



inapa

CODE OF CONDUCT

MAKING BUSINESS WITH INTEGRITY

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01

MESSAGE FROM THE CEO

Conducting business in a strictly ethical manner is a key cornerstone of Inapa culture.

Our Business Conduct is the core of our culture, founded on our shared values that are as relevant today as when Inapa was founded in 1965. The Code of Conduct sets the principles that guide our business practises and oversees our behaviour.

We are nowadays an international Group, operating in different countries and jurisdictions. We recognize that there are differences between regions and countries, which change over time, but our aim is to ensure that all behave ethically, as one Group, in any part of the world, independently of their position.

The principles of our Code of Conduct emphasizes the role that each of us plays in building trust, protecting and enhancing INAPA's reputation for integrity. We build trust by treating others with honesty, respect, transparency and accordingly to the regulations of our businesses sectors and society. Acting with integrity is about each of us knowing that we are doing the right thing. We must continue to demonstrate these values in all our interactions, every day.

The Code of Conduct lies at the heart of our success. By behaving with high ethical standards, we create a positive and collaborative atmosphere. How we do business is never a short-term goal, but should rather contribute to our long-term sustainability.

Please take time to read and understand the Code of Conduct, to ensure that you and your fellow colleagues do business according to it.

With your contribution, I am confident that Inapa will continue to be known for its ethical leadership – a company where employees are proud to work, with which customers, suppliers, business partners and other stakeholders want to do business and that actively contributes to a better society and environment.

Thank you

Diogo Rezende
CEO



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THE CODE

WHAT IS THE CODE?

Our Code of Conduct (Code) is a statement of our commitment to do the right thing and be a trustful partner. It is a tool to support your decisions and acts through ethical situations you may encounter on the job.

The Code defines what the Group expects of its businesses and people and provides information to help each of us to act with integrity and in compliance with laws and regulations of our operation. As it cannot cover every possible situation, INAPA relies on you to use good judgment and speak up when you have questions.

WHO SHOULD FOLLOW IT?

The Code applies to all employees, managers and members of the Board of INAPA (includes the holding and all the group affiliates).



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PRINCIPLES OF BUSINESS CONDUCT

INAPA's success is based on being the partner that creates value to the customers, suppliers and other stakeholders. INAPA's principles of business conduct define the way we do business. The principles are:

- **Integrity:** Act consistently with absolute honesty and high ethical standards.
- **Respect:** Treat customers, suppliers, employees and others with courtesy, tolerance, loyalty and fairness.
- **Transparency:** Lack of hidden agendas or conditions, making sure that commitments are respected, reasonable information is provided to enhance collaboration with stakeholders and there is accountability for the actions.
- **Compliance:** Ensure that business decisions or actions comply with applicable laws, regulations and sector best practices.

INTEGRITY

Integrity is a fundamental value that should be a pillar of the actions of all employees. Your daily actions should adhere to high ethical standards and act consistently based on strong moral principles. You should be honest, not just with what you say, but also on the way you act (if you say you care, your actions should also reflect that).

RESPECT

You should treat with esteem, consideration, dignity and tolerance all people, regardless of race ancestry, place of origin, skin color, ethnic origin, citizenship, religion, gender, age or disability. You should promote a positive **atmosphere, where different ideas and opinions are respected and listened at all levels, always being constructive.**

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PRINCIPLES OF BUSINESS CONDUCT

TRANSPARENCY

You should communicate openly, sharing the information in the most clear and complete way. Transparency embodies honest and open communication. To be transparent you might need to share information when it is uncomfortable to do so (like poor performance, potential risks, any misconduct or problems). You should proactively promote an environment that makes it easier for others to speak up.

COMPLIANCE

Your business actions should follow the guidelines of INAPA, the regulations of the sector, the law and the Code. You should be familiar with the rules, asking for advice when needed, and assisting your colleagues.

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YOUR RESPONSABILITIES AND WHAT TO DO

ALL EMPLOYEES

- **Follow the policy:** read, understand and follow the Code.
- **Use good judgment:** make decisions and act in a consistent manner with INAPA values and the Code.
- **Ask questions:** raise questions and concerns if you become aware of possible violations to the Code, laws or regulations.
- **Stay informed:** Taking part in training courses that Inapa offers on important topics like safety, compliance, sustainability or anti-corruption.
- **Speak-up:** if you have knowledge of a possible violation you must report it and co-operate fully when responding to an investigation or audit.

