

Institute Code of Conduct

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1. PURPOSE

This Policy describes the Institute’s approach to conducting business around the world. The Institute is committed to operating worldwide in a manner fully consistent with the highest standards of conduct including following best practices in integrity and ethics, anti-discrimination, anti-harassment, child protection, prevention of sexual exploitation and abuse, health and safety, anticorruption and other areas in order to promote good governance and positive impact.

2. APPLICABILITY

This Policy is applicable globally to all Institute operations, and all Representatives of the Institute. It also applies to any project where the Institute has responsibility for the functions of the Responsible Official. Any deviation from this Policy requires the approval of the Responsible Official.

The Institute has in place Guidelines or Standard Operating Procedures (SOPs) to support the implementation of this Policy.

The Responsible Official, with input from the business as appropriate, is responsible for preparing and implementing the related Guidelines and SOPs.

3. DEFINITIONS

“Bribery” or “Bribe” means to directly or indirectly offer, promise or provide a financial or other advantage (including hospitality) to another person to:

- Induce or encourage the other person to perform a function improperly;
- Induce or encourage the other person to expedite the performance of a routine government action (see “Facilitation Payment”); or
- Reward the other person for the improper performance of a function.



“Bullying” means repeated unreasonable behaviour over time, where the behaviour causes or has the potential to cause harm to another person or persons.

“Child” or “Children” means a person or persons who is or are below the age of 18, regardless of the age of majority/consent in the relevant country. Where the age of majority/consent in the relevant country is anyone aged 18 or above 18 then that higher age limit shall apply and take precedence.

“Client” means any individual or entity who engages the Institute to provide goods or services.

“Commercial Sex Act” means any sex act on account of which anything of value is given or received.

“Compliance” means adherence to laws, codes, regulations, rules, standards, policies and guidelines concerning proper conduct, management and business transactions.

“Conflict of Interest” means when a Representative’s interests are (or potentially are) inconsistent with or are (or potentially are) otherwise in opposition to the interests of the Institute, the Institute’s Clients or the Institute’s stakeholders.

“Corruption” means the abuse or perversion of entrusted power, including the expectation of impartiality, for private or unlawful gain.

“Discrimination” is any unfair treatment or arbitrary distinction based on personal characteristics such as age, gender, sexual orientation or identity, disability, marital or parental status, pregnancy, religious belief or activity, political belief or activity, race (including colour, national origin or ethnicity) or citizenship.

“Diversity” refers to the individual differences and variety of characteristics that we all bring to the Institute.

“Duty of Care” refers to the obligation of the Institute to take reasonable care to prevent foreseeable harm to any Representative and provide a safe system of work.

“Facilitation Payment” means a direct or indirect payment to a Public Official to carry out or expedite the performance of a routine government action. Routine government actions include, but are not limited to, clearing customs, processing visas and scheduling inspections.

“Fraud” means dishonestly obtaining a benefit or causing a loss by dishonest or other improper means.

“Guidelines” means the written elaborations on Institute policy that provide further information and interpretation for the implementation of policy.

“Harassment” means any improper and unwanted behaviour that makes a person feel threatened, intimidated, degraded, humiliated, or offended.

“Inclusion” means ensuring that the right conditions are in place so that every person is able to achieve their full potential regardless of personal characteristics, socioeconomic background or personality type.

“Institute” refers to INSTITUTO DE TECNOLOGIA DE SOFTWARE E SERVIÇOS ITS and all of its subsidiaries.

“Intellectual Property” means rights including, but not limited to, patents, copyrights and trademarks, with regard to goods and/or services and other materials which bear a direct relation to or are produced, prepared, or collected in consequence of or in the course of the execution of an agreement or contract with the Institute.

“Personally Identifiable Information” means any data that could potentially identify a specific individual or any information that could be used to distinguish one person from another and can be used for de-anonymising anonymous data.

“Privacy” means a person’s right to control access to his or her personally identifiable information.

“Prohibited Act” means any offence under any applicable statute in any jurisdiction.

