

# Code of Ethics

## NIPLAN

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## 1. Application

This Code of Ethics defines the behavior expected from employees in several situations, basing their actions in integrity and moral. It applies to all NIPLAN's employees and directors, as well as service providers that use the company's resources.

## 2. Diffusion

The Code of Ethics will be available to be consulted by all employees at any moment, in the company's site. It will be diffused through internal communication means, such as: DDSMS, Integration, trainings, notice boards, in the *Boletim NIPLAN* (magazine) and on the Sight Management Boards, and they are aware of the code at the integration/hiring moment when they sign a knowledge term.

The responsibility of diffusing this Code of Ethics to employees and third parties that work in the company, and the clarification of eventual doubts to assure the complete understanding regarding the content and application are in charge of the areas' managers.

## 3. Rules

Employees will be required to fulfill the behavior norms, in the administrative units, work places, construction sites, lodgings, domain area and access roads, such as the following ones:

### 3.1 Work Environment – headquarter and work sites

3.1.1 The work environment shall be respectful and maintain the order, cohabiting acts such as sexual or moral harassment and discriminations regarding race, gender, color, religion, sexual orientation, social status, nationality, age, party liner option, diseases or any type of mental or physical disability.

- 3.1.2 The hiring of employees with relative relation is allowed. They shall be also submitted to all selection process phases, and privileges are not allowed in comparison to other candidates.
- 3.1.3 All employees shall collaborate for the creation and preservation of a healthful environment, not diffusing information without proof (rumors). Eventual doubts shall be deemed with the areas' managers.
- 3.1.4 It is not allowed, in any hypothesis, to hunt, commercialize, keep or maltreat any type of sylvester animal.
- 3.1.5 Extraction, commercialization and maintenance of native vegetal species are not allowed.
- 3.1.6 In case some sylvester animal is hurt due to the construction or headquarters' activities, the fact shall be reported to the Environmental Inspector or Environmental Police.
- 3.1.7 Predatory fishing is forbidden in the construction sites and in their surroundings.
- 3.1.8 White and fire weapons are forbidden in lodgings, construction sites and other areas of the company, and they are only allowed for patrimonial security guards, legally authorized. Only work equipment that can eventually be used as weapons is allowed (bowie knife, hatchet, electric saw, etc.) for the execution of activities pertinent to their functions, and at the end of the work time this equipment shall be collected by the responsible head and stored in a safe place.
- 3.1.9 Consumption, sale and maintenance of alcoholic beverages are forbidden in the work places and lodgings during working times.
- 3.1.10 Employees shall behave correctly concerning the population surrounding the constructions, avoiding fights, misunderstandings, and significant alterations in the local population routine, and shall evaluate inclusively any interferences that may occur due to the project implantation to be carried out, and communicate the contracting party immediately for the pertinent decision making.

- 3.1.11 The use of illegal drugs and negotiations is expressly forbidden in any places of the headquarters, construction sites and lodgings.
- 3.1.12 Respect all internal norms of the sites where there are undergoing constructions.
- 3.1.13 All guidelines shall be obeyed concerning residue generation, toilet usage and, mainly, not dumping residues in the environment, such as recipients and meal rests or dispose materials of vehicles' maintenance.
- 3.1.14 Only access roads which are previously authorized can be used.
- 3.1.15 Aiming at keeping the security of employees, the transportation of people in trucks, outside the cabin, is forbidden.
- 3.1.16 NIPLAN respects its employees' privacy concerning sensitive information (including medical), which are obtained and kept by the human resources department.
- 3.1.17 NIPLAN doesn't allow the usage of natural resources which are not legally liberated (for example: wood, forest products, etc.).
- 3.1.18 Don't promote parties, meetings or confraternizations that go over the 10PM limit.
- 3.1.19 Avoid agglomerations in squares, sidewalks or public centers that impede the usual local movement.
- 3.1.20 Notify the company in case some colleague misbehaves, so that we can orientate and help in his/her attitudes.
- 3.1.21 Don't practice or collaborate in any way with the practice of games of chance in our lodgings, including those practiced in the betting market.

## **3.2 Fulfillment of Laws**

- 3.2.1 The fulfillment of laws, tax payment and rules applicable to the company's activities shall be observed in all levels of public administration (federal, state and municipal), as well as of other countries where the company operates.

- 3.2.2 Third parties' intellectual rights shall be respected, including authorship, patents and original documents, avoiding any type of piracy. Only the use of software official copies will be allowed.
- 3.2.3 All employees shall respect the professional code of ethics based on their qualifications. For example: Engineers, architects, administrators, lawyers, among others.
- 3.2.4 Accounting reports shall reflect credit/debit operations, and any type of payment or reception without the respective register isn't allowed.
- 3.2.5 One of the administration's principles is to manage the company in order to impede any act that can be interpreted as administrative improbity.
- 3.2.6 NIPLAN repudiates all actions that can be interpreted as anticompetitive, monopolist or contrary to the international, national or local laws that control the market's competitive practices in a passive and/or active way. In case of doubts in the commercial processes, the company's Legal advisory shall be consulted.

