

CODE OF ETHICS AND CONDUCT

MESSAGE FROM THE BOARD

HECT acts towards its mission: “To meet the demands of our clients with excellence, putting our technical consulting expertise into service, reaffirming our credibility”.

The company understands this is a path that can only be taken in the light of righteousness.

Our performance in the Market should be backed not only by our competence, but by our ethical values as well. Aligned with proper professional attitude, we should always act accordingly to our values and follow principles that strengthen transparency and correctness.

In that sense, HECT has been evolving each year with its Compliance and Integrity Program, increasingly assuring commitment to promote ethics and integrity on its business deals.

This Code of Ethics and Conduct has as goal to guide employees’ practices and HECT’s relations towards the internal and external communities. We shall act in conformity with the principles therein, as well as perceive, respect and abide by the legislation applicable to the company.

The Code must be referred to when needed and, in case of doubt, HECT’s Integrity Office may be consulted for clarification.

We appreciate everyone’s commitment to complying with the guidelines set forth herein and count on the support of all to improve constantly our standards of conduct and integrity.

Geovane Martins

Director

MISSION

To meet the demands of our clients with excellence, putting our technical consulting expertise into service, reaffirming our credibility.

VALUES

HECT's values translate the company's spirit and its attitude towards the clients, employees, partners and society itself. The set of values from HECT was synthesized in four main pillars:



Credibility

We have as one of the main values the development of services with the highest professional standard, providing credible solutions with regards to their relevance and importance for value generation, maintaining the trust of our customers and employees.

Excellence

We constantly seek to improve our services and processes, with the commitment to achieve the highest quality, putting into service in an innovative way the best management practices and techniques.

Synergy

We embody a synergistic work environment, where all employees work in an interactive, aligned and synchronous way, seeking to provide high quality solutions, with effectiveness and efficiency.

Talent development

We have a team of qualified professionals committed to the success of our company, our services and the generation of value for our customers. We value and promote the continuous development of our employees, aiming to improve our quality standards and professional satisfaction.

ABOUT THE CODE OF ETHICS AND CONDUCT

The Code of Ethics and Conduct is a set of guidelines and principles that guides employees and third parties in the execution of their activities, decision-making and interpersonal relations in the workplace.

The Code applies to the entire HECT team, including directors, employees, interns and young apprentices, as well as other stakeholders who relate to HECT, such as suppliers, service providers, customers and anyone, whether physical or legal, who will represent the company.

Everyone is expected to not only know and abide by the Code, but also to promote its dissemination, reporting acts that may be in disagreement with the guidelines contained in this document.

All employees and third parties who provide services to the company must act in accordance with the principles in this document and observe and comply with current legislation in areas where the company carries out its activities.

Everyone is expected to strictly observe the laws applicable to HECT's business, as well as the Anti-Corruption Law.

COMPLAINTS CHANNEL

Any cases of violation or suspected violation of rules provided for in this Code of Ethics and Conduct, current laws or internal company procedures, must be reported on HECT's whistleblowing channel.

The whistleblowing channel has full guarantee of secrecy and confidentiality. The complaints received are verified independently and free from any external or internal influence, with caution and responsibility, in a fair and impartial manner. In case of proof of the violation, appropriate disciplinary and/or legal measures are taken.

For greater efficiency in the process, it is recommended that the reporting of the complaints be as complete as possible, containing the description of the fact, where and when it happened or is happening, people and organizations involved and evidence (if any) to assist in the investigation. Identification is not mandatory if the person prefers to preserve their anonymity.

Retaliation against anyone who report in good faith any misconduct or suspicion is strictly prohibited, even if, after investigation, the fact is not considered a proven deviation.

Retaliatory acts must be immediately reported and are subject to the application of disciplinary measures by HECT.

The whistleblowing channel may be used by the internal public (employees) and also external (third parties, suppliers and customers).

COMPLAINTS CHANNEL CONTACTS:

www.hect.com.br/ouvidoria

ouvidoria@hect.com.br

DISCIPLINARY MEASURES

Any violation of the rules defined in this Code or in other policies and standards constituent part of the HECT Management System, as well as of the laws related to the business, is subject to disciplinary measures.