“Public Official” means an elected or appointed executive, administrative, legislative or judicial officer or employee of a country, state, territory, or political

subdivision thereof; an officer or employee of a public international organisation; or an officer or employee of a public enterprise or public body, including officers or employees of State owned or controlled entities. In addition, Public Official includes any person who performs a public function or exercises public authority, by employment or contract, for any branch of the national, state, local or municipal government of any country or territory. Public Official also includes employees or officers of political parties as well as candidates for political office.

“Representative” means an Employee or any person who has an independent individual contractual relationship with the Institute, whether as a contractor, consultant or agent of the Institute. This includes non-executive directors of the board.

“Safeguarding” means action taken by the Institute to protect the beneficiaries and communities with which we work, our Representatives and Clients from harm.

“Security” means a stock, bond, note or debenture, as well as options, warrants and similar instruments related to such stock, bonds, notes or debentures.

“Sexual Abuse” is any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

“Sexual Exploitation” means any actual or attempted abuse of position of vulnerability, differential power, or trust, for sexual purposes, including but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

“Sexual Harassment” means unwanted sexual advances, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another. Any gender can be either a victim or offender.

“Standard Operating Procedures” or “SOPs” are the detailed written descriptions of processes that aim to ensure consistency and quality in process execution.

“Trafficking” means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or a position of vulnerability or the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

4. POLICY

4.1. Integrity and Ethics

4.1.1. General Integrity

Representatives are required to:

- Observe and abide by all applicable laws and regulations, including relevant treaty obligations and internal policies, both in the countries where the Institute is registered and, if different, in the countries where the Institute is doing business;
- Read and comply with all Institute Policies, Guidelines and SOPs;
- Conduct business in a truthful, honest, diligent, transparent and ethical manner;
- Treat Clients, Representatives, communities with which we work and others with whom we interact, fairly, humanely, and with proper regard for their human rights and obligations;
- Respect cultural differences among Clients, Representatives, and others with whom we interact and conduct themselves in a manner that will not reflect adversely on the Institute, its shareholders, Clients, partners or the wider community; and
- Honour commitments and keep confidences.

4.1.2. Accountability

The Institute holds Representatives accountable for their conduct and expects all Representatives and others with which the Institute does business to adhere to

the spirit and letter of this Policy. To ensure compliance with this Policy, the Institute asks its Representatives to:

- Review this Policy and commit to abide by it;
- Ensure that questions about this Policy are addressed promptly and all Representatives know how to seek guidance about complying with this Policy;
- Ensure that non-compliant conduct is reported through any means including Institute email, telephone or the Institute Whistle-blowing mechanism as soon as practicable; and
- Report any known or suspected unlawful or unethical conduct related to the Institute. Self-reporting of non-compliance is encouraged.

The Institute will investigate any credible report of a violation of this Policy or any unethical or unlawful conduct.

4.1.3. Transparency and Record Keeping

The Institute is committed to transparency in all business dealings. The Institute maintains a comprehensive system of record keeping. Representatives must ensure that all official records are properly identified and maintained according to Institute policies on records management. The records are required to be true and accurate and any intentional misuse, editing or handling of the official records is prohibited.

4.1.4. Tax

The Institute complies with all obligations to pay taxes, duties and charges imposed or levied in the countries in which the Institute is registered and in the countries in which the Institute is doing business as required by law, including all taxes, entitlements, other statutory charges and/or any other amounts payable to personnel in the relevant jurisdiction.

4.1.5. Procurement

The Institute believes in fair competition and competes honestly, transparently, and fairly for business opportunities. The Institute always seeks to outperform competition in a fair and honest manner and seeks competitive advantage through superior performance. The Institute will not collude with competitors when bidding for contracts and, if collusion is brought to the Institute's attention, it will be investigated and reported without delay. Representatives are required to follow all applicable procurement laws and regulations. In a tender process, Representatives will, to the best of their ability, provide accurate and truthful information and will not misrepresent the Institute's approaches, capabilities or pricing.

Representatives must never ask for or receive preferential treatment or special privileges or make use of information they are not authorised to have, including non-public documents or other proprietary data, including information released to the Institute under Non-Disclosure Agreements. Representatives must not take unfair or improper advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts or any other illegal or unethical trade practice. Representatives will not attempt to influence Public Officials or other Clients with payments, gifts, offers of employment or otherwise unlawful conduct.

