

Code of

Ethics and Conduct

sciath



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1. Purpose of the Code of Ethical Conduct



We understand and respect that each of our employees has their individual liberty, thus, they may have different principles and beliefs. However, in relation to their professional activities, it is necessary that their actions are aligned with the values of the company. Therefore, the Code of Ethical Conduct serves to **guide our employees' attitudes**, whether they are personal or professional. We hope our partners, suppliers and clients also act in accordance with the guidelines presented here.

This code applies equally to everyone involved in the company, regardless of the hierarchical level. Considering that this represents an agreement to the norms and values of the company, adherence to it occurs at the moment when the relationship between the employee and the company starts, represented by the signing of the adherence term. It is up to Sciath the duty to update and disclose this document.

In this document, it is possible to find how to proceed in certain situations that may affect Sciath, in an attempt to prevent situations that may bring risks to the business of the company, mainly the ones related to the Company's finance and image whether it be directly or indirectly.

Thus, the Code of Ethical Conduct presents as its main purpose the alignment of Sciath's and its employees interests to preserve and protect the value of our organization.





Our

Culture

sciath



2. Our Culture



Sciath's culture is guided by the principles described below. It is by them that everybody who takes any actions on behalf of the company must be guided when making professional decisions and actions, as this is our main purpose.



Mission

Guarantee **exclusive service** and contribute to the economic stability of our partners, with focus on the management of benefits, in order to **promote the well-being** of the company and its talents, offering tranquility for the leadership.



Vision

Be a reference in the benefit management segment (benefit solutions), standing out for the **excellence and personalization of services provided**, through solid and lasting partnerships with our partners.



Values

We follow the following principles:

- **Commitment;**
- **Honesty**
- **Ethics;**
- **Transparency in conducting business.**



Ethics

Committee



3. Ethics Committee

Sciath's Ethics Committee has the objective of assuring the agreements proposed in the Code of Ethical Conduct and its internal policies, guaranteeing the adherence of its employees to the ethical and legal principles.

This committee is made up of:



**Executive
Board of
Directors**

Because we are aware that our code does not cover all the situations of the current reality, any doubts about exceptions and compliance with the Code of Ethical Conduct must be forwarded to the Ethics Committee for clarification.

In the event of a breach of our code, the committee is responsible for the discussion and decision on the direction to be taken and penalty to be applied and may vary according to the seriousness of the act, leading to possible warnings, suspensions, or even legal action and dismissal for just cause.





Our

Conducts

sciath



4. Our Conducts



4.1 Work Relationships

We believe that having a **safe, healthy, pleasant and motivating** work environment for our employees is essential. Thus, we always act with the objective of **encouraging** friendly and respectful relationships, with **respect for diversity and individual rights**.

We want our employees to feel open to denouncing any attitude that is not in line with these principles and the guidelines set out herein, acting in an ethical manner and not being complicit with it.

4.1.1 Personal Treatment

- The relationship between the employees and public relations must be based on **cordiality, mutual respect, honesty and trust**.
- Sciath values **diversity**, valuing the quality of opportunities and treatment in relation to all people.
- No form of **prejudice, defamation or discrimination** related to gender, color, physical condition, religion, sexual orientation, nationality, social background or political preferences between Sciath's professionals and its relationship public will be allowed.
- **Sciath repudiates** any type of humiliation, intimidation, exploitation, blackmail, harassment (physical, moral or sexual) or abuse of position.
- Any act of violence, whether it be psychological or physical, must be communicated **immediately**.



4.1.2 Use of the facilities and resources

- Care with the facilities, furniture, equipment and systems of the work environment is expected. The use must be **correct and with care** for professional purposes and with prior authorization, and in case of improper use, the employee may be held civilly and criminally liable.
- Sciath aims at providing an environment that allows for the reduction of possible risks to health and personal integrity.
- **The use of weapons or equipment** that represents a risk to the safety (such as **flammables**) of the company's premises.
- The use of the facilities is **restricted** to **activities** related to the **professional activity performed**.
- Sciath is entitled to **monitor phones, websites, emails**, among other tools used in the professional environment.
- In the work environment, we believe in the **common sense** of our employees in relation to clothing and accessories, contributing to the creation of a positive and professional image of the company. It is worth mentioning that the same is expected in case of visits to clients, partners and suppliers.





