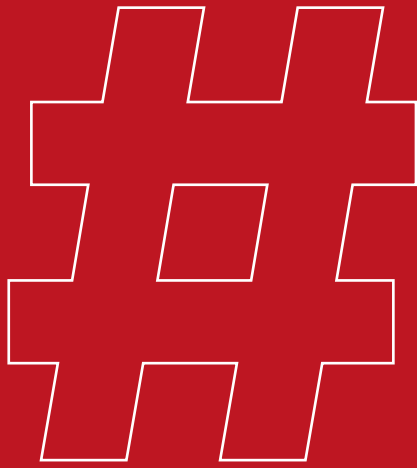




CODE OF CONDUCT

SECRETARIAT OF STATE FOR
INFRASTRUCTURE AND MOBILITY





Integrity Builds

Secretariat of State
for Infrastructure
and Mobility



**A MESSAGE
TO SEINFRA'S TEAM**

Dear colleagues,

We are proud to present our Code of Conduct!

We are committed to building an organizational culture dedicated to integrity in everything we do. The ethical decisions we make daily, choosing to do what is right, strengthen society's trust in us, and build our legacy.

There is no other way than the integrity one, and it is our responsibility to demonstrate Seinfra's values in every decision we make. Acting with the highest standard of ethics and integrity is part of our DNA and is a non-negotiable position in constructing a solid and long-term future.

This Code of Conduct summarizes Seinfra's values in concrete guidelines, providing valuable guidance to help you make the best decisions. It also serves as a reminder of the attitude we should expect from our co-workers and the values and standards of conduct that we must exhibit in interacting with everyone who relates to us.

So please read it, understand it and follow it. Seinfra is counting on you!

Kind regards,



**Secretary of State for
Infrastructure and Mobility**



ABOUT US
SEINFRA



OUR MISSION

To promote the continuous improvement of mobility and public infrastructure in the State to expand society's access to goods and services and contribute to the development of Minas Gerais.



OUR VISION

To be a national reference in promoting quality public works and services and in the effectiveness of responses to society's mobility and infrastructure demands.



OUR VALUES

The values represent our essence and should be reflected in all Seinfra's actions and decisions. Always remember them:

- Ethics and Integrity
- Transparency and Openness
- Objectivity and Technical Excellence
- Efficiency and Innovation
- Effectiveness
- Equity
- Excellence and Commitment



ABOUT THE CODE

SEINFRA'S CODE OF CONDUCT



TO WHOM IT APPLIES

This Code of Conduct applies to Seinfra's public agents, including managers - from all hierarchical levels -, government officials, interns, and collaborating agents. It also applies to outsourced workers who perform their functions within the scope of the Secretariat.

In addition, where applicable, this Code of Conduct should serve as a reference for all partners that relate to Seinfra to disseminate and strengthen the culture of integrity.



HOW TO USE IT



Use this Code as a guide to help you make correct decisions in all situations, especially the most difficult ones.



We must understand and respect our Code of Conduct and the other policies and regulations of the Secretariat.

Whenever a law or custom conflicts with the guidelines of our Code, we must use the strictest criteria in line with the highest standard of ethical behaviour.



THE ROLE OF THE LEADERSHIP



As a manager, you have extra responsibilities.



As a manager, you must help your team members understand and apply our Code and demonstrate our values by putting them into practice daily.

It means acting as an example for your team, consistently demonstrating our standards of conduct through your words and actions.

**WE TAKE CARE OF PEOPLE
AND THEIR INFORMATION
WITH CONCERN AND RESPECT**





1.

RESPECT AND INCLUSION IN THE WORKPLACE

“

We treat people with respect and care!

We value diversity and include all people without distinction.
We are committed to creating a welcoming and dialogue
environment in which everyone feels included.

”



THEREFORE:
ALWAYS!

- Treat all people with respect and attention, regardless of the position or hierarchical position they occupy.
- Act fairly and courteously, even in conflict situations.
- Express yourself using the official channels if you witness or experience any harassment situation.
- Inform the contract manager of any abuse of human rights, labor infraction, or ethical deviation - even if potential or suspicious - by Seinfra's contracted companies or partners.



THEREFORE:
NEVER!

- Discriminate against anyone because of their gender, sexual orientation, age, race, ethnicity, religion, national origin or disability.
- Commit an act of disrespect, threat, or aggression in the workplace.
- Allow personal characteristics to interfere in the working relationship or limit the professional development of your team members.
- Disqualify or expose co-workers through words, gestures, or attitudes.
- Adopt any behavior that constitutes moral and sexual harassment.

UNDERSTAND IT BETTER

Harassment:

To better understand the situations that constitute moral harassment and the prevention and punishment measures adopted by the Executive Branch, see State Decree 47.528/2018.

For information on sexual harassment, consult the Ombudsman Specialized in Moral and Sexual Harassment of the State Ombudsman-General.

2.

PROTECTION OF PERSONAL AND CONFIDENTIAL DATA

“

We treat personal data and sensitive information appropriately and diligently.

We understand the rules and legislation applicable to protecting personal data and confidential information and are committed to complying with them in full.

”



THEREFORE:
ALWAYS!

