Code of Ethics and Conduct
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Last Update Date: May 23, 2019
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Thank you

Last updated date

Last Update Date: May 23, 2019
What is a Code of Ethics and Conduct?
A Code of Ethics and Conduct clarifies an organization’s mission, culture, values and principles, linking them with standards of professional conduct. The Code articulates the values the organization wishes to foster in leaders and employees and, in doing so, defines desired behavior. As a result, written codes of conduct and ethics become benchmarks for which individual and organizational performance can be measured.

Additionally, the Code is a central guide and reference for employees to support day-to-day decision making. The Code encourages discussions of ethics and compliance, empowering employees to handle ethical dilemmas they encounter in everyday work. It also serves as a valuable reference, helping employees locate relevant documents, services and other resources related to ethics within the organization.

Why do we have a Code?
We make a difference in everything we do in ways that respect ethical values and precepts.

Our commitment to respect is one of our cornerstones. The way we behave helps us retain great people working with us, provide excellent services, build great products, and nurture long and loyal relationships with our clients.

We are doing the right thing because not only it is good for business but it is our moral obligation to do right to everyone. This Code of Ethics and Conduct is intended to serve as an important guide for CI&T to form relationships and build trust with our clients, employees, suppliers, contractors, partners, shareholders and the community.

This Code may and will be revised, and the last update date will be available at the end of this material.

What does it mean to CI&T?
CI&T’s Code of Ethics and Conduct is a way to actively practice our values within our culture. Our core values and ethics should be carried out consistently across the globe.

Our values are essential and help inform the decisions made by the Company and by individuals. The commitment of CI&T and its employees to our values is crucial to ensure that professional activities are developed in compliance with the applicable law and with the highest ethical standards, ensuring opportunities and professional development for everyone.

The CI&T Attitude is defined by the following values:
- Develop our people
- Generate value to our clients
- Seek excellence
- Demonstrate integrity
- Teamwork
- Maintain profitability for continuous growth

And we can describe our attitudes like this:

Diversity and Respect. We want to continuously develop our people and guarantee that collaborative teamwork is one of our pillars. We believe that diversity and respect for all people is essential. We are leaders, not bosses, and we have long lasting relationships with our colleagues and clients.
Freedom and Responsibility. We give our people freedom and expect them to act responsibly, caring for our work environment and following our Code of Ethics and Conduct and security. The goal is to show their full potential and generate value for our clients.

Flexibility and Commitment. Our environment and practices allow maximum flexibility contributing to the pursuit of excellence and quality in everything we do. The result is a group of people committed to our culture, demonstrating this through attitudes that sustain the Company's continued profitability and growth.

Autonomy and Conscience. We believe that our people are capable of self-governance. They maintain integrity with a critical view and always consider the best results for our Company, colleagues, and clients.

A word from our CEO

Dear Colleagues,

We stand by our purpose of being transformation agents, unlocking business, technology and, above all, people potential. By transforming and humanizing the corporate environment, we help to make the world a better place. To support us on this purpose, we have a well defined set of values and Code of Ethics and Conduct to create a great place to work that is safe, fair, and has equal opportunities for all.

Our continued success depends on maintaining our culture and following our Code of Ethics and Conduct, which helps us to have great people working with us, provide excellent services, build great products, and nurture long and loyal relationships with our people and clients. This Code of Ethics and Conduct is intended to serve as an important relationship guide for CI&T to relate to clients, employees, suppliers, contractors, partners, shareholders and the community, as business is built on trust-based relationships.

In our vision to transform enterprises into lean digital businesses, responsibility, respect, ethics and integrity are mandatory. If you are ever unsure or feel that the Code of Ethics and Conduct is being violated, we ask you to speak up. Talk to your manager or reach out to our Communication Channels.

Remember: Our non-retaliation policy means that you don’t need to be afraid of, in good faith, asking questions or reporting potential issues.

