



MESSAGE FROM THE CEO

We are undergoing a period of technological advances that will remove restrictions, bring alternatives and create new possibilities for a more inclusive and better future for all. All of this will happen through a connectivity and service revolution in which Oi has a key role, given its ability to bring fiber optics throughout Brazil and provide digital experiences that will improve the lives of people and companies.

In order to fully fulfill this purpose, we need to focus our attention on our people and our governance. After all, people put our strategy into practice and build our transformation, our future. And these same people are responsible for carrying out, every day, thousands of activities, processes and deliveries that will generate value for our clients and our company. And these activities always have to be based on right, complete, common sense decisions, in line with our goals and that help us fulfill our purpose.

With this, we generate not only a sustainable company, but opportunities for all.

And, as each company has its own way of doing business, this Code of Ethics and Conduct exists to bring together, in a simple and direct way, what we expect from all our employees, inside and outside Oi. I'm particular proud of this document, not only for the role it has to guide and support us in our daily decisions, but mainly because it was remodeled in a collaborative and inclusive process, hearing the entire organization and reflecting our mission, our vision and our values.

I here invite everyone to explore this document and put its principles and concepts into practice in our daily lives.

Rodrigo Abreu
CEO, Oi



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1

OUR WAY OF BEING

Learn our purpose and
our vision and stay on
top of Oi's values

Our Purpose

**CREATING NEW FUTURES,
BRINGING DIGITAL LIFE
TO EVERYONE.**

Our Vision

**BEING THE LEADER IN FIBER OPTIC CONNECTIONS
AND DIGITAL EXPERIENCES THAT IMPROVE THE LIVES
OF PEOPLE AND COMPANIES THROUGHOUT THE COUNTRY.**

Our Values

EFFECTIVENESS TO DELIVER

Evaluating and making the right decisions for our business and clients, with a sense of ownership, delivering effective and sustainable results

CREATIVITY TO INNOVATE

Thinking outside the box and being able to create solutions with new perspectives that set us apart and take us to the future

TENACITY TO GROW

Facing the day to day with willpower, tenacity, engagement, enthusiasm, sense of urgency and lightness

EMPATHY TO COLLABORATE

Putting yourself in the other's shoes, taking care of people, embracing diversity and building trusting relationships

FLEXIBILITY TO TRANSFORM

Letting go of the past and being open to new ideas, committed to transformation

A close-up portrait of a young man with short dark hair, smiling broadly and showing his teeth. He is wearing a white button-down shirt. The background is a soft-focus indoor setting with warm lighting and a window with blinds on the right.

2

OUR WAY OF DOING THINGS

Everything you need
to know about our
practices and how to act



2.1

OUR WAY OF DOING THINGS

VALUING DIVERSITY AND PROMOTING INCLUSION

Diversity is part of our essence. We understand that personal differences, plural experiences, knowledge and different points of view expand our perspectives and multiply the potential of all of us and the company. Thus, we are able to deal with challenges and opportunities in a more creative way, better prepared and generating increasing results. Let's find out how to multiply that together.

🔌 STAY TUNED!

STAY TUNED TO OUR ATTITUDES:

- We are open to diversity and do not discriminate based on race, origin, sex, gender identity or expression, sexual orientation, age, religion, physical and mental disability, social class, family, marital status, sick leave (including pregnancy), political affiliation, physical appearance, lifestyle, among others.
- We build awareness and act to strengthen an environment in which people feel valued and included.
- We do not allow jokes, publications on social media or comments that are discriminatory or prejudiced in our internal and external interactions.
- We defend equal opportunity for candidates and employees.

⊕ LEARN MORE

- ▶ [Oi's Diversity and Inclusion](#)
- ▶ [Diversity and Inclusion Policy](#)
- ▶ [E-learning Compliance Path - Oi Educa](#)
- ▶ [E-learning Compliance Path - UVV \(Stores\)](#)
- ▶ [Policy of Good Practices in Social Media](#)
- ▶ [Whistleblowing channel](#)

⚠️ STAY TUNED

We cannot tolerate any discrimination and prejudice in our relationships, inside or outside Oi. These are unacceptable behaviors that can lead to disciplinary measures.

💬 SPEAK UP!

What to do when you hear a prejudiced joke?

You should warn the colleague from who you heard a prejudiced or discriminatory tone. If this is not in line with what we believe in Oi, show this to the author of the joke, so that he/she may learn and do better. Take a firm stand and, if the conversation goes nowhere, activate our Whistleblowing channel. You can no longer agree with this type of behavior. In fact, it is always good to remember that these behaviors may have consequences.

Can I make disclosures about politics or religion?

Oi respects the personal convictions of each employee, but you must avoid any type of campaign or distribution of material that involves politics or religion in the work environment.

2.2

CONTRIBUTE TO A RESPECTFUL AND HARASSMENT-FREE ENVIRONMENT

Did you know that the way we treat others ends up reflecting our true professionalism? More than that, it shows who we are!

