

ASSOCIAÇÃO ESCOLA SUÍÇO-BRASILEIRA – AESB **(ASSOCIATION OF SWISS SCHOOLS IN BRAZIL)**

CODE OF ETHICS AND CONDUCT

Ethics are unique and depend exclusively on the attitude of every individual.

The AESB's Code of Ethics and Conduct sets up the principles to guide the conduct of all "collaborators" before the school community: parents, students, suppliers, service providers and other stakeholders we connect with.

This Code acts as a guideline, and the contents thereof are illustrative rather than exhaustive, and may be altered and/or improved at AESB's discretion at any time.

Transparency, professionalism and respect are pillars supporting all of AESB's activities.

This Code applies to all people performing tasks inside AESB and for AESB, namely:

Employees, volunteers and interns working for the institutions integrating AESB;
Members of the Board of Directors, Audit Committee and Advisory Board;
Advisors working for AESB inside its structure.

All categories above mentioned are included in the concept of "collaborators" for the purposes of this document.

Since the behavior of a collaborator may affect AESB's reputation, it is important to remember that the Code of Ethics is always applicable, both inside and outside of the work environment, whether at the institutions integrating AESB or when AESB is represented, including during business trips.

Upon signing the Statement of Acceptance of this Code of Ethics and Conduct, each collaborator acknowledges their awareness of, and agreement with, the principles described therein.

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ATTACHMENT I: STATEMENT OF ACCEPTANCE

1 – CONDUCT RECOMMENDED TO ALL COLLABORATORS

We value and always encourage good relationship between all collaborators. No disrespect whatsoever among the collaborators shall be accepted.

Respect is essential for good social coexistence and interpersonal relationships. Respecting someone means accepting their differences and overcoming prejudices.

All persons must be treated in a strictly equal manner, with dignity and respect, irrespective of their position in AESB's hierarchy and their gender, religion, belief, ethnicity, marital status or civil partnership, pregnancy and maternity, nationality, social and economic standing, disability, age, sexual orientation, gender identity or sex reassignment, including suppliers, third parties, parents, students and, ultimately, the whole school community.

All collaborators must reject and question any form of harassment, discrimination, intimidation, exploitation or abuse. They must also contribute to a work environment characterized by mutual respect, integrity, dignity and an absence of discrimination. Aside from this, they must ensure that their relationships and behavior are not ones of exploitation, abuse or characterized in any way as corrupt and which do not involve any form of sexual abuse, aggression or any kind of people exploitation. Furthermore, they should report any inappropriate behaviors or practices at the workplace to their line manager or through recognized confidential whistleblowing systems.

2 – RESPONSIBILITY FOR THE INSTITUTIONAL IMAGE

All collaborators must:

A – Care for the institution's image, in and out of the work environment;

B – Refrain from making statements or giving interviews on behalf of AESB if not authorized and prepared;

C – Make sure that all information made available to family members, suppliers, service providers and all the stakeholders AESB deals with is correct and always updated;

D – Care for the safeguarding and secrecy of confidential information;

E – Defend AESB's integrity and reputation, making sure that their professional and personal conduct is clearly consistent with the institution's values and standards;

F – Maintain and increase the public trust in the entities integrating AESB. To achieve that, they must be honest, transparent, and responsible for their professional and personal actions. They must respect and contribute to achieving the legitimate and ethical goals of the institution;

G – Take immediate steps to correct and interrupt behaviors not conforming with this Code;

H – Refrain from working under the influence and from being in possession of illegal substances (drugs included) at the facilities, vehicles or accommodations of schools integrating AESB.

3 – CONFORMITY WITH AESB POLICIES, STANDARDS AND PROCEDURES

All collaborators and third-party employees must abide by the procedures, standards and policies set up by AESB, irrespectively of their position in the institutional hierarchy.

4 – TRANSPARENCY AND INTEGRITY

All collaborators must always abide by the laws, policies, standards, procedures, and regulations applicable to the institution, thinking and acting with the maximum level of commitment and transparency, irrespectively of the position held at the institution.