- Observe the principles and guidelines of the Brazilian General Personal Data Protection Law - LGPD.
- Collect and process personal data only for specific and legitimate purposes.
- Immediately report any security incidents or personal data leakages to the Information Technology area and the Data Protection Officer.
- Comply with the information security requirements established by Seplag Resolution 107/2018 and other rules or guidelines related to the topic.
- Treat sensitive and confidential information with caution.
- Block your user before leaving the computer, when working in person or remotely



THEREFORE:
NEVER!

- Share passwords with third parties or use third-party passwords to access corporate systems.
- Disclose or pass on any content that implies privileged or confidential information.
- Keep conversations highly restricted or confidential in public spaces.

UNDERSTAND IT BETTER

Personal data:

Information related to an identified or identifiable natural person. For more information, see Law 13.709/2018, known as the General Law for the Protection of Personal Data.

If in doubt, consult the Data Protection Officer.

Classified information:

The one temporarily submitted to the restriction of public access due to its indispensability for the security of society and the State. For more information see State Decree 45.969/2012.



WE ACT WITH INTEGRITY



3.

FRAUD AND CORRUPTION PREVENTION

“

We achieve our goals through good performance, never through unethical or illegal practices.

We are against any acts that constitute corruption, and we act to prevent any action that is harmful to the Public Administration.

”



THEREFORE:
ALWAYS!

- Respect our integrity policies and any anticorruption laws or regulations.
- Act ethically, even if there are pressures or opportunities to obtain undue favors, benefits, or advantages.
- Be aware and, if there is a suspicion of fraud or corruption, report it.



THEREFORE:
NEVER!

- Accept or allow the payment of bribes or any form of facilitation payment.
- Accept financial values or any personal benefits from users of services or companies that maintain a commercial relationship with Seinfra.
- Engage in any negotiation or process that may result in specific advantages for you or a close third party.

UNDERSTAND IT BETTER

Corruption:

It is the abuse of power or authority to gain advantages or influence decisions. One of the most common ways of materializing corruption is via the payment of bribes.

Bribe:

It is the offer, promise, payment, or receipt of something of value in exchange for the favorable treatment of a company, government official, or public official.

Facilitation payment:

Any payment made to speed up or guarantee routine government actions, such as obtaining permits and licenses.

Fraud:

Intentional act or omission designed to deceive others, resulting in the victim suffering losses or the perpetrator obtaining a win.¹



¹Managing the Business Risk of Fraud: A Practical Guide.

4.

PREVENTION OF CONFLICTS OF INTEREST



“

**We put the public
interest first, always!**

We understand the boundaries between the public and the private. We do not influence or participate in decision making that generates benefits for ourselves or close third parties, such as relatives, friends and affective relationships. We also do not admit any form of nepotism.

”



THEREFORE:
ALWAYS!

- Be impartial in your decisions and inform your manager of any situations that may represent conflicts between public and private interests.
- Declare yourself prevented or suspected of making decisions that may generate specific benefits for you or for third parties with whom you have a close relationship.
- Observe the guidelines contained in State Decree 48.021/2020, which provides for the prohibition of nepotism.

If you are a secretary, deputy secretary, undersecretary, or chief of staff:

- Observe the rules and guidelines established in the Joint Resolution CGE/AGE/OGE 01/2020.



THEREFORE:
NEVER!

- Share or make use of privileged information for your own benefit or that of others.
- Perform activities incompatible with the duties of your position.
- Use the influence of your position at Seinfra to obtain undue benefits for you or third parties.
- Act as contract manager or inspector of a contracted party whose administrator or partner with power of direction is your spouse, partner or relative, by consanguinity or affinity, up to the third degree.
- Divert public official under your hierarchy or influence to serve particular interests.

**UNDERSTAND
IT BETTER**

Conflict of interests:

It occurs when the public official partially influences, acts, or makes decisions, being motivated by personal interests other than the public interest.

Nepotism:

For more information on nepotism, see State Decree 48.021/2020.

5.

RECEIVING GIFTS, PRESENTS AND HOSPITALITIES

**Gifts, presents, and hospitality
cannot influence our decisions.**

We encourage the construction of good relations with all interlocutors, but always in an impersonal way and guided by the public interest.

THEREFORE:

It is prohibited to receive any gift, present or hospitality by Seinfra public officials - regardless of the monetary value - when it comes from an individual or legal entity that has or may be interested in:

- Decision-related to your duties as a public official, including any acts of mere expediency under your responsibility.
- Seinfra's competence decisions.
- Institutional information of a confidential nature to which you have access.

Included in this list of prohibitions are the offerors that are subject to Seinfra's regulatory jurisdiction, maintain commercial relations with the Secretariat, or represent the interests of those who maintain it.

UNDERSTAND IT BETTER

Gifts:

An item that has a commercial value of less than 208.16 UFEMGs or that is distributed as a courtesy, advertisement, usual disclosure, or on the occasion of events or anniversaries; that are not directed at a specific public official; and whose distribution periodicity is not less than 12 months.

Present:

Items, benefits or advantages, such as wines, flowers, watches, and gift baskets, worth more than 208.16 UFEMGS (Fiscal Unit of the State of Minas Gerais).