I invite you to be part of our continuous evolution, improving and humanizing CI&T. Let’s learn together, not only to make CI&T an incredible place to work, but also an inspiring Company for the future that truly reflects the world today. It will be from this mosaic of our differences that we will define and shape our world for tomorrow.

Best,
Cesar Gon
@Campinas - April, 16 2019
Who must follow our Code?
All guidance provided in this Code and any other CI&T policy should be known and respected by all CI&T Group employees: board members, directors, executives, employees, interns and all people acting on behalf of CI&T or CI&T Group.

All CI&T employees must uphold the principles of the Code of Ethics and Conduct in any decisions they make that may affect our stakeholders: our coworkers, clients, suppliers, contractors, partners, shareholders and the community.

We ask our employees to seek contractors, consultants, and others who may be assigned to perform work or services for CI&T to follow the Code in connection with their work with us.

Your responsibility
Please read the Code, understand your responsibility and incorporate it in your actions, and please encourage others to do the same. Do not remain silent if you have any questions or if you think that one of our colleagues (or CI&T as a Company) may be behind in this commitment. You are responsible for communicating to the Company, through the channels made available to employees, about any events that might violate this Code of Ethics and Conduct and any other policy or security rules of the Company.

Not every issue has a clear path to resolution. In difficult situations, please use your best judgement, ask your manager or talk to us on any of our Communication Channels. Unsure about any conduct or decision? If you answer "yes" to any of the questions, don't do it.

- Could it be against the law?
- Could it violate our values, the Code of Ethics and Conduct or any other policy?
- Could it breach an obligation to a client or another business partner?
- Could it cause harm to any person, their individual reputation or CI&T's brand, reputation, financial performance or business relationships?

We may ask you to review this Code on an annual basis, or after any adjustment has been made.

Client's Code, when applicable
If a CI&T client has a different Code of Ethics and Conduct, please respect both codes. In the case of any incompatibility, please discuss it with the client as appropriate and seek to comply with the spirit or key principles of its Code. If need be, please escalate to your manager, HR or Legal to resolve the issue and/or contact our Communication Channels.

Cooperate with investigations
It is also expected that employees understand the need for investigations, and cooperate when the Company has to look into the reported concern (fact or perception) that has been reported through any of the Communication Channels or any incidents raised during security audits, so we can properly address it. This Code ensures confidentiality of the information provided.

While you may report a concern anonymously (where permitted), CI&T may require or request additional information in some cases to properly investigate the matter. If the required extra information is not provided, some cases might be closed without further investigation so we encourage you to identify yourself if possible, and remember we have zero tolerance for any type of retaliation.
You should collaborate with investigations and do not investigate independently, as alleged violations may involve complex legal issues and you may risk compromising the integrity of a formal investigation.

And we expect more from leaders
We hold CI&T Leaders to the highest standard of modeling respectful behavior, taking action when they see misconduct and ensuring there is no retaliation against anyone who speaks up in good faith. It is not just an expectation - it is an obligation. In some cultures, respect for leadership can make it difficult for more inexperienced people to disagree or provide critical feedback, so we expect our leaders to create an environment where people feel comfortable raising their concerns.

Leaders have an incredible opportunity to set the right tone for their team and be the example.

How to raise concerns or ask questions

Speak up
Our Company and leaders encourage you to speak up. If you have a good-faith concern, have experienced or witnessed disrespectful, inappropriate, fraudulent, unethical or illegal behavior, including concerns about retaliation, please access one of our Communication Channels. If you know something, say something.

We take all good-faith concerns raised extremely seriously, regardless how you raise a concern, even if it later turns out to be incorrect. Your concerns will be handled by the most appropriate people within CI&T - with the utmost confidentiality and sensitivity. However, knowingly providing inaccurate or misleading information will not be tolerated and may result in disciplinary actions or even civil or criminal liability.

