



CODE OF ETHICS AND CONDUCT

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Conectas Human Rights

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INTRODUCTION

This document is intended to guide how the employees, volunteers and directors, the Board of Trustees and audit committee of Conectas Human Rights (hereinafter called Conectas Staff and Boards respectively) behave internally and externally, i.e. among themselves and with donors, government, partners and suppliers.

Moreover, this Code of Ethics and Conduct (CEC) also guides how to proceed when reporting a violation, by a member of the Conectas Staff or the Boards, of the principles established herein (consult section 6).

Version: April 14, 2020

1.

Mission, Vision and institutional principles

Our Mission

Realize and enhance human rights and combat inequality to build a fair, free and democratic society from a Global South perspective.

Our Vision

Face injustices and propose solutions that have a positive impact on people's lives, particularly the most vulnerable in society.

Our organizational principles are:

1

Idealism:

defined in the sense of believing that our actions can make a difference, even in adverse contexts.

2

Partnerships:

as our name suggests, Conectas believes that “connection” and partnering with different actors and organizations in society is fundamental, both in terms of respecting the work of other organizations and promoting horizontal cooperation, but also as a strategy for achieving results.

3

Innovation:

defined as the ability to reassess the organization and to implement innovative ideas, projects and strategies when confronting old and new challenges in the struggle for the protection of human rights.

4

Persistence:

Conectas believes that the desired social transformation will only be achieved through the combination of short, medium- and long-term actions, planned and executed persistently.

5

Impact:

Conectas develops its activities strategically and with a view to having a real impact on the prevention or resolution of human rights violations.

2.

Principles for interpersonal relationships

An attitude of mutual respect is essential for the well-being of the staff and of each member individually, contributing to a pleasant and healthy work environment. Relationships with and between Conectas Staff and the Boards shall be governed by the following premises:

1 Encourage respect and collaboration in professional relationships and teamwork;

2 Encourage equity and inclusion in all the spaces where you are present;



3 Foster a commitment to activism and the defense of human rights;

4 Ensure participatory methods in decision making that affects the course of the organization.

THE FOLLOWING CONDUCTS ARE UNACCEPTABLE AND SUBJECT TO DISCIPLINARY MEASURES:

1

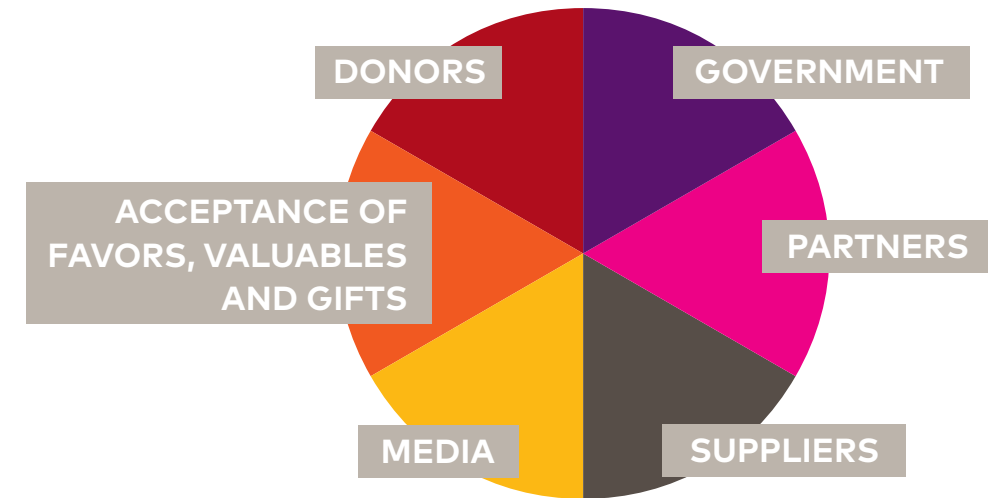
Discriminatory behaviors, whether due to skin color, origin, ethnicity, age, gender, sexual orientation, religious beliefs, political party or union affiliation, marital status or any other that offends human dignity;

2

Intimidation, aggression, abuse, retribution, threats, sexual harassment, moral harassment or any other type of violence.

