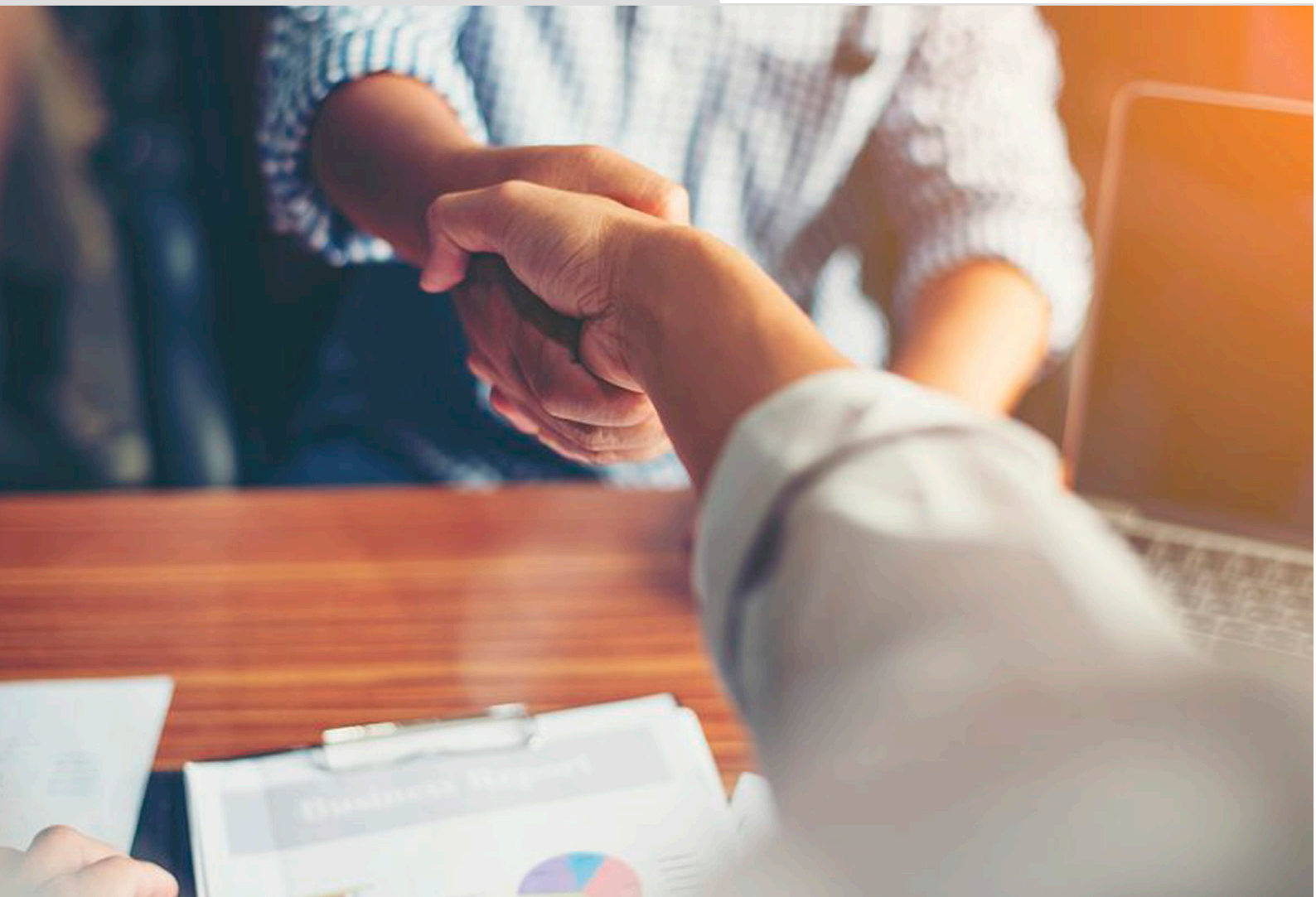


ETHICS CODE

DATA ENGENHARIA



2020

INFORMATION:

This material aims to translate the values and principles of Data Engenharia. It seeks to introduce the essential elements that should be considered in the relations established by Data Engenharia with the most different entities. With this code, our goal is to contribute to the creation of relationships, seeking to create beneficial results for society.

