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## **1. JUSTIFICATION**

**1.1.** Ethics consists of demands imposed by society, moral duties, consequences of actions and reflects responsibility towards society, the Institution and the employee. The CDC Code of Ethical Conduct and Professional Integrity brings together the guidelines that must be observed in each professional action to achieve a standard of conduct consistent with the precepts of morality and ethical stance.

**1.2.** The values essential guiding from the conduct ethics from the CDC what contribute to the improvement of professionalism and high standard ethical of the your employees they are:

- a) governance put excellence in the provision of services, committed with the respect and the appreciation of to be human, of public good and of the environment;
- b) exercise professional responsible, acting put standards of integrity of character, righteousness and honesty;
- c) preservation from the smoothness of the your services and processes internal;
- d) protection from the image institutional from the CDC; and
- e) search of guidelines in the outlet of decisions in situations of conflict of interests, and prevention of facts of corruption and fraud;

## **2. OBJECTIVE**

**2.1.** The commitment to this Code of Ethical Conduct and Professional Integrity, of all those who work and maintain any institutional, commercial or service relationship with CDC, aims to provide a high standard of behavior that effectively contributes to the smoothness and transparency of the acts practiced in the driving of the ours business.



### 3. SCOPE

**3.1.** They are considered participants of that commitment: the members of the Advice Tax, CDC Board of Directors, Management and employees, interns, young apprentices, advisors and commissioned positions, outsourced service providers, business partners, suppliers, and all anyone who, by force of law, contract or any other legal act, provides a service of a permanent nature, temporary or exceptional, yet that without retribution financial, directly or indirectly linked to CDC.

### 4. INSTITUTIONAL INFORMATION - CDC

**4.1. Mission :** To develop and manage the Port of Fortaleza, offering efficient services and infrastructure, promoting trade and economic development with socio-environmental responsibility;

**4.2. Vision:** By 2028, to be recognized as a reference Port Authority in the Northeast, for efficient and environmentally sustainable port management;

**4.3. Values:** CDC is governed by ethics, socio-environmental responsibility, transparency and integrity.

### 5. PRELIMINARY PROVISIONS

**5.1.** The representatives of the Union on the Board of Directors and the Supervisory Board shall keep secrecy of information privileged relative the act or fact relevant from the CDC, to the which have access privileged in reason of position or position what occupy, until your effective disclosure to the market;

**5.2.** Privileged information is considered to be information that concerns confidential or that which is relevant to the decision-making process within the scope of CDC's Corporate Governance that has repercussion economic or financial and that no it is of wide knowledge public;

**5.3.** Public agents holding the position of Director must disclose, daily, through from the network



worldwide of computers - Internet, your agenda of commitments public;

**5.4.** Members of senior management must demonstrate, through their actions, that they are committed to the Company's mission, vision and values, and must contribute to improving the entity's ethical standards;

**5.5.** Senior management members must act as those primarily responsible for promoting ethical culture and integrity within CDC, as their actions are examples for all employees and collaborators and help to shape the Company's image;

**5.6 .** Senior Management members must act in such a way that their conduct is always in accordance with the ethical and integrity standards required by this Code, exercising leadership by example and by the ongoing commitment to monitor, evaluate and demand from their teams permanent adherence to the principles and values of the CDC.

**5.7.** The conduct of the agents defined in item 3.1 of this Code, will be guided by Decree No. 6,029, of 02/01/2007, by Resolution No. 10, of 09/29/2008, of the Public Ethics Commission (CEP), by Decree No. 1,171/94, by Law No. 12,813 of 05/16/2013 (Conflict of Interest), by Law No. 9504/1997 (Rules for elections), by Code of Conduct from the High Administration, by the CDC Conflict of Interest Policy and by the CDC Diversity, Plurality and Inclusion Policy, node what him is applicable.

## **6. FUNDAMENTAL PRINCIPLES AND VALUES**

**6.1.** The agents, subjects the this Code, must to value the ethics as form of improve behaviors, attitudes and actions, substantiating your relations us principles constitutional:

- a) legality (respect to the laws);
- b) impersonality (interest public);
- c) morality (respect the values and standards);

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- d) publicity (accountability); and,
- e) efficiency (quality of work), as well as the principles of honesty , discretion, transparency, politeness, decorum, good faith and permanent care for the image and institutional integrity.

**6.1.1.** Agents, subject to this code, must respect and value the diversity of any nature, providing equal treatment to all people, without prejudice based on social, cultural, ethnic or related to gender, age, religion, philosophical or political conviction, sexual orientation, marital status, condition physical, psychic, degree of education, repudiating all form discriminatory.

## **7. PUBLIC RELATIONS**

**7.1.** The agents of Companhia Docas do Ceará will maintain their relationship with the public governed by the following standards of conduct:

- a) respect;
- b) equity;
- c) cordiality;
- d) courtesy;
- e) agility;
- f) promptness;
- g) transparency;
- h) receptivity to the suggestions and criticism;
- i) confidentiality and security of information; and,
- j) observance of principles and standards relevant to the rights of consumer.

