

Code of Ethics and Conduct

sitawi finance
for good

Code of Ethics and Conduct_004

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Sumário navegável!

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Message from the Board of Directors

Redefining the role of capital to drive transformative purposes is Sitawi's mission. We aim to impact for a greater and collective good, enabling positive socio-environmental initiatives and connecting believers with actors.

We mobilize and manage resources for those who seek to build a better future, where capital occupies a benevolent position.

We reaffirm our commitment to act ethically, with integrity and transparency, and to report, investigate, and take action whenever appropriate when faced with indications of irregularities or violations of our compliance system.

We operate with transparency, responsibility, and a commitment to ethics and integrity, under the guidelines of our internal policies and procedures and regulatory legal framework.

Sitawi's Code of Ethics and Conduct brings together our principles and values, with the aim of formalizing, promoting, and disseminating our culture and positioning to all stakeholders who interact with us.

Employees, in the course of their daily duties, must align their actions with this document, just as we expect the same commitment from external individuals who interact with Sitawi.

Together, we will build a more sustainable and just future for all.

Objectives

This Code of Ethics and Conduct serves as a guide for our ethical conduct and compliance with the law, while this important work is carried out, anywhere and every day.

Sitawi's Code of Ethics and Conduct consolidates the culture built throughout the Organization's history and defines the expected behavior of all its employees, consultants, partners, service providers, suppliers, beneficiaries, and stakeholders in conducting their daily activities, and compliance is mandatory.

Throughout this document, the fundamental values of the Organization are defined, namely, the ethical and moral principles that must be adhered to by all Sitawi members or by those who, in some way, relate to it.

This document not only addresses a set of rules on how to behave but a set of principles that must be applied in interpersonal relationships during activities related to Sitawi.

In addition to being a tool for aligning internal ethical conduct, this Code of Ethics and Conduct complies with the Anti-Corruption Law (Law 12.846/2013), which Sitawi considers a significant advancement for ethical and integrity issues in the country. This Law values the implementation of codes of conduct, the existence of channels for reporting irregularities, training and awareness-raising actions for its employees and those who in some way relate to Sitawi, as well as internal audit and Compliance mechanisms and procedures.

With this Code of Ethics and Conduct, Sitawi seeks to inform employees and those who have a relationship in any way about what they should or should not do and to provide them with the confidence to report practices that are not in line with the Organization's pillars and standards. The Code of Ethics and Conduct, together with the Integrity Policy, aims to gather the ethical and moral guidelines and standards for the conduct of Sitawi's activities.

Target Audience

This Code of Ethics and Conduct is addressed to all employees, board members, consultants, suppliers, partners, beneficiaries, and stakeholders of Sitawi.

Sitawi's Values

The success in fulfilling Sitawi's purpose depends on the commitment of everyone who is part of or related to the Organization in promoting ethical values and also on the mutual commitment of responsibilities between the Organization and individuals.

Sitawi's values are:

- Prioritize Impact;
- Share Responsibility for Change;
- Innovate and Set the Best Example;
- Act with Empathy;
- Operate Transparently.



Preliminary Definitions

For a better understanding of Sitawi's ethical conduct, the following terms used throughout the document are listed below to ensure alignment of concepts.



Workplace Harassment

Any conduct that demonstrates psychological violence against another person, regardless of their position or status within Sitawi. Workplace harassment is considered when an individual is subjected to humiliating and embarrassing situations during the performance of their duties, which ultimately destabilizes the victim's relationship with the work environment and the organization.



Sexual Harassment

The conduct consists of harassing someone with the intention of obtaining sexual advantage or favoritism, with the perpetrator leveraging their hierarchical position or influence.



Employee

An employee refers to directors, staff, interns, volunteers, and service providers who directly engage in Sitawi's internal operations.



Conflict of Interest

A conflict of interest arises when an employee influences or may influence a decision of Sitawi that could result in some personal gain, either directly or indirectly, for themselves or for close relatives and associates.



Discrimination against Individuals

To distinguish or differentiate one individual from another, not respecting the fact that, in Sitawi, it is believed that all individuals should be treated equally within this institution.