Talk with us: data@data.com.br

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INTRODUCTION

This material aims to translate the values and principles of Data Engenharia. It seeks to introduce the essential elements that should be considered in the relations established by Data Engenharia with the most different entities. With this code, our goal is to contribute to the creation of relationships, seeking to create beneficial results for society.

Data Engenharia believes that ethical commitment is the sum of the behavior of each of its employees. Therefore, I recommend that you carefully read the information contained in this code, as it will help you in your initiatives and decisions.

This Code of Ethics is a reference document not only for Data Engenharia and its employees, but also for other entities with which we interact. It is these different entities involved in our business that, when making their daily decisions and acting on them, ratify ethical conduct that we hope can assure meaningful and sustainable relationships that are compatible with the most legitimate interests and aspirations of stakeholders and society .

This document is not expected to address all possible situations of ethical conflict that may arise, but to define the basic principles that should guide our behavior.

The Code of Ethics of Data Engenharia considers the following entities:

- Professional Class Associations
- Banks
- Customers
- Community and Society
- Competitors
- Suppliers
- Government
- Press
- Investors
- Cardholders
- Internal Public

CONDUCT ASPECTS

Data Engenharia and all its employees undertake to follow the following conduct guidelines in all their relationships:

HARASSMENT, DISCRIMINATION AND PREJUDICE

At Data Engenharia we appreciate all employees and their contributions, and we are committed to equal employment opportunities and zero-tolerance to discrimination . We are dedicated to keeping workplaces free from discrimination and physical or verbal harassment based on race, gender, skin color, nationality or social origin, religion, age, disability, sexual orientation, political opinion or any other state protected by applicable law. The recruitment, hiring, placement, training, compensation and promotion at Data Engenharia are based on the qualifications, performance evaluation, skills and experience of the candidate for the position.

FIGHT AGAINST CHILD PORNOGRAPHY

Data Engenharia opposes any form of discrimination, violence or violation of the fundamental rights of children and adolescents and of any person who produces, reproduces or records by any means any explicit scene of sex or child pornography. The same applies for those who organize, facilitate, procure, coerce or mediate the participation of children or adolescents in such scenes.

INTEREST CONFLICT

We consider as an interest conflict any opportunity for the employee's to gain personal benefit that may conflict with the activities, interests and image of Data Engenharia, as well as their participation in any other activity during their work schedule that is not their duty at the Company.

CONTRIBUTION TO POLITICAL PARTIES

Data Engenharia does not make contributions to politicians or political parties.

CORRUPTION AND FORMATION OF CARTELS

Data Engenharia opposes and does not participate in any form of corruption and cartel formation.

MONEY LAUNDERING

Money laundering is understood as economic and financial practices that aim to disguise the illicit origin of certain assets, so that those assets appear to be of legal origin.

Data Engenharia does not participate in such practices and, if it observes its practice, will properly inform the competent authorities.

GIFTS, FAVORS AND SERVICES

The acceptance of gifts, favors or services depends on the usual practices of the market and one should avoid anything that may, or seems to compromise, the Company or anyone involved.

To preserve the business image of Data Engenharia:

- We must not accept or offer, directly or indirectly, favors, money or gifts that may affect decisions, facilitate business or benefit others. Any accepted item must be properly delivered to the Department of Human Resources to proceed with your donation;
- We may incur expenses intended to strengthen our relationship with customers, such as meals, meetings, entertainment, accommodation, provided they are related to the work meeting, within reasonable limits that do not imply any embarrassment for the guests or a possible compensation on their behalf.

INFORMATION CONFIDENTIALITY

It is everyone's obligation to maintain the confidentiality of information on the Company, our employees, customers, suppliers and other organizations, which are obtained as a result of the activities that the employee carries out at Data Engenharia Ltda.

All the information on Data Engenharia that can be disclosed is available on our website (www.data.com.br). Therefore, the transfer of any internal information or document is not allowed.

The disclosure of Company information on social networking sites such as Facebook and Twitter is prohibited.

If the disclosure of any information outside the Company, including external or employee requests, is required to perform academic and/or school work that focuses on the activities of Data Engenharia, such disclosure must be authorized by the Company management in writing.

INFORMATION SECURITY

Data Engenharia handles internal and external information with extreme care. Therefore, it is necessary that all information is stored, passed on and processed in a secure environment and that all parties share responsibility for security processes and ensure the integrity, availability and confidentiality of information assets.