Communication Channels
All reports and questions about the Code of Ethics and Conduct can be submitted directly to one of the following Communication Channels:
- Ethics Portal (ethics.ciandt.com): all items related to this Code.
- Direct Line (directline.ciandt.com): a direct channel for your suggestions, questions and complaints not related to the Code of Ethics and Conduct.
- Other channels to discuss topics related to this Code are:
  - Coach/PDM: people in these roles are your first communication channel with CI&T. Talk to them about any questions you may have or any problems you may be facing.
  - Business Partner (BP): the BP knows the team you work with and can help you to handle many situations. Also they can help you to address them properly.
  - If your issue involves your manager, Coach, PDM or BP, use our Ethics Portal (ethics.ciandt.com) or Direct Line (directline.ciandt.com).

No retaliation
Retaliation means any kind of unfair treatment whether subtle or overt, against an employee for engaging in legally protected activity. Retaliation is prohibited, not tolerated. Anyone who reported or participated in an investigation of a possible violation of this Code, policies, or the law, will not be the target of retaliation. If you believe you are being retaliated against, please contact any of our Communication Channels.
Failure to follow the Code

We expect all stakeholders: employees to board members to know and follow this Code. Noncompliance with this Code can result in disciplinary action, from verbal warning to dismissal for cause, in accordance with the relevant law. In some cases, CI&T may have a legal or moral obligation to report the results of an investigation to the appropriate law enforcement authorities, or may otherwise choose to do so.

Violations of the Anti-Corruption Laws can be subject to criminal and civil penalties.

We Deliver!

Our mission is to develop people who continuously use their talent to discover new ways of generating value to our clients.

In order to do that, our people work with Commitment, Impact, Honesty, Mastery and Respect. We are loyal to our values and commitments, and we collaborate with our teams, clients and suppliers. We work hard to communicate with transparency.

And we don’t deliver if there will be embarrassment, humiliation or exclusion of people and groups, if the work relates to mistreating animals, stimulating environmental damage and most importantly, illegal exposure of children and minors.

We respect our people, our Company, and our spaces

Workplace safety and its diligent use

To ensure the security of CI&T employees and visitors, employees should know and follow the emergency and security procedures communicated and adopted by CI&T.

If any risk situation arises, it must be immediately communicated to CI&T through the Communication Channels available.

All employees must take care of CI&T’s environment, such as tables, chairs, bathrooms, food courts and meeting rooms. Maintaining the organization and cleanliness of our environment makes for more productive and enjoyable work, and reinforces our respect for one another. If you work in the client’s office or in a co-working space, the same conduct of respect is expected.

It is the responsibility of the employee to perform and promote diligent, conscious and responsible use of our environment and amenities offered by the Company.

Disrespect, Harassment and Discrimination

Not only harassment and discrimination should be communicated, but any act of disrespect, bullying or intimidation will be investigated. As our workplace exists both physically and virtually, all interactions count whether in person or online.
Disrespect, harassment and discrimination take many forms. We encourage you to check our Examples section. They consist of behaviors that interfere with work performance, or any other treatment of a person that creates an intimidating, hostile or offensive work environment. Even if you consider something as a joke, it is disrespectful if someone is offended by it.

Violent behavior or violence threats (verbal or physical, including weapons) among employees, clients, partners and suppliers violate the Company values and are not justified in ANY circumstance. Anyone who is involved in such behavior or who brings dangerous materials to the workplace will be subject to disciplinary action.

Harassment and discrimination of any kind is not accepted in any of CI&T’s environment as well as online channels including hangouts, video conferences, social media, forums, written communications and speeches. A respectful behavior is expected from all of us when representing CI&T.

CI&T believes in having a diverse group of people working here, so it is important to understand, respect, and value differences between people including those:
- of different races, nationalities, ethnicities, gender, gender identity, sexual orientation and identity, age, marital status, religion/beliefs, socio-economic status, physical or mental disabilities, and veteran status.
- with differences in education, backgrounds, lifestyles, experiences, tenure, family composition, perspectives, opinions, and knowledge base.

Diversity of thoughts, perspectives and experiences is essential to innovation incorporates the best advantage of collective intelligence. We are constantly adapting our work, environment and equipment to ensure equal opportunities and accessibility, so everyone can collaborate.