4.1.6. Anti-Corruption/Bribery

The Institute is committed to honesty, transparency and fairness and has zero tolerance for Bribery, including making Facilitation Payments. The Institute rejects Corruption in all of its forms and complies with the spirit and letter of all applicable anticorruption laws and regulations. Institute Representatives are required to:

- Reject Corruption in all of its forms, including Bribery, making Facilitation Payments or any Prohibited Act;
- Understand and appreciate that Bribery is unlawful and therefore strictly prohibited, regardless of jurisdiction or circumstance;

- Adopt and enforce all policies that prevent Corruption in the conduct of business;
- Ensure that no Public Official benefits financially or in any other unlawful way from the relationship with the Institute (or any Client);
- Operate with an adequate system of internal accounting controls and maintain accurate records that document relevant transactions; and
- Immediately inform their line manager or any other senior member of staff if information is discovered indicating that a Prohibited Act has been committed, has been requested or otherwise suggested by any person, including a Public Official or private individual, in connection with, in relationship with, or working for the Institute.

Institute Representatives must not:

- Directly or indirectly commit or attempt to commit any Prohibited Act including Bribery or making a Facilitation Payment;
- Directly or indirectly receive a Bribe;
- Use their authority for personal gain; or
- Offer, provide or receive unlawful gifts, benefits, hospitality, advantages, courtesies or entertainment from a Public Official where a reasonable person could interpret the offer, provision or receipt as a Prohibited Act made in connection with the Representative's duties, status or authority.

Hospitality is permitted under specific circumstances. Bona fide hospitality or other business expenditure with the aim of presenting the Institute or its products or services, or establishing cordial relations is permitted. However, hospitality or promotional expenditure can be misinterpreted as Bribery and Representatives must keep in mind appearances and perceptions and not offer hospitality where it could be mistaken to have the intention of influencing an official to secure a business advantage, to perform a function improperly or to expedite the performance of a routine government action.

Receipt and provision of gifts, benefits or entertainment must be notified on relevant registers kept for that purpose.

4.1.7. Intellectual Property

All Intellectual Property developed in the course of employment with the Institute, whether permanent or fixed term, remains the property of the Institute or, where contractually specified, the property of its Clients.

Representatives are required to comply with all applicable laws, rules and regulations, Institute policies and procedures, and contractual policies and procedures of Clients covering Intellectual Property rights.

4.1.8. Scientific Integrity

The Institute is committed to the highest standards of scientific integrity when performing any science-based and research-oriented work. These include ensuring that research and science-based work is grounded in documented approaches, is supported by validated data and information and that results and conclusions are independent and unbiased.

Representatives are required to ensure that there are no actual or perceived Conflicts of Interest that might bias work they are undertaking or otherwise call into question the validity or accuracy of their work. Institute Representatives will not falsify, fabricate, or misrepresent data or results, even if pressured to do so by internal or external sources. Due credit must be given when the work is not the Institute's own. If the Institute is involved in any research work involving human subjects, then it must follow the highest standards, ethical considerations, laws, rules and regulations applicable and take great care to interact with any human subjects with empathy and respect.

4.1.9. Fraud/Waste/Abuse

The Institute does not tolerate fraudulent activity, waste of Institute or Client resources or abuse of authority by Representatives. Representatives are

required to prevent, detect and report Fraud, waste, abuse, or any other Prohibited Acts about which they know or reasonably should have known. Concerns may be reported to the Representative's line manager or regional leadership. The Institute Whistle-blowing mechanism is also available to report confirmed or suspected violations. Representatives are expected to cooperate fully if and when investigations are undertaken.

4.1.10. Conflicts of Interest

The Institute believes in open and transparent business dealings. Representatives must separate their own personal interests from those of the Institute. Conflict of Interest arises when, for example, a Representative or any member of his or her immediate family, his or her partner, an organisation that employs or is about to employ any of the above, or any outside employment in which the Representative is engaged, has a financial or other interest in, or will receive a tangible personal benefit from, an action taken by the Representative. Actual or potential Conflicts of Interest must be reported immediately to the Representative's line manager so that action can be taken to manage and mitigate the Conflict of Interest, including but not limited to the exclusion of the Representative from any relevant decisions.