## **8. RELATIONS WITH GOVERNMENTS, SOCIETY AND COMMUNITY**

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**8.1.** CDC agents will guide their relationship with the Public Authorities through democratic discussion and establishment of institutional partnerships, aiming at the implementation of policies, projects and programs aimed at to the development sustainable of yours area of performance.

**8.2.** In its relationship with the communities in its area of operation, as well as society in general, CDC agents will value and support projects that promote sustainable development and social justice, respecting you values cultural and historical.

**8.3.** CDC agents will recognize the relevance of the role of legally recognized associations and professional bodies. constituted, and will look for to maintain dialogue permanent with these, like this as will accompany and will support to the initiativesand practices of these institutions what if agree with the mission of the CDC.

**8.4.** CDC agents will make express reference to this Code of Ethical Conduct and Professional Integrity when contracting services, public tender notices, and acquisitions in general, for the prior knowledge of suppliers and those involved in these processes.

**8.5 .** During the election period, CDC agents must:

- a) respect the ideological, religious, political, sexual, social and origin orientations of candidates and voters;
- b) respect freedom of expression within the norms of civility without disrespecting candidates and other voters;
- c) not to promote an opinion on behalf of the CDC;
- d) respect the principle of impersonality, not using names, symbols, logos or images that characterize personal promotion in advertising acts, programs, works, services and campaigns;
- e) not make derogatory or defamatory comments that harm the reputation of candidates, including in

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communication channels such as emails and social networks on the internet;

f) comply with the restrictions on public agents contained in electoral legislation.

## **9. INVESTOR AND SHAREHOLDER RELATIONS**

**9.1.** CDC agents will base their relations with tenants, investors and shareholders on the principles of universally accepted governance and the assumptions of legality, impersonality, morality, publicity and efficiency, what guide the public management, aiming the (the):

a) transparency in the relations with the market, through the provision of information what enable the performance evaluation from the Institution;

b) equity of treatment to the shareholders;

c) compliance with the laws, standards and regulations and requirement of your greeting by the counterparts;

d) compliance from the mission institutional; and,

e) continuity of the business from the Enterprise node far away term, adding value to the your services and the generation of results positive.

**9.2.** The strategies, objectives and goals of management corporate, like this as the Flat Master/PDZ of Port and the Annual Budget Plan are planned and evaluated by the Board of Directors, observing the general orientation of the business defined by the Board of Directors in line with the Master Plan of the National Ports Secretariat, linked to the Ministry of Ports and Airports.

## **10. RELATIONS WITH THE MARKET AND COMPETITORS**

**10.1 .** The competitiveness of Companhia Docas do Ceará is exercised by the pursuit of excellence in the provision of its services, in order to promote fair and loyal competition and in compliance with

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applicable laws and regulations.

**10.2.** CDC agents will respect their competitors and will be prohibited from disclosing or disseminating, by any means and under any pretext, any concept, comment or news that may compromise the image of the company in the market, direct or non-direct competitors, or harm them in any way, ensuring the protection of information.

**10.3.** CDC agents will be strengthened by practicing serious and honest business relationships with their competitors, seeking information in a lawful manner, using it reliably, through authorized sources.

## **11. RELATIONS WITH SUPPLIERS AND OTHER PARTNERS**

**11.1 .** CDC agents will base their relationship with suppliers and service providers on sharing the moral and ethical standards contained in this Code and the appreciation of social and environmentally responsible.

**11.2.** A selection of suppliers and providers of services it will be carried out with impartiality, transparency and preservation of quality and economic viability of the services provided and products provided, observed you principles from the legality, impersonality, morality, advertising and efficiency of administrative acts.

**11.3.** CDC agents will require respect for ethical principles and conduct commitments. defined in this code of conduct, when contracting service providers, and while endure the relationship contractual.

## **12. WORK RELATIONS**

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**12.1.** The agents from the CDC if will compromise in the relations of work the:

- a) comply with laws, standards and established human development policies, encouraging coexistence harmonica, citizenship, the spirit of team, honesty and the solidarity node environment of work;
- b) stimulate actions of responsibility socio-environmental;
- c) optimize the flow of information necessary the excellence of procedures node environment of work;
- d) repudiate, prevent and punish any procedure that may constitute harassment of any nature, whether of character physical, moral or psychological;
- e) provide and democratize opportunities for professional advancement, through clear criteria for access to training, performance evaluations and provision of positions and functions, ensuring employees smoothness and transparency in all you processes this nature;
- f) offer environment of work safe and healthy, prioritizing for the quality of life of employees;
- g) provide all employees with effective, secure and reliable communication channels to to receive information, suggestions, queries, criticism and complaints;
- h) provide institutional guarantees regarding confidentiality, the reservation of process information and the identity of collaborators involved in complaints, aiming preserve rights and protect the neutrality of decisions; and,
- i) ensure free trade union association and the right to collective bargaining, prioritizing it as a way preferential of solution of conflicts labor.