This is true both as individuals and as a company. Here, respect is always a basic principle in our relations with everyone, whether colleagues, managers, clients, suppliers... See how you can do your part in this search for an ever better environment.

 STAY TUNED!

FIVE RECOMMENDATIONS IN LINE WITH OI'S PRINCIPLES:

- Keep a healthy environment of mutual trust, listening and respecting everyone.
- Solve problems that may arise with professionalism, without abusive conduct or exceeding limits.
- Always encourage good relations and be patient with the different profiles of each professional.
- Set an example with an awesome behavior, with that right attitude, at the right time.
- Whenever you need it, stay tuned to talk about what is happening with Compliance or People and Management, and correct any deviations in conduct.

 **SPEAK UP!**
What is an abusive conduct?

Well, we can sum it up by saying that it is behaviors, words, acts, gestures or even writings that can hurt someone's dignity and physical or psychological integrity. To make it even easier to understand, let's think about a list of unwanted attitudes. It may include accusations, threats, insults, shouting and humiliation, as well as intimidation, spreading rumors and gossip. Do not forget to also include isolation, social exclusion and even the imposition of unattainable goals or urgent tasks that become permanent, among others. Ok?

What is understood as moral harassment?

The repetitive and prolonged practice of abusive conduct, disqualifying, through words, gestures or attitudes, the self-esteem, security or image of the person – is a good explanation. But remember that it happens regardless of hierarchical relationships. In other words, the manager against the employee or the team or employee against their manager. Ah, obviously, it can also happen between peers.

How do you know when professional demands turn into moral harassment?

First of all, it is always good to remember that it is more than natural to demand, criticize and evaluate the work of each one. These eventual complaints about a task not performed - or performed with negligence - are part of the professional life of all of us. The important thing is to encourage the fulfilment of the goals and for the work to be done efficiently, but always following the ethical precepts of this Code.

And what characterizes sexual harassment?

The answer here is simple and straightforward: Embarrassing colleagues with constant hints and insinuations to gain sexual advantage or favor. This behavior can be clear or subtle; spoken or just hinted at; written or made explicit in gestures or physical contacts. It can show as coercion or blackmail and also when there is a promise of promotion.

 **LEARN MORE**

- ▶ E-learning Compliance Path – Oi Educa
- ▶ E-learning Compliance Path – UVV [Lojas]
- ▶ Whistleblowing channel

 **STAY TUNED**

With you, we are committed to keeping a respectful behavior, with no room for moral or sexual harassment, physical or verbal violence and other abusive conduct that may harm other people, the work environment and Oi itself.



2.3

OUR WAY OF DOING THINGS

COLLABORATE WITH A HEALTHY AND SAFE ENVIRONMENT

Here, at Oi, you already know that people are our greatest asset. With this in mind, the company's management and employees assume their commitment to life, always strengthening our daily health and safety practices. Together, we build a healthier environment every day.

STAY TUNED!

A GOOD ENVIRONMENT DEPENDS ON ALL OF US. COMPANY AND EMPLOYEES MUST DO THEIR PART, CONTRIBUTING TO AN ENVIRONMENT INCREASINGLY HEALTHIER AND SAFER. STAY TUNED TO INDIVIDUAL RESPONSIBILITIES:

LEADERSHIP COMMITMENT

Health and Safety Requirements

- Offering a safe and healthy environment for employees and partners.

Hazards and Risks

- Ensuring the right management of the risks inherent to the company's activities, avoiding dangerous acts that may damage employees, clients, third parties and Oi's assets.

Accidents and Emergencies

- Ensuring that all activities are carried out safely, preventing accidents and damage to employees.

Training and Awareness

- Frequently promoting internal awareness actions and all the necessary training so that the organization is kept up to date with the most modern health and safety management practices, and with all changes in our segment.

- Supporting the implementation and promotion of all of our Occupational Health and Safety (OHS) programs.

Remote Work

- Respecting the employees' working hours, avoiding out-of-hours calls or messages. Respecting breaks and lunch times is essential. Addressing demands during established working hours through good-time management is essential.

EMPLOYEE'S COMMITMENT

Health and Safety Requirements

- Knowing and complying with all legal requirements, policies, good practices and procedures for health and safety at Oi.

Hazards and Risks

- Taking on a leading role to build and keep a safe environment. That is, every professional must analyze the hazards and risks before starting their activities. Good recommendations include carrying out the necessary exams for their functions and actively participating in training and health and safety programs.

Training and Awareness

- Carrying out all training courses legally required for your duties and with the recommended frequency. But beware: take note activities should only be carried out with the employee appropriately equipped and in favorable physical and mental health conditions.

STAY TUNED

Don't forget to take the "Postural Guidance" and "Avoiding Domestic Accidents" e-learning on Oi Educa's Portal.