Hospitality:

Any social entertainment, such as travel or meals.



To facilitate your analysis, think about the following: can the offerer of the gift, present, or hospitality be affected by any decision made by you or Seinfra?

If the answer is yes, do not accept the gift, present or hospitality.

For more information on the assumptions and rules for accepting gifts, presents, and prizes, please consult Resolution 08/2008 of the Public Ethics Council of the State of Minas Gerais.

WE TAKE CARE OF SEINFRA'S ASSETS AND IMAGE





6.

USE AND PROTECTION OF ASSETS

“

We take care of public assets with zeal and attention.

We are aware that all the inputs, resources, goods, and equipment made available to carry out our work are part of the public assets, and it is up to all of us to look after them.

”



THEREFORE:
ALWAYS!

- Take care of Seinfra's assets, protecting them against losses and damages.
- Use the resources at your disposal rationally and consciously, ensuring the saving of water and office supplies.
- Make a police report in case of theft of any Seinfra property under your responsibility.
- Report to your manager any misuse or damage to Seinfra's assets.



THEREFORE:
NEVER!

- Use or lend Seinfra's assets for personal use.
- Remove documents or goods from Seinfra's premises without proper authorization.

UNDERSTAND IT BETTER

Office supplies:

They are all the inputs used for the exercise of administrative activity, such as pen, paper, prints, and reprographic copies.



7.

**USE OF THE
INTERNET
AND SOCIAL
NETWORKS**





We use the internet, e-mail, and social networks ethically and responsibly, observing the basic premises of information security.

As part of the Seinfra team, we wish you to be a promoter of our brand and follow us on social media. However, remember that you are an ambassador of the Secretariat and must strive to protect our image and reputation.



THEREFORE:
ALWAYS!

- Use institutional e-mail exclusively for professional purposes.
- Conduct internet access properly, respecting copyright, software licensing rules, as well as property and privacy rights.



THEREFORE:
NEVER!

- Use social media to expose co-workers or service users negatively.
- Publish or propagate, through your social networks, content that violates public morality.
- Improperly use the Seinfra logo or institutional campaigns, projects, or programs.
- Share on your social networks confidential matters or information involving Seinfra's activities.

8.

COMMUNICATION AND PRESS DECLARATION



“ “

All institutional communications with the press must comply with the guidelines of the Communication Office.

We maintain proper practices in the relationship with the press, always guided by respect, dialogue, and the integrity of the information shared.

“ “

THEREFORE:

- If you are asked to give information, interviews or statements to the press, direct the request to the Communication Office.
- Only grant statements and interviews that involve Seinfra following the guidelines of the Communication Office.
- Provide information to the Communication Office team on activities that may attract the interest of the media or other external stakeholders.

**UNDERSTAND
IT BETTER**

○

Institutional Communication:

External and official communication, on behalf of Seinfra.



**STILL IN DOUBT?
PONDER OR ASK**

The guidelines of this Code must be observed by all of us. However, it is possible that you are faced with a situation in which the guidelines compiled here are not sufficient²

In these cases, your public spirit will be able to assist you in decision-making, always seeking to assess the risks involved.

Make the following reflections beforehand:

- Is my conduct compatible with the principles of Public Administration?
- Is my conduct an example for my co-workers?
- Have I evaluated all available information?
- Have I assessed the risks and is the decision to be made the best one for Seinfra?

If you still have questions regarding the use of this Code of Conduct, get in contact with the Ethics Committee.

Send an e-mail reporting your question clearly and objectively to the address:
comissao.etica@infraestrutura.mg.gov.br

²Petrobras - Code of Ethical Conduct, 2020.

CODE'S MANAGEMENT

REPORTING PROCEDURES



WHO TO REPORT

Seinfra expects us to report possible violations of this Code of Conduct and the Code of Ethical Conduct for Public Officials and Senior Management, contained in State Decree 46,644/2014. In this way, we help the Secretariat identify and eliminate misconduct and protect the Public Administration and ourselves against the risks or damages that may result from them.

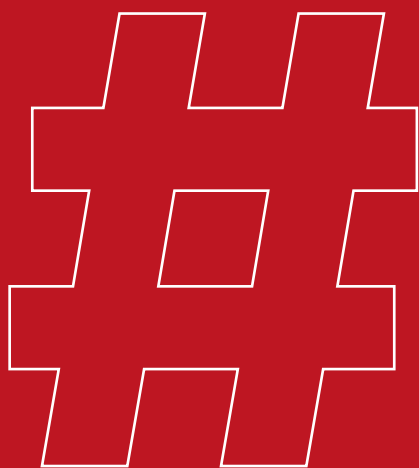
We may report circumstances that indicate a violation of the guidelines in this Code of Conduct and the Public Officials' Code of Ethics, through the email address below, or through the official ombudsman channel.

comissao.etica@infraestrutura.mg.gov.br



CONFIDENTIALITY

Information on possible violations of the rules of this Code of Conduct and the Public Official's Code of Ethics can be provided under the complainant's identification or anonymously and, in all cases, will be treated as confidential.



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