**12.2.** The members of the advice, directors, advisors, commissioned and too much employees from theCompany Docks from Ceara if will compromise the:

- a) comply the mission institutional;
- b) observe this Code of Conduct and to the standards internal the he related;
- c) maintain secrecy on matters of interest from the Institution, including related to the your customers,competitors and shareholders, no owing disclose them, under any pretext, unless

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authorized;

d) act of agreement with you principles and values ethical defined in this Code, choosing always, ahead of more of one option, the better to the CDC and to the society;

e) submit previously the area technique responsible request to elaboration of project of search and publication of work authorial in which be used information from the CDC, public or internal;

f) to excel for the economy, guard and conservation of the resources materials the your disposition, using them only to works of interest from the CDC;

g) take care from the integrity of the resources patrimonial and financial of third parties what be under the guard or be being administered for the CDC;

h) contribute and to watch over for the good image from the CDC, within and outside of environment of work;

i) abstain from decisions involving personal interests or blood or family ties. affinity, in line straight or collateral, until 3rd degree;

j) deprive oneself of to obtain advantage of position, function or of information, in benefit own or of third parties;

k) abstain of adopt procedure what may configure harassment of any nature, it is physical, moral or psychological ;

l) communicate to the areas competent pressure or harassment of any person whose interest conflict with you from the CDC;

m) contribute to maintaining a healthy work environment based on respect, solidarity, honesty, harmony, self-development, team spirit, citizenship and the sharing of knowledge in favor of the CDC;

n) carry out its activities with professionalism, contributing to the excellence of the services provided by CDC;

o) consult with Commission of Ethics, in case of doubt, about possible situation of violate this Code;

p) report to the Ethics Committee any incidents of non-compliance with this Code;

q) value and respect human rights, to life, liberty, freedom of opinion and expression, maintaining

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a welcoming, diverse and egalitarian environment, valuing human beings and promoting physical, emotional and psychological health;

r) strive for respect, appreciation of diversity and promotion of a culture of inclusion in all relationships and practices within this Company;

s) prevent and combat the occurrence of acts of fraud and corruption, in any form, direct or indirect, active or passive, involving monetary values or not, reporting suspicious facts to the competent authorities;

t) not to insinuate, request, accept, receive, promise, offer or pay bribes, kickbacks or any undue advantage.

**12.3.** In employment relationships, the following are commitments of CDC's Senior Management:

a) comply with the laws, rules and policies of the CDC, encouraging harmonious coexistence, citizenship, team spirit, honesty, transparency of actions and cordiality in the work environment;

b) ensure an adequate, comfortable, safe and constantly improving work environment, prioritizing the health, well-being and quality of life of employees and collaborators;

c) provide conditions for employees and collaborators to be treated equally, making any form of discrimination inadmissible, whether based on social, cultural, ethnic, sexual origin, or related to issues of color, age, religion, language, philosophical, political or ideological conviction, sexual orientation, gender identity, marital status, union and party affiliation, physical and mental condition, origin, level of education, training, appearance and nationality;

d) repudiate, prevent, investigate and punish any procedure that may constitute harassment of any nature, whether physical, sexual, moral or psychological;

e) repudiate any and all illicit practices, such as bribery, extortion, corruption, kickbacks, nepotism, money laundering, in all their forms;

f) respect and value the diversity of employees and collaborators, as well as all people with whom CDC maintains a relationship, combating all forms of prejudice and discrimination.



### **13. BEHAVIOR ON SOCIAL MEDIA AND NETWORKS**

**13.1.** The members of the advice, directors, advisors, commissioned and too much employees from the Company Docks from Ceará must apply, where applicable, the provisions contained in this Code whenever they identify themselves or are identifiable as linked to the CDC in social media and network environments.

**13.1.1.** For the purposes of this Code, examples of social networks and media include discussion forums, electronic groups and chat rooms on the Internet, *Facebook*, *Instagram*, *YouTube*, *blogs*, *microblogs* (such as *Twitter*), instant messaging applications (such as *WhatsApp*), as well as others that may emerge over time.

**13.2.** CDC respects and values the right to free expression of its administrators, members of statutory bodies, as well as other agents, but it is essential that each one is aware that their behavior on social networks and media, even in interactions of a personal nature, can compromise the institutional image, reputation and integrity.

**13.2.1.** Administrators and other members of statutory bodies, as well as other CDC agents, must use social networks and media responsibly, with empathy and commitment to institutional ethics and integrity, aware of the consequences that their actions may generate in the event of a proven violation of the provisions of this Code.

**13.2.2.** The participation of public agents in social networks must not, deliberately, without prejudice to critical thinking and freedom of expression, carry out or provoke exhibitions in social networks and alternative media that cause damage to the image of Companhia Docas do Ceará and your agents public.