People from all areas, roles, positions, teams and offices are subject to this Code of Ethics and Conduct. If you are experiencing disrespect, harassment or discrimination, or if you realize that someone is, or even if you have other concerns and questions, look for the official Communication Channels.

**Illicit Drugs and Alcohol**
Substance abuse and illicit drugs are incompatible with the health and safety of our employees, so they are prohibited.

We do not ban alcohol consumption, but use good judgment and never drink in a way that leads to impaired performance or inappropriate behavior, which may endanger the safety of others, violates the law or embarrass others.

**Employees as Ambassadors**
All our employees are representatives and ambassadors of CI&T, whose job it is to preserve and promote our culture, values and this Code of Ethics and Conduct. All of us understand that any action against our values, our culture or this Code pose a threat to our safety and the safety of others.

Whether at work, travelling on business, communicating online or attending a training or social event with colleagues or clients, we are always guardians of CI&T’s culture. Our behavior reflects both on ourselves and on CI&T. Good professional conduct is especially important because our individual behaviors not only impact our colleagues, our clients, our community and, but also, the success of our Company.
Impartiality & Non-Discrimination
All CI&T employees should be respected and treated impartially - whether in person or online. Career decisions are made exclusively based on performance, contributions and opportunities, and depend on the compliance with the Career Plan established for each job position and on the specific business needs of the Company. The decisions also follow market best practices.

This applies to any decision about recruitment, hiring, compensation, promotions, performance evaluation, and work assignments.

Employee Relationship with Suppliers
The contracting process of a product supplier or service provider of any kind, must always aim for the best interest of CI&T.
The selection process should be based on technical and professional criteria, such as competence, quality, timeliness, price, financial stability, etc. It is forbidden to perform business with suppliers or service providers of dubious reputation, or that do not comply with the standards and requirements in this Code of Ethics and Conduct. CI&T expects that its suppliers conform to our values and comply with all applicable laws.

In addition, CI&T expects its suppliers to perform in accordance with the principles outlined below:

- Comply with all applicable laws;
- Prohibit acts of fraud and corruption;
- Respect human rights of employees;
- Comply with laws prohibiting child labor;
- Take responsibility for the health and safety of its employees;
- Act in accordance with applicable local and international norms related to environmental protection.

Personal Conflict of Interest
A personal conflict of interest is a situation and circumstance that reasonably presents the appearance of a conflict, where your own personal interests (or those of a family member or close friend) can affect your ability to act in CI&T’s best interest, or interfere with your personal objectivity and obligation to the Company.

Some examples of CI&T’s best interest:

- We do not use CI&T’s property or information, or our position, for our own personal gain (or that of a family member or close friend);
- We do not take opportunities for ourselves (or family member or close friend) that we discover through the use of CI&T’s property, information or otherwise through our position here.

As stated before, our business is built on trusted relationships and such conflicts undermine that trust. A failure to avoid, or properly deal with, a personal conflict can have very serious consequences - both for CI&T and for you personally.

A personal conflict can arise in many different situations. Each of us is best qualified to identify when there is a personal conflict. Therefore, it is important to use your best judgment to identify actual, potential or perceived personal conflicts of interest; and it is often easy to resolve when it is disclosed early enough.
If you have outside work, this other work should not take time away from your job at CI&T, interfere with your performance, or create a potential conflict for CI&T.

If you have been asked to sit on (or already is part of) a Board of Directors or Advisory Board for a non-profit or for-profit organization (even if you are not being compensated for it), you need approval from your manager and the Legal Department.

**Co-worker Relationships**

You are not allowed to participate in the management of or decision-making regarding potential or existing CI&T business relationships that involve your relatives, partner or significant other. This includes being the hiring manager for a position for which your relative (as an example) is being considered, or participating on the performance evaluation process of your partner or significant other. Another example is having a partner or significant other, as a member of the team you manage.

Avoid participating in the management of or decision-making regarding potential or existing CI&T business relationships that involve your close friends. This includes being the hiring manager for a position for which your friend is being considered, or participating in the performance evaluation process of your friend.