Ethics

A set of rules and precepts of a social group or society's evaluative order.



Forced or Degrading Labor

Forced or degrading labor is when an employee is compelled to perform a task that may or may not involve restrictions on their freedom. In such cases, they are required to provide a service without receiving adequate payment or receiving an insufficient amount for their needs, and the employment relationships are typically illegal.



Ethical Guidelines

Respecting Sitawi's values, it is required that all employees working for Sitawi or representing this institution adhere to the ethical guidelines described below. Any violation of the Code of Ethics and Conduct occurring within the professional lives of the organization's members is subject to reporting and judgment by the Ethics Committee.

In situations unrelated to Sitawi, that is, within the personal lives of each member of the organization, the guidelines described below are only recommendations. However, in these cases, any violation of this Code of Ethics and Conduct may be reported, and it is up to the Ethics Committee to decide whether to investigate and judge the complaint.

It is important to note that, before making any complaint, Sitawi encourages dialogue among its members, aiming to resolve any disputes or disagreements without the need to involve higher investigative authorities.

Workplace Harassment

No Sitawi employee should engage in behaviors that could be interpreted as workplace harassment by another individual.

Additionally, all Sitawi employees should remain vigilant regarding suspicions of workplace harassment within Sitawi's premises or outside the premises while performing activities related to the Organization.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Sexual Harassment

No Sitawi employee should engage in behaviors that could be interpreted as sexual harassment by another individual. All Sitawi employees should remain vigilant regarding suspicions of sexual harassment while performing activities related to the Organization.

Sitawi does not tolerate the practice of Sexual Harassment and instructs employees through training, communication, and policies about the expected and accepted behaviors in the workplace.

Although it may not be possible to list all behaviors that may constitute sexual harassment, some examples include:

- Making derogatory jokes about sexuality and/or sexual orientations of others, sharing pornographic or nude images, making typically sexist jokes, or commenting on others;
- Unwanted physical contact;
- Soliciting sexual favors;
- Inappropriate invitations, pressure to participate in "meetings" and outings;
- Gestures or words, written or spoken;
- Promises of preferential treatment;
- Blackmail for job retention or promotion;
- Threats, veiled or explicit, of retaliation, such as losing one's job.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the People and Culture department or immediate management, or if preferred, through

the compliance monitoring channel, and an investigative process will be initiated. If the harassment is confirmed, penalties will be applied, as per item 15 of this policy, without replacing any criminal action if the conduct falls under the definition of sexual harassment (Article 216-A of the Penal Code).

No retaliation will be taken against those who report sexual harassment, oppose harassment practices, or participate in the investigative process of any complaint.

Well-being

All Sitawi employees should carry out their daily activities cooperatively, seeking to collaborate with their colleagues, within the possibilities, interests, and ethical principles.

Do not foster unfounded expectations or make promises that cannot be fulfilled.

Assume a constructive attitude in criticism when necessary.

Assume an open position for negotiation and understanding in conflict situations.

Competence

All Sitawi employees must fulfill their roles within Sitawi by striving for continuous learning, improvement of skills, enhancing their capabilities, and always maintaining behaviors conducive to excellent performance of their activities.

Confidentiality

All Sitawi employees must take necessary measures to protect the confidentiality of information and materials they possess, respecting the obligation not to disclose any professional or personal information of a confidential nature, except by delegation or with express authorization.

Even after the individual's relationship with Sitawi is terminated, all information remains confidential.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Conflicts of Interest

Upon joining Sitawi, the employee commits to not using their affiliation with the Organization to favor other businesses, individuals, or obtain undue advantages for themselves. A conflict of interest arises whenever an employee finds themselves in a situation that could lead to decisions motivated by interests other than those of Sitawi.

No Sitawi employee should participate in the selection, hiring, or management of contracts if there is any real or apparent conflict of interest.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Loyalty and Non-Competition

Employees commit not to engage personally or through a third party in acts of competition against the organization, as part of their duty of loyalty.

In this context, any hiring between an employee and partners with an existing contract with Sitawi or whose contract has ended within a period of less than 6 (six) months is prohibited, without prejudice to the confidentiality duty assumed.