MANAGERS AT ALL LEVELS HAVE THE ADDITIONAL DUTIES TO:

- **Explain:** Help team members to understand the Code and its expectations.
- **Role model:** On your decisions and actions be an example on the application of the Code (lead by example), on its enforcement and on motivating and supporting others.
- **Inclusive atmosphere:** Create and promote an environment that is respectful, open and transparent, encouraging to speak up.
- **Hear and act:** Listen and respond to any raised concern.

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YOUR RESPONSABILITIES AND WHAT TO DO

SEEK GUIDANCE

The Code provides guidance but it does not provide definitive answers to all questions. Operating in many countries, as the Group does, means that sometimes you may arrive to a difference between an applicable legal requirement and the Code. If you have questions regarding any of the content discussed in this Code or if you are in doubt about the best course of action in a particular situation, please seek guidance with your supervisor, the local Board members or with the Group Ethics Officer. They are supposed to be available to listen to your concerns and suggest approaches for resolving ethical issues you may face on the job.

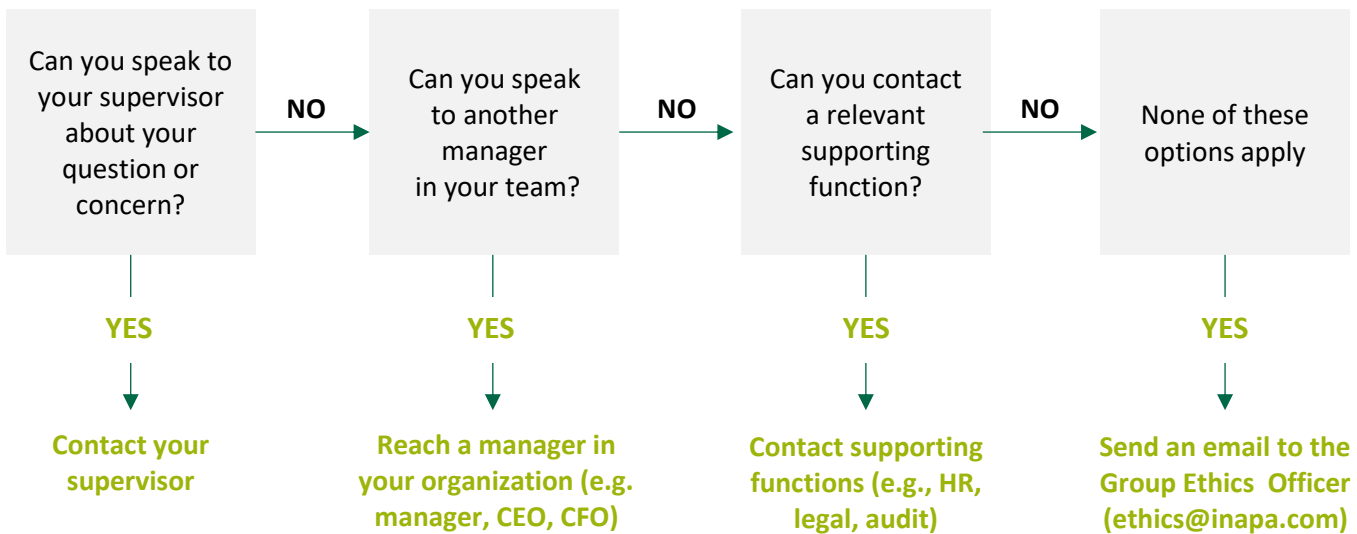
Whenever a supervisor is approached with a possible violation, he/she should listen carefully and give the employee the complete attention, asking for clarification whenever is needed. Answer any question if possible, but should not feel that an immediate response must be given (seek help if needed).

SPEAK UP OR REPORT VIOLATION

Each of us has a responsibility to speak up if we see something unethical or potentially harmful.

If you know a violation of INAPA’s Code of Conduct, you are required to notify it. Failure to do so may result in disciplinary action. All reported violations will be treated as confidential and, if requested, anonymous.

How can you speak up or report a violation:



The supervisors, managers or the Group Ethics Officer will analyze the possible violation and will suggest the best course of action to investigate it. They will also be responsible for keeping the process confidential and inform about the progress of such investigation and its conclusions.

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YOUR RESPONSABILITIES AND WHAT TO DO

NO RETALIATION

INAPA values the help of employees who identify potential problems that need to be addressed. Anyone who reports a violation will be treated with dignity and respect and will not be subjected to any form of discipline or retaliation for reporting truthfully and in good faith.

