



Câmara de Comércio Árabe Brasileira
الغرفة التجارية العربية البرازيلية
ArabBrazilian Chamber of Commerce

CODE OF CONDUCT

ABCC 2023

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ArabBrazilian Chamber of Commerce

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1) Introduction

Dear all,

Combining entrepreneurial activities and ethical principles is a key factor for the Arab Brazilian Chamber of Commerce (**ABCC**).

The ethical principles are a major part of the institutional mission on the conduct that guides the relations between the **ABCC** and the Arab member countries.

The reputation of the **ABCC** in the market we operate in is one of our most valuable assets. This reputation is basically shaped by how we conduct our actions. We fulfill our commitments with confidence and work with honesty and righteousness in our activities. This Code of Conduct establishes mandatory, incontrovertible standards regarding how we work. We expect our employees to carry out their activities according to our ethical values and principles and that all our Members, Advisors and Directors comply with and communicate these principles.

Rules of conduct, when observed individually, benefit all, so may this serve as a reminder to you. Breaches of these guidelines could lead to the application of appropriate actions.

Respect the rules of the entity. This way you will contribute to the general welfare, with the positive repercussions for you as a citizen.



2) The Code of Conduct and Its Goals

2.1) The Code of Conduct is a set of rules that help manage conflicts for the interest of the **ABCC** with the following purposes:

- a)** Making sure Board Members, Directors and employees know how to handle ethical issues and conflicts of interest;
- b)** Establishing a management culture that preserves the reputation of the **ABCC**;
- c)** Establishing a conduct that protects the entity from losses, dishonest practices, provides transparency and equity in accountability;
- d)** Establishing rules to preserve the physical and moral integrity of Board Members, Directors and Employees;
- e)** Making sure all decisions observe the Brazilian and international law and are governed by high standards of ethical conduct;
- f)** Ensuring an ethical, honest conduct in situations of conflict of interests in personal and professional relations;
- g)** Ensuring full compliance with internal policies and procedures of **ABCC**;
- h)** Promoting serious, honest, loyal, legal, transparent work attitudes in work relations;
- i)** Promoting to all members the Arab Brazilian Chamber values that guide the desired Organizational Culture, namely: ETHICS, INNOVATION, COMMITMENT, TRUST, COMPETENCY, and LEADERSHIP; and,
- j)** Promoting among Directors and employees the development and maintenance of an agile, results-driven teamwork.

3) Scope of this Code

3.1) The provisions of this code apply to:

- a)** All Employees of the **ABCC**;
- b)** Its Board of Directors and Advisors;
- c)** Its executive Directors; and
- d)** Third parties participating or contributing to the activities of the entity.

4) Management of the Code of Conduct

4.1) The tasks of interpreting and applying the rules of the Code are assigned to the Ethics Committee. It falls upon the Committee to monitor the dissemination of the Code. It is assigned to the Ethics Committee to update the Code, and its approval is up to the Chairman and the President of the Entity.

The Ethics Committee can be called upon by the party if the matters falls upon the following conditions: legitimacy, suitability, interest and feasibility.

5) Mission, Vision, and Operations of the Arab-Brazilian Chamber of Commerce

5.1) Mission

Connecting Arabs and Brazilians to bring about economic, social and cultural development.

5.2) Vision

Being a relevant player in the growth and diversification of Arab-Brazilian trade, partnering with public and private players in Brazil and the Arab World, contributing to the Arab bloc becoming the 3rd largest trade and investment partner of Brazil.

5.3) Operations

- a)** Bringing about commercial and cultural integration between Brazil and Arab countries by holding events and producing promotional material that improve the relations and promote mutual knowledge.
- b)** Exploring the commercial potential to increase the creation of activities between importers and exporters;
- c)** Producing information to support exporters and importers;
- d)** Supporting communication by offering quality translations;
- e)** Excellence in services of certificates of origin by issuing certificates with agility and meeting legal requirements with high quality standards in serving exporters, including by providing guidance on the certification process;

- f) Providing arbitration and conciliation services regarding issues permitted by the legislation between members and/or third parties;
- g) Encouraging, fostering and organizing the interchange of commercial missions of delegations between Brazil, Latin American and Arab countries for trade and economic, technical and cultural cooperation;
- h) Accrediting HALAL processes for products and services for the consumers of any country, seeking of excellence, impartiality and Halal compliance assessment requirements.