Diversity and Inclusion

Sitawi provides a work environment where people are treated with dignity and equality, respecting differences, empowering individuals, and valuing their potential.

It is committed to creating a respectful and dialogue-oriented environment where people can be themselves.

Discrimination

No Sitawi employee should discriminate against another individual based on race, skin color, gender, gender identity, age, sexual orientation, nationality, ethnicity, language, physical condition (e.g., individuals with disabilities and/or HIV-positive), psychological condition, political position, or religious position, respecting the well-being, health, and privacy of each individual while performing activities related to the Organization.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Illegal Drugs

No Sitawi employee should use illicit drugs while performing activities related to the Organization, nor should they tolerate their coworkers doing so.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Balance Between Personal and Professional Life

All Sitawi employees should maintain vigilance regarding the balance between their personal and professional lives, as well as those of their colleagues, whether subordinates, superiors, or partners, and may kindly alert and assist in seeking solutions for rebalancing.

No individual should be subjected to embarrassing situations or an excessive workload that is beyond their terms of reference.

An employee may request personal favors from another employee, provided it is not an imposition or disruptive to their work.

Image

All Sitawi employees should uphold a positive image, exuding confidence and good personal habits.

Social Media and Related Platforms

In their activities on social media, Sitawi employees, board members, consultants, service providers, suppliers, partners, beneficiaries, and stakeholders should avoid disrespectful or discriminatory approaches that may generate an unfavorable understanding of the Organization.

Use of Equipment

Sitawi employees should take care of the Organization's assets, including the handling and transportation of computer equipment, peripherals, electronics, and ergonomic kits provided for teleworking. Their use follows internal rules and recommendations from competent areas.

The equipment constitutes Sitawi's assets and is provided through loan exclusively for the performance of employees' daily activities and should not be used for personal purposes.

The equipment should remain with the same configurations as when they were provided to employees, including but not limited to the operating system, installed files and programs, access password, among others. If any changes of this nature are necessary, the employee must notify Sitawi and request authorization.

Sitawi hereby informs employees that access to equipment, corporate communication platforms, Slack, and corporate emails may be possible through technological tools, with no right to privacy applying in these environments, as they are directly related to Sitawi's activities.

Equipment must be returned in perfect condition when requested.

Gifts, Presents, and Hospitality

Sitawi's employees shall not offer or accept, directly or indirectly, gratuities, gifts, trips, or favors from partners, suppliers, competitors, except for gifts with a commercial value of less than BRL 500.00 (five hundred Brazilian reais). Exceptional cases must be discussed with the Presidency and Compliance.

The exchange of courtesies (lunches, working dinners, or entertainment) between employees and third parties is acceptable when reasonably related to the social objective and within the limits of what is customary in a normal professional relationship. However, any entertainment or favor that may create the perception of influence or obligation towards the giver or receiver is prohibited.

When it is impossible to refuse gifts, hospitality, and other benefits that do not meet the mentioned guidelines, or where there is believed to be sufficient benefit to the organization to justify the acceptance of certain types of hospitality, the employee should seek written guidance from their immediate senior manager, Directors, or Presidency.

Relationship with Beneficiaries, Suppliers, and Partners

Sitawi considers its relationship with its beneficiaries, suppliers, and Partners fundamental to achieving its main objective and is based on legal, ethical, and transparent practices, striving to establish relationships free from favoritism and expects the same from its beneficiaries, suppliers, and Partners, requiring them to:

- Maintain a treatment based on efficiency, respect, and honesty in their actions;
- Observe established and planned deadlines;
- Act transparently in the execution of their actions;
- Be honest and comply with current legislation;
- Maintain confidentiality and secrecy of data and information accessed by any means or form;
- Follow the rules in the Code of Ethics and Conduct, Integrity Policy, and Partner Management Manual.

Any violations of the guidelines presented here must be evaluated for the application of appropriate measures, listed below:

- Written warning
- Contract termination
- Appropriate legal action

The hiring of suppliers to meet Sitawi's institutional purposes must follow, in addition to the above, the guidelines of the organization's Procurement Procedure.

