagio
Advisor

EXECUTIVE BOARD OF INSTITUTIONAL RELATIONS - DRI
Monica Messenberg Guimarães
Director of Institutional Relations

Executive Management Unit of Executive Branch Relations
Pablo Cesário
Executive Manager of Executive Branch Relations

CORPORATE SERVICE DIRECTORS - DSC
Fernando Augusto Trivellato Andrade
Director of Corporate Services

Superintendency of Human Development
Renato Paiva
Superintendent of Human Development

Remuneration and Personnel Management
Suyane Ricci
Remuneration and Personnel Manager

Superintendency of Administration - SUPAD
Maurício Vasconcelos de Carvalho
Administrative Superintendent

Alberto Nemoto Yamaguti
Normalization

EXECUTIVE BOARD OF EDUCATION AND TECHNOLOGY - DIRET
Natalia Pacheco Rabelo
Advisor

Superintendency of Control and Management
Eliane Fernandes
Superintendent of Control and Management

SESI – National Department
Robson Braga de Andrade
Director

Rafael Esmeraldo Lucchesi Ramacciotti
Director Superintendent

Paulo Mól Júnior
COO

SENAI – National Department
Rafael Esmeraldo Lucchesi Ramacciotti
General Director

Julio Sergio de Maya Pedrosa Moreira
Assistant Director

Gustavo Leal Sales Filho
COO

Joana D'Arc Cerqueira
Technical Team

IEL – Central Hub
Paulo Afonso Ferreira
General Director

Eduardo Vaz da Costa Junior
Superintendent

Paula Duarte Schnor
Advisor

Carneiros e Dipp Advogados (Law Firm)
Justice Gilson Dipp
Rafael Carneiros
Mariana Rabelo
Carlos Henrique Barbosa
Consultancy

Candeia Revisões (Language Review Team)
Danúzia Queiroz
Fabiano Gama
Grammatical and Spelling Proof-reading (in Portuguese)

www.cni.com.br

[/cnibrasil](https://www.facebook.com/cnibrasil)

[@CNI_br](https://twitter.com/CNI_br)

[@cnibr](https://www.instagram.com/cnibr)

[/cniweb](https://www.youtube.com/c/cniweb)

[/company/cni-brasil](https://www.linkedin.com/company/cni-brasil)



CNI

Brazilian National Confederation of Industry
THE FUTURE OF INDUSTRY

SESI

Brazilian Social Service for Industry
THE FUTURE OF WORKFORCE

SENAI

Brazilian National Service for Industrial Training
THE FUTURE OF WORKFORCE

IEL

Euvaldo Lodi Institute
THE FUTURE OF INDUSTRY