

# BRAZILIAN POST CODE OF ETHICAL CONDUCT



# Preamble



The Brazilian Post Code of Ethical Conduct aims at preventing breaches of ethical conduct and is geared toward achieving corporate organizational goals. As such, it promotes the dissemination of the corporate identity as well as the guidelines governing both the continuous commitment to act in line with law-based governance principles and Ethics in all relationships and the penalties arising from the breach of such provisions.



### Scope

#### Article 1

All members sitting on the Board of Directors, the Audit Committee and the Board of Executive Officers, as well as special advisers under contract, employees, civil servants assigned to the Brazilian Post, trainees, service suppliers, representatives and any other individuals working for Brazilian Post, including as a result of the performance of service contracts, social welfare programs, partnerships and volunteering initiatives, shall be bound to abide by the rules of the Brazilian Post Code of Ethical Conduct.

1 On taking office, when signing a formal instrument stating the kind of contractual relationship established with Brazilian Post or on being introduced as a new staff member, individuals governed by the rules of this Code shall pledge themselves to abide by and observe the rules set out in the Brazilian Post Code of Ethical Conduct.

2 Invitations for Bid Notices published by and Administrative Contracts entered into by Brazilian Post shall include a clause setting forth that legal representatives and resident employees from service supplier companies shall undertake the obligation to abide by the standards set out in this Code.

3 Within their respective competences, Brazilian Post employees shall commit themselves to instruct service suppliers, clients and any other natural or juridical person – either private or public – to abide by the standards set out in this Code in their relationships with Brazilian Post.

4 Stakeholders referred to in this Article shall also abide by the standards set out in the Code of Professional Ethics for Civil Servants of the Federal Executive Power and in the Code of Conduct for the High Administration in the Federal Government, as the case may be.

### **Purpose of the Brazilian Post Code of Ethical Conduct and Corporate Identity**

#### Article 2

This Code is rooted in constitutional explicit and implicit principles governing public administration as well as in the company's purpose, mission, vision and values which express its corporate identity. Furthermore, it aims at supporting and fostering an ethical conduct within the framework of the relationships between Brazilian Post and their stakeholders, namely the shareholder, clients, society, suppliers and employees.

1 The purpose, mission, vision and values mentioned below are the distinctive features of Brazilian Post and serve as the basis for this Code.

- i Purpose:** Solutions to bring closer;
- ii Mission:** To connect people, institutions and businesses through affordable, reliable and competitive postal and logistic solutions;

**iii Vision:** To be the customers' first choice for the products and services offered;

**iv Values:**

a **Integrity** in every relationship, according to ethics, transparency and honesty;

b **Respect for people**, by promoting their competences and contributing towards a fair and safe environment;

c **Commitment to results**, ensuring consistent returns to the society;

d **Responsibility** in the provision of services and in the conscious use of resources aimed at developing business sustainability;

e **Pride** for serving the society and for being part of Brazilian Post; and

f **Orientation towards the future** in order to swiftly respond to customer needs.

### Statement of Ethical Principles

#### Article 3

Brazilian Post will follow the ethical principles referred to below, without excluding anyone else set out implicitly in this Code:

- i **Human dignity and respect for people:** equality, equity and justice-oriented life enhancement and citizenship empowerment aimed at safeguarding people's physical and moral integrity from threats against both individual differences and diversity in social groups membership;
- ii **Integrity:** honesty and probity when making commitments, along with coherence between discourses and practices, repudiation of any form of fraud and corruption and proactive approach toward circumstances which are in discordance with the recognized ethical principles;
- iii **Sustainability:** a balanced approach to environmental, economic, social and cultural

responsibility shall respect the right to a full life for current generations and contribute to the preservation of the future ones;

iv **Transparency:** visibility of the criteria that guide the organization's decisions and actions by conveying and disclosing information in an objective, speedy and accessible way, provided that boundaries of the right to confidentiality be observed;

v **Impersonality:** prevalence of public interest over particular interest, along with objectivity and impartiality in what relates to decisions, actions and use of corporate resources;

vi **Legality:** compliance with national law rules and with law rules from countries where Brazilian Post perform or is expected to perform activities, as well as with internal rules governing postal activities, in accordance with constitutional principles;

vii **Professionalism:** high-level standards performance or competence expected of diligent, devoted professionals, based on social values,

loyalty, mutual respect, commitment to results, excellence and corporate enhancement.