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**13.3 .** In interactions on social networks and media, administrators, members of statutory bodies, as well as other agents, when they identify themselves or are identifiable as being linked to the CDC, must observe the following guidelines:

- a) be aware that you are responsible for everything you publish or share on social networks and media;
- b) misconduct in the virtual world is comparable and equivalent to that carried out in the real world and may even be more serious due to the publicity that can be achieved;
- c) respect other network users and their opinions and convictions, even in cases of disagreement;
- d) understand that the fact that social networks and media allow anyone to publish what they think on the Internet does not give them the right to offend, mistreat, threaten, discriminate, violate copyright, reveal confidential or sensitive information or harm people and institutions.

## **14. CONDUCT WHEN RECEIVING GIFTS AND OTHER BENEFITS**

**14.1.** The CDC agent may not accept, request or receive any type of financial assistance, gratification, prize, gift, commission, donation or advantage of any kind, for themselves in the fulfillment of their mission or for influence other agent to the same purpose, as well as it is forbidden for any CDC agent to receive gifts from anyone who has an interest in their decision or in the decision of a collegiate body in which they participate.

**14.1.1.** In cases where the gift cannot, for any reason, be refused or returned immediately, the CDC agent must deliver it upon receipt, to the sector responsible for the heritage and warehouse to you due records and adoption of appropriate measures regarding their destination, without prejudice to the provisions below:

- a) the delivery referred to in item 14.1.1. will be made within seven days from the date of receipt of the gift;
- b) in the event of receipt of the gift during the agent's absence, the period referred to in subitem "a"

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will be counted from the date of the agent's return to the CDC.

**14.1.2.** To ends of this Code, gift, that is, an item of low economic value and distributed in a generalized manner, as a courtesy, advertising or usual publicity not features present.

**14.2.** In protocol cases where there is reciprocity, the agent is allowed to accept gifts from a foreign authority, owing be adopted the same procedure predicted in subitem “a” of item 14.1.1.

**14.3.** To the agent and allowed to accept gifts.

**14.3.1.** It is understood that as gifts, you objects what:

- a) have no commercial value or are distributed by an entity of any nature as a form of courtesy, propaganda, disclosure usual or put occasion of events or dates commemorative of character historical or cultural, since what no surpass the value stipulated in article 5, § 4, of Decree No. 10,889/21;
- b) have periodicity of distribution no lower the twelve months; and,
- c) are of a general nature and are not intended to exclusively benefit a specific public agent.

**14.3.2.** The agent shall not link the use of the gift, even if received as a gift, to propaganda, in the image of the Companhia Docas do Ceará and its agents in the exercise of their assignments.

## **15. CONFLICT OF INTEREST**

**15.1.** The exercise of the activity performed by an authority subject to the Code of Conduct of the Senior Federal Administration, in accordance with CEP Resolution No. 8, of 09/25/2003, raises a conflict of interests, which:

the) due to its nature, is incompatible with the duties of the position or public function of the

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authority, considered as such, including the activity carried out in areas or matters related to the functional competence;

b) violates the principle of full dedication by the holder of a position of commission or position of trust, which requires that the duties of the public position or function take precedence over any other activities;

c) involves the provision of services to a natural or legal person or the maintenance of a business relationship with a natural or legal person who has an interest in an individual or collective decision by the authority;

d) may, by its nature, involve the use of information to which the authority has access by virtue of its position and which is not public knowledge;

e) may transmit doubts to public opinion regarding the integrity, morality, clarity of positions and decorum of the authority.

**15.1.1** . The occurrence of a conflict of interest is independent of the receipt of any gain or remuneration by the authority.

**15.2.** The authority, subject to the Code of Conduct of the Federal Senior Administration, according to CEP Resolution No. 8, of 09/25/2003, may prevent the occurrence of conflict of interests by adopting, as the case may be, one or more of the following measures:

a) give up the activity or take leave from the position, while the situation that could give rise to a conflict of interests continues;

b) alienate assets and rights that form part of its assets and whose maintenance may give rise to a conflict of interests;

c) transfer the administration of assets and rights that may give rise to a conflict of interest to a financial institution or a securities portfolio administrator authorized to operate by the Central Bank or the Securities and Exchange Commission, as the case may be, by means of a contractual instrument that contains a clause that prohibits the authority from participating in any investment



decision as well as its prior knowledge of decisions by the managing institution regarding the management of assets and rights;

d) in the event of a specific and temporary conflict of interests, communicate its occurrence to the hierarchical superior or to the other members of the collegiate body of which the authority is a member, in the case of a collective decision, abstaining from voting or participating in the discussion of the matter;

e) publicly disclose their schedule of commitments, identifying activities that are not a result of their public office or function.

**15.2.1.** The Public Ethics Committee must be informed by the authority mentioned in item 15.1 and will give its opinion, in each specific case, on the sufficiency of the measure adopted to prevent a situation that could give rise to a conflict of interests.

**15.2.2.** The participation of an authority on the board of directors and supervisory board of a private company, of which the Union is a shareholder, shall only be permitted when it results from an institutional indication by the competent public authority. In such cases, the authority shall be prohibited from participating in any deliberation that may give rise to a conflict of interest with the Public Authority.

**15.2.3.** In voluntary work in non-profit third sector organizations, the provisions of CEP Resolution No. 8, of 25/09/2003, must be observed.