3.

Principles for external relationships



WITH DONORS

The relationship with donors is underpinned by precise and transparent communication.

Conectas does **not** accept funds from arms, tobacco, alcohol or pharmaceutical companies. Any other conflicting case must be analyzed in detail and submitted for the approval of the Board of Trustees.

To guarantee its independence and credibility, and given the nature of Conectas' activities, it is not permitted to receive public funds from the Brazilian government, at any level. Funds from other governments may only be accepted through selection processes underpinned by transparency and free competition.

Conectas does not accept funds from arms, tobacco, alcohol or pharmaceutical companies. Any other conflicting case must be analyzed in detail and submitted for the approval of the Board of Trustees.

WITH GOVERNMENT

Conectas conducts its activities with regard to government in accordance with the following principles:

1

Maintain a transparent and respectful relationship. Act ethically, efficiently and transparently, transmitting accurate and objective information and always taking an open and interested position that allows for criticisms and suggestions;

3

Any form of pressure or solicitation by government agents that conflicts with these principles must be rejected and immediately reported to the Executive Board;

2

The participation of Conectas Staff and Board Members on public/governmental or mixed economy bodies, at any level, must be expressly authorized by the Directors or in cases of participation by the Directors themselves, by the Board of Trustees. Cases should be analyzed individually and as needed. The Executive Board should also be notified about spouses, partners and relatives of Conectas Staff or Board Members up to the second degree who hold or have held a relevant public position, job or office in the past five years, either in Brazil or abroad.

4

The values that guide our internal conduct should also guide our actions with government.

WITH PARTNERS

All the values addressed here must be observed in relationships with partner organizations, in particular the principle on *Partnerships* (1.ii) and the *Principles for interpersonal relationships* (2). The same treatment should be expected of the partner organizations.

If any of these values are disrespected, members of Conectas Staff and Boards may, if they feel comfortable, respectfully notify the partner of this. Moreover, the Directors should be immediately informed so that the appropriate actions can be taken as soon as possible.

¹In other words: children, siblings, parents, grandparents, grandchildren, uncles, nieces and nephews, great-grandparents and great-grandchildren.

WITH SUPPLIERS

The relationship with suppliers is also based on the premises already presented and we will give precedence to sustainable suppliers whenever

possible, prioritizing fair and transparent economic relations, in accordance with the following provisions:

1

All contracting must be underpinned by the search for quality, adequate/fair prices, technical and financial reliability, and integrity in negotiations;

3

A commitment by the partners and/or suppliers to not use child labor, slave labor or working conditions that in any way violate human rights. Non-compliance will result in exclusion from the list of partners and/or suppliers of Conectas.

2

Any business relations between members of Conectas Staff and Boards and their spouses, partners or relatives to the third degree, or with companies they control or own more than 10% of the equity interest, shall be analyzed using the normal contracting process and validated only after express approval by the Directors or, in the case of the Directors, by the Board of Trustees;

WITH THE MEDIA

Press and media contacts requesting comments from Conectas should be handled directly by or forwarded to the Communication Department, which shall assess the requests and ensure that the communication is aligned with the guidelines of Conectas.

If a spokesperson of Conectas is part of other collectives, organizations and/or political groups and wishes to speak on behalf of the organization in question, they must explicitly inform the media outlet that they are speaking in this capacity, making it clear that they are not speaking on behalf of Conectas.

ACCEPTANCE OF FAVORS, VALUABLES AND GIFTS

Conectas Staff and Boards shall not accept any kind of gift, donation, invitation or anything else of value from any person or organization if they consider that the person or organization providing it intends to benefit or obtain some confidential information or, otherwise, if it could negatively affect the activities or the image of Conectas.

If in doubt, the coordinators or directors should be consulted. In interactions with the public sector, it is forbidden to offer or receive any courtesies to/from public employees or people in political office or their parties for the purpose of exerting undue influence.