4.1.3 Use of drugs and alcoholic beverages

- It is not allowed to **represent Sciath or act** in its work environment **under the effect** of any intoxicating substances.
- It is highly recommended **that the consumption of alcoholic beverage is moderate in corporate events** sponsored either by Sciath or its direct relationship public.

4.1.4 Use of social media and internet

- Sciath's contents must only be published in the official social medias of the company, **with prior approval by the Marketing department and responsible board of directors.**
- No employee is allowed to create web pages or profiles in the name of Sciath.
- In relation to personal social media, if there is any connection with Sciath, the published content must be adequate, avoiding any damage to the reputation of the company, its suppliers, partners or clients. Thus, no confidential information of the company is to be published.
- When manifesting an opinion, avoid connecting it to Sciath. It is forbidden to disclose texts, images and videos with defamatory, prejudiced and/or any contents that incite violence.





4.2 Conflict of interest

It is understood as conflict of interest all and any situation in which one of the involved parts presents **a hidden interest in its own favor**. In these cases, there is a contradiction between the private interest of the ones involved in the business and the objectives of Sciath.

This type of conflict is most common in the financial field, in which one of the parts may obtain profit, whereas the other part loses out, but it can occur in different fields.

Thus, Sciath repudiates actions based on personal preferences and/or interests or even situations in which the position and influence in the company is used for obtaining advantages.

In case there is the identification of a situation as the one described, the Ethics Committee may be called on to guarantee that the interests of the organization are prioritized by acting to mediate the situation.

It is important to point out that in these situations of conflict of interest, there might be actions that fall under **fraud and corruption**, which are not accepted in any form by Sciath and shall be punished with measures in accordance with legislation in force and the company's internal policies.

All employees have the duty to report such situations and cooperate with the cases of internal and external investigation.



4.2.1 Parallel activities

- Employees are not allowed to promote any kind of political and/or religious action, **secondary commercial activities** (even of an artisanal nature) or any propaganda linked to matters of **personal interest** in the professional environment.
- There must be no **parallel activities that negatively** affect Sciath's **professional performance**. Furthermore, personal investments in businesses that compete with the company or that could negatively interfere with the company's interests are forbidden.
- Employees who are interested in pursuing a second professional activity have this right, as long as it is **legitimate and legal**, but they must give prior and express notice to their immediate superior and the Executive Board.
- It is not permitted to use one's position to obtain **any favors** for oneself or others..
- Sciath data may not be used for **academic research, lectures, presentations or training** without prior authorization from the Ethics Committee.



4.2.2 Hiring of family members and affective relationships



- With regard to hiring relatives of current employees, Sciath is against this practice, with the exception of the Academic Vacation Program.
- **Affectionate relationships** between employees are forbidden, whether they are between positions in a hierarchy of subordination or not.
- It is forbidden for the employee to participate in business in which the company involved has a family member as one of its employees, which could bring some **kind of benefit or favor** for personal interests..

4.2.3 Fraud and Corruption

- Sciath believes that corruption and fraud must be combated in any form. Employees are therefore expected **to cooperate** with current investigations, whether of internal or external origin, reporting any suspicions to the Board of Directors of the area in which they work.
- Any form of receipt or payment of bribes, fraud, crimes against the economic, tax or administrative order and **any other criminal activity** is prohibited. Acts of omission and maintenance of favor also fall under the heading of corruption.
- Sciath guarantees **full compliance with current legislation**, promoting the dissemination and adherence of all its employees to the definitions of Law 12.846/2013, popularly known as the Anti-Corruption Law.