The omission in the face of a violation may be interpreted as agreement or cooperation with such and is also subject to punishment.

HECT has guidelines for the application of punitive disciplinary measures to violations. The Compliance Committee is responsible for recommending the application of appropriate disciplinary measures in each case.

COMPLIANCE COMMITTEE

The Compliance Officer, together with the Compliance Committee, is responsible for the implementation, operation and monitoring of the HECT Compliance and Integrity Program.

Among its attributions, the following stand out:

- Solve doubts or conflicts in the interpretation of this Code;
- Identify and determine awareness and training actions;
- Receive and evaluate complaints and;
- Promote the continuous improvement of the Program.

Committee members are appointed by the HECT Board of Directors, and like the Compliance Officer, they report directly to the board regarding the affairs from the Compliance and Integrity Program.

Work environment and internal conducts

HECT values a pleasant working environment, which is why it encourages harmony among its employees, commitment, transparency and trust in relationships. This is the way to achieve better results and a higher quality of life.

Diversity and inclusion

HECT is guided by principles of equal opportunity and non-discrimination. Work relationships must be guided by trust, integrity, impartiality, mutual respect and fairness.

Under no circumstances are discriminatory practices allowed regarding to: ethnicity, color, gender, sexual orientation, belief or religion, physical conditions, age, marital status, social class, or any other form of prejudiced and discriminatory treatment.

Professional attitude

HECT expects its employees to have a positive, honest professional attitude, of mutual respect, trust and collaboration.

The company's values are conduct guidelines and must be practiced in all environments, whether internal or external.

The commitment to the optimization of resources and the reduction of costs and expenses in all company activities is fundamental, always maintaining the quality of the services offered.

It is not permitted to take advantage of a position or status held at HECT to obtain favors or personal benefits or benefits for third parties of one's relations.

The involvement of employees and third parties in illegal activities that harm or jeopardize HECT's image and reputation is not tolerated.

Moral and sexual harassment

Harassment is a behavior that is offensive in nature, that annoys or disturbs, and that under no circumstances are allowed, and if they occur, should be reported in the Reporting Channel.

Moral Harassment

Moral harassment is the exposure of someone to humiliating and embarrassing situations, prolonged and repetitive, during the working day and in the exercise of their duties. They are more common in hierarchical subordination relationships, in which negative behaviors of one or more bosses directed at one or more subordinates predominate, destabilizing the victim's relationship with the work environment and the organization.

Sexual harassment

It is defined as any form of approach, verbal, virtual or physical, which aims to obtain sexual advantages from the victim using or not the hierarchy in the work relationship.

They may be unwanted and unsolicited actions, gestures, messages or behaviors of a sexual nature that make the target feel uncomfortable.

Sexual harassment is not just a violation of our Code of Ethics and Conduct. It is also a crime, foreseen for in the Penal Code.

Property protection

HECT equipment, software and means of communication (telephone, e-mail, messaging software, internet and others) are for exclusive use for the development of work activities and during working hours, and should not be used for personal purposes, being prohibited through their use the propagation of material of an offensive, discriminatory or illegal nature.

The use of HECT's assets, whether from the central office or from remote services provision locations, is exclusive for professional activities. The use for personal purposes should be restricted to the minimum necessary.

Confidential and privileged information

Information is an intangible asset, of great importance to HECT. Inside information should be kept confidential in order to protect the interests of the company, its customers, contractors and employees. The proper use of such information is a fundamental principle of HECT. Failure to respect the protection of information will be strictly punished under the terms of the law, and the offender may respond civilly and criminally.

HECT, as well as its collaborators and third parties, are committed to maintaining the integrity and confidentiality of all information received from customers and partners, whether in physical, digital format or any other means of disseminating the information.

Employees and third parties who have access to strategic and confidential information about the projects and studies developed by HECT will not be able to use it for the purpose of obtaining personal gains, nor to divulge it to people who do not belong to the access group.

It is a serious fault to copy confidential customer data files and projects developed by HECT, be it computerized systems or physical documents, for personal use or for the benefit of third parties.

Any situations in which information security is compromised must be communicated to HECT, so that the appropriate measures can be taken.

Prohibition of fraud

Fraud is highly damaging and causes, in addition to financial losses, damage to HECT's reputation and integrity.