6) Quality Policy

Connecting Brazilians and Arabs to bring about economic, social, and cultural development, through activities and events, disseminating information and materials to foster relationships and mutual knowledge, stimulating business and offering trade support to importers and exporters from the countries involved.

Improving leadership to continuously enhance the Quality Management System, focusing on satisfaction and exceeding the expectations of internal customers, members and partners, observing the strictest principles of ethical, legal and moral conduct.

7) Principles of Ethics and Code of Conduct

7.1) The principles of ethics aim at defining behaviors and attitudes for benefiting and facilitating life in society. We must see them as pillars for guiding our conduct.

7.2) The rules and guidelines listed in this code of Conduct must be known and observed by all Employees, Members, Advisors, Directors, service providers, partners and visitors participating and contributing to the activities of the ABCC.

7.3) In light of the Code of Conduct of the **ABCC**, we must express our commitment and respect to the following aspects:

- a) The interests of the Entity should take precedence over individual or personal interests of its directors and employees;

- b)** The recommendation and hiring of suppliers with family or financial ties with statutory directors, employees or executives of the entity is allowed as long as it is carried out with fair conditions of competition with other suppliers, observing the selection criteria provided for in the procedures of acquisition of products and services of the entity.
- b.1)** the abovementioned case will be allowed only if there is no level of subordination of the involved the party to the supplier and upon prior approval by two members of the statutory Executive Board as long as there is no conflict of interests.
- c)** Adequate, accurate and correct information of the documents kept and promoted internally or in different means of communication;
- d)** Compliance with the law, rules and regulation that apply to the activities of the **ABCC** where we are present and in the countries we establish relations in;
- e)** Immediate manifestation of any possible breach of the Code of Conduct;
- f)** Making every effort for promoting the preservation of health, physical health and quality of life of employees, discouraging any conduct that could create a hostile, intimidating, offensive work environment;
- g)** Curbing and rejecting any types of acts or demonstrations of sexual or moral harassment or discrimination based on race, color, religion, sexual orientation, social standing, nationality, age, political views or any type of mental or physical disability;
- h)** Fighting any types of prejudice or discrimination based on gender, age, color, race, religion, disability, sexual orientation, origin or any other personal trait;
- i)** Respecting the diversity of opinion, encouraging the debate of ideas;
- j)** Guaranteeing the fundamental rights provided for in the Federal Constitution;
- k)** Prohibiting the use, commercialization and provision of information and data that are property and responsibility of the **ABCC**, whether they are confidential or not, that were obtained in a privileged way during its operation for their own benefit over the interests of the entity;
- l)** Preventively fighting against demeaning work practices (child labor and forced labor) and labor analogous to slavery;
- m)** Fostering cordiality, collaboration and team spirit in the relationships, always practicing dialogue and encouraging the diversity of opinions;
- n)** Adopting a high professional conduct and encouraging the practice of activities that add value to **ABCC**;

- o)** Using in the exercise of our responsibilities the same attitude any honorable person of an upstanding character would use in regard to others and in managing our own affairs;
- p)** Properly carrying out our responsibilities accordingly with the institutional values;
- q)** Prohibiting any type of sale of products or services including but not limited to clothing, food and beverage, adornments, cosmetics as well as promoting cash loans inside the entity;
- r)** It is everyone's responsibility to look after their own possessions on the premises of the Entity, as well as not misappropriating any items found, regardless of their value;
- s)** Allowing the recommendation and hiring at the **ABCC** of any candidates for a job opening that have a kinship relationship based on birth and its extensions* under equal conditions of competition with other candidates as long as there is no relation of direct subordination or possibility of positive or negative intervention on the performance of duties.