To ensure compliance with information security, each Data Engenharia employee must sign the documents "FO-SGQ-052 – STATEMENT OF COMMITMENT AND RESPONSIBILITY – EMPLOYEE'S MANUAL" and "FO-SGQ-051 – STATEMENT OF COMMITMENT AND RESPONSIBILITY – TECHNOLOGY RESOURCES".

SLAVE LABOR

At Data Engenharia we prohibit the use of all forms of forced labor, including work in prison, bonded labor, debt servitude, military nature work, slave labor and all types of exploitation of people.

CHILD LABOR

At Data Engenharia we comply with the applicable laws and regulations regarding the minimum age for admission to employment. The Company prohibits the hiring of persons aged under 18 for jobs that involve hazardous work. The prohibition of child labor in the Company meets the standards of the International Labor Organization.

SEXUAL EXPLOITATION OF MINORS

Data Engenharia Ltda does not accept the sexual exploitation of minors in its Value Chain, nor does it accept the use of its products/services by customers that may exploit this activity. Any supplier or customer that has any participation, whether direct or indirect, with this type of situation will lose their accreditation and be reported to the competent authorities.

ENVIRONMENT

Data Engenharia has control over its activities and services in order to prevent the inherent environmental impacts of its process, complying with existing legislation, thus ensuring continuous improvement and preservation of the environment.

RESPECT FOR ASSOCIATION TO TRADE UNIONS AND COLLECTIVE BARGAINING

Data Engenharia understands the importance of professional class associations as defenders of the rights of their employees and seeks to maintain mutual respect with associations focused on guaranteeing the interests of professionals in the category and market segments.

USE OF COMPANY RESOURCES

The resources and equipment used in the professional activity are the property of Data Engenharia and must be used for the exclusive use of the Company. Therefore, to preserve this use, Data Engenharia reserves the right to control and monitor their content and how they are used.

All employees must guarantee zeal for the assets of Data Engenharia, by preserving and storing materials, work tools, furniture and other equipment, as well as safeguarding the tidiness and safety of our facilities, using them only for professional activities related to Data Engenharia.

CONDUCT ASPECTS ACCORDING TO THE PUBLIC OF INTEREST

PROFESSIONAL CLASS ASSOCIATIONS

Data Engenharia understands the importance of professional class associations as defenders of the rights of its employees and seeks to maintain mutual respect with associations focused on guaranteeing the interests of professionals in the category and market segments.

BANKS

We consider banks as our partners. This relationship must be increasingly appreciated and based on transparency and commitment to results.

CUSTOMERS

We understand that contributing effectively to our customers' success is the shortest way to accomplish our mission.

We must take care of the transparency and confidentiality of information, preserve the relationship of trust and harmony towards our customers, strictly comply with what was agreed upon and constantly seek excellence when rendering services.

COMMUNITY AND SOCIETY

Data Engenharia recognizes its importance in the development of society, in the generation of jobs for the community in which it operates, as well as in compliance with current laws and in the collection of taxes.

COMPETITORS

The relations with our competitors must be based on ethical standards, avoiding any action or practice that may characterize an unfair competition.

No employee is authorized to provide Company information to our competitors. The employee who is related to employees of direct competitors must communicate this fact to the Company management.

SUPPLIERS

Our suppliers have a direct influence on the quality of our products and services. Therefore, we appreciate the association relationship, taking into account what is good for us, them and other parties involved.

The relationship with suppliers will be characterized by compliance with the provisions of the Code of Ethics of Data Engenharia Ltda.

Data Engenharia practices free competition, transparency and impartiality in the process of contracting suppliers, as well as strict compliance with the contracts. One should constantly seek to encourage the adoption of good practices, with a focus on the sustainability issues.

GOVERNMENT

Our company complies with current legislation and is interested in contributing to the social and economic development of the country. We understand that we have an important role to play in the fight against tax evasion and money laundering.

We maintain strict compliance with the legal, fiscal and labor requirements established by the law agencies, through compliance with the legislation imposed and the payment of fiscal and labor obligations.

PRESS

We must take care of the reliability of information transmitted to the media and ensure that all comments, statements or pronouncements on behalf of the Company are made only by authorized persons.

EMPLOYEES

We permanently wish to build the best Company to work for, so we look for an environment of personal and professional fulfillment that is healthy and promotes physical and emotional wellness. In addition, it is the responsibility of each employee to take care of the assets of Data Engenharia and take care of the image that the Company has. The attitudes of all employees should reflect their commitment to the perpetuity of the Company and its values.