**15.2.4.** Queries addressed to the Public Ethics Committee must be accompanied by elements pertinent to the legality of the situation in question, in accordance with CEP Resolution No. 8 of 25/09/2003.

**15.3.** Configure conflict of interests node exercise of office or job node scope from the CDC:

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- a) disclose or make use of privileged information, for one's own benefit or that of a third party, obtained as a result of activities exercised;
- b) carry out an activity that involves the provision of services or the maintenance of a business relationship with a natural person or legal entity that has an interest in the decision of the CDC employee and other members of the boards or collegiate body of which this participate;
- c) carry out, directly or indirectly, an activity that, due to its nature, is incompatible with the duties of the position or job, considering as such, including, the activity developed in areas or subjects related;
- d) act, even informally, as a proxy, consultant, advisor or intermediary for private interests in bodies or entities of the direct or indirect public administration of any of the Powers of the Union, the States, the District Federal and of the Municipalities;
- e) perform an act in the interest of a legal entity in which the CDC employee and other members of the boards or their spouse, partner or relatives, by blood or marriage, in a direct or collateral line, participate, up to the third degree, and that may to be put he benefited or influence in your acts of management;
- f) receive present of who you have interest in decision of employee from the CDC and too much members of the advice or collegiate of which this participate outside of the limits and conditions established in regulation; and,
- g) provide services, even if occasional, to a company whose activity is controlled, monitored or regulated by CDC.

**15.3.1.** The situations that constitute a conflict of interest established in this item 15 apply to occupants of the positions or jobs public, yet that in enjoyment of license or in period of removal.

**15.4.** Configure conflict of interests after the exercise of position or job node scope from the CDC:

- a) at any time, disclose or make use of privileged information obtained as a result of the activities carried out;

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b) within a period of 6 (six) months, counted from the date of dismissal, exoneration, removal, resignation or retirement, except when expressly authorized, as the case may be, by the Public Ethics Committee or the regulatory body. control internal of the Government Federal:

i) provide, directly or indirectly, any type of service to a natural or legal person with whom it has established relationship relevant in reason of exercise of position or job;

ii) accept a position as administrator or establish a professional relationship with an individual or legal entity that performs activity related to the area of competence of position or job busy;

iii) enter into service, consultancy, advisory contracts with bodies or entities of the Federal Executive Branch or similar activities, linked, even indirectly, to the body or entity in which the position was held or job; or

iv) intervene, directly or indirectly, in favor of private interests before a body or entity in which he/she has held a position position or employment or with which he has established a relevant relationship due to the exercise of the position or job.

**15.4.1.** Queries about Conflict of Interest must be communicated in writing to the Committee on Public Ethics or the Human Resources Coordination (CODREH) of the CDC, as the case may be, like the example of exercise of private activity or the receipt of job proposals that you intend to accept, contract or business node sector private, still that no sealed by the standards in force.

**15.4.2.** Queries made to CODREH that raise a potential conflict of interest between the public activity and the private activity of the agent must be reported to the interested party and to the Comptroller General. from the Unity.

**15.4.3.** The agents mentioned in art. 2 of Law No. 12,813/2013 are subject to “b” of this item 15.4.

## **16. GENERAL LAW ON PERSONAL DATA PROTECTION – LGPD**

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**16.1.** The General Personal Data Protection Law – LGPD covers principles, rights and duties aimed at regulating the processing of personal data.

**16.1.1.** CDC agents, when processing personal data on behalf of the Company, will perform work based on the premises of the LGPD, subject to compliance with the principles of purpose, adequacy, transparency, free access, security, prevention and non-discrimination in the processing of data, as well as paying attention to processing in accordance with legal assumptions.

## 17. HIRING

**17.1.** You CDC agents involved in public procurement, in all phases, from planning and supplier selection to contract execution, must observe the following general rules of conduct:

- a) **Integrity and decorum:** those involved in public procurement must ensure that their actions are in line with probity, considered essential to public procurement, and that they do not tarnish the exercise of their duties or have a negative impact on the image of the CDC;
- b) **Compliance:** current legal and regulatory rules must be observed at all stages of public procurement, with a view to achieving compliance with the rules with impartiality, objectivity, excellence and ethics;
- c) **Transparency:** administrative acts carried out due to public contracts are subject to publicity as a rule, in order to allow society and control bodies to verify the fairness and correctness of procedures, and should only be waived when confidentiality is provided for in the current regulation;
- d) **Public Interest :** all those involved in public procurement must safeguard the public interest and are not permitted to dispose of it or act deliberately to its detriment.

