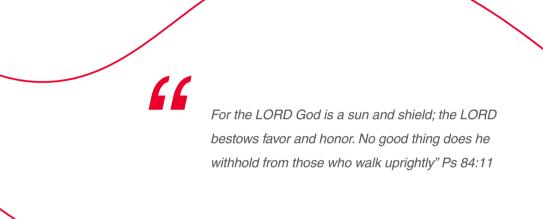


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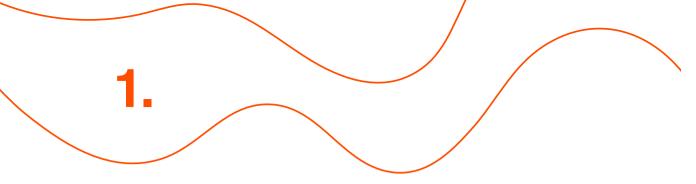
Ethics





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Message from the Management

1.1 Message from Chairman of the Board of Curators

One cannot conceive of an enterprise apart from its ethos, a word of Greek origin that means custom, rite. It is from this concept that an institution's notion of ethics is deduced.

The Code of Ethics of the Mackenzie Presbyterian Institute comes to light, as a result of its long sesquicentennial trajectory. The norms and standards that make up this document were not written to serve, from now on, as guidance to Mackenzie; they are, in fact, the assumptions that have always been present in the Institution and that, now, take on a legislative format.

In Holy Scripture, we are faced with a sui generis Code of Ethics that became known as Sermon on the Mount (Matthew, chapters 5 to 7). This legacy of the Son of God presents us with the way in which his followers must live and live before God and before men, in the exercise of devotion and, equally, in the relationship with others.

The ethics recommended by Mackenzie is present in all its activities and relationships and is guided by its Institutional Identity, established in the framework of its Confessionality. As an educational institution and, recently, also a health institution, Macken-

zie expresses, in its services, the missional duty that was imposed by its founders, to be guided by the Word of God.

All those who are part of the large Mackenzie family, including Maintaining Entity, managers, employees, students, parents, service providers, are aware of the unique nature that marks the differential of this great Institution. Therefore, it is the duty of everyone to cooperate so that Mackenzie's DNA is not only preserved, but also evidenced in all his actions.

Mackenzie does not conduct himself on a proselytizing bias, much less that of privileging people because of his beliefs, but he expects that all who serve on his staff are aware of the assumptions that underlie the life and history of this institution; respecting, within the scope of its actions, values and principles that make Mackenzie what he effectively is.

What is expected in compliance with this Code of Ethics is the formation of a harmonious and respectful environment, aiming at the continuity of the good services provided by Mackenzie to our nation and the world, especially in this period of history; when we lack so much solid institutions, based on durable values, that promote knowledge and progress, good and truth, justice and peace (Isaiah 32.17).

Rev. Juarez Marcondes Filho Chairman of the Board of Curators Mackenzie Presbyterian Institute

1.2 Message from the

CEO

At Mackenzie, what drives our actions is Institutional Identity.

We are a confessional institution and we believe that the Triune God is the reference of all reality, whose Kingdom is manifested in all areas. Thus, we have our Mission, Vision, Principles and Values well defined, embodying eternal purposes. We must, therefore, manifest in the exercise of our actions and decisions, ethical and moral behavior that are shown to be in line with the Holy Scriptures.

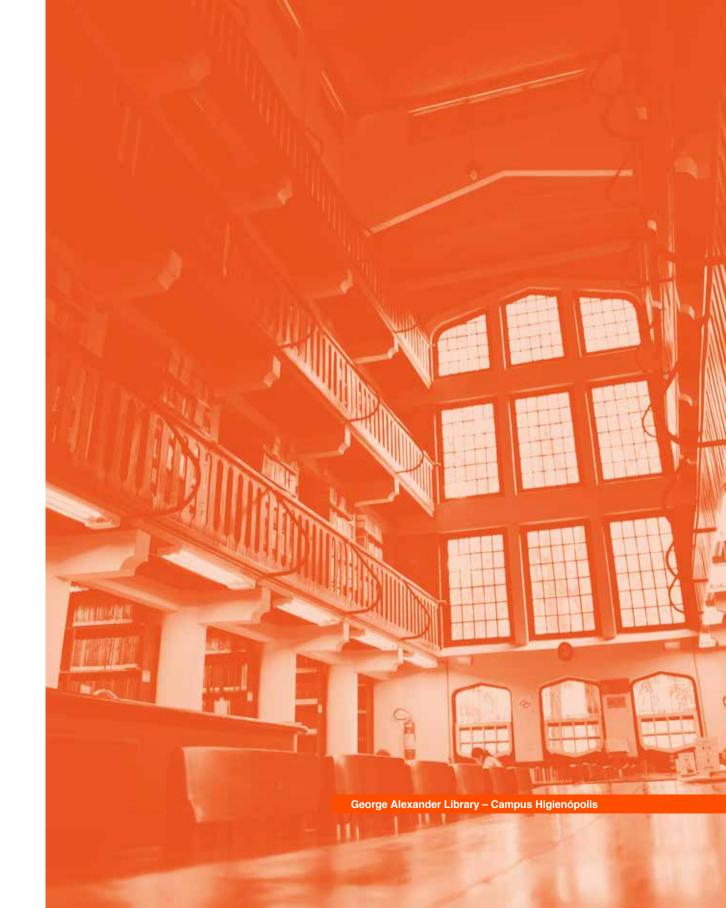
In accordance with these Institutional Values, each Mackenzie employee must act as an example of ethical standards and integrity for our students, patients, partners and for society.

Each Mackenzie employee, regardless of their hierarchical level, must be committed to compliance with laws, rules and internal regulations. In addition, you must behave responsibly, honestly, ethically, transparently and with integrity.

Our Code of Ethics is the responsible execution of our Institutional Identity and the translation of the "Mackenzie spirit" into words, which has made us become a great Teaching and Health Institution. We arrived here only by the grace of our good God.

I thank each employee for their support and for complying with all the guidelines established in this Code of Ethics, so that we continue our journey as one of the most respected institutions in our country!

José Inácio Ramos CEO Mackenzie Presbyterian Institute



2. 3.

Objective

The Mackenzie Code of Ethics idealized and developed for its employees in all its units, its maintained, its associates; and to everyone who somehow interacts in its operations and in its operation has the primary purpose of explaining to its public the Institutional Confessionality of its Lifetime and Maintaining Entity; the PRESBITERIAN CHURCH OF BRAZIL and the principles and values of its founders, which will serve as a parameter for the construction of its rules of coexistence.

Mackenzie also aims to enable its staff of partners and partners to infer the high concept of ethics and morals in its principles and values and from there to sculpt and improve the quality of its interpersonal relationship in the performance of its functions.

What is a Code of Ethics

A Code is a collection or body of laws, rules or principles, organized by themes, identified by titles and arranged methodically, in order to facilitate its understanding and application.

The word "ethics", in turn, is related to precepts about behaviors and decisions and is inseparable from the reference to the notion of right and wrong, just and unfair, good and bad, with virtue or vice. As a general rule, there is no human activity totally alien to the premises of ethics, whether in the sense of adopting or rejecting them.