Any acts of retaliation (threats, intimidation, exclusion, humiliation and raising issues maliciously or in bad faith) are considered a misconduct and a violation of the Code and will not be tolerated.

MAKING UNTRUE/FALSE ACCUSATIONS

INAPA will protect any employees who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation. Honest reporting does not mean you have to be right when you raise a concern, you just have to believe that the information you provide is accurate.

All employees must be committed to ensure the integrity i) to colleagues, ii) in INAPA, iii) with business partners and iv) towards the community.



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CONDUCT TO COLLEAGUES

RESPECT FOR FELLOWS

All employees should feel respected with one another, promoting a collaborative atmosphere. Pro-actively show colleagues your respect and tolerance. Do not engage in any conduct that could be considered disrespectful, discriminatory, intimidating, aggressive, violent or harassing. Harassment can be verbal, visual or physical in nature.

If you believe you've been bullied or harassed by anyone at INAPA, we strongly encourage you to immediately report the incident to your supervisor or Human Resources (in case it exists) or both. A promptly and thorough investigation should take place in order to assess the facts and decide on appropriate action.

FAIRNESS

Fairness is treating others in the same fashion that you would want to be treated. It requires impartiality, intellectual honesty and disclosure of any material conflicts of interest. It involves a subordination of one's own feelings, prejudices and desires so as to achieve a proper balance of conflicting interests.

We strive for a positive workplace where all are recognized and rewarded for their efforts and contributions. If you recruit or manage other, then your decisions on recruiting, compensation, benefits and promotions matters have to be based on individual's performance, skills and company needs. Do not make these decisions based on gender, race, ethnicity, religion, age, medical condition or pregnancy.

DIVERSITY AND INCLUSION

All sorts of unlawful discrimination or harassment on the basis of race, color, religion, nation of origin, ancestry, pregnancy status, sex, age, marital status, mental or physical disability, medical condition, sexual orientation, are strictly prohibited.

Employment is based solely upon individual merit and qualifications directly related to professional competence. INAPA provides equal employment opportunities, so all applicants or employees need to be treated without bias or any form of discrimination.

When developing international business relations, all should pay particular attention to respect country cultures, laws and the Code.

HEALTH AND SAFETY

INAPA believes that the well-being and safety of the employees is essential to success. So, it strives to foster the physical and psychological well-being of our employees sustainably. The promotion of committed employees, as well as fewer illnesses and a lower accident rate is as a key element of sustained productivity and the quality of service.

Having all employees informed about the strategy of Inapa group and its company and keeping a good balance between professional and personal life are important factors for the success of the business.

Following safety instructions is absolutely mandatory for all.

INAPA will not tolerate any level of violence or the threat of violence in the workplace.

HUMAN AND LABOUR RIGHTS

INAPA is committed to support and respect the human rights, ensuring that no violations are being performed on its operations or with stakeholders with whom has business relations, following the Universal Declaration of Human Rights and international conventions and treaties.

INAPA undertakes i) not to employ child or forced labour and condemn such practices by third parties, ii) to respect freedom of trade union association, iii) to respect all local legislation, namely in safety and hygiene, iv) to guarantee good working conditions and v) foster a fair compensation and training of its employees.

All employees undertake to work under INAPA's commitments in human and labour rights.

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CONDUCT IN INAPA

SPENDING MONEY

All employees have to use money wisely. When you submit an expense for reimbursement or spend money on INAPA's behalf, make sure that the cost is reasonable, directly related to INAPA's business, supported by appropriate documentation (recording the business purpose) and within the guidelines of your organization.

Whenever you are uncertain if you should spend money or submit an expense for reimbursement, check with your supervisor. All supervisors are responsible for all money spent and expenses incurred by their direct reports and should carefully review the expenses before approval.

All expense reimbursement must be approved by the supervisor of the person that has submitted the reimbursement. No person at INAPA (employees, managers and board members) can approve its own expense reimbursement.

PROTECTING COMPANY ASSETS

All employees must restrain to use INAPA assets for their personal benefit or the benefit of anyone other than INAPA. They should also act in a way that promotes that the value of those assets is preserved.

All electronic information on INAPA equipment and Inapa email accounts are considered an asset of the company and INAPA may access or analyze them in compliance with the principles, rights and individual guarantees established by the law or applicable regulations.

Theft or misuse of INAPA assets could lead to sanctions, according to internal rules and regulations and specific local regulations. INAPA treats workplace theft of assets belonging to other employees in an equivalent way it treats theft of Company assets. Potential risks for the company should also be shared to evaluate them.