## 18. DISCIPLINARY INFRACTIONS

**18.1.** These are infractions subject to sanctions, in addition to others not exemplified that conflict

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with the principles and values provided for in this Code and in current legislation or which may constitute acts of corruption or fraud:

- a) use privileged information, of which they are aware as a result of their position or activity, to influence decisions that may favor their own interests or those of third parties;
- b) use or allow the use, by third parties, of information, technologies or knowledge belonging to the domain and property of CDC and the relationship with its customers, without express authorization from the respective owner;
- c) provide information or comment on internal matters that may anticipate a decision by the CDC or create a privileged situation for those who request it or that refer to the interests of third parties;
- d) carry out acts of management of private assets based on information of which they have privileged knowledge;
- e) provide access to privileged information to unauthorized persons or disclose it under any pretext;
- f) tamper with, suppress or omit official documents, even if they are addressed and delivered incorrectly to the CDC employee and other board members;
- g) harm the reputation of another CDC employee and other members of the councils or of a citizen who depends on their activity, through prejudiced judgment of any nature, false testimony, untrue or unfounded information or fallacious argument;
- h) be complicit, even if out of solidarity, in an error or violation of this Code or the Code of Conduct of their profession;
- i) make inappropriate and uneconomical use of CDC's material, technical and financial resources;
- j) prevent or hinder the investigation of irregularities committed in the CDC;
- k) use CDC employees and other members of subordinate councils or companies contracted by CDC to serve their own private interests or those of third parties;
- l) request, suggest, insinuate, mediate, offer or accept, directly or indirectly, any type of financial assistance, bonus, prize, commission, donation or personal advantage, of any kind, for oneself or for third parties, as well as propose or obtain an exchange of favors that may give rise to a commitment that may influence CDC decisions;



- m) provide services of any kind to contracted companies, suppliers, service providers or those who have an interest in the outcome of a bidding process;
- n) defend, favor or preserve the interests of people, clients, financial institutions, suppliers, entities or other companies to the detriment of the interests of CDC;
- o) continue to exercise a position of trust or a paid position, when there is dissonance or conflict with the CDC's strategic guidelines and orientations;
- p) make the hiring of a company, the provision of a service or the acquisition of material or product conditional on the admission of any professional indicated by himself or by another CDC employee, as well as other members of the boards;
- q) promote, suggest or induce the hiring of a spouse, partner or relatives, whether consanguineous or related, in a direct or collateral line, up to the third degree, by themselves or through another CDC employee and other board members;
- r) keep under his/her immediate command, in a position of trust or remuneration, a spouse, partner or relatives, by blood or marriage, in a direct or collateral line, up to the third degree;
- s) maintain private commercial relations with suppliers or companies that, either directly or indirectly, have an interest or participation in CDC's business or activities, except in the strict capacity of consumer of the product or service;
- t) engage, directly or indirectly, in suspicious, dubious activities or activities that violate ethical values and that, in any way, may tarnish the public image of the CDC;
- u) invoke political-partisan support or support from a political or union organization, in the performance of their professional duties, with the aim of influencing or attempting to influence, in a way that is contrary to the public interest, CDC decisions;
- v) disclose a confidential document or express yourself through the media, on behalf of the CDC, without authorization;
- w) denigrate the honor or functional performance of another employee or CDC employee and other board members or publicly express an opinion on the merits of a matter submitted for their consideration or decision, whether individually or in a collegiate body, except in cases provided for



in specific rules;

- x) use one's position, function, friendship or influence to obtain benefits or special treatment, for oneself or for others, in one's relationship with a client, public body or private entity; and,
- y) practice discrimination based on ethnicity, nationality, gender, religious belief, political conviction, origin, social class, age or physical ability.

**18.1.1.** The agent who performs the acts provided for in items 15.3 and 15.4 of this Code may incur Administrative Impropriety, in accordance with Law No. 14,230/2021.

**18.2.** Failure to comply with the guidelines set out in this document are also disciplinary infractions subject to sanctions. article about from the provision of services or expenses for transportation, food, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent to a public agent in the institutional interest of the body or entity in which he/she operates.

**18.2.1.** Hospitality related to the participation of an employee or any commissioner, and other members of advice or CDC public agent in events what keep correlation with the assignments of your position, job or function, promoted by a private institution, such as seminars, congresses, visits and technical meetings, in Brazil or node outside, should to be paid for, preferably, for the CDC.

**18.2.2 .** Exceptionally, upon authorization within the scope of the CDC, observing the institutional interests of the CDC and the potential risks to the integrity and image of the CDC, the institution promoting the event may cover, in full or in part, expenses related to transportation, food, accommodation and registration of the CDC employee and others members of the advice, sealed the receipt of remuneration, in accordance with art. 19 and art. 20 of Decree No. 10,889/2021.

**18.2.3.** Whenever possible, any amounts that would be paid as speaker or panelist remuneration will

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be converted by the event organizer into registrations for training of CDC agents.

**18.2.4.** When the matter to be addressed is related to their institutional functions, the CDC employee and other board members may accept invitations to dinners, lunches, breakfasts and activities similar nature, funded by third parties, as long as the activities do not involve items considered luxury, such as excessively expensive drinks and food, and that he informs his superior, directly or through the channels suitable node scope from the CDC.