²In other words: children, siblings, parents, grandparents, grandchildren, uncles, nieces and nephews, great-grandparents and great-grandchildren.

4.

Commitments in Organization-Staff relations

COPYRIGHTS

Copyrights corresponding to the authorship of texts, reports, projects, articles and other communication materials produced by staff members in the course of their work shall be assigned free-of-charge to Conectas for use and distribution. The same applies for mentions and images/photos on the website of Conectas and other social media.

As a rule, recognition of authorship will be expressed, with the inclusion of the names of those involved in the preparation of research, articles and working documents. In exceptional circumstances, this will be analyzed by the coordinators, directors, Board of Trustees and author when the material produced could pose some risk to the person.

CONFIDENTIALITY

Any information that is secret or strategic to Conectas must be kept strictly confidential and must not be disclosed to third parties, except when in the strict institutional interest of Conectas or in compliance with the law, and only by authorized persons.

The Administrative/Financial Department shall hold all the personal information related to the members of the organization. Access to this information is restricted to this department and to the Directors, which have an obligation to keep it confidential.

EXTERNAL ACTIVITIES

Participation by Conectas Staff in other non-governmental organizations shall not constitute a conflict of interest if the other organizations are aligned with the promotion of human rights and the participation does not interfere with their work at Conectas.

Before starting work at other companies or non-governmental organizations, members of Conectas Staff must inform the Directors (or the Board of Trustees in the case of Directors).

CONFLICT OF INTEREST

A conflict of interest, for the purposes of this Code, is any situation caused by the conflict between the interests (i) of any individual from Conectas Staff and Boards and (ii) the organization; and that could undermine the collective interest, exert improper influence or impair the performance of the activities or relationships of Conectas.

All members of the organization should be aware of potential conflicts of interest that could affect the legitimacy, autonomy and capacity of Conectas. In the event of conflicts of interest (potential or actual), the Directors must be informed.

Volunteering and paid work by spouses, partners and relatives to the third degree should be avoided. Exceptionally and when necessary, such work must be approved in advance by the Directors (or, when it affects the Directors, by the Board of Trustees).

³In other words: children, siblings, parents, grandparents, grandchildren, uncles, nieces and nephews, great-grandparents and great-grandchildren.

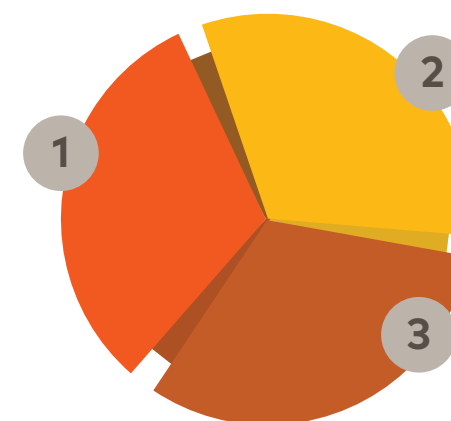
5.

Private conducts

USE OF SOCIAL NETWORKS

Personal social media (Facebook, Twitter, Instagram, etc.) is authorized during working hours for moderate use so as not to interfere with the individual and collective work and concentration of the staff. Always remember the importance of:

Clearly distinguishing personal opinions from those of Conectas (for example, including the words "personal opinions" on your profiles);



Protecting the privacy and confidentiality of information whether it is your own, other people's or the organization's – think carefully before tagging people or posting photos, addresses and events, etc.;

Ensuring that your public profile and any content that you publish is consistent with the principles that guide our conduct (section 2).

PARTISAN-POLITICAL ACTIVITIES AND CONTRIBUTIONS

Conectas is a non-partisan organization. However, we respect the individual right of Conectas Staff and Board Members to get involved in civic affairs and participate in the political process, provided that this is done in their spare time and at their own expense. It is the responsibility of Conectas Staff and Board Members to always make it clear that partisan-political manifestations are personal and completely unrelated to Conectas, thus ensuring its independence. Furthermore, any participation in a public demonstration by a member of Conectas Staff and Boards must be consistent with the principles that guide our conduct (section 2).

