CODE OF ETHICS, CONDUCT AND INTEGRITY
Message from the Executive Board

This document is the result of the professional experience of our company’s managers and employees, who in preparing it took into consideration the universal ethical principles, those contained in the Code of Conduct for High-Ranking Officials of the Federal Government, and the Code of Professional Ethics for Public Servants of the Federal Government, which provide guidance on individual conduct and the corporate culture and ethics of INB, a company with more than twenty years of existence.

This Code of Ethics, Conduct and Integrity will also add more value to the actions developed by INB in the fields of Quality, Safety Culture, Environmental Preservation, Social Responsibility and Transparency in Communications and Sustainability, thus strengthening its institutional actions.

We believe that this Code, by minimizing the subjectivity of personal interpretations, will constitute an important guiding instrument for decision-making by the members of the Board of Directors, Audit Committee, and the Executive Board, as well as all other managers and employees, who hold important responsibility in enhancing INB’s image with the community as an ethical company and a citizen.
Introduction

The Code of Ethics, Conduct and Integrity, consisting of the Ethical Principles, Code of Conduct and Integrity, Internal Rules of the Ethics Committee and other rules is a guiding instrument for the personal and professional conduct of all members of the Board of Directors, Audit Committee, Executive Board and other managers and employees of INB, who will hereinafter be referenced as Participants.

Those participants who are on vacation or an equivalent leave of absence status, with or without remuneration, will still be considered participants, as is also the case of any employees who are temporarily reassigned or loaned to other organizations.

The company’s clients, suppliers, service providers and interns are hereinafter referenced as associates.

The provisions set forth in this code are of a mandatory nature to all participants and associates, and should also be considered by any natural person, legal entity, or public or private law body, including partners, in their relations with INB.

Participants and associates are to apply individual values which are compatible with those established by INB in its Code of Ethics, Conduct and Integrity in order to harmonize their standard of conduct in activities performed with and for the company.

Participants should also consider in their activities the general legislation, the specific regulations pertaining to the nuclear area, the standards of conduct of their professional category, and the rules and procedures of INB. The members of the Board of Directors, Audit Committee, and the Executive Board in particular, should also observe the guidelines contained in the Code of Conduct for High-Ranking Officials of the Federal Government.

Should the participants have any doubt pertaining to their field of operation, they are advised to report to their immediate supervisor, or appropriate manager, or to the Ethics Committee or, where communication seems to be impractical, the participants should opt for the alternative that provides the best return as far as the company’s social interest is concerned.

Ethical principles and commitments of INB

2.1 Ethical Principles

As they work in a government-owned company, participants must be conscious of their important corporate social responsibility by looking after the common good and contributing toward the country’s development.

In their actions and relationships the participants must adopt honesty, loyalty, decorum, zeal, responsibility, justice, solidarity, civility and the principles of appreciation and respect for life and dignity of all human beings, considering all differences, including gender, sexual orientation, race and ethnicity, physical condition, social class, geographic origin, civil status, age, religion, culture and political conviction, among others, ensuring equality of rights and opportunities.

While implementing INB projects, the participants should seek efficiency and effectiveness in applying public funds to promote cost effectiveness, without neglecting the safety and security of people and installations, the common good, preservation of the environment, appreciation of human beings and sustainable development, providing environmentally healthy living conditions and social inclusiveness for the current and future generations.

The internal and external public must have access to accurate, reliable and timely information. To this effect, individual responsibility underlies the credibility of information as only authorized and accredited employees should be allowed to provide information cleared by the competent technical area, where this is the case.

In dealing with the community the participants must respect the local cultural values, treating all citizens with urbanity and respect, supporting community actions, following the company’s policy of regional insertion, and preserving the environment on the basis of sustainable development.

The participants must behave responsibly before the government and shareholders in implementing projects, by seeking to optimize energy and resources and avoid waste, and in diligently providing information as requested by oversight and control bodies.
In the relationship with partners and associates the participants are to abide by principles of legality, impersonality, morality, publicity, efficiency and other principles of Public Administration.

In liaising with unions the participants must show an attitude of respect, fairness and priority while seeking the resolution of common interests of the company and employees, through negotiation.

2.2 Mission

To supply products and services associated with the nuclear fuel cycle as a means for the generation of electric power, with safety, quality and sustainability.

2.3 Vision

To be an internationally recognized supplier in the uranium market, reputed for excellence in business management and aiming at self-sufficiency.