4.2.4 Presents, gifts and courtesies

- These types of bonuses will only be given or accepted if they occur in **a transparent and legal manner** and are not characterized as a conflict of interest or an attempt at corruption.
- All employees who receive presents, gifts or courtesies may use them if the value does not exceed half the minimum wage, otherwise it must be reported to and assessed by the Ethics Committee.
- Gifts, courtesies and presents to be offered to stakeholders must respect the limit of half the minimum wage.
- With regard to invitations to cultural, sporting and entertainment events, participation in these is permitted as long as it is institutional and regular and/or part of sporadic or periodic campaigns.

4.3 Information Security

Considering that Sciath presents information that must be kept confidential, whether produced by the company itself or by its stakeholders. Employees must therefore act in accordance with **the Information Security Policy**, always respecting the General Law on the Protection of Personal Data, preserving information and maintaining its privacy and confidentiality. This information can only be disclosed with the prior **authorization** of the Marketing department and the executive board, through the correct channels .





4.3.1 Intellectual Property

- Any patents and/or registrations, information, designs and strategies are properties created in the course of Sciath's exclusive professional activities. As such, it is the responsibility of all employees to take care of these resources, and it is not their responsibility to claim patents or copyrights.
- It is forbidden to copy, sell or disclose any asset that constitutes intellectual property.

4.3.2 Disclosure of Information

- All information about Sciath's dealings with partners and suppliers in relation to costs and commercial agreements, information about employees, budget and short, medium and long-term planning is considered confidential. In addition, commercial strategy and customer data must also be kept confidential.
- The company's internal affairs must be treated with discretion and zeal, so caution is needed when making any comments about Sciath and its employees.

Any privileged information about the company, business, clients, partners, suppliers, processes and results should be kept confidential. To this end, conversations on these topics should be avoided in places where there is no privacy (elevators, bathrooms, restaurants, airports, corridors, public transport, etc.).

- All interviews and information for the media must be authorized by the Executive Board.
- It is forbidden to disclose any information from the employee database without prior authorization from the Ethics Committee.



4.3.3 Use of Systems

- Once part of the company, all employees have access to passwords for systems and network directories. Therefore, this information should not be divulged or shared, as it is for **personal and non-transferable use**.

4.3.4 General Personal Data Protection Law

- Sciath complies with all the terms and requirements established by Law 13.709/2018, which provides for the **protection of information** collected, analyzed and stored by companies, prohibiting the transmission of personal data without the consent of the owner.





4.4 People Management

- Sciath recognizes and respects the legitimacy of trade unions in representing employees.
- We respect legal and labor regulations in accordance with current legislation.
- Our managers and leaders should be followed as an example of professional behavior, through transparent, honest and upright conduct with their respective work teams.
- Selection processes are conducted in a respectful manner, with the aim of verifying the competencies and requirements needed for a given position, as well as adherence to Sciath's values. Candidates nominated by employees or third parties must normally complete all stages of the selection process.
- We have developed internal policies to recognize individual contribution and competence, with a view to equal opportunity for growth.
- Our aim is to deliver a quality service to our clients, so we provide all the necessary information and equipment for our employees, ensuring that this is achieved.
- We expect our employees to show proactivity and commitment to their work at Sciath. It is essential that everyone questions and communicates to their managers any doubts or suggestions that arise in relation to any project, thus guaranteeing a quality product.

Sciath recognizes the importance of mistakes in learning and in the creative process. If there are any, they should be reported immediately to the manager so that the appropriate mitigation measures can be taken.



Relationship with the
Public



5. Relationship with the **Public**

5.1 Employees

We are always looking to provide a **transparent, honest, pleasant and learning environment** for our employees, promoting motivation by valuing individual and teamwork. In this way, the Human Resources department is constantly striving to improve, guaranteeing the renewal of internal policies when necessary, which will be disseminated through the company's internal communication channels.

It is worth noting that the same working conditions must be applied to temporary workers, trainees and any others who provide services for Sciath, guaranteeing their health and safety..