Alcohol and Drugs

- Everyone already knows that self-care is the first step that must be taken to benefit our safety. But it is always good to remember that the consumption of alcohol and drugs not only damages our health, but also impacts other people, damaging the professional performance and the work environment, in addition to damaging Oi's reputation and image. For this reason, we must respect the company's guidelines, which prohibits owning, encouraging, selling, distributing and consuming alcohol and other drugs on our premises or when working for the company. In addition, it is worth remembering that, in compliance with the law, it is also not allowed to smoke in any Oi's building.

Remote Work

- Always follow the key health and safety rules of our Work from Home Program.

SPEAK UP!

What to do in case of an accident at work?

First of all you should seek medical attention. Then, within 24 hours of the accident (mandatory deadline), register the Occurrence at Work Notice (COT) with Téo (Virtual Self-Service Assistant). If you prefer, there are more guidelines in the corresponding section in Interativa and with Téo himself. Another good source of information can be found in the related document: REG193 Occupational Accident Management.

What precautions to follow in my work from home?

For your safety, check that your furniture, lighting and ventilation are in line with the recommended minimum ergonomic requirements. Oh, also avoid getting involved in domestic affairs (except for emergencies, obviously). And remember: do not do work from home when you are in a leave of absence due to health problems.

How can I contribute more to safety on a daily basis?

Simple attitudes make all the difference. Wearing a seat belt while traveling and not giving unauthorized rides on company vehicles are important guidelines for greater safety. Not turning on appliances at workstations or outside cafeterias is also a good recommendation.

LEARN MORE

- ▶ **Virtual Assistant Téo**
Health, Safety and Environment Policy (HSE) Workplace
Accident Management Regulation
- ▶ **Alcohol and Other Drugs Program**
Oi's Golden Rules Corporate Fleet Regulation
Electricity Management and Use Policy

CHANNELS

- ▶ **Work Safety Situations:**
PPSEGURANCADOTRABALHO@oi.net.br.
- ▶ **Occupational health situations:**
PPSaudeOcupacional@oi.net.br.
PPSERVICOSOCIAL@oi.net.br



2.4

OUR WAY OF DOING THINGS

THE ROLE OF LEADERSHIP

Being a leader is also encouraging your team to multiply Oi's practices and values. A positive leadership is one of the key pillars in conducting the company's business, therefore, stimulating a work environment that encourages productivity, diversity and integrity must be in the DNA of each manager.

STAY TUNED!

LET'S REMEMBER SOME OF THE KEY ATTITUDES FOR OI'S LEADER:

- Encouraging ethical behaviors and decisions.
- Trying to be a model for your team, leading by example.
- Encouraging a good environment of mutual respect and trust.
- Treating everyone the same and always fairly.
- Trying to promote diversity and inclusion every day.
- Not practicing and not tolerating abusive behaviors, such as physical, verbal violence and harassment.
- Always encouraging collaboration, exchange of knowledge and continuous development of everyone.
- As different visions enrich decisions even more, valuing dialogue and diversity of views.
- Covering results with clear, direct, objective and, obviously, non-violent communication.
- Turning mistakes into learning. You will see that everyone will evolve with this.
- Establishing a relationship of trust and transparency with your team. Making sure that you will deal with individual problems and eventual team conflicts even better.
- Being understanding and open-minded to new technologies and work formats.
- If an employee breaks a rule, being active.

STAY TUNED

Always using the communication tools released for work in line with the guidelines of the company's Social Media Policy. This goes for emails, social media... And always respecting working hours. Oh, don't forget to guide your team to do the same. To use new technologies and management methodologies that are not used and practiced at Oi, check with the People and Management.

SPEAK UP!

What attitudes do not match ethical management practices?

Well, good leadership does not match offensive, humiliating or exclusionary treatment. You can't even imagine that today! Swearing, shouting, retaliation, threats and any other attitude that is not in line with this Code also do not match the current management practices.

2.5 PROTECT OI'S RESOURCES

We are all together here on a daily basis. For us to continue growing, it is also worth keeping an eye on some basic obligations. Protecting Oi's assets and resources is one of them. This means using them with common sense, correctly, responsibly and avoiding waste and misuse. Let's find out what else we can do about it!

🔌 STAY TUNED!

STAY TUNED TO OUR GOLDEN RULES TO HELP PROTECT THE COMPANY:

- Being sensible to use financial resources, always with prior authorization and in line with Oi's policies.
- Requesting your refunds exactly according to the expenses you incurred.
- Oi's vehicles? Only for company activities and complying with traffic legislation.
- The company's computers and electronic systems are used to carry out your professional activities. But you can even use them for personal reasons, as long as it doesn't interfere with your responsibilities or generate costs for Oi.
- Only use Oi's brand in allowed activities and after authorization from the responsible areas. And don't forget to always follow the standard and rules of the Brand Manual.

💬 SPEAK UP!

Can I use Oi's sponsored event invitations for leisure?

The invitations to events sponsored by Oi are to accompany clients in relationship actions. Exceptionally, there may be employees selected by the People Department, but always with the knowledge of their Director. The same reasoning applies to the receipt of Oi's products.

Can third parties use Oi's brand?