Thus, stands not tolerated the conduct of people who, in the exercise of their functions, want to obtain gains through fraud for themselves, for third parties or even for the company itself.

What is considered fraud?

Fraud is any act performed to obtain gains in an unlawful, improper or irregular manner, to the detriment of another person or another organization. That includes:

- Falsification of documents or medical certificates;
- Change in accounting data and management results;
- Payments by unofficial forms.

Financial information and accounting records

HECT is committed to strictly respecting and complying with the laws and regulations applicable to its business activities, including tax laws and regulations, anti-corruption laws, anti-money laundering laws and competition laws.

HECT has a system of internal accounting records that reflects financial and equity transactions carried out with due authorization and precision.

All transactions and payments must be duly verified, justified and recorded in books, records and accounts in a clear and transparent manner.

All documentation and records of accounting and financial transactions must be preserved, as required by HECT legislation and procedures.

Health, safety and environment

All employees must comply with the internal health and safety rules and regulations applicable to their work, whether they are internal rules of HECT or of the companies where the work is being performed.

It is everyone's duty:

- Obey traffic laws and internal rules for driving vehicles;
- Inform the company about unsafe acts and conditions observed in the context of work and that may generate risks of accidents;

- Ensure the prevention of waste of water, energy, materials and food, as well as practice and execute the responsible disposal of organic, recyclable and electronic waste;
- Comply with laws and regulations regarding health, safety and the environment applicable to the nature of the business.

CONFLICT OF INTERESTS

Conflict of interest is a situation where the interests of one part may contradict or overlap the objectives or interests of another part. Situations where there are emotional, financial or family ties can open space for conflicts of interest within the company.

Attitudes and choices influenced by conflicting interests can undermine the reliability and credibility of the company; therefore, one should not make decisions that are influenced by conflict of interest.

Employees and third parties who work with HECT must identify and prevent any conflict of interest that occurs during the development of their duties and responsibilities. Likewise, they must report to the integrity department any situations, real or potential, of conflict of interest with HECT's businesses through the Declaration of Transparency form.

Parentage and affective relationship between employees

The parentage or affective relationship between employees is allowed, as long as there is no subordination or execution of activities that, directly or indirectly, may influence the activities of the partner or person with parentage.

The indication of friends and family is accepted, as long as the link with the person indicated is informed and an exempt position is assumed in the selection process, in order to ensure that the candidate is submitted to all stages of selection, without preference or priority.

Relationship with suppliers, customers and partners

HECT employees must refrain from participating in any project, debate, negotiation or decision related to suppliers, customers and partners in which they have a family relationship or emotional relationship.

Gifts, presents and hospitality

The offering of gifts, presents and hospitality is common in the business world; however, this practice can awaken the idea of interests involved. For this reason,

caution is necessary so that these practices do not generate expectations of favoritism or of any influence on decision-making.

Employees and third parties acting on behalf of HECT are not permitted to promise, offer or grant any gift, present or hospitality to public officials or operators of other means of conflict resolution, except for gifts without commercial value, distributed as a courtesy, habitual advertising, always respecting the applicable laws and regulations. In the case of other individuals, internal guidelines established by the Compliance and Integrity Program must be followed.

HECT employees who receive gifts, presents and hospitality must declare to the integrity department, which will decide on the destination of the item.

Expenses related to gifts, presents and hospitality must be recorded in the appropriate accounting entries.

Donations and Sponsorships

Contributions may be made in favor of projects/institutions of recognized reputation and respectability, whether educational, sports-related, cultural or philanthropic. They must be analyzed by the Administrative Management and integrity department, and approved by the Board of Directors.

In accordance with Law No. 13165/2015, HECT does not make any kind of donation to political parties or candidates. Employees will be able to make donations with their own resources, as long as there is no involvement from HECT.

RELATIONS WITH THE EXTERNAL PUBLIC

It is part of HECT's routine to interact with different publics, and these relationships must be based on respect, ethics and transparency, always in line with the company's values.

Clients

HECT focuses its efforts on carrying out its clients' projects, meeting the demands of time and cost. HECT will always prioritize the interest of its customers and the work and projects that are carried out by its team.