5 – CONFLICT OF INTEREST

Conflict of interest occurs when, due to one’s own interest, a collaborator may be influenced to act against the principles of the institution, making inappropriate decisions or failing to meet any of their professional responsibilities.

These are situations where the person’s judgment and/or attitude is maybe distorted on behalf of other interests and to the detriment of those of the organization.

This way, whether in internal or external relationships, no collaborator should use their role at AESB to influence decisions that could favor their own interests or those of third parties.

All collaborators are bound to ensure that all business decisions are made in a correct, fair way, without conflict of interest. In the event of doubts, they must seek guidance from their line manager.

They must also declare any financial, personal, familiar or close intimate relationship in official business matters that could impact work at AESB (e.g., agreement of goods/services, employment or promotion inside the institution).

AESB must be informed about other roles performed by them, whether voluntary, compensated or otherwise, and about any politically active job roles, such as representative or candidate of any political party or public office.

Obviously, they must fight against any form of corruption and shall not offer, promise, give or accept bribery.

6 – PARTY/POLITICAL POSITIONING

Every collaborator may post their comments freely on their social media. This is a constitutional right.

However, within the school environment, no collaborator is authorized to disseminate political ideology, whether directly or indirectly.

During daily activities, in the classroom, at school events and pedagogical meetings, one must always maintain party/political neutrality.

7 – RELATIONSHIP WITH SUPPLIERS

We must always keep a respectful, lasting relationship with all suppliers of materials and services, holding transparent, fair negotiations for both parties.

Suppliers must meet the rules, give fair treatment to collaborators and act in a responsible way to preserve a sustainable environment. They must, contractually speaking, adhere to AESB's ethical conduct practices.

8 – RECEIPT OF GIFTS

Gifts may help the reinforcement of business relationships with suppliers and families integrating the school community.

Collaborators must keep a close eye on the supply or receipt of gifts so that both occur in compliance with AESB's policies and standards.

The offering or receiving of gifts must not be made with a view to obtaining undue advantages.

In the event of doubts about whether to receive or offer any gift, the collaborator should submit the issue to the CGE (School Management Council).

A suggestion to assess the possibility of offering or receiving gifts, presents and entertainment is to pose the following questions as a means of self-assessment.

Could the offer:

- 1 – Influence or seem to influence a business decision?
- 2 – Generate or seem to generate an expectation of a benefit or advantage?

3 – Generate unease or embarrassment?

4 – Be or seem to be an exchange of favors?

5 – Be or seem to be a gift or entertainment offered or given to someone to “facilitate” or speed up a routine procedure?

6 – Be understood as an action taken to try to obtain illicit or undue advantage?

7 – Represent intentional damage to AESB’s reputation?

If the answer to any one of these questions was affirmative, the offer must not be made or accepted.

9 – MISREPRESENTATION

Misrepresentation is a crime and is provided for in article 299 of the Criminal Code, which describes criminal conduct as an omission of the truth or insertion of a false statement in public or private documents.

AESB acts with full transparency and integrity in all its processes and does not accept this type of behavior from its collaborators.

10 – ANTICORRUPTION ACT

Act No. 12,846/2013, aka the Anticorruption Act, provides that companies may be held liable for corruption against the Public Administration and fines applicable thereto may reach 20% of the annual gross revenue of the company.

AESB encourages all collaborators to abide by the practices set up in the manual of standards and procedures and rejects all kinds of corruption and favoring.

Collaborators must act truthfully, transparently and impartially, avoiding any kind of privileges to suppliers, families, third parties or persons related to any entity of the public administration.

11 – INTELLECTUAL PROPERTY

All information produced or received by collaborators as a result of their professional activities belongs to AESB.

Collaborators must be mindful when dealing with sensitive or confidential information. Any disclosure of such confidential information is considered a violation, unless requested by a court order, by law or by a governmental supervisory body.