Therefore, a code of ethics is, by its very nature, linked to absolutes, whereby attitudes and decisions in its field of application must be evaluated or judged and, thus, considered meritorious or worthy of disapproval.



4.

The Institutional Identity

The Institutional Identity of the Mackenzie Presbyterian Institute (IPM) is made up of Confessionality, Mission, Vision, Principles and Values, expressed below.

4.1 Confessionality

We believe in the Triune God - Father, Son and Holy Spirit - reference to all reality, whose Kingdom is manifested in all areas of knowledge and human existence, as taught in the Holy Bible.

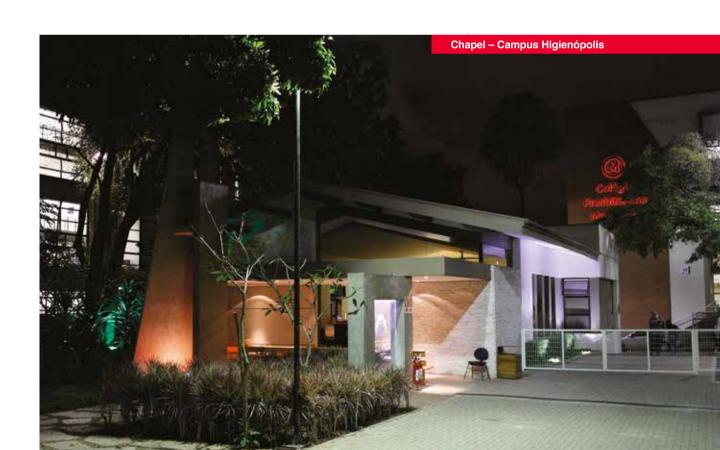
Mackenzie is a reformed Christian confessional, more specifically with a Calvinist orientation. This means that its founders conceived the Institution based on ideas, goals and guidelines consolidated in the Sacred Scriptures, according to the interpretation of the Protestant Reformation.

The Calvinist Christian worldview arrived in Brazil in 1859, with Ashbel Green Simonton, (1833-1867) who in 1867 wrote: "The Gospel stimulates all the faculties of man and leads him to make the greatest efforts in the path of progress. If that doesn't happen between us, it will be our fault. If the new generation is not superior to the current

one, we will not have fulfilled our duty". Aligned in that same foundation and vision, George Whitehill Chamberlain (1839-1902) and his wife Mary Annesley Chamberlain founded Mackenzie in 1870. In the words of the founder, George W. Chamberlain, the newly established school should teach: "Evangelical education, along the lines of the most sacred principles of Christian and Protestant morals; and, within this concept, every element of religious propaganda in the school will be excluded and its function will be limited to the question of ethical morality, based on the teaching of Christ". In other words, from the teaching of Christ the principles of institutional ethics must come, to guide the standard of conduct of all Mackenzie employees, of their retained employees; whether permanent, temporary, suppliers, customers and other interested parties, regardless of the position held or the function performed.

It is necessary that each one, when making any type of commitment to the Mackenzie, be fully aware of the relevance of this legacy, of which we are heirs and formally commit to its principles and values to pass them on to the next generations.

In order for each employee to be clear about their own role in fulfilling this MISSION and to focus on Mackenzie's Institutional VISION, it is essential to clarify the meaning of the expressions that make up this Code of Ethics.



4.2 Mission

Educate and care for the human being, created in the image and likeness of God, for the full exercise of citizenship, in an environment of reformed Christian faith.

According to Noah Webster "education involves the whole range of instruction and disciplines that aims to enlighten understanding, correct temperament and shape the ways and habits of young people, preparing them to be useful in their present and future lives". This conception of education brings in its context, the perception of the human being as admirably complex, however incomplete, having the need for his intellectual, moral and spiritual faculties to be illuminated; that their behavior is directed and that their manners and habits are formed, so that the student will be able to fully exercise their human potential.

Education for citizenship involves the transmission of content and information, but also the qualification for independent research and training for the exercise and defense of duties, as well as the rights of life in society. It is important to emphasize that a society of free human beings presupposes a wide intellectual, moral and spiritual capacity of each one, since it is not possible for a free and ignorant people to coexist.

"

...everything that is true, everything that is respectable, everything that is fair, everything that is pure, everything that is kind, everything that is of good reputation; if there is any virtue and if there is any praise, that is what occupies your thinking". Philippians 4:8

Likewise, the social, economic and political development of a society is not feasible, disregarding the observance of elementary ethical principles. The full exercise of citizenship requires the ability to act with freedom and responsibility.

However, an environment of reformed Christian faith cannot be conceived without self-discipline and self-government being an integral part of the conduct of employees in all units of Mackenzie.

The application of Mackenzie's Institutional MISSION concepts in the reformed Christian faith environment presupposes the continuous exercise of loyalty, mutual respect, understanding, honesty and humility, precisely as expressed in its set of values.

4.3 Vision

To be recognized by society as a Confessional, Presbyterian and philanthropic institution, dedicated to the divine and human sciences, committed to socioenvironmental responsibility, in a continuous search for academic excellence, care and management.

Mackenzie as an educational and hospital institution of a confessional character and makes an invaluable contribution to the educational, assistance and health system in Brazil, since its purpose is within the scope of mission and service to others.



"... walk in a manner worthy of the vocation to which you have been called, with all humility and gentleness, with patience, accepting one another in love". Ephesians 4:1-2

Excellence as an institutional vision, in turn, is related to overcoming, the ability to exceed, being above what is expected. To be excellent is to have highly praiseworthy and meritorious qualities. It is not possible to understand and seek excellence by spending the least effort or comparing it with undue and inappropriate criteria. Convenience and inertia can irremediably lead to stagnation and ruin.

Mackenzie's expectation is that each employee in his units will have the full notion that he is undergoing successive improvement; applying to continuous self-training, taking advantage of the opportunities that the institution itself provides, with a view to reaching higher and higher levels of functional, academic and management excellence.

4.4 Principles and Values

Mackenzie accentuates its Institutional Principles and Values at a high level, since they are fundamental for the implementation of its purposes and, therefore, they must be ostensibly known among its collaborators and partners in all its units, which go on consigned below.

In personal conduct: (act with) dignity, (order), character, integrity and Mackenzie spirit;

In the exercise of professional activity: (posture) ethics, competence, creativity, discipline, dedication and willingness to volunteer;

In interpersonal relationships: (acting with) loyalty, mutual respect, understanding, honesty and humility;

In the decision-making process: Always encourage the search for consensus, justice, truth, and equal opportunities for all;

In the relationship between collegiate bodies, units and departments: Cooperation, team spirit, professionalism and adequate communication;

In the relationship with other institutions and public agents: Responsibility, independence and transparency;

In society: Participation and provision of services to the community;

And, **in all circumstances**, act with love that is the bond of perfection, for the greatest glory of Jesus Christ.

Among these Principles and Values we highlight some of extreme relevance.