To be clear, just because a relative, partner/significant other, or close friend works at CI&T or at a competitor or business partner doesn’t mean there is a conflict of interest. However, if you are also involved in that CI&T business relationship, it can be very sensitive. The right thing to do in that situation is to discuss the implications with your manager.

**Comply with the Law**

CI&T does not tolerate the practice of illegal activities, under any circumstances. Any person engaging in such practices shall be subject to disciplinary action and in accordance with applicable applicable law, whether local, national, or regional.

Violations of law can result in a significant harm to CI&T, including financial penalties, denial of contracts, imprisonment for criminal misconduct and damage to our business relationships and reputation.

Whenever there are doubts as to the legality of an attitude or behavior, guidance should be sought through your manager or through the Communication Channels provided by CI&T.

**Anti-Corruption Law Compliance**

CI&T requires that all employees comply with all applicable Anti-Corruption Laws. In order to follow the Anti-Corruption Laws:

- Do not offer bribes - CI&T employees are strictly prohibited to give, offer, gift, promise or authorize a third party, either directly or indirectly (through intermediaries), any valuable item to any person for the purpose of influencing any act or decision or concession, to obtain advantage;
- Do not accept bribes - CI&T employees are strictly prohibited to accept or solicit any person any valuable item in order to perform or omit any action or decision to provide a benefit to a third party or the CI&T itself;
Be careful in commercial interactions with third parties - To act on behalf of CI&T, the employee cannot provide any valuable item - including gifts, meals or entertainment - to government representatives or business partners without first obtaining the approval of his/her manager;

Report irregular situations - CI&T employees shall report to the Company any actual or potential breach of this Code and/or the Anti-Corruption Laws, including suspected violations by business partners. The employee should contact one of the Communication Channels available.

Bribes are “valuable items” intended to secure an improper advantage or otherwise inappropriately influence the recipient. This means anything that is valued by the person that someone is attempting to influence—whether or not it has any commercial value. It does not matter whether the thing of value is funded by CI&T, a third party or from the employee’s own personal resources. Merely offering something of value can violate the law, whether or not it is actually accepted or a benefit is received.

Before providing or accepting any gift, meal, entertainment or travel, apply our five gifts, meals, entertainment and travel criteria to confirm that it is:

1. For a proper purpose and not intended to secure an improper advantage or otherwise inappropriately influence the recipient;
2. Permitted by law;
3. Permitted by our policies;
4. Permitted by the recipient’s policies and by any agreements between CI&T and the recipient’s employer;
5. Reasonable in value and appropriate under the circumstances.

Here you can find more details on the Brazilian Anti-Corruption Law (No. 12,846, OF AUGUST 1, 2013). Please note: the text of the law is in Portuguese.

Protect People, Information and Our Business

Privacy

Any information that is received, sent or stored in any asset of the Company (notebooks or other devices) or that travels through its network can be monitored.

CI&T employees should act professionally whenever they use Company resources and access the Internet or any other type of external system using CI&T assets.

This commitment is also applicable to activities performed on the systems and facilities of clients or with access provided by them. If CI&T and the client have different rules, the most stringent shall apply.

We value the privacy of the information shared with our people. If you have received personal information from an employee, please make sure that you have permission to pass the information onto someone else. If confidentiality has been requested, do not pass along the information on, under any circumstances.
Assets
Employees should be extremely careful to safeguard, protect and value the Company assets and use them only for legitimate work purposes that are connected to our core values. These assets include all physical properties of CI&T, as well as intangible properties, such as our brand and all forms of intellectual property.

We should protect all equipment that is allocated for the performance of our tasks against theft, breaks and/or inappropriate use, according to the specific rules defined in the Security Policy. All employees should keep the equipment allocated to them under control and should take appropriate measures to protect against unauthorized access, including family members and friends.

If you find CI&T equipment unsupervised, report through ITTalk@ or the available Communication Channels.