DATA ENGENHARIA REPORTING CHANNEL

Data Engenharia Reporting Channel is the means by which any interested party may report unethical behavior or in violation of the law, the Code of Ethics or this Policy, including suspected fraud and corruption.

This medium is extremely confidential and secure, ensuring impartiality in handling the issue, as well as the confidentiality of the identity of those who use it and do not wish to identify themselves.

If you have any doubt about whether a situation is a deviation from the precepts established in this Code, before formalizing the possible exit, you can request the advice of the Department of Human Resources, the Department of Quality and/or your line manager.

If someone observes any deviation from this code, this should be reported on the website www.data.com.br, on tab "Contact", item "Talk with us", option "Reporting".

Regularly recorded information will be submitted to top management.

DATA
engenharia

data@data.com.br (31) 3577-0404 BR | EN | SP

HOME QUEM SOMOS SERVIÇOS PRODUTOS MERCADO NOTÍCIAS CONTATO

FALE CONOSCO

Você está em: Home > Fale conosco

Nome

Telefone (xx)xxx-xxxx

Mensagem

Email

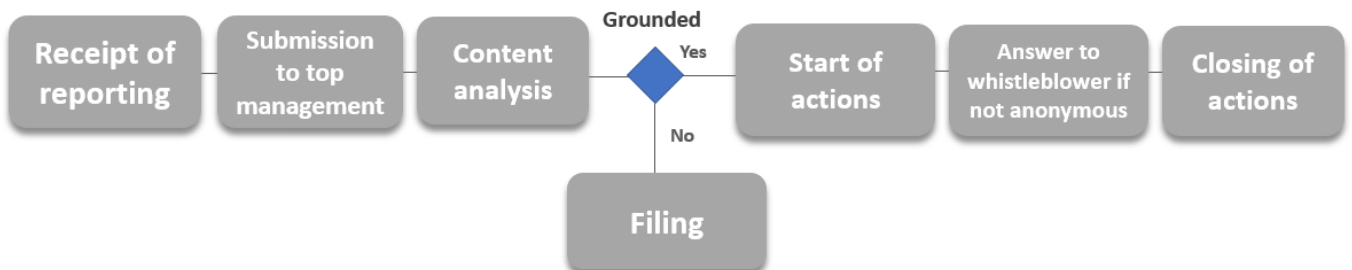
Área de interesse

- Área de interesse
- Comercial/Vendas
- Administrativo/Financeiro
- Engenharia
- Marketing
- Sugestões/Reclamações
- Denúncia**

ENVIAR MENSAGEM

Reportings will be handled as follows:

PROCEDURE FOR HANDLING REPORTINGS



POLICY OF FIGHT AGAINST CORRUPTION

In line with the objectives of Law 12.846/2013 and several international anti-corruption laws and guidelines, such as the Law Against Corrupt Practices Abroad (FCPA), Guidelines of the Organization for Economic Cooperation and Development (OECD), the Global Compact (UN), the Anti-Bribery Law of the United Kingdom, among others (“Anti-Corruption Law”), and the Code of Ethics adopted by Data Engenharia Ltda, this Anti-Corruption Policy aims to ensure that all its adherents understand the requirements of the Anti-Corruption Law, anticorruption preventive practices, legal and internal sanctions, as well as reinforcing the obligation of compliance and reiterating the commitment of Data Engenharia Ltda to their principles - transparency, equity, accountability and corporate responsibility.

APPLICABILITY (PARTIES INVOLVED)

This Policy is applicable to the following persons and must be faithfully complied with by them:

- Employees;
- Top management members;
- Suppliers;
- Service providers;
- Sales representatives;
- Any third party working on behalf of the Company.

The parties involved must comply with this Policy, either individually or as part of other documents, such as contracts, general conditions, disclaimers, letters, etc., that will be filed with the Human Resources sector, except that the employees of Data Engenharia Ltda will automatically accede to its policies, in accordance with the Employee's Manual.