In the event that a Representative is subject to codes or rules of conduct other than those contained in the Institute Policies, Guidelines or SOPs (such as other professional codes), and a conflict arises between these codes, it is the Representative's responsibility to bring the conflict to the attention of the Representative's line manager for resolution.

4.2. Privacy and Information Protection

4.2.1. Privacy Protection, Responsibilities, and Expectations

The Institute's Privacy Policy sets out the details of the collection, storage, use, disclosure, access to, and correction of Personally Identifiable Information by the Institute.



Protecting sensitive and Personally Identifiable Information and preventing its misuse are essential to ensure that the Institute maintains the highest standards of professional conduct, including complying with data protection legislation wherever the Institute carries out its business. Representatives, partners or other organisations with which we do business, Clients, and beneficiaries have a right to be protected against unwarranted infringement of their privacy resulting from the collection, maintenance, use and dissemination of their personal information. The Institute is dedicated to the protection of the information we hold and to the prevention of actions that could result in harm, embarrassment, inconvenience or unfairness to anyone with whom the Institute has a relationship.

All Representatives are responsible for protecting sensitive and Personally Identifiable Information from unauthorised exposure and reducing the volume and types of Personally Identifiable Information to only that which is necessary for business functions. Representatives must protect the Personally Identifiable Information they collect, handle, maintain and transmit and they must use proper collection, storage, transmission and disposal methods. Further, Representatives must not access Personally Identifiable Information they do not need to complete their job functions and must not disclose Personally Identifiable Information to unauthorised parties.

Failure to protect Personally Identifiable Information may result in disciplinary measures or termination. All Representatives are obligated to notify their line manager if they discover any actual or potential privacy breaches.

Users of Institute information systems have no reasonable expectation of privacy. This means that any information transiting or stored on an Institute system can be monitored, intercepted, searched and seized by the Institute. Further, any information transiting or stored on an Institute system may be disclosed or used for any lawful governmental purpose including law enforcement, public health or security purposes.

4.2.2. Access to and Protection of Information

In the performance of their duties, Representatives may be granted access to many sources of information, confidential or otherwise. Any information provided as part of a Representative's duties or any information to which the Representative has access must be used only for official purposes. Representatives will not make any unauthorised, improper or unlawful use of any information made available to them in the performance of their duties. Further, Representatives will not access information without an official purpose related to the performance of their duties.

4.2.3. Information Communication Technology Systems Use

All Institute information communication technology systems, including email and any connected computer communications network, server, individual computer workstation, laptop, or Smartphone may only be used for business purposes, subject to the following. The Institute will permit limited personal use of the information technology systems as long as the personal use does not interfere with the Representative's work or incur an unreasonable expense to the Institute. Representatives' use of information technology systems is a business privilege and, as such, the Institute reserves the right to take disciplinary action, up to and including termination, for violations relating to use of the information technology systems.

The following are some examples of unacceptable and, therefore, prohibited actions involving the Institute information technology systems. Actions include, but are not limited to:

- Excessive use of Institute information communication technology systems for personal use;
- Intentionally inefficient or wasteful use of Institute assets or resources;
- Unauthorised access or use of any information communication technology system;
- Intentional disruption of the Institute's internet service, a third party's internet service and/or the global internet;

- Compromising or damaging the integrity of or misusing any host/server information communication technology assets or resources;
- Compromising the privacy of any Institute or third party users;
- Violating information rules, regulations or policies in the jurisdiction in which the Representative is working or living;
- Compromising corporate proprietary or otherwise sensitive information; and
- Using information communication technology systems to violate corporate policies or procedures, including sending or forwarding emails that violate any of the Institute's policies.

4.3. Respectful Workplace

The Institute supports Diversity and Inclusion and is committed to nurturing a positive workplace environment in which all Representatives are treated with respect and dignity. We foster a culture that is diverse, inclusive and respectful, giving all Representatives the opportunity to reach their full potential and contribute to the Institute's success. We are committed to creating inclusive opportunities for all Representatives and those seeking employment with the Institute. The Institute encourages a workplace free of Discrimination.

All Representatives are expected to demonstrate professional and respectful behaviours in the workplace, at Institute events, and/or under any circumstances when representing the Institute. This includes business travel and time spent at Institute related social events, whether held on or off Institute premises and whether during or outside working hours.