## CHAPTER IV

### **Brazilian Post Commitments Towards Employees**

#### Article 4

As regards relationships with its employees, Brazilian Post undertakes itself to:

- i seek ways to provide a good organizational environment, by creating and cultivating a healthy, secure workplace climate;
- ii respect and promote diversity, besides fighting any form of discrimination whatever, regardless of origin, race, sex, color, age, social condition or any other form of prejudice whatever;
- iii make formal communication channels available in order to both record and process the claims from employees, including those related to complaints and ethical dilemmas resolution;

- iv preserve employees' personal data privacy and confidentiality, barring exceptional circumstances provided for in law;
- v disclose information – not only when referred to by law or regulation – in a complete, objective, timely and equitable way;
- vi promote equality of opportunities for all employees under the umbrella of all corporate policies, emphasizing individual merit as the criterion for career advancement;
- vii support the right to freedom of association by maintaining a permanent dialogue with the employees' representative entities, without losing sight of the corporate organizational goals;
- viii promote initiatives aimed at preventing any kind of moral or sexual harassment;
- ix motivate every member of staff to integrally abide by this Code.

### Employees Commitments Towards Brazilian Post

#### Article 5

As regards relationships with Brazilian Post, employees undertake themselves to:

- i be polite, loyal, devoted, faithful, collaborative and dependable, respecting individual differences vis-à-vis every customer, user and Brazilian Post employee, without demonstrating any kind of prejudice of race, sex, nationality, color, age, creed, political belief and social position discrimination whatever;
- ii preserve intimacy, privacy, honor and the reputation of work colleagues and contribute for correct interpersonal and professional relationships;
- iii comply with professional commitments undertaken with the company, without benefiting personal or third-party interests;

- iv maintain professional secrecy, except when the breach thereof is authorized or required by law;
- v preserve corporate interests and enhance the company's image, either internally or externally, besides refraining themselves from releasing negatively oriented initiatives, images or information related to Brazilian Post's trademarks, irrespective of the kind of media, including electronic communication;
- vi ensure the correct use of information and technology resources made available;
- vii take care of the company's property/assets either as an user or as a holder and give them proper allocation pursuant to their specific purpose;
- viii while exercising the right to strike, watch out for the company property and abide by the right of come and go protecting both employees and clients;
- ix resist pressures geared towards obtaining any favors, personal benefits or improper

advantages as a result of immoral, illegal or unethical behaviors and denounce them;

x respect the hierarchy, while acting without fear of denouncing superiors upon becoming aware of any irregular act;

xi attend work in an appropriate work attire;

xii refrain themselves from attending activities which are likely to characterize a conflict of interests regarding Brazilian Post's activities, besides reporting to the proper channels possible conflicts, either actual or apparent, between Brazilian Post interests and those related to their professional, personal activities or involving third-party activities;

xiii know, obey and commit themselves to make this Code of Ethical Conduct known;

xiv report immediately to their superiors every and any act or fact contrary to the interests of Brazilian Post;

xv refrain themselves from soliciting, requesting, giving rise to, suggesting or receiving any kind of financial incentive, reward, monetary or non monetary benefit, commission, grant or advantage of any kind whatever, for themselves, for their family members or any other individual for the fulfillment of their duties or for the sake of influencing other employee for the same purpose;

xvi preserve integrity of documents, records, registers, information systems and do not withdraw from Brazilian Post's facilities any document or asset belonging thereto, without express legal authorization;

xvii prevent themselves from public inappropriate behavior, participation in untrustworthy associations and socially condemned practices;

xviii preserve intellectual production and acknowledge the value of the works carried out by workmates, regardless of their hierarchical position;

xix obtain prior corporate authorization for publication or exhibition, outside company boundaries, of studies, researches,

technical and legal opinions and other authored works or contributions involving post office-related knowledge;

xx perform managerial responsibilities with transparency and equanimity, guiding and motivating employees and contributors with a view to helping create a sound work environment likely to boost performance excellence and productivity and committing themselves to comply with corporate rules and instructions, as well as with this Code of Ethical Conduct;

xxi give priority to and preserve Brazilian Post interests with clients, government bodies, financial institutions, suppliers, organizations and any other companies Brazilian Post keeps in touch with.

### **Brazilian Post Commitments Towards Government and Society**

#### Article 6

As regards relationships with Government and Society, Brazilian Post, in what relates to competences falling within its remit, undertakes itself to:

- i act as a social, economic and cultural development agent, supporting government public policies initiatives as well as specific programs and projects geared towards sustainable development;
- ii be transparent when disclosing information likely to assess the development of its activities;
- iii adopt corporate governance-related best practices.

### **Brazilian Post Commitments Towards Clients**

#### Article 7

As regards relationships with clients, Brazilian Post undertakes itself to:

- i ensure that clients be satisfied, by offering them quality-promise products and services;
- ii treat clients with courtesy and respect, giving them the required explanations in a clear, prompt and transparent way;
- iii handle information requests, claims, criticisms and suggestions with promptness and accuracy.

### **Brazilian Post Commitments Towards Suppliers and Partners**

#### Article 8

As regards relationships with suppliers and partners, Brazilian Post undertakes itself to:

- i hire suppliers and partners on economic, technical and legal criteria;
- ii require that suppliers and partners act in an ethical way as relates to their management practices, including as far as their productive chain.