MAIN DEFINITIONS

The main definitions required for the correct understanding of this Policy are the following:

- Public administration: set of bodies and entities that carry out the management and execution of companies or public services by civil servants at the federal, provincial and municipal levels;
- Civil servant:
 - a) Any person who holds public office or public function, either temporarily or without remuneration, including a position or function in public companies or mixed capital companies;
 - b) Any person acting for or on behalf of a political party;
 - c) Foreign official is any person who has a position, job or public function in state entities or diplomatic representations of a foreign country, even if it is temporarily or without remuneration. Foreign officials are equivalent to international public organizations;
 - d) The definition extends to immediate family members (spouse, parents, children and/or siblings) of the civil servant.

- Offer or promise of improper advantage: the mere fact of offering or promising an inappropriate advantage, regardless of acceptance, already constitutes corruption;
- Inadequate advantage: anything of not necessarily economic value, offered with the intention of receiving favors in return (examples: dinner, scholarships);
- Directly or indirectly: the promise or offer of inappropriate advantage may occur directly or indirectly, when the advantage is directed to third parties that are related to the civil servant;
- Fraud: attempt to cause harm to others and/or hide the truth to avoid obligations in bad faith;
- Bidding: is the means used by the Public Administration to contract services or buy products from a private company;
- Public or administrative contract: contracts signed between a private entity and the Public Administration;
- Economic and financial balance of the contract: it is the harmony between the benefits and the obligations established by the contractor and the contracting entity, keeping a certain proportionality between them.

COMPLIANCE WITH THE LAW

Employees must refrain from committing the corruption acts listed in the Anti-Corruption Law, including, among others, acts such as:

- Promise, offer or give, either directly or indirectly, an undue advantage to a civil servant or third party related to them;
- Promote the practice of illegal acts against the Public Administration for their own benefit;
- Use an individual or legal entity registered to hide or disguise their real interests or the identity of the beneficiaries of the acts performed;
- Prevent or defraud bids, public contracts or any related act;
- Discard or try to eliminate a bidder fraudulently or by offering an inappropriate advantage;
- Obtain an inadequate advantage or manipulate the economic and financial balance of the contracts through fraud in contracts and/or related documents signed with the Public Administration;
- Make it difficult to investigate or intervene in the activities of supervisory and regulatory agencies.

PRECAUTIONARY MEASURES

By refusing corruption, Data Engenharia highlights some precautionary measures that all employees must follow:

- Understand the Anti-Corruption Law, the Ethics Code and related regulations;
- Develop a critical sense to be able to identify attitudes that may result in an inappropriate advantage, and not practice them;
- Avoid and request clarifications on contracts outside the activity of the Company, invoices without identification number or description of the services rendered; meetings with officials outside the scope of work; proposals for apparent accounting tricks to hide or cover up payments; any refusal to sign contracts containing anti-corruption clauses.

PENALTIES

In Brazilian legislation, the crimes of passive and active corruption are typified in Articles 317 and 333 of Decree-Law 2.848 of December 1940 (Brazilian Criminal Code).

Civil, criminal, administrative and disciplinary penalties may result from breach of the Anti-Corruption Law, this Policy and the Ethics Code.

The legislation provides for severe penalties for both individuals and corporations, ranging from restrictive sentences of freedom to substantial fines and mandatory dissolution of the legal entity.

In addition to the penalties provided by law, the employee, the individuals or legal entities related to them, who, either directly or indirectly, breach or encourage breaching any anti-corruption regulations, are subject to penalties that Data Engenharia Ltda will apply, including job contract termination, without prior notice, without any charge for Data Engenharia Ltda and without prejudice to the application of compensation for losses and damages, as well as a fine, provided for in said contract.

ANNEX I – LAW 12.846/2013 AND ANTI-CORRUPTION INTERNATIONAL LAWS AND GUIDELINES

Law 12.846/2013

Available on:

http://www.planalto.gov.br/ccivil_03/_Ato20112014/2013/Lei/L12846.htm

Foreign Corrupt Practices Act (FCPA)

Available on:

<http://www.justice.gov/criminal/fraud/fcpa/docs/fcpaportuguese.pdf>

Guidelines of the Organization for Economic Cooperation and Development (OECD)

Available on:

http://www.oecd.org/daf/antibribery/ConvCombatBribery_ENG.pdf

Global Compact (UN)

Available on:

<http://www.pactoglobal.org.br/artigo/56/Os-10-principios>

Decree-Law 2.848/1940

Available on:

http://www.planalto.gov.br/ccivil_03/decreto-lei/Del2848.htm