*A kinship relationship based on birth and its extensions is understood as any relationship between parents, children, siblings, cousins, aunts and uncles, nieces and nephews, spouses, partners (in a stable union), or in-laws.

8) Rehiring a Former Employee

8.1.) Rehiring is possible, even in the face of resignation or termination without cause, as long as a period of 180 (one hundred eighty) days from the termination is observed, always respecting the criteria and equality with the other candidates for the same opening and a prior analysis of the history and the series of evaluations carried out by the HR during the period of employment

8.2) Rehiring a former employee will observe all criteria and requirements laid down for the recruiting process.

8.3) The HR must give their results and conclusions recorded in their files to the director and manager that will receive the employee so that they can take a decision with greater confidence.

9) Conduct Standards and Policies in Internal Relations for Employees

- a)** Don't use your position at the **ABCC** to obtain any personal benefits or advantages.
- b)** Don't get any personal advantage due to your position as a personal present or benefit arising from a business relationship of the **ABCC** that could presumably impact business decisions or transactions between companies.

Invitations should be within the limits of cordiality intrinsic to the business. Gifts of money must never be accepted.

- c) Eventual gifts offered to the **ABCC** to be raffled among employees on special dates can be accepted.
- d) The employee is hired in accordance with the labor standards in force regulated by CLT on an exclusive basis, and their relationship with other companies, entities and institutions that aim to earn remuneration, benefit or parallel business that could give rise competition to the **ABCC** will not be allowed;
- e) There is no restriction against volunteer work as long as it doesn't interfere with the work hours contracted and whose subject-matter has no conflict of interests with the **ABCC**;
- f) Carrying out business activities of consultancy, advising or any type of paid counselling that compete with the activities of the **ABCC** will not be allowed;
- g) Don't use the equipment or resources of the **ABCC** for private or unauthorized purposes;
- h) Don't remove from the **ABCC** without proper authorization any document, book or asset belonging to it;
- i) Impartially and efficiently manage your competing interests;
- j) Don't condone irregularities by failing to take relevant actions when identifying the fact;
- k) Don't spread rumors or slanders;
- l) If you make a mistake, don't hide the facts. Talk to your manager to help you minimize eventual consequences and learn from your mistakes;
- m) Look after the facilities, preserve the environment, control the consumption of material resources, printouts and supplies;
- n) We emphasize that bribery and corruption in domestic and international business is a felony;
- o) Respect the differences and the diversity of opinion. Homophobic or xenophobic comments, acts of sexual or moral harassment or discrimination based on race, color, religion, sexual orientational, social standing, nationality, age, political views or any type of physical or mental disability or discrimination acts will not be tolerated under any circumstances;
- p) Providing a good service by solving the solicitation, even if it is referred to another department, is essential;
- q) Smoking is prohibited on the premises of the **ABCC**;
- r) The image of the employee reflects the image of the entity and vice versa. It is key that you preserve it by using clothing that is suited to the work environment, looking after your appearance and personal hygiene;

- s) Matters and information relevant to your work and the **ABCC** shall be disclosed to unknown people or entities. Make sure your work papers and electronic files are well guarded and not removed from the workplace, without the permission of your immediate superior;
- t) When using their own social media, employees, statutory directors and executives when the Arab Brazilian Chamber is displayed should use common sense within the limits of their activities, not answering on behalf of the entity under any circumstances;
- u) Don't speak out on behalf of the **ABCC** when you are not authorized or able to do so;
- v) The Employees are not authorized to give interviews, statements or explanations on behalf of the **ABCC** or its news agency – ANBA and should refer all solicitations to the Marketing Department that will examine them together with the Board and the Press Office to see to the best response;
- w) The Employees must not use the brand, corporate name and logo of the **ABCC** without prior authorization of their Marketing Department Manager;
- x) If it is necessary to use the logo, stationery or brands of the **ABCC** in official documents or for meeting any solicitation of third parties, the Employees should contact the Marketing Department to request authorization and the appropriate model or form.