Brand
The CI&T brand is a valuable asset and all visual identity rules must always be observed and respected. Employees are encouraged to support and promote the brand name, identity and positioning every time it is mentioned, as well as in their professional actions and decisions.

Employees are forbidden to use the CI&T brand for any purpose other than the subject matter of the employment agreement or if there is no Company authorization to do so.

Confidential Information and Intellectual Property
CI&T uses contract clauses and records to protect its intellectual property and copyrights. The confidential information and intellectual property of CI&T clients is protected under proper agreements in the same manner as CI&T protects its own information or as determined by the client.

Anything that results from the work of CI&T employees during the validity of their contract with the Company, and that is related to its current or future business, belongs exclusively to CI&T. This respects the signed work contract.

All employees must protect information that is confidential or that belongs to CI&T against inappropriate use and disclosure. Therefore, employees must follow and adopt all measures required to avoid unauthorized disclosure of such information, including respect to security policies and rules of use and disclosure, both established by the client and CI&T.

You are not allowed to copy or disclose any information from clients or third parties to obtain personal benefits or to favor CI&T interests, except in cases where there is express and specific authorization of CI&T, clients and third parties involved.

Obligations pertaining to confidential information and CI&T intellectual property will remain in force even after the termination of the employee/supplier contract with CI&T.

You may from time-to-time be requested to sign an Non-Disclosure Agreement to acknowledge and accept the terms stated heretofore of confidential information and intellectual property.
Social Media
We participate in constructive online dialogues and use our best judgment when posting to external or internal social media.

Contributing to online communities—including social networks, blogs, wikis, podcasts and virtual worlds—allow us to demonstrate CI&T’s innovative and collaborative culture. Online discourse helps us promote our capabilities, build stronger relationships and enhance our reputation.

Social Media interactions should be consonant to the Company’s values and this Code.

When using Social Media

● Communicate thoughtfully and never post content that is disrespectful, harassing or discriminatory in any message or post that relates to CI&T, our business, our clients, our business partners or our people;
● Provide sufficient context and support in personal online communications to help readers understand your statements;
● Get appropriate approvals before providing an official CI&T position about a topic related to CI&T - and otherwise do not make statements that could be perceived by others as speaking on behalf of CI&T;
● Be transparent and identify yourself and your association with CI&T when commenting on CI&T matter;
● Protect nonpublic information that relates to CI&T’s business, research and development activities, clients or other business partners; and protect CI&T’s intellectual property and respect the rights of others;
● Do not identify a Company as an CI&T client unless you have authorization to do so;
● Be mindful of your own privacy and respect the privacy of others.

Information Security
All CI&T employees must know and follow our Information Security Policy. Everyone should perceive Information Security as the appropriate way to protect co-workers, our Company, our assets, our clients' information, and mitigate the risks of exposure and the damage this exposure may cause the Company's brand. CI&T expects all employees to be champions on Information Security by reporting suspicious incidents and events. More details can be found at our Information Security Portal.

Business Ethics
We respect all CI&T policies including, but not limited to, expenses, purchases, time reporting and travel.

Expenses
CI&T employees who are authorized to make expenses for work purposes should submit, in a timely matter, all reports related to such expenses. They are also accountable for all expenses reported and for the receipts presented, according to the rules established by the Company.
Purchases
All purchases and invoice payments made by the Company must follow the corporate process and will have to be formally requested and properly authorized by the person responsible for that. This procedure will ensure that purchases and the financial control of expenses are properly carried out.

Finance
If your job involves financial recording of our transactions, make sure that you are familiar with all relevant policies, including those relating to revenue recognition.

Never interfere with the auditing of financial records. Similarly, never falsify any Company record or account. These actions shall warrant an investigation and possible termination from the Company.

Time Reporting
When required by the Company or law, you must accurately report all hours worked, time off and vacation time taken. Never ask or suggest that those under your supervision inaccurately report hours worked, and submit accurate and legitimate business expenses within policy and the appropriate timeframe.

Travel
We conduct all business travels in the most cost-effective, safe manner and we get the proper visas or work permits required for international business travel or assignments.