### **3.3 External Relationship**

- 3.3.1 Confidentiality of the company's strategic information shall be preserved. Only authorized people can diffuse it to third parties.
- 3.3.2 NIPLAN is committed in maintaining the transparence and veracity of the information provided to all parties interested in the contractual deals with customers and suppliers.
- 3.3.3 NIPLAN carries out commercial communication through publicity, direct marketing, sponsorship, sales promotion and public relations destined to promote its products and/or services.
- 3.3.4 Employees shall not criticize publically customers, competitors (products and services), suppliers or other employees of our company, as well as the company itself.

- 3.3.5 Aiming at illicit favoring, any kind of contribution, donation, favor provision or sending of presents to public/private entities or to servers/employees will be allowed.
- 3.3.6 Employees shall not practice liberality acts at the company's expense, not offering or receiving any modality of direct or indirect personal advantage related to the exercise of their positions.
- 3.3.7 The acquisition of gifts, for distribution as institutional marketing and general distribution, shall be approved by the Executive Management.
- 3.3.8 The employee that participates in meals with suppliers or customers, outside the company, shall previously inform the area's manager.
- 3.3.9 Employees shall not concede to public/private employees or people that occupy similar positions, in retribution to the performance of their functions, any economic favor, such as money, gifts or other favors, be directly or through third parties.

#### **3.4 Use of the Company's Resources**

- 3.4.1 Company's resources shall not be used for other means than those defined by the company. The use of properties, equipment and information systems of the company will not be allowed for self or third parties' benefits, in detriment of the company's interests.
- 3.4.2 Employees and their direct relatives shall avoid any action or business relationship that can create conflicts among their own interests and the company's.
- 3.4.3 Employees shall not have societary participation with NIPLAN's suppliers, customers or competitors.
- 3.4.4 Employees shall not render personal advisory or technical assistance activities to suppliers, customers and service providers.

- 3.4.5 Employees shall not get involved in parallel activities that conflict with working hours, their attention and time at NIPLAN.
- 3.4.6 The intellectual property of all programs, plans, projects and software developed in the company belong to NIPLAN, even after the employee leaves the company.
- 3.4.7 Informatics resources shall not be used for diffusion of de e-mail or documents with content of indecent assault, discriminatory or defamatory die, rumors and current.

### **3.5 Social Liability**

- 3.5.1 NIPLAN doesn't use child or forced labor and doesn't acquire products or services from suppliers known as making use of this type or resource, repudiating merchandising that allows any one subject to prejudice, as well as those that keep employees in inhuman work conditions.
- 3.5.2 NIPLAN stimulates the participation of its employees in social die activities, in volunteering works and others that aim at improving the community's quality of life. In case of donations by the company, they can only be carried out after approval, according to specific procedure.
- 3.5.3 Beyond the fulfillment of the applicable environment legislation, NIPLAN promotes the rational use of natural resources, environmental preservation, recycling and reduction of residues generated in productive processes.

## **4. Transgression (Violation) and Penalties**

The Managing Director and managers of the company are responsible for assuring the fulfillment of this Code of Ethics. In case the Managing Director judges necessary, he can compose an Ethics Committee for analysis of cases that violate this code.

When noticing acts that are contrary to this Code of Ethics, the employee shall inform the area's manager of the company's responsible immediately. Absolute secrecy will be maintained concerning his/her identity, assuring that he/she doesn't suffer any type of retaliation.

The employee that, having noticed some transgression, doesn't inform it, will be considered an infractor's accomplice.

All available communication channels to communicate transgressions can be used: e-mail, telephone, correspondence or personally.

Penalties applicable to the disobeying of this Code of Ethics will be defined according to the occurrence gravity, and can involve advertence, suspension, contractual rescission for fair cause or other measures applicable according to legislation in force.

## **5. Recommendations and Practical Examples:**

- a. Conflict of Interests: Render advisory or have participation in companies which are NIPLAN's suppliers or competitors. Privilege the acquisition of products/services of companies which proprietors have relative relation with NIPLAN's employees.
- b. Sexual Harassment: Use the position's authority to obtain sexual favors from subordinate or hierarchy inferior level person.
- c. Confidentiality: Comment about projects and internal issues of the company in open environments (airport rooms, restaurants, events, ...). Abandon in the printers sheets with secret information (production volume, products under development, company's plans, reports, ...).

- d. Moral Harassment: The exposition of the employees to repetitive and prolonged humiliating and embarrassing situations during the working journey and in the exercise of their functions, being more common in authoritarian and asymmetric relations, in which negative behaviors predominate, inhuman and antiethical long term relations, of one or more chiefs directed to one or more subordinates, unbalancing the relation of the victim with the work place and the organization, forcing him/her to quit the job.

For example: Revendicate for himself/herself the credit of ideas and works that belong to others, not recognizing the merit of the results for the deserved ones.

- e. Humiliation of the employee in public: Put a person to execute in a continuous way, activities much below his/her capacity, with the clear purpose of discouraging him/her. Treat subordinates with pejorative or depreciative terms.
- f. Discrimination: Privilege people of determined race or gender against others, not allowing equality of opportunities for all employees. Make depreciative jokes concerning skin color, physical disability or sexual orientation.