In addition, Sciath repudiates any form of child or slave labor.

5.2 Clients

Our main objective is to offer a **professional**, objective and useful service, **ensuring the satisfaction** of our clients. As such, employees must be customer-oriented, understanding their primary needs, guaranteeing a quality service and building ethical and lasting relationships.



5.3 Partners and Suppliers

We look for business partners and suppliers that are compatible with our values and strategic objectives **to build sustainable relationships** based on respect and professionalism.

The selection of these must be based on quality and market criteria to avoid situations described as “conflict of interest”, which may be characterized as privilege or discrimination.

Any situation that violates the Anti-Corruption Law is prohibited, which promotes the objective responsibility in the civil and administrative spheres by actions that may cause damage to the public, national or foreign administrations.

5.4 Public Power

Sciath is in conformity with the legislation in force, meeting any legal demand from the public bodies and/or regulators related to the activity.

The respective demands must be presented to the Executive Board of Directors.

5.5 Competitors

Sciath agrees with the principles of free competition. Thus, it is not up to any employee to make statements that may affect the image of our competitor negatively.



5.6 Press and communication vehicles

We respect freedom of expression and the duty of the media to inform public opinion.

Therefore, Sciath undertakes to disseminate information about the company and facts about the market through official channels for the respective demands in the Marketing area.

