



FUNDAÇÃO SÃO PAULO

# **Fundação São Paulo** **Code of Ethics** **and Conduct**



# Table of contents

Institutional Message	4
Purpose	5
Scope and Applicability	5
Institutional Ethical Principles	6
Professional Integrity and Interpersonal Ethical Conduct	7
Commitment to Information Security and Data Protection	12
Disciplinary Measures	14
Final Provisions	15



Funda  o S o Paulo  
Code of Ethics  
and Conduct

## Institutional Message

Fundação São Paulo (São Paulo Foundation, or FUNDASP), Sponsoring Institution of the Pontifical Catholic University of São Paulo and Centro Universitário Assunção (Assunção University Center), established in October 10, 1945, is a not-for-profit legal entity, recognized as being of public and philanthropic utility, which aims to maintain and direct its managed and related organizations, promote education, stimulate scientific research and the extension of services to the Community, and contribute in the cultural and social field.

With activities that continuously focus on improving and consolidating the **Integrity Program**, FUNDASP reinforces its journey of applying best practices and promoting a culture of integrity, always ensuring that ethical behavior remains as one of the pillars to be observed in all actions carried out by the Institution.

The Foundation's **Code of Ethics and Conduct** presents guidelines that, in line with Institutional principles, clearly and objectively highlight internal rules that are essential for maintaining a high standard of professional conduct in our institutional activity and, subsequently, a healthy work environment.

## Purpose

This **Code of Ethics and Conduct** aims to establish principles and standards, in addition to the general ethical and moral principles in force in society, and is addressed to all members of Fundação São Paulo, third parties, suppliers, service providers, and intermediaries, including the entity's senior management, as well as all those who maintain links with Fundação São Paulo, through its Sponsored Institutions.

**The Code is mandatory, and the expected conduct must be adopted by everyone. We have Integrity as one of the main pillars of our business, and based on that, we reaffirm our daily commitment to Ethics and Integrity.**

## Scope and Applicability

The values, principles and conduct guidelines herein presented comprise instructions to be practiced by everyone who has a relationship with the Institution, in addition to other internal policies and standards, as well as the relevant Bylaws and Regulations.

Therefore, administrative and academic employees, professors, students, members of the clinical staff, patients, suppliers, and other partners, whether they are natural persons or legal entities, must, in their conduct involving Fundação São Paulo and the Sponsored

Institutions, comply with the principles of ethics, morality, and integrity, in addition to the laws.

Conduct that is not in line with this Code will be subject to disciplinary measures, in addition to relevant referrals for the appropriate punishments provided by law.

## **Institutional Ethical Principles**

Fundação São Paulo operates in accordance with the principles of dignity, legality, impersonality, morality, and efficiency, as well as based on the following values:

- I.** Respect and ethics in all relationships maintained in the Institutional scope, not accepting any form of discrimination, prejudice, or harassment, whether of an ethnic, racial, religious or cultural nature, or even based on one's age group, marital status, political conviction, physical condition, gender, sexual orientation, health status, or any others;
- II.** Compliance with legislation and institutional standards;
- III.** Maintaining a safe and healthy work environment, ensuring professional and personal development;
- IV.** Social and environmental commitments;
- V.** Investigation and prevention of any and all conduct that may constitute a violation of the rules of this Code or current legislation.



## **Professional Integrity and Interpersonal Ethical Conduct**

The provisions of this Code must be observed in all activities, whether at the administrative, academic or cultural level or when related to the health area. Therefore, it is essential to:

- I.** Comply with and enforce the Fundação São Paulo Code of Ethics and Conduct, as well as other applicable internal rules, legislation, and regulatory standards;
- II.** Act according to the institutional mission of Fundação São Paulo, carrying out activities with transparency, honesty, and commitment to the truth;
- III.** Commit to preventing and combating all forms of violence, particularly bullying, sexual harassment, and discrimination. Therefore, any conduct in this regard must be immediately registered at the Fundação São Paulo Ombudsman channel;
- IV.** Maintain respectful and professional internal relationships, acting ethically in the treatment of co-workers, students, patients, customers, and suppliers, while recognizing and accepting the differences inherent in the diversity of people who make up Fundação São Paulo, its subsidiaries, and supplementary units, guiding internal and external relations with absolute respect for human beings, considering that FUNDASP rejects any form of prejudice, discrimination, or harassment;

- V. Refraining from offensive or derogatory comments towards any coworkers, students, patients, suppliers, or anyone else involved in the institution's activities;
- VI. Complying with health and safety standards, carrying out activities that are consistent with one's role and responsibility;
- VII. Attend any and all work appointments at the pre-established time, being prepared to meet expectations and dressed appropriately, under no circumstances being allowed to work under the influence of drugs or in a state of intoxication;
- VIII. Encourage, propagate, and comply, within the scope of the activities, with the appropriate and rational use of resources in general, as well as fulfilling the commitment to sustainability;
- IX. Ensure the good use of Fundação São Paulo's physical assets, its Sponsored Institutions, and its supplementary units, as well as ensuring the preservation of assets that may be placed under custody or at its disposal, using them correctly, legally, and for the performance of activities that serve FUNDASP;
- X. Commit to preventing and combating all forms of fraud, corruption, and money laundering;
- XI. Do not use one's position, role or influence to obtain any advantage for oneself or others;
- XII. Protect all institutional information to which one has access, in order to prevent leakage of data or

results obtained in projects, negotiations, and other activities, maintaining confidentiality and preventing access to confidential information by unauthorized persons;

- XIII.** Ensure ethical performance in commercial activities, considering the legitimate interests of the parties involved, with any form of undue advantage being expressly prohibited, whether through manipulation of information, unfair competition practices, illicit or improper payments, of any nature, and situations of conflict of interest with the Institution's business;
- XIV.** Analyze possible risks involved in projects, studies, and solutions for third parties, aiming to protect the reputation of Fundação São Paulo, its Sponsored Institutions, and its units;
- XV.** Commit to presenting this Code to everyone who maintains commercial relations with FUNDASP, requiring suppliers to prove compliance with labor, social security and tax legislation, as well as those related to preventing and combating corruption.
- XVI.** Act with integrity in public and private contracting processes, formalizing agreements, contracts and partnerships with honesty, ethics, integrity, and impartiality, with a focus on continuously adopting actions and procedures to prevent fraud and illicit activities in any situation while avoiding conflicts of interest, real or apparent, internal or between FUNDASP and public and private institutions.