Relationship with the Public Sector

Sitawi does not condone any acts of corruption, bribery, or harmful conduct against the Public Administration, including entities that use public resources. It should be noted that Sitawi adopts an ethical and transparent stance, based on integrity, and for this reason, it must be emphasized that:

- Regulations and legal obligations from these agencies are strictly adhered to;
- Any situation that may constitute or suggest a conflict of interest must be reported to Compliance via email compliance@sitawi.net or the Ethics Channel;
- It is prohibited, in any situation, to offer, pay, promise to pay, or authorize the payment of any amount of money, gifts, or valuable objects to any authority or public agent;
- The offering of gifts to public officials is only allowed if there is no commercial value or if distributed as a courtesy or habitual brand promotion of Sitawi, being prohibited in any case to obtain undue advantage;
- Donations and/or financing of political campaigns for candidates or political parties are prohibited;
- Participation in public tenders occurs in strict compliance with and observance of Laws No. 12.846/2013; Law No. 14.133 /2021; and 8.666/1993 regarding the provisions that remain in force;
- All interactions with the public sector, including entities that use public resources, must be reported to Compliance.

The Organization has an Integrity Policy that expresses in more detail the conduct to be adopted and rules

Political Party Activity

Employees have complete freedom to exercise their individual political rights, but must ensure that Sitawi is not associated with any political party positions. Any political activity should occur outside of Sitawi's dedicated period and corporate communication networks/tools.

Sitawi is prohibited from making any donations to political parties or candidates.

Integrity

All Sitawi employees must conduct their activities with honesty towards partners and colleagues and act in a way that does not tolerate illicit practices.

Sitawi combats corruption in all its forms, including extortion, bribery, administrative misconduct, crimes against the economic and tax order, among others.

Therefore, participation in any form of corruption or bribery is prohibited, including payments or other ways of conferring benefits to any official, whether from a public or private institution, with the purpose of influencing decision-making in violation of current legislation;

Sitawi not only finds direct participation in acts of corruption, bribery, or payment of bribes intolerable but also knowledge, encouragement, or any indirect involvement in the aforementioned illegal acts.

These guidelines apply to Sitawi's suppliers, partners, and public relations.

Teletrabalho

The guidelines contained in this Code of Ethics and Conduct were developed considering the new reality provided by a digital and integrated world. Therefore, it is essential that the posture of Sitawi professionals remains in line with Organizational Policies, regardless of the environment where they are located for the exercise of their professional activities, always respecting the daily routine stipulated in the employment contract, the care for physical and mental health, regular contact with team colleagues, and instructions for Good Remote Work Practices.

For the purposes of this Policy, Telecommuting is considered the activities performed outside Sitawi's premises, not classified as fieldwork and performed exclusively within the national territory, with the exception of members of the Board of Directors and the Council.

Protection of Personal Data

Compliance with data protection laws is the obligation of all Sitawi employees, and all operations involving data processing must comply with the General Data Protection Law (13.709/2018) and follow the practices below:

- Familiarize themselves with Sitawi's Data Privacy Policy and consult the responsible area in case of doubts;
- Do not disclose information, emails, files containing personal data of employees, suppliers, partners, through unofficial channels;
- Do not keep disorganized or unprotected files containing personal data;
- Report to the area responsible for policies related to the processing of personal data about any personal data leaks they become aware of or through the following channels:
 - dpo@sitawi.net
 - <http://www.helloethics.com/sitawi>
 - E-mail: sitawi@helloethics.com

Exclusion or Sanction Lists

All Sitawi employees must ensure that they do not maintain any professional or commercial relationship involving Sitawi with any entities or individuals on the US or UN exclusion or sanction lists. In cases of doubt, one should check the presence or absence of these entities or individuals on the following lists:

- OFAC (Office of Foreign Assets Control), a list from the US Department of the Treasury that includes individuals and entities:
- <https://sanctionssearch.ofac.treas.gov/Default.aspx>;
- United Nations Security Council Sanctions List, which includes individuals and entities: <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>;
- Terrorist Exclusion List from the US Department of State, which includes terrorist organizations: <https://www.state.gov/j/ct/rls/other/des/123086.html>;
- Foreign Terrorist Organizations List from the US Department of State, which includes terrorist organizations: <https://www.state.gov/j/ct/rls/other/des/123085.html>;

In case of certainty, doubt, or suspicion, with concrete evidence or not, regarding the non-compliance with this guidance, one should contact the Compliance Monitoring Channels of the Code of Ethics and Conduct.