Respect and ethical commitment are paramount values, and HECT's business relationships are based on the principles and standards of conduct set out in this Code.

The preservation of the confidentiality and secrecy of the information received from customers is a commitment of this company and of all its employees and third parties who work in collaboration with HECT.

Public Authorities and Judiciary Operators and other means of conflict resolution

HECT is a signatory to the Business Pact for Integrity and Against Corruption and is committed to following the anti-corruption rules - in particular the Brazilian Anti-Corruption Law (Law No. 12846/2013) and the United States Foreign Corrupt Practices Act - FCPA.

The Brazilian Anti-Corruption Law provides for the objective liability, in the civil and administrative sphere, of companies that commit harmful acts against the national or foreign public administration. It provides for strict punishments in the administrative and judicial spheres applied to those responsible for repairing the damages related to corruption, including in the criminal sphere, for the individual involved.

In view of this, it is expressly prohibited:

- To offer, promise or give, directly or through third parties, favors, money, gifts, presents or hospitality to public officials, operators of the judiciary and other means of conflict resolution, political parties and their members or to any candidates for public office, in Brazil or abroad, as well as family members or the like of any such person, on behalf of HECT, to obtain undue advantages for personal benefit or for benefit of the company.
- Make “facilitation payments” to speed up or favor the analysis and obtaining of licenses, authorizations and permissions and other routine acts, whether for the benefit of HECT or its customers;
- Interact with a public agent with whom you are related or have an affective relationship, on behalf of HECT;
- Induce authority or public officials to perform any act in violation of their legal duties.

It is HECT's guideline to contribute to the investigation or inspection activities of public bodies, entities or agents, and any action that may hinder or intervene in such processes is not allowed.

Meetings with the Government

In order to guarantee transparency and inhibit unethical conduct, meetings with the Government must preferably take place with the presence of two HECT employees, on the official premises of the public agency or in the company. In addition, it is important to formalize minutes that allow the traceability of meetings and their decisions.

Suppliers and business partners

HECT avoids relationships with business partners who have a history of involvement in illegal activities or conduct such as corruption, money laundering, administrative misconduct, tax evasion, smuggling, bribery and facilitation payments, among others.

According to the Anti-Corruption Law, HECT can be held responsible for the actions of suppliers, service providers, third parties with representation and other business partners if they participate in illegal acts of bribery or corruption that benefit the

company regardless of HECT's knowledge of the wrongdoing. It is enough to prove that the company was somehow benefited by the illegal act.

For this reason, the importance of contracting and closing partnerships with suitable entities, committed to the integrity of their acts, aligned with the internal rules of HECT and with the current legislation.

Competitors

HECT's commercial relations are guided by strict observance of the competitive practices determined by laws and regulations, based on the principles of honesty and respect.

Any agreements, understandings and/or exchanges of commercially sensitive confidential information (examples: price, costs, margins, commercial or investment plans) with competitors, which may give rise or influence, directly or indirectly, the setting of prices, adjustments, discounts and/or conditions of sale, division of markets or customers, among other measures that may limit or restrict in any way free competition in the market, are prohibited.

APPROVAL, COMMUNICATION AND TRAINING

This is the third version of the Code of Ethics and Conduct, which was approved by the Board of HECT in October 2020 and is effective until next review.

HECT has a Communication and Training Plan, under the integrity department, with which lies the responsibility of disseminating the rules of the Code of Ethics and Conduct and raising awareness of the importance of its complying.

DECLARATION OF ADHERENCE TO THE CODE OF CONDUCT

I declare that I have received, on this date, the HECT Code of Ethics and Conduct (Revision 3) and that I am aware of all the rules and obligations contained therein, committing myself to comply fully with them.

Violation of the rules of this Code may result in internal disciplinary measures and are subject to penalties provided for in Brazilian law, notably the Civil Code and Penal Code.

I am aware that if there is any doubt about the interpretation or application of this Code, and, in case of non-compliance with the practices or policies adopted by HECT, I can bring them to the attention of the Board of Directors.

NAME: _____

() Partner/Director of HECT

() HECT employee

() HECT supplier

() Other: _____

PLACE: _____

DATE: _____ / _____ / _____

SIGNATURE: _____