10) Conduct Standards and Policies in Internal Relations for Statutory Directors and Advisors

- a) Having in mind that volunteering is the foundation of the creation and development of the **ABCC** and that the roles of Advisors and executive and statutory directors will always be performed pro bono, which should be clear in any internal or external relationship of these members of the Entity;
- b) Assuring that transactions with related parties in the context of the entity are conducted with total transparency and equity and that they don't result in personal benefits for the advisors themselves, their family or friends. Giving an example of adhering to the dispositions of the Social statute and other internal rules of the entity, while making sure by all means within their powers that these guidelines are known and fully respected; and
- c) Caring for the integrity of Financial Demonstrations and information disclosed by the **ABCC**.

11) Conduct Standards and Policies in External Relations for Members, Suppliers, Governments, Partners and Visitors

- a) We are open to all types of manifestations of our members, answering to all with the same agility and professionalism;
- b) We respect the privacy of all our agents, maintaining secrecy over their information;
- c) We nurture a good relationship with the media;
- d) We follow transparent criteria in selecting and hiring suppliers, nurturing relationships based on professionalism and mutual respect; and
- e) We strictly abide by all legal and regulatory rules created by governmental entities, as well as internal and external policies of the **ABCC**, acting carefully and using professional and independent judgment.

12) Information Security

12.1) All information owned by the Arab Brazilian Chamber of Commerce and its Members must be properly protected and managed, preserving its availability, integrity, confidentiality and authenticity within the regulations and legal requirements.

12.1) Employees, members, directors and advisors of the entity, third parties and other agents in service of the company are responsible for the security and good use of information they have access to while performing their activities, and they must abide by the guidelines and procedures set forth in the Information Security Policy.

12.3) Using confidential and/or privileged information obtained while performing activities at the ABCC is forbidden. The secrecy of data of the Arab Brazilian Chamber and third parties that are under the care of the entity must not be disclosed to third parties and must be treated according to the Data Protection Law;

12.4) Handling, disclosing or improperly using information is considered a gross misconducts and could imply in applying pertinent sanctions.

12.5) All should share the commitment to keep the environment safe by using responsible attitudes and behaviors.

13) Information Technology Rules

- a) Make legal and adequate use of the Information Technology resources made available to you;
- b) The equipment and IT resources can be used for private purposes as long as they do not conflict with internal rules and procedures of the ABCC nor hinder their work;
- c) All files create, received or stored in equipment, systems or reports are property of the ABCC;
- d) Accessing franchised information regarding the private and shared storage area, respecting their level of access and data reach;
- e) The ABCC reserves the right to monitor information transmitted or stores in its systems, whether they are owned or hired;
- f) Asking for technical support of the responsible department whenever a malfunction of the technology resources made available is noted;
- g) Using phone and communication systems to deal with matters regarding your duties;
- h) Keeping your access passwords to the entity's technology resources and information confidential;
- i) Reporting immediately to those responsible and the immediate manager any failures or deviations regarding Information Technology;
- j) Keeping internal information on results, strategies, innovation projects or other projects confidential from external players or internal users;
- k) It is forbidden to install software on the equipment of the ABCC without prior authorization of the IT department.

14) Prohibitions on Use of Information Technology

14.1) All Information Technology users should be aware of the following prohibitions:

- a)** Accessing, copying or storing computer programs, files or any other material (music, photos and videos) that violate the copyright law or any material that is illegal, discriminatory, pornographic, bellicose or promotes crime apology or hate speech through any resource made available by the ABCC;
- b)** Using technology resources, connections, data networks, telephony or accesses owned by the entity to embarrass, harass, discriminate, harm or threaten any individual or company;
- c)** Impersonating any person or hiding by any other means your own identity when using the computer resources made available to the employee, partner or third party that needs to somehow use technology resources made available by the entity;
- d)** Using personal resources like email, personal computer, smartphone, tablet, data storage devices for trading corporate information, talking with Members, suppliers, business partners, coworkers or any subject of interest to the entity.
- e)** Creating blogs, virtual communities, virtual environments or social media that use logos of the ABCC without prior authorization;
- f)** Storing data, information and files owned by the ABCC in devices, electronic means, whether they are fixed, mobile or remote, that are not authorized by the Information Technology department; and
- g)** Cyberbullying or spreading and forwarding fake news if prohibited.