All of us are responsible for ensuring Oi's visual and language standardization. Therefore, we must guide partners and third parties who can only use our brand after authorization from the company. This surely also helps avoiding fines and lawsuits.

⚠️ STAY TUNED

It is important that you know that Oi reserves the right to monitor the use of its assets and resources whenever necessary, including email and systems.

2.6

PROTECT OI'S INFORMATION

Oi's information will be used exclusively for professional purposes, in your activities at Oi. In this scenario, we all play an important role in protecting the business, avoiding misuse and unauthorized access. Double care with information classified as confidential, including those protected by law or privileged, which must be further protected. Stay on top of what you can do to also ensure data security.

STAY TUNED!

SIX TIPS TO PROTECT INFORMATION:

- Since credentials (ID, passwords and badges) are non-transferable, you already know that they should not be shared or used in places with unauthorized access.
- Taking care that sensitive information is not shared or posted on social networks. It is also worth paying attention not to leave them exposed in workstations or forgotten in meeting rooms. And, if you print anything, be careful with the material at the printer.
- When working from home, always remember to file documents safely.
- Pay attention to your surroundings when in virtual environments, remote work or public places, such as elevators, restaurants, taxis, airports or airplanes. The important thing here is to avoid conversations with confidential or competitive information. This goes for face-to-face chats or phone, WhatsApp or Telegram conversations.
- Do not use confidential or legally protected information for your benefit or that of others. Suggesting investments to family members, friends or others, based on this information, fits this requirement and is not allowed.

- Do not use confidential or legally protected information for your benefit or that of others. Suggesting investments to family members, friends or others, based on this information, fits this requirement and is not allowed.

! STAY TUNED

Remember that what we produce in our daily work belongs to Oi. That is, we must not delete, destroy or take this information when, eventually, we terminate our employment agreement. Especially because our commitment to the protection of Oi's information must be upheld even after interrupting the professional relations. Oi is a publicly held company, with shares listed on stock exchanges and subject to rules regarding the disclosure of information.

+ LEARN MORE

- ▶ Information Security Policy Information
- ▶ Disclosure Policy
- ▶ Trading Policy for Securities

☰ SPEAK UP!

What is a confidential information?

Information with restricted and confidential access, such as salaries, organizational structure, research, business methodologies, reports or confidential data. Information of great commercial relevance and related to Oi's strategy is also included in this list, among others.

Who classifies the information as confidential?

The information's owner is always responsible for classifying this confidentiality. The owner does this in compliance with Oi's internal guidelines and rules. If you have any questions about this classification, contact the owner. If you are unable to locate the owner, consult the Compliance, Legal or Information Security departments.

Can't find the confidentiality classification in Oi's document? Is the document non-confidential?

No. If you are not the owner of the information and have not identified the classification as confidential, do not assume that it can be exposed or shared. The recommendation is that you look for the information in internal regulations or with the person in charge.

Can I share confidential files via instant messaging applications?

Avoid sharing files with sensitive or confidential information via social media, such as WhatsApp or Telegram. Use the company's official email or messaging services, such as Teams, to do so.

What precautions should I take with call conference systems?

When using collaborative call conference tools, be careful not to record meetings unauthorized to do so or share them with unauthorized people.



2.7

OUR WAY OF DOING THINGS

PROTECT PERSONAL DATA

At Oi, we are committed to honoring privacy and protecting the personal data of our clients, business partners and employees.

Thus, we further strengthen the quality of our services and the trust of our stakeholders. More than that, when carrying out any type of treatment of personal data, we must ensure the protection of privacy, sharing only with authorized persons, and retain this information only as long as it is necessary according to laws and regulations. But you can do even more. See how on the next pages.

STAY TUNED!

SEE HOW TO COMPLY WITH OI'S ETHICAL PRINCIPLES:

- Seek to know and apply the laws and regulations on the protection of personal data.
- Try to continuously improve security measures. They will be increasingly effective to further protect everyone's privacy.
- In your daily life, evaluate the effect of decisions on people's privacy, seeking the most appropriate solutions.
- Do not collect, store, share, transfer, delete or process in any way personal or sensitive data without making sure that this complies with the guidelines and rules.
- Respect people's choices regarding their privacy.

LEARN MORE

► Privacy Policy / Data Protection

SPEAK UP!

What is personal data?

All information related to a person that allows the person to be identified. Including the name, surname, ID numbers, address, parents, phone number, email, profiles and purchase history, among others.

What is sensitive personal data?

These are linked to choices or aspects of a person's personality. This includes racial and ethnic origin, religious belief, political or philosophical opinion and data related to health or sexual life, besides genetic or biometric information, when linked to a individual, among others.

STAY TUNED

When creating products and services or when developing new projects, always assess if you are respecting our commitment to data protection.

What is data processing?

These are transactions carried out with personal data. That is, those with collection, production, reception, classification, use, access, reproduction, transmission, distribution, processing, archiving, storage, elimination, evaluation or control of information, modification, communication, transfer, diffusion or extraction.