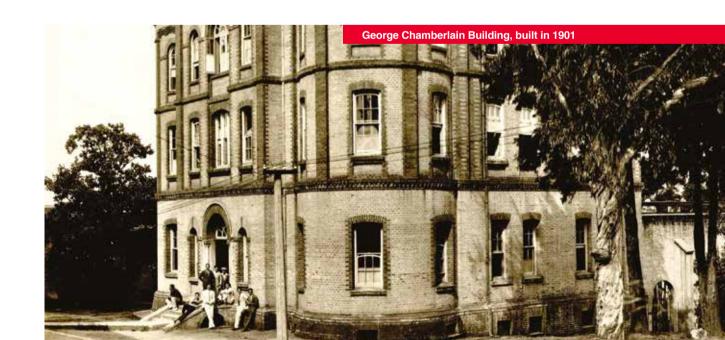
The **Integrity** is an indispensable principle for Mackenzie employees, as it covers not only the totality of the moral character, but also the special reference to justice in mutual transactions and interpersonal relationships.

Numerous Values derive from it: transparency, equity, accountability, loyalty, honesty, corporate responsibility and love of truth..

The **Unity** is a Principle that can be defined as "the state of being one"; agreement, conjunction, agreement or uniformity. Unity is a type of symmetry or style and character. Unity of interests. All Mackenzie employees form a body, acting in unity, around the same purpose, to transform the VISION into reality through the fulfillment of the Institutional MISSION.

No less important, we also quote the principles of the "Order"; "Property"; "Justice"; "Character" that can be read in full in the text of the Code of Ethics on page 30.

The breach of these principles implies serious consequences such as the loss of value and inconsistency between its declaration in this Code of Ethics and its explanation through the values that represent it. All employees of all units are responsible for externalizing Mackenzie's principles and values in their functions and procedures, and it is essential that everyone is aware of the parameters defined in this coded manual.



5.

What Mackenzie expects from its employees

Mackenzie expects from its collaborators and partners a solid convergence of purposes, for the construction of an ethics based on its Confessionality. Aware of their origin, their guiding principles, their mission, their vision, their values, Mackenzie's employees and partners are able to establish high-level professional relationships, always observing the proactive dispositions as ordered below.



"...for this very reason, you, gathering all your diligence, associate virtue with your faith; with virtue, knowledge; with knowledge, self-control; with self-control, perseverance; with perseverance, piety; with piety, fraternity; with fraternity, love." 2 Peter 5:7

5.1 Behavior

· Act in an ethical and transparent manner and with initiatives committed to Sustainability;

- **Preserve** honor, nobility and dignity in the profession, function and student activities, in personal and interpersonal relationships, acting in a spirit of respect, honesty, truthfulness, dignity and good faith;
- **Exercise** the effective practice of Mackenzie's standards and principles of conduct, statutory and regimental rules, which aim at harmonious coexistence among employees of all Mackenzie units, with a view to achieving the common good;
- **Respect** the Institution's guiding principles and values, as well as its confessional principles;
- **Behave** with dignity, integrity, decorum, cooperation, awareness of moral principles, mutual respect and principles of ethics and the reformed Christian faith:
- · Respect all other Employees, Customers and Partners in all aspects;
- · Present yourself in costumes or clothing compatible with decorum;
- · **Properly** use the work uniform, when required in their function; when the use of a uniform is not required, the Employee is expected to use common sense and discretion in his/her clothing, in a manner compatible with the Mackenzie Principles and Values.
- **Observe** disciplinary standards compatible with Mackenzie's purposes, in all activities that bear his name or image, or that are associated with them, while also protecting his material and immaterial heritage, in a manner consistent with his nature;

5.2 In the exercise of the duties of the position

- **Fully** comply with their Employment Contracts, committing themselves to excellence and respecting all aspects mentioned in this Code;
- **Exercise** the tasks entrusted to them with efficiency and competence;

- · **Provide** reliable clarifications and within the established deadlines when responding to requests for information or interpellation, including when they do so to external bodies;
- · Carefully take care and use all of Mackenzie's resources;
- **Economically** use the material entrusted to you and keep the Mackenzie assets and assets you have access to, for the exercise of your duties;
- · **Promote** a culture of care, zeal and protection of Mackenzie's heritage, image and intellectual property;
- **Maintain** the necessary protection and confidentiality regarding all information, physical or digital, in compliance with current legislation, which preserves Mackenzie's security and interests:
- **Exercise** secrecy and privacy the handling of documents and matters of a reserved nature of which they are aware due to their position, function or condition;
- **Communicate** to the higher authority or the relevant institutional channels any irregularities of which you are aware;



5.3 Use of networks and technological tools

· **Use** Mackenzie's computer resources and networks exclusively for institutional purposes;

5.4 Mackenzie representation

• **Only** use the name or symbol of Mackenzie, the Maintaining Entity and its Lifetime Member, with the consent of the competent authority;

5.5 Protection of the university community

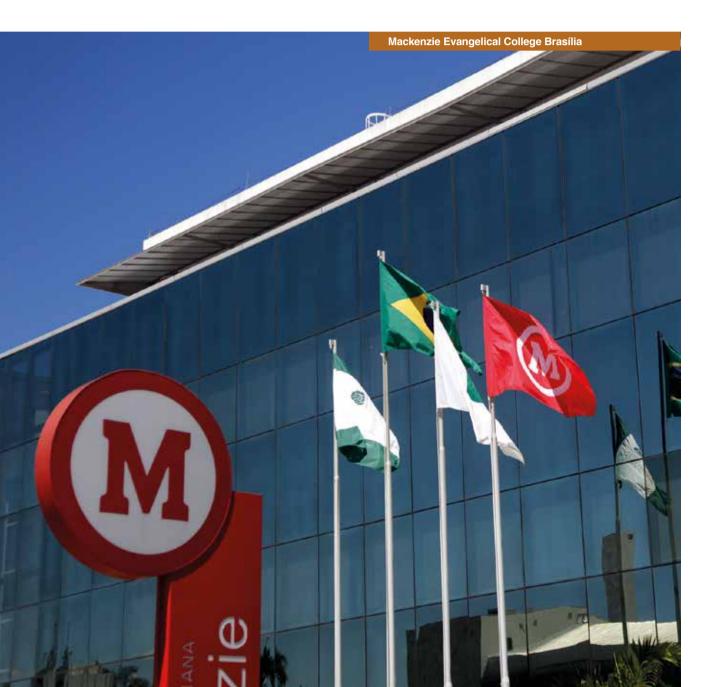
- · Protect Mackenzie's intellectual property;
- Respect intellectual property and copyright, including in relation to third parties;

5.6 Compliance with laws, policies and standards

- · **Comply** with ordinary laws in the relationship with financial institutions and public agents;
- **Comply** with all norms, rules and legislation in force and contribute to the improvement of Mackenzie's internal procedures;
- · **Commit** to preventing and combating all forms of fraud, corruption, money laundering, moral and sexual harassment or discrimination;
- **Observe** the legal, statutory, regimental and regulatory rules in any Mackenzie activities or environments, including regarding deadlines established by academic managers;
- · **Act** with fairness in the rendering of accounts regarding budget execution or funds granted by the Maintaining Entity for specific purposes.