**18.2.5 .** CDC employees and other board members are prohibited from accepting invitations or tickets for activities. of entertainment, as shows, presentations and activities sports, with exception: a) cases in which the CDC employee and other board members are exercising institutional representation, in which cases the transfer of invitations or tickets to third parties outside the institution is prohibited;

b) invitations or tickets originating from public access promotions or draws, or from private consumer relations, without any connection, in any case, with the condition of employee of CDC and other members of the boards of the acceptor;

c) invitations or tickets offered due to family or friendship ties, without any connection to the status of employee of CDC and other members of the councils, and provided that the cost is borne by the individual offering the ticket;

d) invitations or tickets distributed by a public body or entity of any sphere of power, provided that the value limit set by the Public Ethics Committee is observed.

**18.2.6.** The invitation to participate in events funded by a private institution must be forwarded to the President of the CDC, or to another body or authority designated by him, who will indicate, in case of acceptance, the appropriate representative, taking into account the nature and matters to be addressed at the event.



**18.2.7 .** Questions on the acceptance of gifts, proposals and offers may be submitted, by means of consultation, the Commission of Ethics from the CDC, to analysis and guidance.

**18.2.8.** Based on art. 11 of Decree No. 10.889/2021, the CDC will publish on its website the agenda of public agents referred to in items I to IV of the caput of art. 2 of Law No. 12.813/2013, containing information on:

a) their participation in a public engagement, whether in person or not, even if outside the workplace, with or without prior scheduling, in national or foreign territory, with, at least: subject; location; date; time; list of participants; and, in the event of a hearing, in addition to the data cited, include the identification of the representative of interests; the identification of the natural or legal person or group of interests, in the event of representing the interests of third parties; and, the description of the interests represented;

b) hospitality and gifts received from a private agent, as a result of the mandate, position, function or public employment that he/she exercises or occupies or of activities that he/she carries out as a public agent, in accordance with the provisions of chapters V and VI of Decree No. 10,889/2021, with, at least: date; good, service or advantage of any kind received; and, identification of the offering private agent;

c) travel undertaken in the exercise of a public function, in which expenses are covered by a private agent, in whole or in part, with, at least: purpose of the trip; date; place of origin; place of destination; and, the estimated value of the expenses covered by the private agent; and,

d) period of absence, with indication, where applicable, of his/her substitute, who must register and publish his/her schedule of public commitments during the period of substitution.

## **19. DISCIPLINARY SANCTIONS**

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**19.1.** The disciplinary sanctions applicable to CDC agents are set out in the CDC Internal Correction System Standard and the ethical sanctions are those contained in this Code.

**19.1.1.** Possible consequences resulting from ethical breaches are:

- a) Dismissal for just cause or dismissal;
- b) Suspension administrative;
- c) Agreement of Conduct Professional and Guys –ACCP, provided for in item 20.1 of this Code;
- d) Censorship ethics;
- e) Warning.

**19.1.2.** The Ethics Committee may refer cases to the Ombudsman's Office if evidence of administrative wrongdoing is duly verified during its investigation procedure involving the duties of the Internal Correctional System.

**19.1.3.** The ethical sanctions applicable to authorities subject to the Senior Management Code of Conduct are those indicated in that Code, consisting of warnings and ethical censures, as applicable to each agent, and may be supplemented with disciplinary sanctions, if applicable, based on the disciplinary infraction found. The Public Ethics Committee, as the case may be, may forward a suggestion for dismissal to the hierarchically superior authority. superior.

**19.1.4.** The application of any sanction will be preceded by an administrative process to be conducted by the CDC Ethics Committee, in accordance with the provisions of the CDC Ethics Committee's Internal Regulations, or by the Public Ethics Committee – CEP in the case of authorities subject to the Senior Management Code of Conduct.

**19.2.** A resignation put Fair Cause is applicable us cases provided for in the Correction System Standard and in the Internal Regulations of the CDC Ethics Committee.

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**19.3.** The Suspension administrative and applicable us cases provided for in the Correction System Standard and in the Internal Regulations of the CDC Ethics Committee.

**19.4.** THE Censorship ethics it will be applied in the form educational to the employee what for submitted to the conduct provided for in items 14.1 , 15.1 and 15.3.

## **20. ETHICS MANAGEMENT**

**20.1.** The Professional and Personal Conduct Agreement — ACPP will be applied to all who, after submitting themselves the preliminary investiture of investigation of deviation from ethical conduct and professional integrity and before the opening of investigation process, sign the ACPP, committing to comply with the agreement, and if not satisfied, the EC will start the opening of process of ethical investigation.

**20.1.1.** The ACPP no may to be signed in case of recidivism.

**20.2.** The CDC Ethics Committee is responsible for permanently evaluating the relevance and relevance of this code, as well as promoting actions necessary for its dissemination in order to disseminate the highest standards of conduct ethics within from the enterprise.

**20.3.** The functioning of the Ethics Committee is established in Internal Regulations approved by the Committee itself. Commission.

**20.4.** The Ethics Committee is responsible for analyzing incidents of non-compliance with this Code

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of Conduct and decide for the opening of process of investigation ethics or by your referral to the areas internal competent.