When we develop a new product, do we have to worry about data protection?

Yes. These data protection impacts need to be assessed from conception to execution. You must always seek the best measures to comply with established rules and legislation.

If a third party asks me to contact an Oi's manager to offer products, can I share?

Remember that, before making any decisions, it is important to assess if you are going to interfere with someone's privacy. Be careful and be sure to ask the person for authorization before sharing their contact details.

OUR WAY OF DOING THINGS

2.8 COMMUNICATE THE RIGHT WAY

We are how we communicate. Therefore, Oi's communication is concise, accurate and direct. We avoid exaggeration, figures of speech or speculation. We are objective, assertive and, above all, respectful. This is true when we communicate verbally and also when we use a collaborative tool [forums, emails, sharepoint, intranet, corporate network, social networks and conference call systems or messages]. We will, together, communicate even better.

STAY TUNED!

THEREFORE, WE COMPLY WITH THE ETHICAL PRINCIPLES OF OUR COMMUNICATION WHEN:

- We ensure the quality of the content communicated. After all, regardless of the original source, as authors, we are always responsible for the content we publish.
- We think of others when it comes to writing emails, messages or attending meetings. In other words, we are polite and avoid including people who do not need to waste their time. At the same time, we keep matters restricted to those directly involved.
- Whenever we use images in Oi's official profiles, we choose neutral options and without undue, exaggerated content or related to politics, religion, among others. This is also true for our professional profiles on the intranet, email, among others.
- When communicating, regardless of the tool we use, we are careful to observe all guidelines in this Code. Everything to ensure the reliability and security of information.

SOCIAL NETWORKS

SPEAK UP!

What to do if you notice that Oi's image is being used improperly?

Report to the communication department immediately for the necessary measures. We are talking about both the logo and any other institutional symbol applied on web-sites, blogs or unofficial social profiles.

STAY TUNED

Do not forget that all information generated by any employee must be guided by the principles of this Code. This goes for internal and external communication channels.

STAY TUNED!

HOW TO BETTER USE SOCIAL NETWORKS:

- Avoid speaking on behalf of the company on social media. After all, there are official channels specialized in communication.
- Use this Code as a guide, being careful not to say anything that could have negative consequences for Oi and its employees.
- Always respect coworkers, managers, subordinates and the company.
- Try not to use social media to express a dissatisfaction that can be solved internally. This also goes to express offensive content that damages Oi's image or the dignity of its members.
- Be careful with sensitive and confidential information. Seek public information from the company to make your posts, like, share or comment on posts.

CHECKLIST

Before posting on your social networks, reflect if you are sure that...

1. Is the content ethical and lawful?
2. Is the information true and from a reliable source?
3. Does it contain sensitive or confidential data?
4. This information will not expose Oi or one of its employees

If the answer is negative to any of the questions, do not interact.

In addition, make sure you are always in line with the Social Media Conduct Policy and with all guidelines in this Code of Ethics and Conduct.

! STAY TUNED

Remember: Freedom of expression must be guided by legal and ethical limits. Whenever this violates the rights of a person or Oi, we are subject to the consequences.

☰ SPEAK UP!

Does Oi monitor posts I make on social networks?

First of all, it is good to remember two things: Everything you post becomes public and, if Oi is tagged in any publication, the communication department can access the content. In addition, as an employee, it is natural to have your image associated to the company. Therefore, try to be careful and avoid exposing yourself and the company to controversial, unethical or false content, or confidential Oi's information.

What precautions should I take when posting photos of my work routine?