• **Report** any misconduct or violations of the UPM Code of Ethics, UPM Academic Decorum Code and UPM Rules of Procedure to your superior or the Compliance area; conflict of interest, non-compliance with rules, regulations, or any action that puts the Institution's reputation at risk;

In addition, all teaching and technical-administrative employees at Higher Education must fully understand and comply with the Academic Decorum Code (CDA).



6.

Unethical conduct subject to disciplinary sanctions

Unethical conduct, disciplinary infractions and all hypotheses of misconduct may be the object of auster investigation, particularly the events contemplated in the following descriptions.

6.1 Behavior

- **Pratice** embarrassing acts or trying to establish relationships of an invasive nature of the student's or other collaborators' intimacy that are or may be interpreted as sexual harassment;
- **Carry** out manifestations, propaganda or an act of a political party, philosophical, of sexual origin or conduct, to discriminate or stigmatize an individual, disrespecting his privacy;
- **Practice** Practice acts of religious or racial discrimination, incitement, bullying or any type of discriminatory manifestation of any nature, directed at any person and in any situation;

- **Public** and scandalous incontinence, characterized by signs of intoxication or drug addiction, which, due to its habituality, compromises the dignity of the Institution;
- Act in the incitement or promotion of acts of disrespect of any nature, disobedience, disturbance or that, in any way, causes indiscipline or disruption of the good progress of institutional and academic activities:
- · Allow or promote the practice of gambling on Mackenzie's premises;
- · **Consume** alcoholic beverages or use any type of illegal substance that alters your functional capacity or behavioral condition during the day and/or in the work environment;
- **Use** any fraudulent means, or any deception, for their own benefit or that of others, for the purpose of obtaining approval, promotion, or any type of advantage, either for themselves or for third parties;

6.2 In the exercise of the duties of the position

- **Use** privileged, confidential or even information about your position as a Mackenzie Employee, in order to ensure opportunities for personal benefit, from family members or third parties;
- · Reveal secrets of which you are aware due to the position;
- · **Improperly** use the institution's resources placed under his responsibility;
- · **Participate** in external activities that affect your ability to perform your Employee functions;
- · **Have** financial, personal or corporate interests in competitors and suppliers of Mackenzie:
- **Sell** any type of product or service in the workplace or working hours or perform any other activity not related to your professional duties;

6.3 Use of networks and technological tools

- **Use** electronic means to produce, store, send and receive messages in any format, with content that is fraudulent, pornographic, threatening or damaging to morals and ethics, or host offensive, prejudiced, slanderous or obscene pages in the Mackenzie system;
- **Acess** computers, computer programs, data, information, networks or restricted portions of the Mackenzie or third party computer system, without proper authorization;
- · **Use** another user's identification when accessing Mackenzie's computers or the Maintaining Entity;
- · **Take** advantage (the existence) of configuration flaws or security flaws or the knowledge of special passwords to change the computer system;
- Obstruct system performance or interfere with the work of other users;



6.4 Mackenzie representation

- **Disseminate** articles, texts or other forms of public manifestation, identifying themselves as Mackenzie Employees, who are contrary to or violate the Values, Principles and Confessionality of the Institution;
- **Use** the name and symbols of Mackenzie, the Maintaining Entity and its Lifetime Member without express authorization from the competent bodies;
- · **Criticize** and or disqualify Mackenzie's products and services before the internal or external public;

6.5 Protection of the university community

- · Carry out expressions of support for the absence of academic work;
- **Failure** to comply with current regulations on the solidary reception of incoming students, or also the practice of acts of physical violence, abuse and or embarrassment on occasion and due to the solidarity reception of incoming students;

6.6 Non-compliance with laws, policies and standards

- Attempt against administrative probity;
- · Violating or appropriating the assets of people and Mackenzie, including their image;
- **Performing** any act, in theory, defined as a violation of criminal laws, such as slander, injury, defamation, feud, factual, bodily injury, damage to the person or property, contempt and ideological or documentary falsehoods;
- · Carry weapons, explosive substances and/or explosive devices on Mackenzie's premises;
- · Provide or disclose false data about academic or professional life or any other nature;

- **Acting** with fraud in the rendering of accounts related to budget execution or to funds granted by Mackenzie or by development agencies for specific purposes;
- **Use** funds granted by Mackenzie or development agencies for purposes other than those established in the concession act;
- **Practicing** acts against the good order and administration of Mackenzie or that violate norms registered in the Academic Decorum Code (CDA);
- **Keep** under your immediate subordination, in a position or function of trust, spouse, partner or relative up to the third degree;



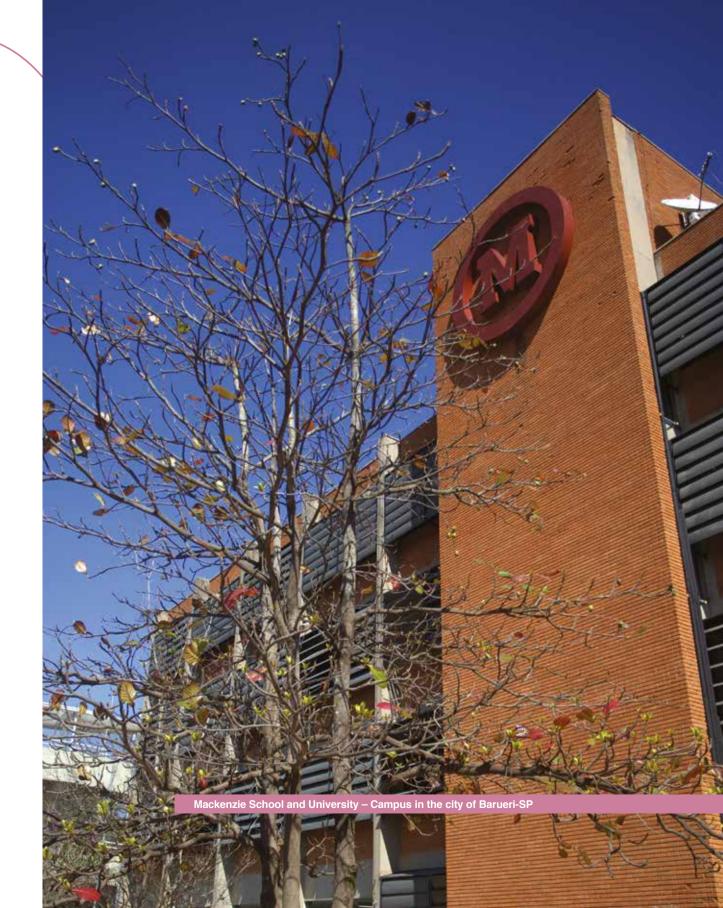
Mackenzie's Normative Command

When determining the elaboration and edition of this Code of Ethics, the Deliberative Council of the Mackenzie Presbyterian Institute expresses its firm commitment to the most noble practices of corporate governance, which, together with its Principles and Institutional Values, will promote greater security and predictability in the interpersonal relationship of its employees.

In this sense, the Code of Ethics comes to fill an immense gap, by becoming a relevant tool for guiding behavior, monitoring and mediation of conflicts. The Code of Ethics, the Code of Academic Decorum and the General Rules of the UPM complement each other and constitute the normative command of IPM, its maintained and its associates.