15) Social Media-Related Conduct

- 15.1)** Do not use the name of the Arab Brazilian Chamber to support or promote products, opinions or causes.
- 15.2)** Being personally responsible for the contents that are published on blogs or any other forms of social network or collaborative tool.
- 15.3)** Being conscious and using common sense, ethics and responsibility regarding your privacy and that of coworkers, the ABCC and members and the disclosure of information.
- 15.4)** Respecting copyrights and disclosure laws and always mentioning sources.
- 15.5)** When identifying as an Employee, Member, Director or Advisor of the Arab Brazilian Chamber of Commerce, make sure your profile and related content is consistent with how you should present yourself to colleagues and members.

15.6) On the corporate network, do not make any manifestations of ethnic, religious, political or personal nature, spreading topics that could be deemed offensive or practicing any conduct that would not be acceptable in the physical work environment.

15.7) In your contributions to the Collaborative Portal, be the first to correct your mistakes and don't change any prior posts without indicating you made the change. Add value to the content, providing relevant information, with substance and perspective.

16) Violations

16.1) Suspected violations of the Code of Conduct can be anonymously reported to the Ethics Committee via the available reporting channels at the Portal of the Arab Brazilian Chamber of Commerce, in its intranet, or through the email comitedeetica@ccab.org.br.

16.2) Employees, Advisors, Directors, members or partners that find themselves in actual or potential situations that conflict with these guidelines and principles can also anonymously turn to the Ethics Committee.

16.3) No employee should be jeopardized at the ABCC for complying with the ethical principles.

16.4) The rules established in this Code are an essential element of our corporate culture. It is fundamental that all consistently observe these principles; each person will be responsible for that. This document is not aimed at constraining the scope of the employees for acting accordingly to their responsibility within reasonable limits.

16.5) Don't speak out on behalf of the ABCC on social media;

17) Establishment of the Ethics Committee

17.1) The Ethics Committee will be composed of Directors of the Statutory Board.

17.2) The Committee must report to the President of the entity and its members must be nominated by the President, who is the only one who can destitute them.

17.3) It is up to the Chairman of the Ethics Committee the casting vote in case of a tie.

17.4) The duration of the Ethics Committee must be the same of the term of the President of the Arab Brazilian Chamber of Commerce;

17.5) When a member of the Committee is involved in some subject matter under discussion, this member cannot participate in the meetings or deliberations.

17.6) All members of the Ethics Committee will have total autonomy for investigating facts and allegations and must keep secrecy and confidentiality over the allegations and evidence.

17.7) The Ethics Committee can make use of the support of any employee regardless of their position or level of management for technical support or clarification keeping secrecy over both parties.

17.8) If it is deemed necessary, the Committee will have autonomy to hire external audit and technical services.

18) Responsibilities of the Ethics Committee

18.1) It is up to the Ethics Committee

- a)** Receiving claims formalized via the communication channels;
- b)** Interpreting and applying the Rules of the Code of Conduct;
- c)** Maintaining, reviewing and spreading the code of conduct;
- d)** Reporting on the complaints received and the status of the process to the president of the Arab Brazilian Chamber of Commerce;
- e)** Addressing cases and investigation procedures and summoning those involved if necessary;
- f)** Those involved should be heard in confidence and sign a term sheet in this regard;
- g)** Assessing cases and taking appropriate actions as per this code;
- h)** Formally communicating the employee involved in the ethical issue about the decision taken by the Ethics Committee.

18.2) The Ethics Committee will convene whenever necessary and recording a minute on the subject matters as the resulting deliberations.

19) Processing Complaints

19.1) All complaints received must be processed by the Ethics Committee in the strictest confidence, which shall be observed by those involved as well as members and employees that somehow become aware of the case.