Intellectual property is considered as all business information, as well as data of the students and their families or of collaborators, or economic/financial information which may not be disclosed externally.

AESB's intellectual property must be protected and shall not be disclosed without an authorization from the board of directors, during the tasks and after completion thereof. This relates to intangible assets, such as (innovative) concepts, tools, symbols and logos, in addition to projects.

They must seek authorization, based on the general policy of AESB or upon request and express approval, before communicating externally on behalf of the institution. They must also avoid any unintended harmful repercussions for themselves or AESB.

They must be responsible for the use of information, equipment, money and resources accessed by them within their employment relationship with AESB.

Improvements or creations resulting from activities developed with resources, data, means, materials, installations or equipment of the institution are exclusive property of AESB.

Therefore, no violation of the rights of any persons or companies protected by copyrights, trade secrecy, patent or other intellectual property rights shall be allowed.

The collaborators must protect the confidentiality of material information accessed by them and may not use it to obtain advantages for themselves, even when no longer integrating AESB' staff.

12 – RESOURCE MANAGEMENT

The collaborators must be responsible for all cash and property of AESB (such as vehicles, office equipment, in addition to computers, including use of the internet, e-mail and intranet).

They must use AESB's assets only to carry out their work, according to the policies and guidelines of the institution.

They must ensure that all AESB's resources are kept from being misappropriated, diverted, misdirected, misused, lost or not accounted for.

They must act with maximum care and integrity when managing, using and appropriating funds of AESB and any assets acquired with such funds.

They must not participate in frauds and thefts. They should immediately report any cases like these witnessed by them or if they have strong suspicions of occurrence thereof.

They must not accept or support corruption or bribery of any kind whatsoever.

They must not participate in tax evasion in the execution of their work and should report any risk of task evasion to their line manager.

13 – INFORMATION TECHNOLOGY AND SECURITY

Any information stored in computers or any other equipment of the institution is the property of AESB.

Care provided in the employment contract relating to responsibility for confidential data and protection of AESB's property shall be guaranteed. The issuer shall be responsible for data transmitted to third parties.

No use of the electronic communication systems of AESB shall be allowed for the transmission and storage of defamatory, obscene, prejudicial material or material giving rise to any interpretation of racial, sexual, religious, political discrimination or other inadequate contents in the work environment that could cause unease or embarrassment to collaborators, suppliers, families and all those with a relationship to the school community.

AESB system passwords are personal and non-transferable.

Collaborators are responsible for any access to the systems that is made using their password.

14 – RESPECT FOR THE INDIVIDUAL

All collaborators are responsible for promoting a productive, creative, harmonic environment, free from any prejudice, respecting the characteristics and decisions of each individual.

The institution is committed to providing a work environment with equal opportunities to all collaborators.

15 – SECRECY AND CONFIDENTIALITY

The use of any confidential information, such as hallway conversations, e-mails forgotten on a desk, among others, shall constitute a violation of this Code of Ethics and Conduct.

16 – PROCESSES/COMMUNICATION

Communication at AESB must be reliable and consistent in all relationships with the public, press and collaborators. The maintenance of the institution's reputation results therefrom.

Collaborators requested to supply information to the press should first contact their line manager or the responsible area or even the CGE (local acronym for School Management Council) to request authorization.

If any collaborator becomes aware of a situation that could involve a violation of this Code, of AESB's policies and of any applicable law or regulation, they should report this fact to the **Canal de Ética** (Ethics Channel), by sending an e-mail to canaldeetica@aesb.com.br

The Ethics Channel is a means of relationship between AESB and our collaborators and family members, our suppliers and service providers and all stakeholders with whom we relate.

The confidentiality of the information, as well as the identity of persons contacting this channel, is ensured.

AESB's Compliance Committee will analyze all information by means of the Ethics Channel, impartially and seriously.

No retaliation shall be permitted against any individuals who, in good faith, make use of the Ethics Channel to report the possible misconduct of our collaborators.