Any use of INAPA assets outside your responsibilities requires prior written approval from the local management.

Examples of company assets: computer systems and software; telephones and other wireless communication devices; photocopiers; vehicles; stocks; working hours; the result of any work done at INAPA; proprietary information; INAPA trademarks.

RECORDS AND CONTRACT MANAGEMENT

Each person should ensure the accuracy of INAPA business and financial records that is aware of within the framework of his work. Accurate recordkeeping and reporting reflects the reputation and the credibility of INAPA. These include not only financial accounts, but other records such as non-financial reports (like quality or environment), sale/activity reports, time records, expense records and submissions such as claim forms and any personal information that has been provided to the company. This applies to all employees, not just accounting, finance or personnel.

Employees must strive to be accurate when preparing any information, but honest mistakes occasionally will happen, so people are encouraged to report them as soon as possible. Only intentional efforts to misrepresent any transaction, falsify any business record are Code violations.

Examples of bad conduct:

- *Two employees on a business trip eat dinner and one pays for the meal and is reimbursed by INAPA for the expense. The other, takes a duplicate receipt and submits an expense report. The second employee has a bad conduct as submits a false expense report.*
- *Someone sees that is not meeting his targets for the month and to make up the difference, makes an invoice, which will be credited next month.*

TRADEMARKS AND COPYRIGHTS

INAPA name and any name of its affiliates, logos or names of products and services (trademarks) collectively create its identity. Before publicly using any of its trademarks, you should consult the “Inapa Brand Manual” and the group’s communication department (through the email group.communication@inapa.com) on how names and logos can be used and presented.

All marketing and advertising materials have to be true and honest on their messages, providing a transparent and informed reality. Any misleading, unworthy or abusive materials should be rejected.

Private or external internet postings may not include INAPA’s logos or any of its trademarks.

Employees cannot use or copy software, music, videos or other copyright-protected content at work. No unauthorized copies can be used or stored in INAPA equipment.

CONFIDENTIAL INFORMATION

Confidentiality means ensuring that information is accessible only to those authorized to have access to it. All database are property of INAPA, its record should be preserved and its access protected. As a principle, non-public information (including financial figures, sales or purchase information or internal records) should be treated as confidential.

The treatment of the information should follow the local data protection and privacy laws or regulations. Additionally, all information that is under judicial restrictions cannot be used or disclosed.

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CONDUCT IN INAPA

Examples of confidential information:

- *Our relationship of trust with the client is key for our business, so any sensitive information in the system, namely client records, should remain confidential and not to be used for any other purposes other than the normal business relationship.*
- *All data related with employee information, including their employment history, compensation, health information, or performance and disciplinary matters.*
- *Example of bad conduct:*
- *I export a sales database from the system that will be used outside INAPA.*

INSIDER TRADING

Trading in stocks or securities based on material nonpublic information, or providing any material nonpublic information to others so that they may trade, is illegal and may result in prosecution.

Example of bad conduct:

- *I have learned that INAPA is considering the acquisition of a company and I trade (buy or sell) any stock of the group, target or other player in the industry.*

BEHAVIORAL CONDUCT

All employees during their work represent INAPA, so their behavior and actions should reflect it. They must follow the laws and regulations during their work, ensuring they have all the necessary permits to exercise their job. They must restrain from the consumption of illegal substance or the abuse of alcohol during their work. Any behavioral misconduct may result in an internal disciplinary proceedings, whenever the employee is during work hours, representing INAPA or using its assets.

They should also refrain from using social media during work time, unless it is work related as authorized by the relevant policy.



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CONDUCT WITH BUSINESS PARTNERS

SUPPLIERS AND SERVICE PROVIDERS

The relationship with suppliers is a key strategic strength of INAPA and needs to be preserved and nurtured. All suppliers must be treated fairly, ensuring an equal treatment under similar circumstances, acting with loyalty, respect and ensuring the commitments that have been agreed are met.

No special privileges or favoritism should be granted, as we should respect the principle of equality when dealing with several suppliers or service providers. All employees should act with loyalty, ensuring impartiality, with no hidden agendas or avoiding any potential conflict of interest. It is also expected the same type of behavior from suppliers or service providers.

All employees should provide the adequate information to suppliers or service providers, ensuring a good communication channels and that any provided sensible information is kept confidential. Whenever adequate, employees shall disclose the criteria that has determined the choice of each supplier.

No employee or manager should participate in a business decision related to a company where he/she may have a direct or indirect financial interest.