Evidently, the present Code of Ethics does not intend to exhaust the description of all acts, facts and hypotheses in which they are configured as unethical conduct subject to disciplinary measures, thus confirming the complementarity of the country's legal command, where applicable.

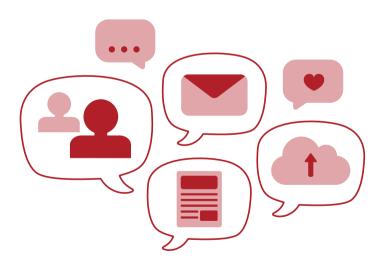
The Internal Regulations of the Code of Ethics are the policy responsible for conducting infringement situations.

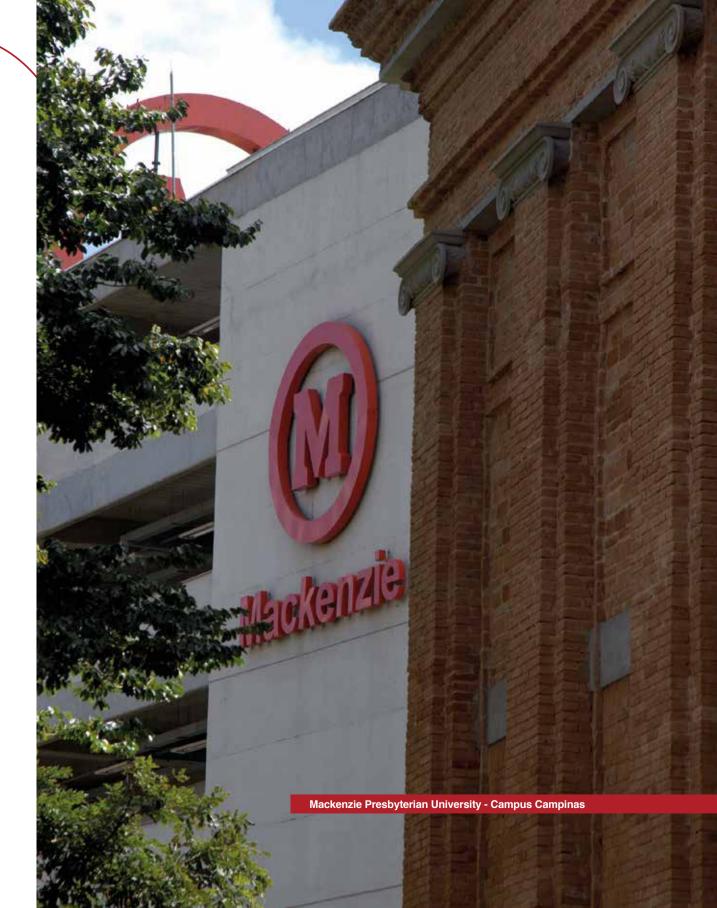


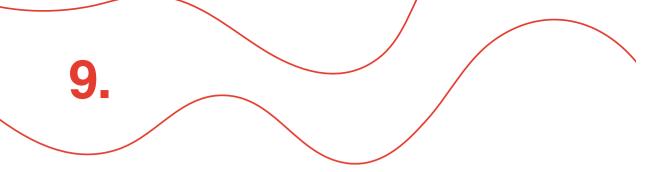
8.

Communication Channels

Confidentiality will be preserved in all procedures, to ensure the privacy of communications and complaints, with a view to preventing the occurrence of any form of intimidation or retaliation against the reporting employee.







Full text of the Code of Ethics

Integral to the Code of Ethics approved by the Deliberative Council on August 22, 2019, according to CI-CD 413/2019 of October 10, 2019.

INTRODUCTION - I. WHAT IS A CODE OF ETHICS - A Code is a collection or body of laws, norms or principles, organized by themes, identified by titles and arranged methodically, in order to facilitate its understanding and application. The word "ethics", in turn, is related to precepts on behavior and decisions and is inseparable from the reference to the notion of right and wrong, just and unjust, good and bad, bearer of virtue or vice. As a general rule, there is no human activity totally alien to the premises of ethics, whether in the sense of adopting or rejecting them. Therefore, a code of ethics is, by its very nature, linked to absolutes, whereby attitudes and decisions in its field of application must be evaluated or judged and, thus, considered meritorious or worthy of disapproval. In the context of contemporary relativism, in which ethics is considered something subjective, of an intimate nature and in which it is often stated that what is ethical for some may not be ethical for others; it is opportune and pertinent to identify and delimit what the values that govern the ethics of a person or an institution emanate from. Christian Ethics, for example, intrinsically derived from the Judeo-Christian worldview, constitutes submission to the principles and values set out in the Holy Scriptures.

II. IPM'S CODE OF ETHICS - The Mackenzie Code of Ethics idealized and developed for its employees in all its units, its maintained companies, its associates and everyone who in any way interacts in its operations; and in its operation, it has the main purpose of explaining to its public the Institutional Confessionality of its Lifelong and Maintaining Entity, the PRESBITERIAN CHURCH OF BRAZIL and the principles and values of its founders, which will serve as a parameter for the construction of its rules of coexistence. One of the main attributes of the Code of Ethics is to institute and disseminate safety factors in an environment of transparency and equity, so that, with clear and previously stipulated rules, it allows inhibiting and eliminating the chances of being founded on ethical misconduct. By undertaking this challenging purpose; Mackenzie also aims to enable its staff and partners to infer the high concept of ethics and morals in its principles and values and, from there, sculpt and improve the quality of its interpersonal relationship in the performance of its functions.

III. GUIDING PRINCIPLES - Mackenzie is a reformed Christian confessional institution, more specifically with a Calvinist orientation. This means that its founders conceived the Institution based on ideas, goals and guidelines consolidated in the Sacred Scriptures, according to the interpretation of the Protestant Reformation and portrayed; mainly, in the Institutes of the Christian Religion, by the theologian, teacher and statesman John Calvin (1509-1564) who transformed Geneva (Europe) in the 16th century; and profoundly influenced politics, science, the arts, education, and all other areas of life, in the centuries that followed. The Calvinist Christian worldview arrived in Brazil in 1859, with Ashbel Green Simonton, (1833-1867) who in 1867 wrote: "The Gospel stimulates all the faculties of man and leads him to make the greatest efforts in the path of progress. If that doesn't happen between us, it will be our fault. If the new generation is not superior to the current one, we will not have fulfilled our duty". In line with this same foundation and vision, George Whitehill Chamberlain (1839-1902) and his wife Mary Annesley Chamberlain founded Mackenzie in 1870. In Chamberlain's words, the newly established school should teach: "Evangelical education, along the lines of the most sacred principles of Christian and Protestant morals; and, within this concept, every element of religious propaganda in the school will be excluded and its function will be limited to the question of ethical morality, based on the teaching of Christ". Knowing the purpose of the founders, we can safely assert that the teaching of Christ must come from the principles of institutional ethics; to guide the standard of conduct of all Mackenzie employees, their employees, whether permanent, temporary, suppliers, customers and other interested parties, regardless

of the position held or the role performed. It is necessary that each one, when making any type of commitment to the Mackenzie, be fully aware of the relevance of this legacy, of which we are heirs and formally commit to its principles and values to pass them on to the next generations. Based on this unity of purposes, we define in our Strategic Planning, the MISSION and VISION, as well as we identify the principles and values of Mackenzie and its Maintaining Entity; the PRESBITERIAN CHURCH OF BRAZIL, which are indispensable to formulate the guiding criteria of this Code of Ethics. In order for each employee to be clear about their own role in fulfilling this MISSION and to focus on Mackenzie's Institutional VISION, it is essential to clarify the meaning of the expressions that make up this Code of Ethics. From the understanding of the ultimate meaning of such concepts, it becomes possible to effectively assimilate the relevance of the Principles and Values that come to govern individual conduct; as well as, what is expected of each of the collaborators in the exercise of their functions and in the institutional context of Mackenzie.