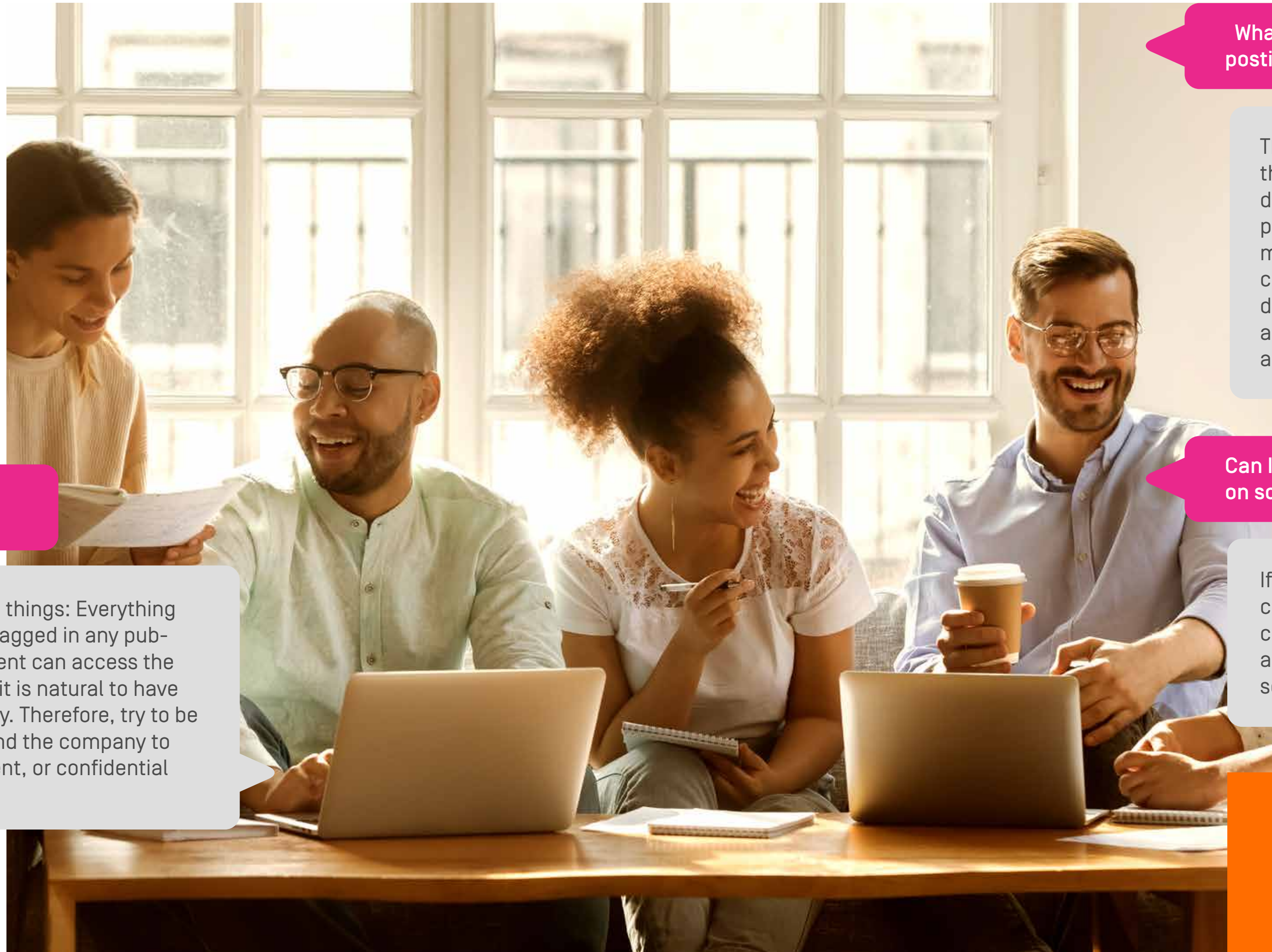
The main thing is to be careful with photos that have files open on the computer or displayed on workstations, as well as presentation slides (ex. Oi Day, conventions, meetings). Participation in confidential corporate projects or that must not be disclosed should also be avoided, as well as images of unauthorized people, among others.

Can I be penalized for posting on social media?

If the content is unethical or exposes the company to an impact on its image or credibility, you are subject to disciplinary action. They may vary according to the severity of the case.

+ LEARN MORE

- ▶ Policy of Good Practices in Social Media
- ▶ Oi's Brand Manual



OUR WAY OF DOING THINGS

2.9

KEEP
ACCURATE
ACCOUNTING
RECORDS

Secure information are used for responsible business decisions. At Oi, it couldn't be different. For this reason, it is our duty to keep all records, including accounting records, complete, accurate and correct. Time to find out how to do this.

 STAY TUNED!
LEARN HOW TO KEEP UP TO DATE
WITH YOUR ACCOUNTING RECORDS:

- First of all, be careful and honest to ensure that the records are true and reliable in any of Oi's process, system, report or documents.
- Never use Oi's resources for purposes other than those described in the documents that support payments.
- Ensuring the compliance with accounting principles, internal methodologies and the structure of current controls, keeping records faithful to the transactions and events.
- Being open and contributing transparently to audits, inspections and other forms of business inspection.
- Do not condone attempts to coerce, manipulate or deceive people involved in audit, inspection and any other form of administrative, regulatory or judicial inspection.

 STAY TUNED

Always taking care to keep complete, accurate and safe records. All of us are responsible for this, not only the accounting and finance teams.

OUR WAY OF DOING THINGS

2.10 REMOVE CONFLICTS OF INTEREST

Transparency is key. A key word that must govern all situations involving any conflict of interest in the company - and in our lives. We must be careful not to allow our ability to judge or make exempt decisions to be impaired when our private interests conflict with Oi's goals, obligations or commitments.

STAY TUNED!

WE FOLLOW OI'S ETHICAL PRINCIPLES WHEN OUR DECISIONS MINIMIZE RISKS, PROTECT OI AND:

- they do not allow personal interests to affect our choices or professional work.
- whenever possible, they remove conflicts of interest.
- seek the most appropriate and least risky solution for Oi.
- are transparent in situations with a potential conflict of interest.

CHECKLIST

At this point, you may be wondering what are the most common situations of conflict of interest. Well, they usually involve family ties or close relationships, another job or misuse of information or resources. They also happen with courtesies outside the rules, among others.