When necessary, INAPA can demand from its employees in the area of supplier or service relationships a statement confirming the absence of any personal or property interests.

INAPA is committed in promoting a better environment and should take this into account on its business processes. They should welcome and proactively foster products and initiatives that are environmental responsible.

07

CONDUCT WITH BUSINESS PARTNERS

Example of bad conduct:

- An employee gives access to more information to one candidate provider that has requested more information, without sharing it with others. The best course of action is whenever it makes sense to provide more information, such information should be proactively shared with the remaining candidates.

CUSTOMERS

INAPA has the mission to “be the partner that creates value to the business of our customers”. To create sustained value, all employees need to be customer focused, providing the best products for the needs of the customer combined with an excellent service.

In order to generate value, employees need to demonstrate integrity, providing relevant, truthful, accessible and accurate information suited to the client needs and respond to requests, queries or complaints within a reasonable time. They should also focus on continuously improve performance and quality of its products and services, simplifying and optimizing processes and searching for the best products and services for our customers.

When necessary, INAPA can demand from its employees in the area of customer relationships a statement confirming the absence of any personal or property interests.

All employees should ensure that all commitments with customers are respected, avoiding any delays, product disconformities or deficient quality of service.

GOVERNMENTS

The nature of the business often requires the interaction with government officials. Transactions with governments are covered by special rules and are not the same as conducting business with private entities.

All bribes are strictly prohibited. As a general rule, do not offer anything to an agent of public service in return for favorable treatment.

Anything of value means anything that might have value to someone, including inexpensive meals, small gifts (even T-shirts), entertainment, vouchers, business opportunities or offers of employment. Any amount of cash could be construed as a bribe.

Governments often place special bidding, pricing disclosure and certification requirements on companies with which they do business. Consult these requirements with the company legal counsel before bidding for government business to be certain that you fully understand these rules.

CONDUCT WITH BUSINESS PARTNERS

SHAREHOLDERS

INAPA and its affiliates are focused on the creation of sustained value in a long-term perspective, based on its commitments to excellence and integrity. Only Inapa IPG Board members, the investor relations and Inapa IPG company secretary are authorized to give company information to the market or shareholders.

GIFTS, MEALS AND ENTERTAINMENT

You should not accept gifts, meals or entertainment, or any other favor, from suppliers, service providers or customers that might compromise, or appear to compromise, your ability to make objective decisions in the best interest of INAPA. Any cash consideration, independently of the amount, cannot be accepted.

Only gifts of modest (like T-shirt or a pen drive with a logo or a small gift basket at festivities period) or symbolic (like trophies inscribed with business relationship) are acceptable. In order to assess if a gift can be considered “modest”, please check your local rules. In case there are no local guidelines, as a rule of thumb, any gift with a value of more than 150€ (or equivalent in your local currency) should not be considered “modest”. All gifts that exceed the rules need to be reported to the board of your organization and Human Resources (in case it exists).

Discounts are only acceptable if offered to a large group of employees as part of an agreement with INAPA.

You cannot accept meals or entertainment in exchange for doing, promise to do, or expected to do anything and should never ask for them from a customer or supplier. For business purposes, you may accept occasionally meals and entertainment if the event is attended by the customer or supplier and the costs involved follow your local rules, but always with previous approval from your supervisor.

If the gift you are being offered exceeds the limits, politely decline and explain the rules. If returning a gift would offend the giver or it is not possible to return it, you should notify the local management, who should donate it to charity or distribute/raffle the item among a large group of employees.

In case you are invited to a premium event or travel, such as Olympics, World Cup or Formula One, consult your supervisor to determine if there is adequate business rationale for your attendance.

Local rules: Each geography will define the maximum threshold for gifts, meals or entertainment. The acceptance of any gift, meal or entertainment that exceeds the limitation must be approved in writing by the CEO/Board (or by the management of Inapa IPG in case of local CEO's).

07

CONDUCT WITH BUSINESS PARTNERS

Examples of bad conduct:

- Tickets to a sport event that are offered by a customer or supplier for personal use without attendance by the customer or supplier. On those situations, only tickets that are offered to large group of INAPA employees as part of an agreement are acceptable.
- An employee that is managing the relationship with a travel agency or hotel chain and gets a discount for personal usage that is not available to other employees.

BRIBERY AND CORRUPTION

The excellence of our services is the key to our business success. All employees must deal with all our customers, suppliers and government agencies in a transparent manner and in compliance with international anti-corruption standards.