We also consider virtual alternatives, such as conference calls, web-conferencing, virtual meetings and other collaboration technologies wherever possible. In addition to reducing travel costs, the use of virtual alternatives also helps reduce the impact on the environment.

Clients
Generating value to our clients is an underlying principle of CI&T. To reach that goal, CI&T is committed to providing high quality and excellence services, and to honoring the commitments.

All CI&T employees must respect the contractual agreements made with our clients, as well as to respect the client’s rules and culture in each and every relationship opportunity. If a CI&T client has a different Code of Ethics and Conduct, please check the "Client’s Code, when applicable" section.

Favoritism
No treat, gift, money or any type of good that carries value can be offered, given, received or demanded as a benefit of any nature, bribery or any other type that violates CI&T policies or the other Company policies. This includes any type of personal favors offered by clients or suppliers, or requested by employees for clients or suppliers. The bribe rule is simple: don’t bribe anybody, at any time, for any reason.

CI&T in no way authorizes or accepts any type of bribery or exchange of favors to get economic or any other type of benefit.
Exchanging business gifts may be appropriate in certain circumstances. However, before accepting or offering any gift, you should ask yourself the following questions:

- Would you and CI&T be comfortable publicly disclosing the fact that the gift was received/given?
- Would you easily justify giving/receiving this gift to the Company?

If the answer to these questions is no, then it is not appropriate to offer or receive the gift. Moreover, if any of the following situations occur, it is a sign that it is not appropriate to receive or give gifts:

- The gift was requested;
- The gift has a significant value (ask at the Communication Channels if you don't know what is a significant value);
- The gift is delivered before or after submission of commercial proposals or response to a bid, while approvals or decisions are pending;
- Giving/receiving the gift violates any laws in the country where you are;
- If the gift is a courtesy, such as participation in an event (national or international), and is conditioned to favor in a bidding process or choice of suppliers.

In the case of courtesies to attend events (national or international), it is important to align with your manager and ensure that participation in the event will not mean any favoring of suppliers in the selection process.

If you are not sure about how to proceed, ask the Legal Department for help before making a decision.

In order to regulate the relations of its employees with the government, CI&T has a Policy of Government Relations.

** Competition **

CI&T respects the laws that promote free competition among companies and all CI&T employees should perform their activities in a fair and lawful manner, in order to avoid any kind of misleading conduct.

Collecting information about CI&T competitors is considered a legitimate activity if it is conducted in a legal and ethical way. CI&T employees should never obtain information about competitors, clients or partners using illicit means, as well as cannot reveal confidential information about CI&T. If we receive any confidential information, we shall not misuse it.

Employees shall ensure their conduct by not entailing a conflict of interest with CI&T business. They can not obtain personal advantages by prejudicing CI&T.

We respect the obligations new employees bring. If there are any enforceable obligations that candidates and new employees may have to former employers, such as confidentiality or agreements not to compete or to solicit former clients or colleagues, we expect them to be aware of those and notify their manager immediately if a job requirement may conflict with those obligations. And we expect our former employees to behave the same way in their new jobs.

** We Care About the World **

We support and respect human rights, foster environmental responsibility and encourage our people’s involvement in the communities where we work and live.
Human Rights
We support and respect human rights as expressed in the International Bill of Human Rights and the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work. Our intent is to align with the United Nations Guiding Principles on Business and Human Rights.

We speak up if we experience any human rights violations and take action, or reach out for guidance, if we witness or become aware of any violations.

Environmental Responsibility
We foster environmentally sustainable economic growth. We incorporate leading environmental practices into our business strategy and operations. We focus our actions on three areas:

- Running efficient operations
- Enabling client and supplier sustainability
- Engaging our people, leaders, business partners and other stakeholders

Our efforts to minimize negative environmental impacts also include improving our energy efficiency, decreasing our water consumption and reducing our waste. We comply with all applicable environmental laws and regulations.