Discrimination, Harassment and Bullying, in any form, are unacceptable. Representatives are expected to adhere to the requirements of this Code of Conduct and to proactively report on Discrimination, Harassment, Bullying or other breaches of the Institute's policy.

Management of poor performance or poor conduct does not constitute Discrimination, Harassment or Bullying when it is conducted in accordance with the relevant Institute Guidelines.

4.3.1. Anti-Discrimination

The Institute values Diversity and employs and partners with individuals and organisations from a diverse range of backgrounds, cultures, and races. The Institute is committed to an open, inclusive and Discrimination-free workplace.

The Institute is dedicated to promoting an accessible and inclusive workplace where all reasonable accessibility requirements and requests will be considered and, where reasonably possible, accommodated.

Representatives must not engage in any Discrimination including, but not limited to, the following:

- Refusing to hire or promote Representatives on the basis of any personal characteristics that are not relevant to the requirements of the role;
- Terminating Representatives on the basis of any irrelevant personal characteristics;
- Refusing to provide reasonable accommodations for those Representatives with disabilities; and
- Refusing to excuse Representatives for documented, medically necessary appointments related to a personal characteristic.

4.3.2. Anti-Harassment

Harassment of any kind is unacceptable and is not tolerated inside or outside of the workplace. It can include a one-off incident or a series of incidents. Representatives must not engage in any form of Harassment.

4.3.3. Anti-Bullying

Bullying is unacceptable and is not tolerated inside or outside of the workplace, or inside or outside working hours, when the parties involved are also Representatives.

4.3.4. Grievances

The Institute encourages an open environment in which all Representatives can raise their work-related concerns, complaints or grievances fairly, honestly, and responsibly. The Institute acknowledges that to achieve a fair, equitable and productive work environment, there must be a transparent and consistent process for resolving grievances. The Institute aims, as far as practicable, to achieve a fair and prompt resolution to individual grievances raised by Representatives in the course of their employment or interaction with the Institute. In the event that a Representative feels inhibited to approach the matter directly with their line manager, their manager's manager, or through Human Resources, they should use the confidential Whistle-blowing mechanism.

4.4. Safeguarding

The Institute commits to work with internal and external stakeholders to protect the safety and welfare of the beneficiaries and communities with which we work, our Representatives, and our Clients. We foster a culture of Safeguarding at all times and support those who have experienced abuse.

4.4.1. Child Protection

The Institute is committed to upholding the values and purpose of the UN Convention on the Rights of the Child, which requires that Children will be protected from performing any work that is likely to be hazardous, interfere with a Child's education, or is harmful to a Child's physical, mental, spiritual, moral or social health. Regardless of the jurisdiction in which the Institute is registered or doing business, these activities are prohibited.

The Institute has a zero tolerance of Child abuse and expects the same commitment to Child protection from Representatives. Specifically, Representatives will:

- Treat Children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, or other protected and/or irrelevant characteristic;
- Whenever possible, ensure that another adult is present when working in the proximity of Children;
- Use any computers, mobile phones or video and digital cameras appropriately, and never to exploit or harass Children or to access Child pornography through any medium;
- Refrain from physical punishment or physical discipline of Children; Refrain from hiring Children for domestic or other labour; and
- Comply with all applicable laws, rules and regulations concerning Child protection, including laws in relation to Child labour.

Representatives will not:

- Use language or behaviour towards Children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
- Engage Children in any form of sexual activity. Mistaken belief in the age of a person is not a defence; Invite unaccompanied Children into the Representative's home or place of residence;
- Sleep close to unsupervised Children; and
- Supply controlled drugs to Children for use, trafficking or importing.

When photographing or filming a Child for work-related purposes, Representatives will:

- Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a Child;

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- Explain how the photograph or film will be used and obtain consent from the child's parent or legal guardian before photographing or filming a Child;
 - Ensure photographs and films however recorded and stored present Children in a dignified and respectful manner and not in a vulnerable or submissive manner;
 - Ensure that Children are adequately clothed and not in poses that could be seen as sexually suggestive; Ensure images are honest representations of the context and the facts; and
 - Ensure that physical and electronic labels of photographs and films do not reveal identifying information about a Child.