2.4 Values

2.4.1 Ethics,
2.4.2 Safety Culture,
2.4.3 Efficiency,
2.4.4 Quality,
2.4.5 Sustainability,
2.4.6 Commitment and Recognition.

2.5 INB Commitments to Participants and Associates

2.5.1 To oppose the practice of ethical, civil or criminal wrongs, and deal with reports of infringements of the principles and commitments under this Code of Ethics, Conduct and Integrity.

2.5.2 To encourage the free expression of ideas.

2.5.3 To monitor the activities of associates in order to prevent child labor, abuse and sex exploitation of children and young people, and forced labor or work in degrading conditions.

2.5.4 To provide all participants and associates with independent, safe, and reliable channels of communication to receive information, suggestions, queries, criticisms and complaints, including procedures to ensure effectiveness in the receipt, retention and treatment of complaints; confidentiality; non-retaliation to complainants; and timeliness in responses to complaints.

2.5.5 To provide institutional guarantees of protection to the confidentiality of the participants involved in complaints to preserve rights and protect the neutrality of decisions; notwithstanding, in the case of the complainant, the confidentiality will be mandatorily required.

2.5.6 To provide guarantees to the members of the Ethics Committee working in all steps of retention and treatment of complaints, in order to preserve their institutional independence and neutrality of decisions.
3.1 Duties of the participants in their functions:

3.1.1 Abide by the guidelines and rules, whether internal or external, especially on combatting corruption, frauds, formation of cartels, permanently looking after the image, reputation and integrity of INB.

3.1.2 Perform their job with precision and on time, adhering to established technical and professional principles. Whenever they feel unprepared to perform any particular task that has been assigned to them, participants should seek orientation from their immediate supervisors.

3.1.3 Perform activities in an impartial manner, not using one’s position or function to obtain benefits or advantages for oneself or third parties.

3.1.4 Be polite, act with urbanity and make oneself available for work with colleagues, associates and the public in general, and abstain from prejudiced behavior with respect to race, color, origin, gender, religion, and other forms of discrimination.

3.1.5 Respond to associates on actions in progress in INB, not keeping them waiting for a solution. When the matter is not within one’s competence or responsibility, refer it to the immediate supervisor or the employee accredited by the Company as authorized representative for commercial contracts.

3.1.6 Refuse to provide services, whether or not paid, to suppliers of INB, consulting with the immediate supervisor as regards any conflicts of interest in one’s activity even in the situation where the employee is on leave, leave without pay, or on furlough or terminal leave.

3.1.7 Communicate with one’s former management-level supervisor at INB, if as an employee loaned to another company, identify any conflicts of interest in the activity developed at the borrowing institution, vis-à-vis those of INB. Similarly, abstain from discussing matters that pertain to the interests of INB, even after one’s period of return.

3.1.8 Abstain from engaging in any acts of harassment, or from exposing any persons to humiliating, vexatious or embarrassing situations by written, verbal or physical conduct to humiliate, coerce, threaten or belittle the image and reputation of people.

3.1.9 Abstain from making or spreading, in any internal or external virtual environment offensive remarks or slanders that demean the image of INB or the honor of its participants.

3.1.10 Oppose any type of pressure or harassment aimed at obtaining improper advantages by reporting it to one’s hierarchical superior or the appropriate management level.

3.1.11 Report immediately to the management-level supervisor and the appropriate officer any act or fact that may represent a threat to the integrity of the worker, company or the environment.

3.1.12 Avoid engaging in any professional behavior detrimental to the work environment and making demeaning remarks on other participants’ reputation and INB; instead, use the appropriate channels for constructive manifestations in a grounded manner.

3.1.13 Use the material resources provided by the company only for the institutional exercise of one’s functions, abstaining from using them to one’s own benefit or for the benefit of any third party.

3.1.14 Respect the intellectual property, protect and preserve the property and assets of the company, and do not disclose its proprietary information, even after leaving the company.

3.1.15 Obtain prior approval from the directorate where you are employed before disclosing internal information on an institutional basis, passing on documents to third parties, conducting lectures or publishing articles that include matters relating to INB.

3.1.16 Refrain from accepting gifts, freebies or invitations of an individual nature from clients, suppliers and service providers, except token gifts of a value equal to or lower than R$100.00. Gifts of a significant value which for any reason cannot be practically returned, are to be transferred to the property of INB or officially donated to social or public entities, and recorded in the gifts register.

3.1.17 While carrying out private, extracompany activities, abstain from engaging in actions or behavior prejudicial to, or conflicting with the interest of INB, or from using the corporate name, mark and symbols without authorization. If a conflict of interest is found to exist, the participants will be subject to the penalties under the applicable legislation, in addition to those specified in this Code of Ethics, Conduct and Integrity.