**XVII.** Refrain from engaging in illegal conduct, including, without limitation, bribing employees of public agencies or private companies, or receiving illegal commissions, rebates or personal favors using their positions and roles at FUNDASP;

**XVIII.** Commit not to carry out any political activity in the name of Fundação São Paulo or using its facilities or assets;

**XIX.** Refrain from participating in decisions involving the selection, hiring, promotion or termination of contracts, by Fundação São Paulo, of a family member or a person with whom one has relationships that may compromise impartial judgment;

**XX.** Perform the role of manager, making the best efforts to disseminate and implement this Code of Ethical Conduct for the team, committing to the values and conduct guidelines established in this Code, reporting any noncompliance that is identified;

**XXI.** Perform the role of professor, contributing to improving teaching conditions and the standards of educational services and carrying out student assessment without interference from personal or ideological differences, in compliance with their responsibility regarding applicable legislation;

**XXII.** Notify the Integrity Sector of any misconduct or violation of the Bylaws, Internal Regulations, or Code of Ethics, as well as noncompliance regarding rules, regulations, conflicts of interest, or other actions

that could potentially compromise the Institution's reputation.

Considering the impossibility of covering all day-to-day situations and expected conduct in just one document, it is important that the guidelines indicated here be also reflections for other situations and that all parties be made fully aware of the provisions of **Fundação São Paulo's Integrity Program and anti-corruption policy**, both made available to all members through access to FUNDASP's website. It is also important to note that, in the event of cases not herein mentioned, the superiors in charge must be consulted.



## **Commitment to Information Security and Data Protection**

All electronic devices and systems at Fundação São Paulo must be used appropriately, without any undue purpose, such as sharing illegal content or activities that do fail to comply with internal policies and procedures, as well as those that affect productivity and work duties.

Confidential and privileged information, as well as information involving intellectual property rights related to brands, patents, and copyrights, must be continuously respected by everyone, in compliance with applicable laws, regulations, and internal rules.

Therefore, information from Fundação São Paulo should not be shared unless you are authorized to do so for professional purposes.

Access data to institutional email or internal systems is personal, confidential, and non-transferable. For this reason, all parties will be responsible for preserving the confidentiality of such data, sharing access to one's email inbox or system password with any other employee or third party being prohibited.

In compliance with the other precepts of this Code, institutional means of communication must not be used to disseminate, internally or externally, messages that fail to comply with the principles of Fundação São Paulo, such as illicit content and, in particular, content that constitutes any type of prejudice or harassment, fake news or hoaxes,

or non-institutional advertisements – whose responsibility lies with a specific area.

Employees are prohibited from carrying out any type of advertising, paid or organic, involving the name and/or visual identity of Fundação São Paulo, its subsidiaries, and supplementary units without the consent of the Executive Department.

Furthermore, adequate disclosure of information involving Fundação São Paulo must be observed at all times, ensuring that it is correct, accurate and transparent, through the adoption of structured procedures for control and quality of information.

Given the crucial care for institutional information and access that under their exclusive responsibility, all parties must be committed to becoming familiar with the **Institution's Information Security Policy**, as well as the policies adopted for data protection, for adequate access to the internal network, Internet, software, and other forms of data access and handling.

All parties must report cases in which any incident related to Information Security occurs inside or outside the organization.

Fundação São Paulo, at the discretion of the President or his Executive Secretaries, may have access to files contained in computers, laptops, mobile phones, and other institutional devices, in case of need for maintenance, security failure, or in internal investigations, particularly in situations related to noncompliance regarding this and any other institutional regulations.



## Disciplinary Measures

Compliance with this Code is mandatory, and failure to follow any of its rules will result in the application of administrative disciplinary measures or those provided in labor, civil or criminal legislation.

In the event that violations of this Code are committed by suppliers, service providers, or intermediary agents, such parties will be prevented from signing agreements, of any nature, with Fundação São Paulo, becoming part of the Fundação São Paulo's Blacklisted Companies.

Fundação São Paulo is committed to investigating the occurrences of violations that are reported in our Ombudsman Offices, observing the institutional policy for this purpose.

## Final Provisions

If you observe or become aware of any potentially irregular, illegal or unethical situation, which represents a violation of the Institution's policies, committed by another colleague, client, supplier or any party that has a business relationship with it, you must report such circumstances.

Reports regarding violations of this Code, policies, procedures or legislation must be made through a statement to the Ombudsman Office

**If at any time you believe that you may be faced with situations that are in conflict with the provisions described in this Code, you must promptly notify the Institution.**

This Code is an instrument to support our commitment to ethics and integrity.

All other commitments expressed by Fundação São Paulo through rules, standards, regulations and policies are also aligned with and are inspired by this set of values.



FUNDAÇÃO SÃO PAULO

**Edifício Franco Montoro**  
Rua João Ramalho, 182, Perdizes  
CEP: 05008-000 - São Paulo/SP

+55 (11) 3670-3333  
[fundacaosaopaulo@fundasp.org.br](mailto:fundacaosaopaulo@fundasp.org.br)