These situations should always be avoided. If not, when they happen, they must be stopped, corrected or recorded immediately - always depending on each situation and its variables. The next page will help you understand better.

MEET SITUATIONS WITH RISK OF CONFLICT OF INTEREST:

Close or family relationship

- Family members in positions with direct or indirect hierarchy among them; or who answer to the same immediate superior; or in interdependent or correlated positions. [*]
- Romantic relationship between employees with hierarchical ties (direct or indirect) or in interdependent or correlated positions. [*]
- Employee who is a shareholder, partner, officer, employee or consultant in competing companies or suppliers. [*]
- Relationship between the employee, board member or their family members with suppliers. [**]
- Direct business relationship of employees with family members or people and institutions with a personal relationship. [*]
- Relatives of employees on boards of competing companies or suppliers. [**]
- Relationship between employee, board member or their family member with the recipient of a sponsorship or donation - who will receive the resource. [**]

Parallel activities

- Other use or trade of products during working hours that interfere with the professional work of the employee or the team. [**]

Use of information and resources

- Use of Oi's privileged information, resources or business opportunities for personal and/or third party benefit. [*]

Receiving amenities or benefits

- Irregular business decision resulting from influence or embarrassment due to receipt of courtesy (gifts, hospitality, etc.) or improper advantage from third parties. [*]

[*] situations not allowed

[**] situations that depend on analysis and approval

Check related policies.

 **SPEAK UP!**

What to do if a family member is participating in a selection process to work at Oi?

You must inform your relationship to the People and Management Department whenever you indicate or know that a family member is participating in a hiring process to work at Oi. Also try to guide your family member to inform this during the selection process.

What family ties does Oi consider when talking about family members?

We consider both kinships in a straight line (parents, grandparents, children, in-laws, stepchildren, etc.) and collateral lines (brothers, uncles, nephews, cousins, brothers-in-law, etc.). Access Interativa to find out all family ties.

Who should I report a conflict of interest to?

The important thing is to comply with Oi's Conflict of Interest rules. Now, whenever there is a question, check with the Integrity Management.

Can we negotiate or sell products at Oi?

We do not sell or trade products or services in Oi's work environment. The exception is due to the department designated for this purpose, on the corporate intranet (classified), but ensuring that the operation is carried out outside the company's facilities.

Can I have another job or professional activity?

Yes, as long as complying with the guidelines related to conflict of interests and does not impair your work and commitment to Oi. The important thing is to always keep your leader informed.

If I start dating someone in my department, should I report this to my manager?

Surely. When entering into a romantic relationship that characterizes an emotional bond with a person in the company, the recommendation is that you talk to your immediate superior and with People and Management. Depending on the variables, an internal change between departments or position may be necessary. Now, if this is a casual relationship, without more serious or lasting ties, this does not need to be reported, as long as it does not have a negative impact on the performance of the department. Remember: Transparency is always the best option.

 **LEARN MORE**

- ▶ Trading Policy for Securities
- ▶ Gifts, Promotional Gifts and Other Hospitalitys
- ▶ Policy Conflicts of Interest and Related Parties
- ▶ Policy E-learning Compliance Path - Oi Educa
- ▶ E-learning Compliance Path - UVV [Stores]

OUR WAY OF DOING THINGS

2.11

USE THE WHISTLEBLOWING CHANNEL

Everyone is responsible for changing things that are wrong. At Oi, we strengthen integrity and ethics when we act to transform things, encouraging people to report situations that don't comply with rules of good conviviality and conduct. To help with these changes and deal securely with anonymous or identified demands, the company created Oi's Whistleblowing channel. But it is worth noting that this should be based on facts and, if possible, with evidence. Employees and third parties can use the tool, always with confidentiality guaranteed. After all, more than a rule, non-retaliation must be everyone's commitment.

STAY TUNED!

FOLLOW THE RULES BELOW TO COMPLY WITH THIS MATTER:

- If you identify deviations that could damage Oi, employees or third parties, do not waste time and file your report right away.
- Base your reports on truth and good faith, with no conspiracy or revenge.
- Try to be as transparent and collaborative as possible with investigations.
- Try to be as careful as you can to keep the confidentiality and not expose people.

STAY TUNED

It is worth noting that no retaliation, threat or intimidation against whistleblowers or investigators is allowed. If this happens, disciplinary actions ranging from verbal warning to termination of employment may take place. In addition, the measures applied are recorded as indicators in the "Ethics Committee Resolutions Chart" available at Interativa itself.