3.1.18 Abstain from engaging in trading or any activity of a partisan, political or religious nature within the premises of INB.
3.1.19 Abstain from keeping under one’s direct or indirect supervision a companion or relative by consanguinity or affinity, in direct or collateral line up to the third degree; also abstain from making nepotistic cross-appointments at INB.

3.1.20 Refrain from engaging or condoning any acts of fraud, corruption and misconduct, including those liable to influence the action of third parties in obtaining improper advantages; instead, report any such acts to the appropriate officer.

3.1.21 Report to the Ethics Committee of INB the occurrence of any facts capable of characterizing infringements of the provisions of this Code, or liable to jeopardize the image, ethical environment, reputation or property of INB.

3.1.22 Preferably, get other participants to be present while work meetings are held with any external interlocutors.

3.2 Duties of holders of positions of trust, in addition to those established under item 3.1:

3.2.1 Ensure compliance with rules, procedures, and technical or professional directives.

3.2.2 Guide your staff by providing suitable working conditions and ensuring that all understand that the conduct of their activities should not affect the commitment to integrity.

3.2.3 Maintain discipline and order in the work environment, taking any immediate corrective measures to tackle any problem.

3.2.4 Ensure that the hazards inherent in the activities are identified, and adopt measures intended to prevent resulting problems.

3.2.5 Support actions oriented toward the exercise of citizenship for local, regional and national development.

3.3. Sanctions

3.3.1 Non-compliance with the provisions of this code will give rise to the application of censorship following an Ethical Misconduct Investigation on the basis of a full adversarial proceeding, without prejudice to other measures as INB’s Ethics Committee deems fit, such as:

3.3.1.1 Recommendation to the President of INB for removal from position of trust in the Company’s organic structure.

3.3.1.2 Recommendation against promotion or advancement for a period of two (2) years, counted from effective date of penalty.

3.3.1.3 Reporting the names of the censored participants for entry on the Public Ethics Committee’s data bank (CEP) accessible for query by any agencies or entities of the Federal Public Administration in cases of appointed positions or highly important public offices.

3.3.2 INB’s Ethics Committee will maintain a data bank on the sanctions applied over the past three (3) years, for use in the process of clearing appointees for positions of trust.

3.3.3 Whenever the violation of the Ethical Principles or the Code of Conduct also infringes on matters of another nature in the criminal, civil, administrative or disciplinary fields, the Ethics Committee will refer a copy of the case documents to the competent authorities for fact checking, without prejudice to the adoption of other measures of their competence.

3.4. Ethics Management

3.4.1 Ethics Management at INB is conducted by the Company’s Ethics Committee on the basis of the provisions of the applicable legislation, especially the Internal Rules of the Ethics Committee;
3.4.2 INB’s Ethics Committee, designated by the President, is responsible for supervising the compliance of the Code of Ethics and for deciding on matters where the Rules are silent.

3.4.3 The Ethics Committee may draw upon the assistance of various staff groups in the Company as may be necessary to perform its duties, including the provision of information and resources as required to cope with requests.

3.4.4 INB’s Ethics Committee is in charge of updating and enforcing the Code of Ethics, Conduct and Integrity, provided that updates are submitted to INB’s Executive Board for review and the Board of Directors for approval.

4.1 The Code of Ethics, Conduct and Integrity will be an integral part of the Employment Contracts to be entered into by all participants.

4.2 The Statement of Commitment to the Code of Ethics, Conduct and Integrity will be presented to the participants and associates, for them to read and acknowledge familiarity with it.

4.3 INB expects the same ethical conduct on the part of its associates. To this effect, the Code of Ethics, Conduct and Integrity will be part of internship employment agreements and other agreements with suppliers, service providers, and partners.

4.4 Assisting or working for INB’s Ethics Committee is considered to be a high-value service provided to INB, being acknowledged in the service records of the relevant employees, who will be provided with suitable working conditions to enable them to fulfill their terms of service without sustaining any injury or damage.

4.5 For any clarification, suggestions, comments or complaints, anyone may contact the Ethics Committee or use the dedicated complaints channel. Total confidentiality and institutional protection will be ensured against any attempted retaliation or threats to those using such channel. Reports of infringements of the principles or conduct commitments will be considered by the proper committee.

4.6 At least once a year INB’s management will provide periodical training for the participants on the Code of Ethics, Conduct and Integrity; and on risk management policy for the company’s managerial staff.