19.2) Any complaints, whether they are handwritten or sent via e-mail, Internet or other channels of communication must be sent to the Ethics Committee, whose electronic address will be disclosed on the website

of the Arab Brazilian Chamber of Commerce. Anonymous complaints will be accepted as long as elements of relevance are verified, making it possible that the Ethics Committee pursue the case.

19.3) The Ethics Committee can pursue a case, too, if there is a notorious case that demands clarification.

19.4) If the analysis of the complaint is rejected by the Chairman of the Ethics Committee, all member of the Ethics Committee must be informed, and the decision can be reviewed by the Plenum of the Committee. If the Plenum of the Committee confirms the rejection of the analysis of the complaint, the President of the Arab Brazilian Chamber of Commerce must be communicated.

19.5) The rapporteur nominated can be declared impeached for reasons of personal jurisdiction.

20) Recommendation of the Ethics Committee

20.1) It is up to the Chairman of the Ethics Committee or other member of the committee that he or she nominates to take statements of the parties (always in company of one more person), examine the statements that they offer, listen to witnesses, who must remain anonymous, and within 60 (sixty) days from receiving the complaint, extendable for 30 (thirty) days with good cause. Within this period, the Committee can ask for additional information on the process.

20.2) The reported will have the opportunity to follow the procedures, indicating evidence and manifesting, including through oral arguments, in ordinary or extraordinary meetings before the matter is put to vote by the Plenum of the Committee.

20.3) The repetition of complaints on cases that are not provided for in the Code of Conduct shall be taken into account on the first update that it is made on it.

20.4) The full period for the Committee to end the procedures from receiving the complaint to pronouncing their decision cannot surpass 90 (ninety) days.

20.5) Once the recommendation of the Committee is made, the process can only be reopened in exceptional cases, e.g., if new proven facts are presented and at the discretion of the Committee itself.

20.6) The final decision shall be taken by the President of the Arab Brazilian Chamber of Commerce within 30 (thirty) days and shall be formally reported to the Chairman of the Ethics Committee. If the process involves some member of the Statutory Board or the Higher Administration Council, the decision shall be taken together with the Chairman of the Orientation Council (CORI). In case the recommendation made by the committee is reviewed, the decision shall be followed up by good causes.



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20.7) This code can be changed at any time by decision of the Statutory Board, and it is up to the HR department to disclose it.

THE BOARD

Cultural Transformation

Decalogue of good behaviors

1. Learn, respect, and promote the mission and values of the ABCC.
2. Make efforts to fulfill the ABCC's goals, aligned with its mission and values.
3. Develop a vision of the whole company and your role in the ABCC and arrange yourself through planning following the Strategic Map.
4. Work with team spirit for effective integration between departments, sharing the necessary information with everyone involved and giving due importance to each person at the ABCC at all times.
5. Bring and encourage innovative ideas.
6. Have a flexible and collaborative stance, respecting other opinions and the hierarchy, accounting for your decisions actions and consequences.
7. Receive and give feedback applying the proposed methodology. Promote self-development and continuous improvement in your performance.
8. Be an example of constructive and positive behavior, promoting harmony and assertive and respectful communication between people and departments.
9. Ask and ensure demands are understood, ensuring delivery quality within the stipulated deadline, focusing on results.
10. Develop an interest in the Arab world and its society, economy, and culture.

Cultural Transformation

Decalogue of bad behaviors

1. Lack of interest in Arab culture or the values and mission of the ABCC.
2. Behaviors misaligned with ABCC vision: Innovation, Ethics, Commitment, Trust, Competence and Leadership.
3. Not assuming your role and responsibilities. Misalignment with expectations.
4. Authoritarianism, lack of respect and politeness, or excessive etiquette and protocol in coexistence among ABCC personnel.
5. Unequal treatment, privileges, favoritism, protection, paternalism.
6. Negative attitude, complaints, ingratitude, corporate gossip, lack of coherence between speech and behavior.
7. Comfort zone, accommodation, or postponing decision-making. Lack of focus on work, individually or in groups.
8. Work in automatic mode to meet schedule, without objectivity.
9. Ego, vanity, individualism, self-promotion.
10. Restricted and closed group behavior, resistance to cooperation.