**20.5.** The Ethics Committee is obliged to preserve the confidentiality of any information to which it has access.

**20.5.1** . How mechanisms of protection to the preservation from the integrity of the people what make complaints through channels of access the CE, members will not disclose the name of any person thus avoiding any kind of retaliation against the person who used the reporting channel.

**20.5.2.** Any interested may to present order of access the information the EC, put any legitimate means, and must the order contain the identification of applicant and the specification of information required.

**20.6.** The reporting channel, which allows the receipt of internal and external reports relating to failure to comply with the Code of Conduct and Integrity and other internal ethical and mandatory standards will be quite direct to the EC from the CDC, or through the communication channels made available by the OMBUDSMAN, also available at place electronic from the CDC.

**20.6.1.** CDC will adopt protection and/or anonymity mechanisms that prevent any type of retaliation against the person using the communication channel. complaint.

**20.6.2.** The protection against retaliation no away eventual responsibility, the example from the labor,ethics, civil or criminal, from the person what use the channel of complaint of form illicit.

**20.7.** The Commission of Ethics will appreciate all and any suggestion of improvement of this Code.

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**20.8.** The Ethics Committee is responsible for:

- a) resolve any doubts related to the application of this Code, including cases of omission; and,
- b) propose to the CDC Board any modifications it deems necessary.

## **21. FINAL PROVISIONS**

**21.1.** The CDC Ethics Committee is composed of 3 (three) full members, with respective substitutes, all chosen between you employees of frame permanent and in activity in the CDC.

**21.1.1.** The members holders and substitutes they are designated for the President from the CDC.

**21.1.2.** It is up to the President from the CDC designate, among you components, the president of Commission.

**21.1.3.** The term of office of the members of the Commission is 3 (three) years, not overlapping, with only one term permitted.reappointment.

**21.1.4.** The Ethics Committee has an Executive Secretariat, with the purpose of contributing to the preparation and execution of the ethics management work plan and provide technical and material support for the fulfillment of the ethics management's duties. Commission.

**21.1.5.** The assignment of executive secretary and trusted the employee of frame permanent and in activity in the CDC,indicated by the members from the Commission of Ethics and designated for the President of the CDC.

**21.1.6.** It is sealed to the executive secretary be a member from the Commission of Ethics.



**21.1.7.** The members from the Commission of Ethics no they are paid for the exercise of your activities in the Commission and youworks put they developed they are considered priority, relevant and consigned in record functional.

**21.1.8.** The consignment in functional record he can also occur for the executive secretary from the Commission of Ethics andto those people what, the judgment of your members, have provided relevant service the Commission.

**21.2.** This Code of Conduct Ethics and Integrity Professional come in in force in the date of its approval by the CDC Board of Directors.

**21.2.1.** This Code of Ethical Conduct and Professional Integrity is valid for a period of indeterminate, and it will be reviewed always what necessary.

**21.3.** This Code of Ethical Conduct and Professional Integrity will be published on the website of CDC, and it will be reason of training periodical between all, node minimum annual, involving the Code of Conduct Ethics and Professional Integrity and on the policy of management of risks, to administrators.

**21.4.** The Public Agent, upon assuming the position, employment or paid function at Companhia Docas do Ceará, must sign the Term of Adherence to the CDC Code of Ethical Conduct and Professional Integrity, according to the model contained in Annex 1 of this code.

THE Commission of Ethics always will be open to the suggestions, which may contribute to improvement of thestandards ethical existing

Questions, suggestions and/or criticisms should be sent to the following address:

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**UNIDADE GESTORA**

DIRPRE/COMISSÃO DE ÉTICA

**TÍTULO/ASSUNTO**

CODE OF ETHICAL CONDUCT AND PROFESSIONAL INTEGRITY

etica@docasdoceara.com.br .

## ANNEX 1

### **TERM OF ACCESSION TO THE CODE OF CONDUCT ETHICS AND INTEGRITY PROFESSIONAL**

#### **COMMITMENT OF OBSERVANCE FROM THE CDC**

Name of Employee:

Position/Function:

Registration:

Capacity:

I declare what read and I am aware and of agreement with standards, policies and practices established node Code of ConductCDC Ethics and Professional Integrity and

I undertake to respect and comply with them fully. I understand that this Code of Ethical

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Conduct reflects the commitment to dignity, decorum, zeal, effectiveness and awareness of the moral principles that should guide the public agent, whether in the exercise of office, function or employment, or outside of it. And, still, that my acts, behaviors and attitudes must be directed towards the preservation of honor and tradition of services provided at CDC. I also assume the responsibility of report to the CDC Ethics Committee or Ombudsman any behavior or situation that is in disagreement with the rules, policies and practices established in the Code of Conduct Ethics and Integrity Professional of the CDC.

Signing the Term of Adhesion and Commitment to Compliance with the Code of Ethical Conduct and Integrity CDC professional is an expression of free consent and agreement to comply with the standards, policies and practices established.

Fortress, dede

20 \_\_\_\_\_.

Name Employee / Signature

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