IV. DEFINITION AND APPLICATION OF THE CONCEPTS OUTLINED IN THE INS-TITUTIONAL MISSION - MISSION: Educate and care for the human being, created in the image and likeness of God, for the full exercise of citizenship, in an environment of reformed Christian faith. According to Noah Webster (1758-1843), a renowned North American lexicographer, "education involves the whole series of instruction and disciplines that aims to illuminate understanding; correcting temperament and forming the ways and habits of young people, preparing them to be useful in their present and future lives ". This conception of education brings in its context, the perception of the human being as admirably complex, however incomplete, having the need for his intellectual, moral and spiritual faculties to be illuminated; that their behavior is directed and that their manners and habits are formed, so that the student will be able to fully exercise their human potential. Webster also defines citizenship as "the condition of being clothed with the rights and duties of a citizen". It follows that education for citizenship involves the transmission of content and information, but also the qualification for independent research and training for the exercise and defense of duties, as well as the rights of life in society. It is important to emphasize that a society of free human beings presupposes a wide intellectual, moral and spiritual capacity of each one, since it is not possible for a free and ignorant people to coexist. Likewise, the social, economic and political development of a society is not feasible, disregarding the observance of elementary ethical principles. The full exercise of citizenship requires the ability to act with freedom and responsibility. It is worth noting

that the Calvinist reformers, who inspired the creation of Mackenzie, understood that every child should be educated in a family environment of high intellectual reflection, being instructed in reading from the early years, to be qualified in reading the Sacred Scriptures and the Constitution of your country. High scholarship was seen as essential, as much as material food and physical exercise. Classical education, centered on the liberal arts domain of grammar, logic and rhetoric, was seen as the ideal method for the education of all social classes. In the case of institutional MISSION, it is also essential to characterize what would be an environment of reformed Christian faith. However, an environment of reformed Christian faith cannot be conceived without self-discipline and self-government being an integral part of the conduct of employees in all units of Mackenzie. The application of Mackenzie's Institutional MISSION concepts in the environment of reformed Christian faith presupposes the continuous exercise of loyalty, mutual respect, understanding, honesty and humility, precisely as expressed in its set of values. "everything that is true, everything that is respectable, everything that is just, everything that is pure, everything that is kind; everything that is of good fame, if there is any virtue and if there is any praise, whatever is in your thoughts". (Philippians 4:8)

V. DEFINITION AND APPLICATION OF THE CONCEPTS OUTLINED IN THE INS-TITUTIONAL VIEW: To be recognized by society as a Presbyterian and philanthropic confessional institution, dedicated to the divine and human sciences, committed to socioenvironmental responsibility, in a continuous search for academic excellence, care and management. Mackenzie has the Institutional VISION to be publicly recognized as a Presbyterian confessional institution. Therefore, it is necessary to clarify what is inferred by: confessional; Presbyterian and philanthropic; divine and human sciences; socio-environmental commitment, academic excellence and management excellence. Mackenzie's confessionality stems from the idealization of its founders in 1870 and remains active today, through the missional purpose of its Lifetime Associate, the PRESBITERIAN CHURCH OF BRAZIL. It is through his declaration of faith that Mackenzie solemnly proclaims his confessionality: "We believe in the Triune God - Father, Son and Holy Spirit - reference of all reality, whose kingdom is manifested in all areas of knowledge and human existence, as taught in the Holy Bible".

Therefore, its confessional vocation and Principles are non negotiable values and regardless of the personal convictions of their employees and partners, they must be fully aware of them through the means widely explained in this Code of Ethics. Ma-

ckenzie as an educational and hospital institution of a confessional nature and makes an invaluable contribution to the educational, assistance and health system in Brazil, since its purpose is within the scope of the mission and service to others. The term Presbyterianism consists of a set of government doctrines, principles and discipline. originally developed in Geneva, Switzerland, and later in Scotland, England and other European countries. It reached the North American continent in 1620, with "pilgrims" who sought religious and civil freedom. Presbyterianism was the great promoter of the system of representative government in which the country's constitution should appear above its rulers. A government of laws and not of men - this is the essence of the representative Presbyterian government system. Educational institutions as a means of preparing people to actively participate in the representative system of government, both in the ecclesiastical context and in the context of secular life, flourished in the colonies of North America from the reformed conciliar religious environment. This education for self-discipline and self-government was decisive in the process of independence of that nation, influencing the other republican constitutions after it, including the Brazilian constitutions after 1891. It is worth mentioning that the Presbyterian missionaries who arrived in Brazil after 1859, including the creators of Mackenzie, came from that teeming cultural environment and supported the same political and religious convictions. To have an idea of the disparity between the reality of the two countries, in 1822 (the year of our independence), only 2% of the Brazilian population knew how to read and write, while in the United States there were practically no illiterates. Another relevant component of Mackenzie's Institutional Vision, philanthropy, in turn, is related to goodwill towards human beings. The reason for the existence of a philanthropic institution, as well as the actions developed in its operational field, is not to earn profits and distribute dividends to its members, but to perform incessant service to others, as a noble imperative of authentic Christianity. (Take one another's burdens, and so you will fulfill the law of Christ. Galatians 6:2). Mackenzie's Institutional Vision also seeks recognition as an institution "dedicated to the divine and human sciences", an expression that is absolutely pertinent in the contemporary academic context. The natural sciences gained expression exactly from the reformed Calvinist view that proposed as indispensable, the scientific study of the laws of nature, for greater knowledge of the Creator and Legislator of the universe. Therefore, the stimulus for research and the study of the natural sciences or humanities has never been incompatible with the search for the knowledge of God. The "divine sciences" empower and enable human beings for their most noble and highest mission, as the English Calvinist reformer Charles Spurgeon deduced: "Nothing will widen the