It is strictly forbidden to offer or accept bribes or kickbacks in any form and any form of corruption in business dealings is not tolerated.

CONFLICT OF INTEREST

All should act in the best interest of INAPA while working. A conflict of interest arises when your personal activities or relationships interfere, or may appear to interfere, with your ability to act in the best interest of INAPA.

All should refrain from conduct business with family members or others with whom you have a significant personal relationship. You shouldn't use your position at INAPA to obtain any favored treatment for yourself, family or other whom you have a significant personal relationship. This applies to purchases of products, sales, investments, hiring, promoting, selecting contractors or suppliers or any other business relations.

All external professional activity, with or without remuneration, needs to be communicated to the local management or holding (for local managers) and cannot give rise to a conflict of interest with INAPA. No company assets can be used during the exercise of the external professional activity.

In case you may be in situation of a potential conflict of interest, you should disclose it your supervisor and exclude yourself from taking part of the decision process. Use your good judgement, but if you are not sure, talk to your supervisor, human resources or the local management.

Examples of bad conduct:

- Someone is involved in the selection of the best supplier and one of the candidates is a company partially owned by his spouse. The best course of action is either that person is not involved in the selection process or the spouse's company is eliminated from consideration.

COMPETITION AND ANTITRUST

All our business relations should promote a fair market competition, acting in good faith, respecting all anti-trust national and European laws. Practices to refrain competition, like price dumping, are strictly forbidden.

Agreements with competitors, verbal or written, are subject to rigorous scrutiny in all markets. Employees cannot engage in any price, policies, contract terms, marketing plans, inventory levels or costs discussion with competitors, share any information or intention on past, present and future tenders or agree in any sales division (like dividing customers or territories).

It is encouraged to collect, share and use information about our competitors, but this can only be done in a legal and ethical manner. It is acceptable to collect competitive intelligence through public data, ask third parties about our competitors, or accept competitive intelligence offered by a third party, as long as there is no reason to believe that the third party is under contractual or legal obligation not to disclose it or we believe that such information has been gathered in a legal and ethical.

Agreements with resellers or exclusivity agreements can also rise scrutiny, especially in markets with a leading market presence. Resellers should be treated fairly and respecting the principle of equality, avoiding any discrimination practices, and being transparent.

In case you have any a question or doubt, please consult the Legal Team at Inapa holding level or, in case it exists, at your local level.

08

CONDUCT TOWARDS THE COMMUNITY

PROTECTING THE ENVIRONMENT

INAPA operates in a manner that preserves the environment, fostering sustained practices of the operations, the operations of its suppliers and service providers and providing council to the customers. Sustainable management of natural resources and effective protection of the environment are foundations both for sustainable economic growth and for the well-being of both the individual and society.

Operations should adopt measures that protect the environment and respect all local and European environmental legislation, ensuring the lowest possible impact on the environment. Consideration of environmental aspects is understood as integrated element in daily work of all employees.

A comprehensive customer information on all environmental aspects should be promoted, namely the company, the supply chain, the suppliers, or the products, and proactively advice customers on environmentally friendly decision.

It is important not only to introduce the measures, but also to establish goals and internal monitoring procedures that allow to track the performance and train all employees.

08

CONDUCT TOWARDS THE COMMUNITY

COMMUNITY ENGAGEMENT

Operations should comply with applicable laws and regulations and foster practices that can benefit the communities where we are integrated. INAPA encourages all employees to have an active role on the development of its community, namely nurturing any social initiatives or supporting charitable causes.

Investment decisions should also take into consideration any social effects.

Any charitable donations involving INAPA assets need to be approved at the Board at local level.

PUBLIC COMMUNICATIONS

Company information and its reputation are among its most important assets and you should preserve them.

In any public event you should refrain from disclose information which is not publicly available. In case you wish to present any INAPA undisclosed information you should get the prior approval from Board at local level. In case the members of the Board have any doubts, they must consult the legal team at Inapa holding level.

Press releases, which are not related with marketing campaigns, must get the prior approval from Inapa group communications (group.communication@inapa.com) or an executive member of the Board of Inapa holding before submission. Marketing campaigns should respect the guidelines of the "Inapa Brand Manual".

POLITICAL ACTIVITY

INAPA does not make any political contribution or supports individual candidates or parties. All support from INAPA employees needs to be done at an individual level, refraining to use the name of Inapa or its assets (including work time, equipment or facilities).

In case you hold an elected or appointed public office while working at INAPA, you should excuse yourself from involvement in any decision that might create or appear to create a conflict of interest.