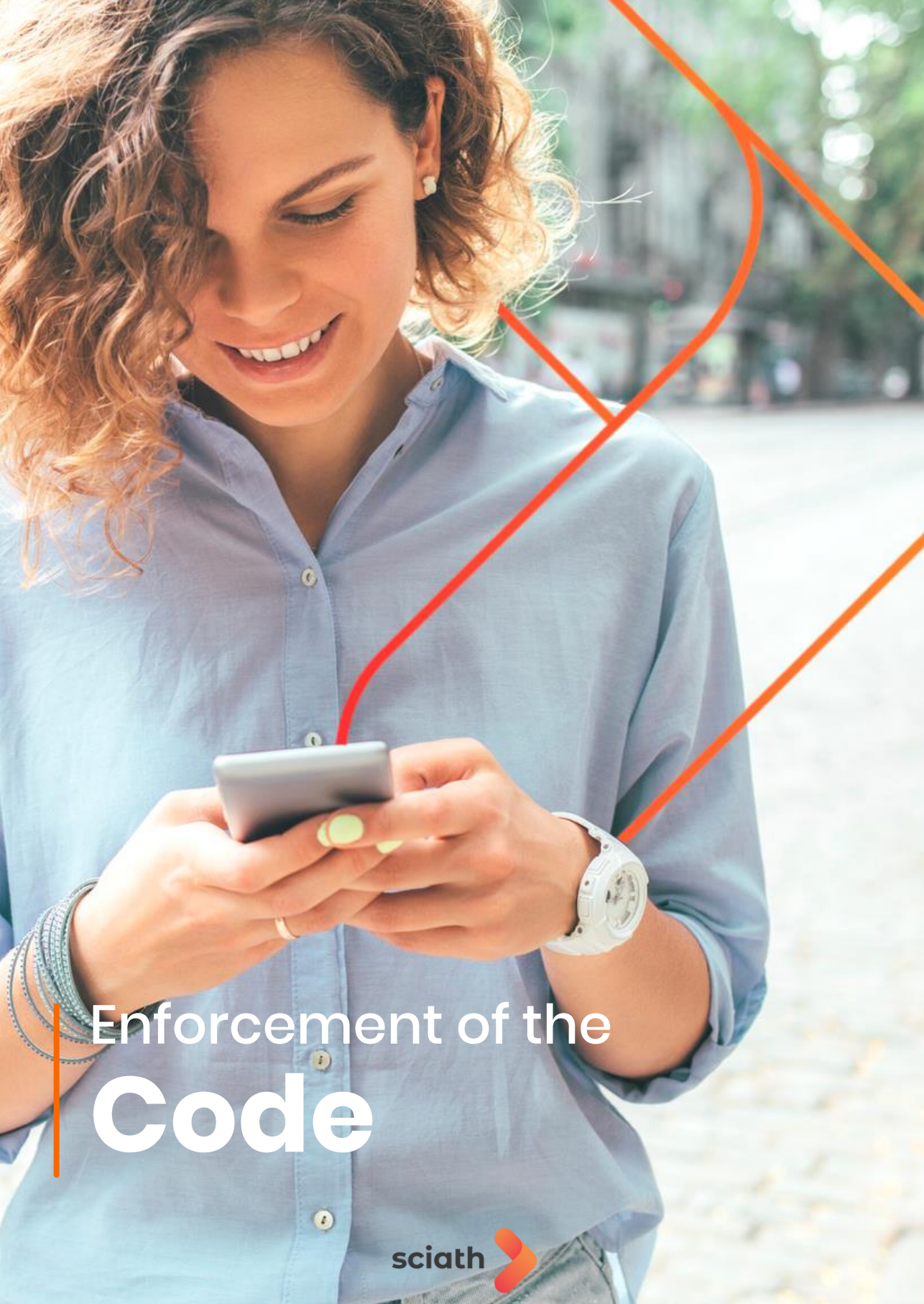
5.7 Society

As a company that **values care**, Sciath understands that this thinking should not only be valid for the present moment, but also for future generations.

We therefore seek **sustainable practices** to ensure the best use and preservation of natural resources.

We want to have a positive impact on society as a whole, and in certain situations we can develop internal campaigns and support volunteers.





Enforcement of the
Code

sciath





6. Enforcement of the Code

Application of the Code of Ethical Conduct is the responsibility of the Ethics Committee and was approved on **April 1st, 2022**.

All our employees must adhere to the Code of Ethical Conduct the moment they start their employment relationship, either during the hiring process or when they sign the agreement, which is valid for an indefinite period.

The Human Resources area will be responsible for promoting training on the content of this document for new employees and updating those who already work for the company.

This will take place whenever the area deems it necessary or when any changes are made, disseminating the information and demonstrating the need to comply with the items proposed in this material.



6.1

Confidentiality Agreement and Anti-Corruption Policy Rules



I agree to keep confidential any data, information, materials, trade secrets, strategies, commercial contracts, reports, commercial contracts, customer lists, commercial conditions applicable to customers, insurers and other suppliers, commercial strategy, results and revenues offered by Sciath, among others, called CONFIDENTIAL DATA, to which I have access or knowledge.

I undertake not to disclose, reproduce, use or make known, under any circumstances, to third parties, nor to allow anyone to make improper use of this confidential data. I also undertake to comply with the national anti-corruption legislation applicable to each partner's activity, including Federal Law No. 12.846/2013 and any other applicable anti-corruption laws.

I am fully aware that Sciath does not tolerate acts of offering, promising or authorizing the giving of any goods, values or advantages to public agents, civil servants or employees of the private sector, either directly or through third parties, in order to influence the actions of such agents or any other authority in obtaining improper advantages in their activities. It is also forbidden to pay bribes to facilitate and speed up processes and procedures before public bodies and their respective officials .

I am also aware that violations of this policy, Federal Law No. 12,846/2013 and any other applicable anti-corruption laws may result in civil and criminal actions, including imprisonment, substantial fines and penalties.

Local: _____ Data: _____

Nome _____
legível: _____

Assinatura: _____



6.2 Term of Acceptance

I have read, am aware of and accept the contents of Sciath's Code of Ethical Conduct, which covers the following topics:

- Purpose of the Code of Ethical Conduct;
- Our Culture;
- Our conduct;
- Relations with the public.

I undertake to comply with the established rules and to bear the consequences of non-compliance in accordance with current legislation.

Location: _____ Date _____

Legible name : _____

Signature : _____

moreforyoutobedifferent



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