intellect so much, nothing will magnify man's soul as much as a devoted investigation of the great theme of Deity. The most excellent study for the expansion of the human soul is the science of Christ, and the latter, crucified and the knowledge of the divine Being in the glorious Trinity. The Christian's own study is Deity. The highest science. the highest speculation, the most vigorous philosophy, with the power to excite the attention of a child of God, is the Name; the nature, the person, the deeds and the existence of the great God, whom he calls his Father ". An institution dedicated to the divine sciences can, with greater legitimacy, pursue excellence in the study and research of the humanities. "If God created the universe and the laws that govern it and endowed human beings with intellectual skills to distinguish their jobs, would he want us to despise those skills? Will He be diminished or threatened by what we are discovering about His creation "? Another relevant point in the Institutional Vision concerning socio-environmental responsibility, must be seriously considered when perceived from the perspective of the Calvinist worldview. Calvin understood that the human being was given the divine socio-cultural mandate, with the task of producing and transforming nature and exercising wise control over it, so that all work would result in glory for the Creator and benefits for the work created. The targeting of natural resources in a self-sustainable way without compromising the health of natural sources, is a relevant commitment of Mackenzie's Institutional Vision. Excellence as an Institutional Vision, in turn, is related to overcoming, the ability to exceed, being above what is expected. To be excellent is to have highly praiseworthy and meritorious qualities. It is not possible to understand and seek excellence by spending minimal effort or comparing it with undue and inappropriate criteria. Comfort and inertia can irremediably lead to stagnation and ruin. Mackenzie's expectation is that each employee in his units will have the full notion that he is undergoing successive improvement; applying to continued self-training, taking advantage of the opportunities that the institution itself provides, with a view to reaching ever higher levels of functional, academic and management excellence. "... walk in a manner worthy of the vocation to which you have been called, with all humility and meekness, with long-suffering, supporting one another in love". (Ephesians 4:1-2).

VI. DEFINIÇÃO E APLICAÇÃO DOS PRINCÍPIOS E VALORES INSTITUCIONAIS:

Principle in a general sense can be defined as concept, conception, conviction, constituent part, primordial substance, foundation, foundation, that which supports a statement, an action or a series of statements and reasons. A Principle is the source and origin of other things, it is an essential part. Meanwhile, VALUE can be determined.

ned as what is worthy, relevant, and significant. The real value of a thing is its power or ability to acquire or produce the good. Digital of respect and consideration. Values are the characteristics of something, they are what distinguish it from other things and allow it to be evaluated as bad, good or excellent. Mackenzie accentuates its Institutional Principles and Values at a high level, since they are fundamental for the implementation of its purposes and, therefore, they must be ostensibly known among its collaborators and partners in all its units, which go on consigned below. In personal conduct: (act with) dignity, (order), character, integrity and Mackenzie spirit; In the exercise of professional activity: (posture) ethics, competence, creativity, discipline, dedication and willingness to volunteer; In interpersonal relationships: (act with) loyalty, mutual respect, understanding, honesty and humility; In the decision-making process: always encourage the search for consensus, justice, truth, and equal opportunities for all; In the relationship between collegiate bodies, units and departments: cooperation, team spirit, professionalism and adequate communication; In the relationship with other institutions and public agents: responsibility, independence and transparency; In society: participation and provision of services to the community; And, in all circumstances, act with love that is the bond of perfection, for the greatest glory of Jesus Christ. Among these Principles and Values, we highlight some of the utmost relevance, which will guide the evaluation of employees' actions in the institutional, disciplinary scope and in relationships with partners, customers, suppliers, government institutions, media and the community in which Mackenzie is inserted. The word Order that inaugurates the set of these Institutional Principles is defined as the relationship between people or events that can be expressed through some rule. The adequate disposition of resources so that a purpose is achieved. Good order is the foundation of good things. The entire universe works within ordered patterns, so every organization depends on good order to perform its function satisfactorily. All employees at Mackenzie units need to understand that they are an integral part of a larger whole and must continually remind themselves of the need to apply this Principle of Order in their individual and collective tasks. From your personal presentation, as in interpersonal relationships with colleagues from the same department or unit, in the relationship between different units or with external people and institutions, it will always be necessary to consider the rules involved and the possible consequences of your actions and words. Following the Institutional Principles of Mackenzie, Integrity stands out as the one from which numerous Values are derived, such as: transparency, equity, accountability, loyalty, honesty, corporate responsibility and love of truth. Integrity means wholeness, wholeness, not broken,

undamaged and uncorrupted. Integrity is an indispensable Principle for Mackenzie employees, as it covers not only the totality of the moral character, but also the special reference to justice in mutual transactions and interpersonal relationships. The following Principle. Property, alludes to the owner's prerogatives, as well defined in Brazilian civil law, to use - dispose and enjoy. With the exception of the social function, constitutionally provided for in the 1988 Charter, property is the condition in which the thing is found, which belongs in its own character and exclusive to a certain person or institution. According to the Principle of Ownership, the assets of the institution made available to its collaborators, the teaching staff, students and others, must be used for the strict purposes previously defined and declared. The Principle of JUSTICE boasts a privileged prominence among Mackenzie's standards. In the broad sense, justice refers to what is upright and virtuous, showing integrity, purity of life and fairness in terms of feeling and action. In the Sacred Scriptures we show that justice is an inseparable attribute of the nature and character of the Supreme Creator God. Regarding the Principle of Character, the illustration of a mark made by cutting or carving on stone, metal or other resistant material is shown. It can be defined as peculiar qualities imprinted by nature or habit on a person, which distinguish him from others. This is a person's true character. Unity is a Principle that can be defined as "the state of being one"; Concord, conjunction, agreement or uniformity. Unity is a type of symmetry or style and character. Unity of interests. All Mackenzie employees form a body, acting in unity, around the same purpose, to transform the VISION into reality through the fulfillment of the Institutional MISSION, All VALUES linked to the PRINCIPLES must be present in the relationship of employees with each other, employees with all users of the services provided by Mackenzie, employees with the community in which it is inserted and with which it operates; employees with financial institutions and suppliers of goods and services, as well as government agents and their competitors. The breach of these PRINCIPLES implies serious consequences such as the loss of value and inconsistency between its declaration in this Code of Ethics and its explanation through the VALUES that represent it. All employees of all units are responsible for externalizing in their functions and procedures the Mackenzie PRINCIPLES and VALUES, and it is essential that everyone is aware of the parameters defined in this coded manual.

VII. WHAT MACKENZIE EXPECTS FROM ITS EMPLOYEES - Mackenzie expects from its collaborators and partners a solid convergence of purposes, for the construction of an ethics based on their confessionality. Aware of their origin, their guiding