Sustainability

The purpose of Sitawi is to redefine the role of capital to drive transformative purposes that generate impact through practices committed to sustainable development. Therefore, operations at Sitawi are managed by observing risks and impacts on communities, considering social, environmental, and economic aspects.

Additionally, Sitawi encourages employees, suppliers, partners, and beneficiaries to adopt actions that contribute to the preservation of natural resources and comply with environmental laws.

Forced or Degrading Labor

No Sitawi employee should engage in behaviors that could be interpreted as slave or degrading labor by another individual within or outside Sitawi's premises while performing activities related to the Organization.

Also, all Sitawi employees must remain vigilant regarding suspicions of slave or degrading labor in the execution of activities for this institution.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Child Labor

No Sitawi employee should request tasks to be performed by individuals under 18 years of age to meet the Organization's interests.

The exceptions to this rule are the Young Apprentice Program, a Federal Government initiative that, according to Law No. 10.097/2000, regulated by Decree No. 5.598/2005, requires medium and large companies to legally employ young people aged 14 to 24, filling the equivalent of a minimum of 5% and a maximum of 15% of their workforce whose functions require professional training, and the condition of Volunteer, provided they are over 16 years old, with the consent of the legal guardian, and in compliance with Law No. 9.608/98 and 8.069/1990 – Child and Adolescent Statute.

In cases of certainty, doubt, or suspicion, with or without concrete evidence, regarding non-compliance with this guidance, individuals should contact the channels for monitoring compliance with the Code of Ethics and Conduct.

Sitawi's Ethics Channel

Sitawi provides all employees with the Ethics Channel, which monitors compliance with the Code of Ethics and Conduct and the Integrity Policy, where it is possible to ask questions and make reports, whether suspicions or concrete evidence, of violations of this Code.

- <http://www.helloethics.com/sitawi>
- E-mail: sitawi@helloethics.com

There is no need for absolute proof of a violation of the Code of Ethics and Conduct before reporting to the monitoring channels. Even if it's just a suspicion, allegations of violation should be reported.

It is important to note that, before making any complaint, Sitawi encourages dialogue among its members, aiming to resolve any disputes or disagreements without the need to involve higher investigative authorities.

The Ethics Channel is operated by an independent company and structured to ensure absolute confidentiality, protecting the anonymity of the whistleblower and preserving all information so that a fair investigation can take place.

Investigative Process

Investigations will be conducted according to the guidelines below, with competency defined based on the subject matter related to the complaint. Competent parties to conduct investigations are as follows:

- **Compliance:** When the subject matter of the complaint involves data leaks or improper sharing of information, third parties external to the Organization or Sitawi as an Institution.
- **People and Culture or Reporting Area Manager:** When the subject matter of the complaint involves issues arising from interactions of employees and/or does not involve Compliance-related topics. If the manager or responsible party involved in the complaint is from People and Culture, the investigation will be conducted by the Executive Board. At the discretion of the person in charge of the investigation, the intervention of Compliance may be requested.
- **Directors:** When the complaint reports violations or suspicions of violations of Sitawi's policies and values committed by a member of the Executive Board, the investigative process will be conducted by Directors who are not involved, with the option to request the intervention of Compliance.
- **Advisory Board:** When the complaint involves all members of the Executive Board or when there is a suspicion resulting in the lack of at least one (1) impartial director to conduct the investigative process.

During the investigative process, some minimum recommendations should be followed:

- Listen to the viewpoints of the parties involved in the complaint (the individual who violated the code and the victims, if any);
- Listen to possible witnesses of the reported violation;
- Listen to related parties who may have been directly or indirectly affected by the violation of the Code of Ethics and Conduct;
- Ensure that, in the testimonies heard, any biases are disregarded, not affecting the opinion and assessment of the Ethics Committee;
- Evaluate the quality of the complaint (whether it's a suspicion or if there is concrete evidence);
- Evaluate if there is a recurrence of behavior that violates the Code of Ethics and Conduct by the same violator; and
- Research similar cases that may have occurred at Sitawi or in any other organizations, which may assist in decision-making.