We encourage and enable environmentally sustainable practices among our employees, clients, suppliers and the charitable and nonprofit organizations we support. We leverage our people and the digital world to achieve environmental goals and ensure a better future for our planet.

Community Impact and Social Responsibility
We support our people who choose to volunteer their time and skills to make a measurable difference for individuals, communities and society through our corporate initiatives.

We also contribute directly to local communities through Tax Incentives. We do not support organizations that have a policy or practice of discrimination.

The CI&T Institute directly addresses the skills shortage by leveraging our core capabilities of training talent and convening partnerships. We mobilize our people, business partners, clients and others to make a measurable and sustainable difference in the economic vitality and resilience of individuals, families and communities by equipping people with the skills they need to gain employment.

Examples
Disrespectful Behavior and Harassment
Disrespectful behavior and harassment can occur in many contexts including, but not limited to:

- Something someone says or does (or does not say or do), whether in person or remotely;
- An email, letter or document;
- A posting on the internet or intranet (for example, on Facebook or Twitter or on a blog);
● A message sent by instant messenger applications (for example, on Skype, Slack, or WhatsApp);
● A physical gesture.

Examples of disrespectful behavior or harassment include, but are not limited to:

● Repeated shouting at employees in public or private or excessive use of profanity/swearing directed towards an individual and/or an individual’s work product;
● Targeted vulgarity and rudeness, personal insults or name-calling, public or private humiliation and/or intimidation;
● Uncontrollable and threatening anger directed towards an individual;
● Repeated, blatant disregard by an individual for another person’s personal time;
● Spreading rumors with a deliberate intention to cause harm to an individual or persistent, unjustified and/or unnecessary negative attacks on a person’s personal or professional life;
● Deliberate and blatant disrespect to cultural differences;
● Deliberate exclusion or continued isolation from work social activities;
● Displays of offensive material or offensive jokes;
● Unwanted physical contact;
● Abuse of authority (including use of intimidation, threats, blackmail, coercion or requiring an individual to perform purely personal errands or tasks);
● Threats of dismissal, loss of promotion, depriving someone of work opportunities or other negative consequences, which are not consistent with our principle of fairness;
● Bullying, “mobbing” or abusive behavior (in each case, by one or more individuals); “bullying” means behavior directed against someone, that is intimidating, offensive or malicious, and that undermines the confidence and self-esteem of that person;
● Threatened or actual violence whether or not directed at an individual.

Sexual harassment involve unwanted conduct of a sexual nature and includes, but is not limited to, the examples above or:

● Sending, taking or displaying sexually suggestive, lewd and/or indecent pictures or other materials;
● Sexually suggestive, lewd or indecent comments or jokes (directed at a particular person or made more generally);
● Repeated unwelcome requests for meeting up socially;
● Unwanted displays of affection;
● Repeated unwanted attention, such as phone calls, texts or messages to an individual without a work-related reason for the contact;
● Unwanted physical contact of a sexual nature;
● When a person in a position of power makes unwanted sexual advances or implies that employment decisions may be affected by acceptance or rejection of sexual advances.

**Situations that may present a Personal Conflict of Interest**

● Personal investments or those of family members;
● Outside activities:
  ○ Membership on boards of directors or advisory boards;
  ○ Charitable activities;
Starting a business or employment outside CI&T;
• Family or personal relationships.

Valuable Items
• Gifts or gift baskets;
• Meals or drinks;
• Entertainment such as theater and sports tickets;
• Client travel expenses;
• CI&T-branded items;
• Invitations to marketing events;
• Intangibles such as:
  ○ Personal favors;
  ○ Loans;
  ○ Preferential treatment in connection with employment and/or internships.

Violations
Activities that are potentially illegal, unethical, fraudulent or any other situation that causes concern or embarrassment.

Thank you
Thank you for reading and following this Code.

It is impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another’s best judgment to uphold a high standard of integrity for ourselves and our Company. Sometimes, identifying the right thing to do is not an easy call to make. If you aren’t sure, please don’t be afraid to ask questions to your manager or go through our Communication Channels.

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