principles, their mission, their vision, their values, Mackenzie's employees and partners are able to establish high-level professional relationships, always observing the proactive dispositions as ordered below: Present yourself in costumes or clothing compatible with decorum: Act with fairness in the rendering of accounts regarding budget execution or funds granted by the Maintaining Entity for specific purposes. Act in an ethical and transparent manner and with initiatives committed to Sustainability; Commit to preventing and combating all forms of fraud, corruption, money laundering, moral and sexual harassment or discrimination; Report any irregularities of which they are aware to the higher authority or the relevant institutional channels; Report any deviation in conduct or violations of the UPM Code of Ethics, UPM Code of Academic Decorum and the UPM Rules, to the hierarchical superior or to the relevant institutional channels; non-compliance with rules, regulations, etc. or any action that puts the Institution's reputation at risk; Carefully take care and use all of Mackenzie's resources; Comply with all the norms, rules and legislation in force and contribute to the improvement of Mackenzie's internal procedures; Fully comply with their Employment Contracts, committing to excellence and respecting all aspects mentioned in this Code; Comply with ordinary laws in the relationship with financial institutions and public agents; Exercise secrecy and privacy the handling of documents and matters of a reserved nature of which they are aware due to their position, function or condition; **Exercise** the tasks entrusted to them with efficiency and competence; **Exercise** the effective practice of Mackenzie's standards and principles of conduct, statutory and regimental rules, which aim at harmonious coexistence among employees of all Mackenzie units, with a view to achieving the common good; Maintain the necessary protection and confidentiality regarding all information, physical or digital, in compliance with current legislation, which safeguard Mackenzie's security and interests; Observe the legal, statutory, regimental and regulatory rules in any Mackenzie activities or environments, including regarding deadlines established by academic managers; **Observe** disciplinary standards compatible with the purposes of Mackenzie, in all activities that bear his name or image, or that are associated with them, while also protecting his material and immaterial heritage, in a manner consistent with his nature; **Behave** with dignity, integrity, decorum, cooperation, awareness of moral principles, mutual respect and principles of ethics and the reformed Christian faith; Preserve honor, nobility and dignity in the profession, function and student activities, in personal and interpersonal relationships, acting in a spirit of respect, honesty, truthfulness, dignity and good faith; **Provide** reliable clarifications and within the established deadlines when responding to requests for information or interpellation, including when they do so to external bodies; **Promote** a culture of care, zeal and protection of Mackenzie's heritage, image and intellectual property; **Protect** Mackenzie's intellectual property: Respect intellectual property and copyright, including in relation to third parties; Respect the guiding principles and values of Institutional Identity, as well as, the Maintaining Entity's confessional principles; Respect all other Employees, Customers and Partners in all aspects; **Only** use the name or symbol of Mackenzie, the Maintaining Entity and its Lifetime Member, with the consent of the competent authority; **Economically** use the material entrusted to you and keep the Mackenzie assets and assets that you have access to, for the exercise of your duties; Use Mackenzie's computer resources and networks exclusively for institutional purposes; Properly use the work uniform, when required in their function; when the use of a uniform is not required, the Employee is expected to use common sense and discretion in his/her clothing, in a manner compatible with the Mackenzie Principles and Values. "therefore, you, gathering all your diligence, associate virtue with your faith; with virtue, knowledge; with knowledge, self-control; with self-control, perseverance; with perseverance, piety; with piety, fraternity; with fraternity, love." (2 Peter 5:7).

VIII. UNETHICAL CONDUCT LIABLE TO DISCIPLINARY SANCTIONS - Unethical conduct, disciplinary infractions and any hypothesis of misconduct may be the object of a strict investigation, especially the events contemplated in the following descriptions: Acting in the promotion or promotion of acts of disrespect of any kind, disobedience, disturbance or that, in any way, causes indiscipline or disruption in the smooth running of institutional and academic activities; Acting with fraud in the rendering of accounts related to budget execution or to funds granted by Mackenzie or by development agencies for specific purposes; Access computers, computer programs, data, information, networks or restricted portions of the Mackenzie or third party computer system, without proper authorization: **Take** advantage (the existence) of configuration flaws or security flaws or the knowledge of special passwords to change the computer system; Attempt against administrative probity; To commercialize any type of product or service in the environment or working hours or to carry out any other activity not related to their professional duties; **Consume** alcoholic beverages or use any type of illegal substance that alters your functional capacity or behavioral condition during the day and/or in the work environment; Criticize and or disqualify Mackenzie's products and services before the internal or external public; Failure to comply with current regulations on the solidary reception of incoming students, or also the practice of acts of physical violence, abuse and or embarrassment

on occasion and due to the solidarity reception of incoming students; Disseminate articles, texts or other forms of public manifestation, identifying themselves as Mackenzie Employees, which are contrary to or violate the Institution's Values, Principles and Confessionality; Provide or disclose false data about academic or professional life or any other nature; Public and scandalous incontinence, characterized by signs of intoxication or drug addiction, which, due to its habituality, compromises the dignity of the Institution; Keep under your immediate subordination, in a position or function of trust, spouse, partner or relative up to the third degree; **Obstructing** the performance of the system or interfering with the work of other users; Participate in external activities that affect your ability to perform your Employee functions; Allow or promote the practice of gambling on Mackenzie's premises; Carry weapons, explosive substances and/or explosive devices on Mackenzie's premises; **Perform** any act, in theory, defined as a violation of criminal laws, such as slander, injury, defamation, feud, factual, bodily injury, damage to the person or property, contempt and ideological or documentary falsehoods; Practice acts of religious or racial discrimination, incitement, bullying or any type of discriminatory manifestation of any kind, directed at any person and in any situation; **Practicing** acts against the good order and the administration of Mackenzie or that violate norms registered in the CDA; Practicing embarrassing acts or trying to establish relationships of an invasive nature of the student's or other collaborators' intimacy that are or may be interpreted as sexual harassment; Carry out expressions of support for the absence of academic work; Carry out manifestations, propaganda or an act of a political party, philosophical, of sexual origin or conduct, to discriminate or stigmatize an individual, disrespecting his privacy; Reveal secrets of which you are aware due to the position; Have financial, personal or corporate interests in competitors and suppliers of Mackenzie; Use any fraudulent means, or any deception, for their own benefit or that of others, for the purpose of obtaining approval, promotion, or any type of advantage, either for themselves or for third parties; Use another user's identification when accessing Mackenzie's computers or the Maintaining Entity; Use electronic means to produce, store, send and receive messages in any format, with fraudulent, pornographic, threatening or anti--moral or ethical content, or host offensive, prejudiced, slanderous or obscene pages in the Mackenzie system; Improperly use the institution's resources placed under its responsibility; **Use** privileged, confidential or even information about your position as Mackenzie Employee, in order to ensure opportunities for personal benefit, from your family members or third parties; Use the name and symbols of Mackenzie, the Maintaining Entity and its Lifetime Member without express authorization from the competent bodies; **Use** funds granted by Mackenzie or by development agencies for purposes other than those established in the concession act; **Violating** or misappropriating people's assets and Mackenzie's, including their image; Evidently, this Code of Ethics does not claim to exhaust the description of all acts; facts and hypotheses in which they are configured as unethical conduct subject to disciplinary measures, thus reiterating the subsidiarity of the country's legal command, as appropriate.

IX. MACKENZIE'S NORMATIVE COMMAND - When determining the elaboration and edition of this Code of Ethics, the Deliberative Council of the Mackenzie Presbyterian Institute expresses its firm commitment to the most noble practices of corporate governance, which, together with its Principles and Institutional Values, will promote greater security and predictability in the interpersonal relationship of its employees. In this sense, the Code of Ethics comes to fill an immense gap, by becoming a relevant tool for guiding behavior, monitoring and mediation of conflicts. The Code of Ethics, the Code of Academic Decorum and the General Rules of the UPM complement each other and constitute the normative command of IPM, its maintained and its associates.

X. COMMUNICATION CHANNELS: Confidentiality will be preserved in all procedures, to ensure the privacy of communications and complaints, with a view to preventing the occurrence of any form of intimidation or retaliation against the reporting employee."

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This Code of Ethics of the Mackenzie Presbyterian Institute, applied to its Maintaining Entity and its Maintained entities, was approved by the Board of Directors on August 22, 2019, in accordance with CI-CD 413/2019 of October 10, 2019.