It is the responsibility of Representatives to use common sense and good judgment to avoid actions and behaviours that could be construed as Child abuse.

4.4.2. Prevention of Sexual Exploitation, Abuse and Harassment

Sexual Exploitation, Sexual Abuse, and Sexual Harassment are unacceptable and prohibited conduct for all Representatives. For example, it is prohibited for Representatives to engage in:

- Any act of sexually humiliating, degrading or exploitative behaviour;
- Any type of sexual activity with Children. Mistaken belief in the age of a person is not a defence;
- The exchange of money, employment, goods or services for sex regardless of whether or not this is illegal in the relevant country.

All Representatives must encourage an environment that prevents Sexual Exploitation, Abuse and Harassment. Managers at all levels have responsibilities to support and develop systems which maintain this environment. All Representatives must report any concerns regarding Sexual Exploitation, Abuse, and Harassment through established reporting mechanisms.

4.5. Environment, Health, and Safety

4.5.1. Sustainability and the Environment

The Institute engages in environmentally sustainable development, and promotes conservation and sustainable use of natural resources, conservation of bio-diversity and heritage sites and disaster risk reduction planning, ensuring Compliance with environmental protection legislation in the countries where the Institute is registered and the countries where the Institute works.

4.5.2. Health and Safety

The Institute is committed to a safe working environment that protects the health and wellbeing of Representatives. The Institute complies with all work health and safety legislative requirements and, in doing so, focuses on actions to prevent harm and ensure reasonable care of all Representatives.

4.5.3. Anti-Narcotics and Drug-Free Workplaces

The Institute maintains drug-free workplaces and does not tolerate the manufacture, sale, transportation, distribution, possession or use of any drug or narcotic substance deemed to be illegal in the countries in which the Institute is registered or is performing work. The Institute uses its best efforts to ensure that payments provided to or by the Institute do not provide direct or indirect support or resources to entities and individuals involved in drug trafficking.

4.6. International Governance

4.6.1. Political Activity

The Institute respects and supports Representatives' rights to engage in civil society in their personal capacity. Representatives are free to engage in political activity in their country of citizenship, providing that their involvement is not in conflict with their official duties or is during work hours and providing the

involvement does not use Institute resources. Representatives who engage in political activity are prohibited from representing that the Institute endorses or is in any way associated with their political activity or other political activities of any type.

4.6.2. Human Trafficking

The Institute does not tolerate or condone the transportation, sale or otherwise Trafficking of human beings for profit or otherwise. Regardless of the jurisdiction in which the Institute is registered or doing business, these activities are prohibited.

Representatives will prohibit transactions with, and the provision of resources and support to, individuals and organisations associated with human Trafficking. Further, Representatives must not:

- Engage in any form of Trafficking in persons;
- Procure a Commercial Sex Act; or
- Use forced labour in the performance of any work.

4.6.3. Terrorism

The Institute does not tolerate or condone the engagement, directly or indirectly, in terrorism or in the financing of or support to terrorists. Further, the Institute uses its best efforts to ensure that payments provided to or by the Institute do not provide direct or indirect support or resources to entities and individuals involved in terrorism. Transactions with, and the provision of resources and support to, individuals and organisations associated with terrorism are prohibited.

4.6.4. Sanctions

The Institute abides by the sanctions put in place by the international community including but not limited to the United Nations, the European Union, the United



States Office of Foreign Asset Control, the United Kingdom Foreign and Commonwealth Office, and the Australian Department of Foreign Affairs and Trade.

The Institute abides by sanctions related but not limited to:

- Counter Narcotics Trafficking;
- Counter Terrorism;
- Non-Proliferation;
- Rough Diamond Trade Controls; and
- Transnational Criminal Organisations.

Updated sanctions lists can be found here: <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

<https://www.gov.uk/guidance/uk-sanctions>

<https://www.un.org/securitycouncil/content/un-sc-consolidated-list>

<http://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx>

5. DUTY TO COMPLY

It is the responsibility of each Representative to comply fully with this Policy. Failure to comply may result in disciplinary action including contract termination, contract non-renewal or other appropriate action.

6. REPORTING

Representatives are required to report violations of this Policy to their manager, corporate and regional leadership, Human Resources or through the Institute's Whistle-blowing mechanism.