It is expressly forbidden to use the resources, the facilities or the image of Conectas to serve the personal partisan-political interests of any members of Conectas Staff and Boards or of any other stakeholders.

We do not make political contributions (monetary or other) pursuant to applicable legislation. Nevertheless, members of Conectas Staff and Boards may individually participate in political activities and/or make political contributions.

6.

What to do in the event of a violation of the principles

DIRECT DIALOGUE WITH THE PERSON RESPONSIBLE OR THEIR COORDINATOR

We value honest communication and we believe that all Conectas' employees should be open to criticism. As such, whenever possible, we encourage all matters to be handled with a frank, respectful and open dialogue with the people involved.

When this is not possible or if the problem is not resolved, the person affected should report the matter to a coordinator or directly to the Directors, also offering suggestions or informing how they expect the case to be resolved.

DIALOGUE WITH A REPRESENTATIVE OF THE INSTITUTIONAL DEVELOPMENT DEPARTMENT

If the person affected does not feel comfortable speaking directly to the person responsible for the offense or with one of their superiors, a representative of the institutional development

department is available to receive complaints and eventually mediate the situation. This representative will assess the situation and, in conjunction with the aggrieved person, agree on the next steps.

EXTERNAL COMMUNICATION CHANNEL

Conectas has an outsourced communication channel that can be used in the following situations:

1

When the aggrieved person does not feel comfortable speaking to the person responsible, their coordinator or even the representative of the institutional development department, but they want to be named;

2

When the aggrieved person wants to make an anonymous complaint. When the complaint is anonymous, the report must be accompanied by all the necessary information so that an investigation of the facts can be conducted, including the indication of possible witnesses, and if the investigation is not possible, it will be shelved.

COMPLAINTS CAN BE MADE IN THE FOLLOWING WAYS:



Website: www.resguarda.com/conectas



E-mail: conectas@resguarda.com



Telephone : 0800 8914636

Working hours: 8 am to 10 pm.

Op.1 Operator | Op.2 Recorded message | Op.3 Fax

Upon receipt of the complaint, the information will be forwarded to a Committee (formed by 2 members of the Board of Trustees, the Executive Director and a representative of the institutional development department). If the complaint is being lodged against one of the members of the Committee, this person will not receive the complaint.

THE FOLLOWING APPLIES TO THE SITUATIONS DESCRIBED ABOVE:

1

The person who receives the complaints (whether it is the representative of the institutional development department, the coordinator, the Directors or the Committee) will acknowledge receipt of the complaint, notify the Directors (or in the event of a complaint against the Directors, the Board of Trustees) and, within 7 days, provide feedback on the measures that will be taken.

2

The confidentiality of the complaints received is guaranteed, and it is strictly forbidden to take any retaliatory measure against the person who lodged the complaint or that results in any type of negative consequence for them. However, this provision does not prevent the adoption of appropriate disciplinary measures when the internal investigation concludes that the complaint is false and/or was made in bad faith.

3

When necessary, an effective and proportional investigation will be conducted and efforts will be made to resolve the matter in the quickest and most transparent way possible.

4

If the department responsible decides to shelve the complaint, both the person who lodged the complaint and the Directors - when they are not the subject of the grievance - shall be notified that it has been shelved, maintaining the secrecy of those involved. Even when inconclusive, complaints shall be analyzed with a view to identifying needs or opportunities to improve our institutional policies.

APPENDIX I

Receipt and Commitment

I received my copy of the Code of Ethics and Conduct from Conectas Human Rights and, after careful reading, I agree with its entire content.

I understand that the Code of Ethics and Conduct contains important guidelines that should serve as a reference for my activities, guide my attitude and behavior, and ensure that my relationships with the other members of Conectas Staff and Boards, donors, suppliers, government and partners are always underpinned by ethics.

I hereby make the commitment to observe and comply with its principles and guidelines for the duration of my activities, and I submit to them and to the penalties established in the internal rules.

NAME: _____

CPF: _____

CITY: _____

STATE: _____

DATE

NOTES



contato@conectas.org

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