After the investigation is concluded, the process will be forwarded to the Ethics Committee in the following situations:

- If the complaint relates to financial, accounting, or any other matters within the competence of the Fiscal Council as stipulated by the Statute, the Fiscal Council will decide on the application of measures or sanctions. It will also decide whether to report the case to the competent authorities or if it should be archived.
- If the investigation relates to violations or suspicions of violations of Sitawi's policies and values committed by a member of the Executive Board, the Ethics Committee will decide on the application of measures or sanctions.

Ethics Committee

Sitawi's Ethics Committee consists of the Fiscal Council, elected in the General Assembly, plus two invited members. The invited members will be selected by the members of the Fiscal Council based on their reputation and credibility, and they can be either members of the institution, members of the Advisory Board, or external individuals to Sitawi (e.g., professionals specialized in the subject matter of the complaint). It is prohibited to invite any individuals involved in the complaint, and diversity of the Ethics Committee's profile should be sought (e.g., gender diversity, racial diversity, diversity of opinions, etc.).

The Ethics Committee is not subordinate to the Executive Board and meets on demand, without a previously defined frequency. Its convocation is carried out by the President with a minimum of two (2) business days' notice before the meeting.

The functions of the Ethics Committee are as follows:

- Deliberate on misconduct and conflicts of an ethical nature related to financial, accounting, or any other matters within the competence attributed by the Statute to the Fiscal Council;
- Notify Compliance of the decision taken;
- Communicate, whenever necessary, with Compliance to request information or support and clarify doubts.

Members of the Ethics Committee who are directly or indirectly implicated in any process or procedure cannot participate in the investigation of any violation of the Code of Ethics and Conduct. The Ethics Committee may conduct the investigation, hire third parties to conduct it, or internally appoint employees of Sitawi, provided they are not involved in the alleged violation.

Applicable Sanctions

Each reported case must be individually analyzed by the person responsible for conducting the investigation, with the exception of matters whose jurisdiction will be that of the Ethics Committee, which will decide on the validity or not of the complaint and the investigation procedure.

In case of violations of this Code of Ethics and Conduct or any other rules or regulations established by the Organization, the following sanctions may be

applied, depending on the severity of the case.

If the transgressor is a supplier, partner, or beneficiary, the sanction to be applied, if so decided, will be the termination of the instrument that the parties have entered into, with prior notification by Compliance, outlining the consequences stipulated therein.

The decisions must fall into the following categories:

- **No sanction to be applied** – if the person responsible for conducting the investigation does not deem it necessary to apply a sanction, after the investigation is concluded, in cases where sufficient evidence is not found to ensure that the violation of the Code of Ethics and Conduct or any other rules or regulations of the Organization actually occurred.
- **Verbal and written warning** – the employee, counselors, consultants, suppliers, partners, beneficiaries, or stakeholders of Sitawi who violate the Code of Ethics and Conduct will be formally warned verbally and in writing, in private (not publicly), by a Director of Sitawi. The immediate supervisor of the violator must be informed of the warning.
- **Disciplinary suspension** – the employee, counselors, consultants, suppliers, partners, beneficiaries, or stakeholders of Sitawi who repeatedly violate the Code of Ethics and Conduct or any other rules or regulations of the Organization and have already been warned will be suspended from their duties for up to thirty (30) days, resulting in the loss of remuneration and other benefits during this period, if any.
- **Dismissal** – the violator is dismissed from their position at Sitawi, and their employment contract, regardless of the type of contract, is terminated.
- **Termination** – The supplier, partner, and beneficiary may have the contract or any other formal instrument linking them to Sitawi terminated if they violate the Code of Ethics and Conduct or any other rules of the Organization, without prejudice to the other rules provided in the particular document executed between the parties.

In addition to the sanctions listed above, violations may also result in civil or criminal proceedings.

Investigative Process Flowchart