### **Brazilian Post Commitments Towards Competitors**

#### Article 9

As regards relationships with competitors, Brazilian Post undertakes itself to:

- i comply with the relevant regulations, binding itself to act as a loyal player, abiding by and respecting market rules;
- ii respect competitors, obtaining and providing licit information while safeguarding the required secrecy.

### Ethics Committee and Penalties

#### Article 10

The following competences fall within the remit of Brazilian Post Ethics Committee:

- i to apply this Code of Ethical Conduct pursuant to the Committee's Rules of Procedure;
- ii to provide guidance and counseling on professional ethics for all those covered by this Code;
- iii to investigate – upon receipt of a complaint or ex officio – the conduct of individuals contravening the applicable ethical rules and thus impose an ethical censure on them, as set forth under indent “e”, item 9.1, of the Rules of Procedure, when applicable; and
- iv to recommend, follow-up and assess the implementation of actions aimed at disseminating ethical rules, then enabling and training individuals on them; and

v to act as an advisory body for all those governed by this Code.

1 Rules of Procedure approved by the Board of Executive Officers shall apply to the Ethics Committee's activities;

2 At least once a year, employees as well as members of the Board of Executive Officers and of the Board of Directors shall attend a periodic training course on the Code of Ethical Conduct.

## Article 11

Management of this Code falls within the scope of the Ethics Committee which shall be responsible for proposing any periodic update thereof, along with the relevant implementation, dissemination and diffusion, with the support of Brazilian Post's President and Vice-Presidents.

## Article 12

Notwithstanding possible administrative, civil and penal liabilities to be determined on the basis of specific procedures, violation of any provision as set forth in this Code infringes ethical standards and is subject to censure.

1 Aside from application of ethical censure, Ethics Committee may take the following steps:

- i to suggest to the President to revoke the offender's appointment to a position of trust;
- ii to recommend the opening of disciplinary proceedings against the offender, if the seriousness of his/her conduct so requests;
- iii to suggest to the President that the employee or civil servant assigned to Brazilian Post be sent back to the organ or service of origin;
- iv to suggest to the President to send a letter to the service responsible for investigating possible transgressions of various kinds;
- v to take other actions for the sake of preventing or solving ethical deviations, by drawing up, if applicable, a Personal and Professional Behaviour Agreement.

## Article 13

The work of the Ethics Committee shall be carried out in compliance with the following:

- i protection of the honor and image of the accused;
- ii safeguard of the complainant's identity, which shall be kept confidential, if so required by the complainant himself/herself; and
- iii independence and impartiality of the Ethics Committee's members when conducting an inquiry and judging the facts subject to their scrutiny, in accordance with the provisions set forth under Decree nr. 6029 of 1 February 2007.

## CHAPTER XI

### General Provisions

#### Article 14

Acceptance of token gifts is allowed, herein defined as those:

- i without commercial value or handed over by entities of whatever nature as a symbol of courtesy, promotional action, recognition or on special events or commemorative dates of historic

or cultural feature, provided they do not exceed the unitary value of R\$ 100,00 (one hundred reais);

ii with an offering periodicity schedule of no more than once every 12 (twelve) months; and

iii intended for any person and, therefore, not intended to confer special favours on individuals.

1 Token gifts exceeding R\$ 100,00 (one hundred reais) in unitary value shall be transferred to Brazilian Post's ownership or donated to charitable organizations, according to their nature.

## Article 15

The Office of the Ombudsman of Brazilian Post shall be responsible for receiving complaints and handling the requests of the stakeholders, ordering and ensuring the follow-up of corrective actions as well as recommending improvements.

1 Complaints shall be directed to inquiry offices, depending on the case.

2 Internal and external complaints reporting non-compliance with rules set forth in Brazilian

Post Code of Ethical Conduct or with other ethical standards shall preferably be directed to the Office of the Ombudsman over the internet or the intranet through the link Denúncias (Complaints) on the homepage or by using phone number 0800 725 0100<sup>1</sup>.

3 Complaints may be directed to and filed directly at Ethics Committee. They can also be sent by mail or emailed to [etica@correios.com.br](mailto:etica@correios.com.br).

4 If an individual willing to lodge a complaint appears before the Ethics Committee, the latter may reduce his/her oral statement to a written transcript, have his/her signature set and receive any evidence that the complainant may produce.

5 All complaints lodged with the Ethics Committee shall be registered by the complaint channel made available by the Office of the Ombudsman, referred to above.

<sup>1</sup> Customers abroad shall call +55 61 2141 9157.

## Article 16

For any situation not foreseen in this document, orientation about the appropriate conduct shall be sought in the Brazilian Post Code of Professional Conduct, in the internal regulations, or upon consultation with the superiors or the Office of the Ombudsman.

## CHAPTER XII

### Entry into Force

## Article 17

This Code of Ethical Conduct shall enter into force on the date of its publication<sup>2</sup>.

<sup>2</sup> The current version of the Brazilian Post Code of Ethical Conduct was published on 17 January 2018.

## ACCESS

This Code is available on [www.correios.com.br](http://www.correios.com.br)