

PROMOTIONAL ITEMS, GIFTS, AND HOSPITALITY POLICY

1. PRESENTATION

This document is an integral part of the policies and regulations associated with the Compliance Program of the Foundation for Research and Outreach Support (FAPEX). The policy on promotional items, gifts, and hospitality must be read and interpreted along with the FAPEX Code of Ethics and Conduct.

2. OBJETIVE

This policy aims to provide guidance to employees and third parties regarding the acceptance or offering of promotional items, gifts, hospitality, travel, or other courtesies from or to public or private agents, which may give rise to actual or potential conflicts of interest.

3. SCOPE

This policy applies to all employees, project coordinators, interns, scholarship holders, trainees, as well as suppliers and other partners with whom FAPEX maintains professional relationships.

4. DEFINITIONS

The terms used in this policy shall be interpreted based on the definitions provided below:

Promotional Items: Goods with no commercial value or with a market value of up to BRL 200.00 (two hundred Brazilian reais), distributed broadly as a courtesy, advertisement, or routine promotional material, typically bearing the company's name and logo. Examples include planners, calendars, notepads, mugs, institutional materials (Management Reports, Commemorative Books), etc.

Gifts: Items of commercial value up to BRL 200.00, offered or received as a courtesy and not qualifying as a promotional item or hospitality, usually intended for a specific individual.

Hospitality: services or expenses due to transportation, food, accommodation, which may be related to courses, seminars, congresses, events, fairs, or entertainment activities, offered by third parties.

5. GENERAL GUIDELINES

FAPEX acknowledges that offering and receiving promotional items, gifts, and hospitality are part of maintaining good institutional relationships. However, when conducted inappropriately, such practices may result in conflicts of interest and/or damage to the Foundation's reputation.

5.1 PROMOTIONAL ITEMS AND GIFTS

Promotional items and gifts may only be offered and/or accepted if:

- a) They comply with the guidelines established in this policy as well as in FAPEX Code of Ethics and Conduct;
- b) They are offered and/or accepted in accordance with the principles of legality, transparency, and integrity, and do not result in any form of embarrassment;
- c) Their value does not exceed BRL 200.00 (two hundred reais);
- d) They are offered and/or accepted without any expectation of reciprocity, obligation, or returning the favor;
- e) Their offering, promise, or receipt occurs at intervals greater than six months;
- f) They do not occur during or immediately after a contracting/bidding process or the negotiation of any amendments.

5.2 HOSPITALITY

Hospitality may only be offered and/or accepted if:

- g) It is formally communicated to the immediate supervisor for approval, following assessment of the principles of appropriateness and timeliness;
- h) They comply with the guidelines established in this policy as well as in FAPEX Code of Ethics and Conduct;
- i) They are offered and/or accepted in accordance with the principles of legality, transparency, and integrity, and do not result in any form of embarrassment.
- j) They are offered and/or accepted without any expectation of reciprocity, obligation, or returning the favor;
- k) Their offering, promise, or receipt occurs at intervals greater than six months;
- l) They do not occur during or immediately after a contracting/bidding process or the negotiation of any amendments.

6. RESTRICTIONS

The following are strictly prohibited:

- a) Offering and/or accepting, directly or indirectly, promotional items and gifts, hospitality, or any other benefits that may influence decisions, facilitate business, or provide undue advantages to third parties or to the institution itself;
- b) Requesting and/or accepting for oneself or others any item of value in exchange for business, personal favors, or access to internal, privileged, or confidential

information;

- c) Accepting promotional items or gifts that exceed the value permitted by this policy;
- d) Receiving promotional items, gifts, and/or hospitality from the same supplier, partner, or third party more than twice within a 12-month period;
- e) Requesting and/or accepting cash or cash equivalents, regardless of currency or amount;
- f) Requesting donations of items and/or gifts from suppliers or project coordinators.

It is important to understand that offering and/or accepting promotional items, gifts, hospitality, and other courtesies may be perceived by third parties as undue advantage, bribery, or favoritism—even if that is not the intention of the parties involved.

To guide behavior in such situations, the following questions should be considered regarding the offer of promotional items, gifts, or hospitality:

- a) Is there any intent or expectation of personal gain involved in this offer?
- b) Is there anything about the offer, apart from business promotion, which should be kept confidential?
- c) If the situation were disclosed to the public or reported in a major newspaper, for example, would it cause any embarrassment or reputational risk for the institution? Could it be misinterpreted?
- d) Would you feel uncomfortable sharing this act with colleagues, supervisors, or family members?
- e) By accepting the benefit offered by third parties, would you be violating the provisions of this policy or the FAPEX Code of Ethics and Conduct?

If the answer to any of the above questions is “YES,” it is likely that the offer violates the rules set forth in this Policy. In such cases, the recommended course of action is to decline the “courtesy” and immediately report the situation to the Compliance team so that appropriate measures can be taken.

7. FINAL CONSIDERATIONS

The creation of promotional items bearing the FAPEX logo, to be offered by the Foundation to its employees or to third parties, falls under the responsibility of the Executive Board.

Prizes received via raffles or drawings at internal and/or external events related to the Foundation are legitimate and acceptable, provided they comply with the objective parameters established in this policy.

Participation in celebratory events organized by third parties must have the sole purpose of socializing on festive or commemorative occasions

Promotional items, gifts, and/or hospitality deemed prohibited must be politely declined and, if necessary, returned with a Letter of Acknowledgment (Annex I) along with a copy of this policy.

If an offer raises doubts regarding their reasonableness, it is necessary to consult the Compliance team for guidance.

Suspected violations or questions regarding the application of this policy or the Code of Conduct must be reported to the Ombuds Office.

Failure by a FAPEX employee to report the receipt or proposed receipt of promotional items, gifts, hospitality, or any other benefits that violate this policy may result in disciplinary measures as established by applicable legislation and internal regulations.

All employees and third parties are responsible for ensuring compliance with this policy.

This policy shall enter into force on the date of its issuance.
Esta política entrará em vigor a partir da data da sua expedição.

REFERENCE DOCUMENTS

- FAPEX Code of Ethics and Conduct;
- Law No. 12,846/2013 - Brazilian Anti-Corruption Law;
- Decree No. 11,129/2022, which regulates Law No. 12,846 of August 1, 2013;
- ABNT NBR ISO 37001:2017 - Anti-bribery management systems - requirements with guidance for use.

LET IT BE RECORDED, PUBLISHED AND COMPLIED WITH.

EXECUTIVE BOARD, JULY 5, 2023


 Antônio Fernando S. Queiroz
Diretor Executivo
Antônio Fernando de Souza Queiroz
Executive Director
 Rosalba Oliveira
Superintendente
Rosalba Silva Oliveira
Superintendent

ANNEX I

TEMPLATE FOR LETTER OF ACKNOWLEDGMENT AND REFUSAL

[City], [Date]

Dear

[Name of Representative/Company],

FAPEX would like to thank you for the [description of the promotional item/gift/hospitality] addressed to our employee, received on [MM/DD/YYYY].

However, the Foundation's internal policies do not permit the acceptance of such [promotional item/gift/hospitality]. Thus, in order to maintain a positive business relationship and to ensure full compliance with the internal policies established, we have decided to decline and return the aforementioned [promotional item/gift/hospitality] on behalf of [employee's name].

We appreciate your understanding.

Employee's Signature

FAPEX Representative's Signature