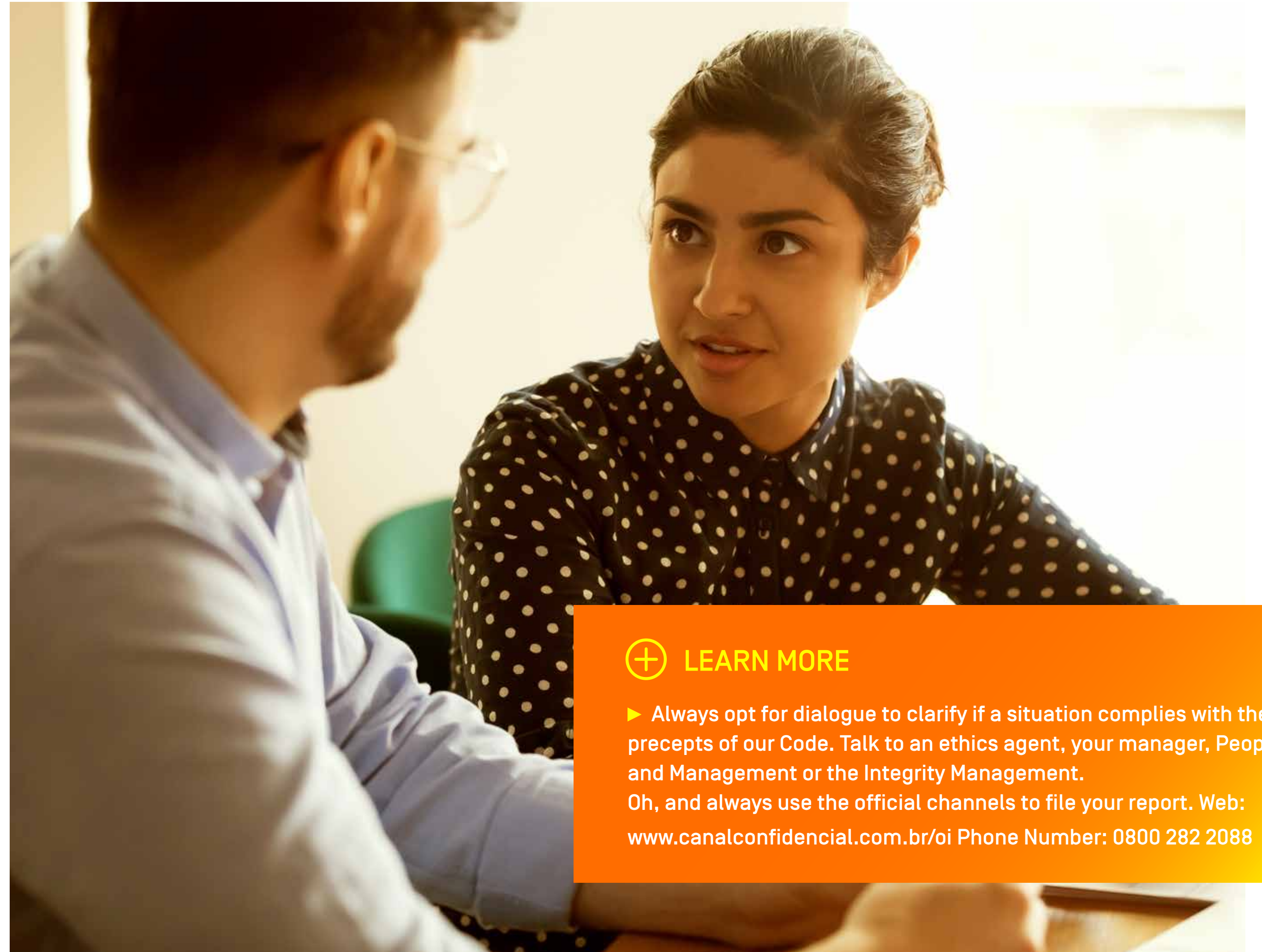
 **SPEAK UP!**

How can I be sure that the channel is really confidential?

To start with, it is managed by a third party contractor, who receives, analyzes and directs the demands only to people with authorized and due access. In addition, the investigation teams are already trained to ensure confidentiality. In addition, the Ethics Committee debates cases of violation of the Code, applying the necessary penalties. But remember that confidentiality also depends on you. Therefore, think well before commenting your report with others during the investigation process. Such conversations can impair confidentiality.

Before activating the Whistleblowing channel, can I my questions be answered by any department or ethics agent?

Yes! You can speak to an ethics agent, Integrity Management, People and Management, Board or other relevant area whenever you need to clarify if a situation should be reported or if there was a breach of Oi's Code or policies and procedures. Just don't forget that the complaint must be formalized through the official channel.

 **LEARN MORE**

► Always opt for dialogue to clarify if a situation complies with the precepts of our Code. Talk to an ethics agent, your manager, People and Management or the Integrity Management. Oh, and always use the official channels to file your report. Web: www.canalconfidencial.com.br/oi Phone Number: 0800 282 2088



3

OUR RELATIONSHIPS

Find out how we address each of our different stakeholders

OUR RELATIONSHIPS

3.1 PUBLIC SECTOR

We know that in our business it is more than common to relate to the public sector. For this reason, respect, integrity, ethics and transparency guide all our relations with the segment and there are departments specially trained to be activated when necessary. Learn more about the precautions and procedures you should take.

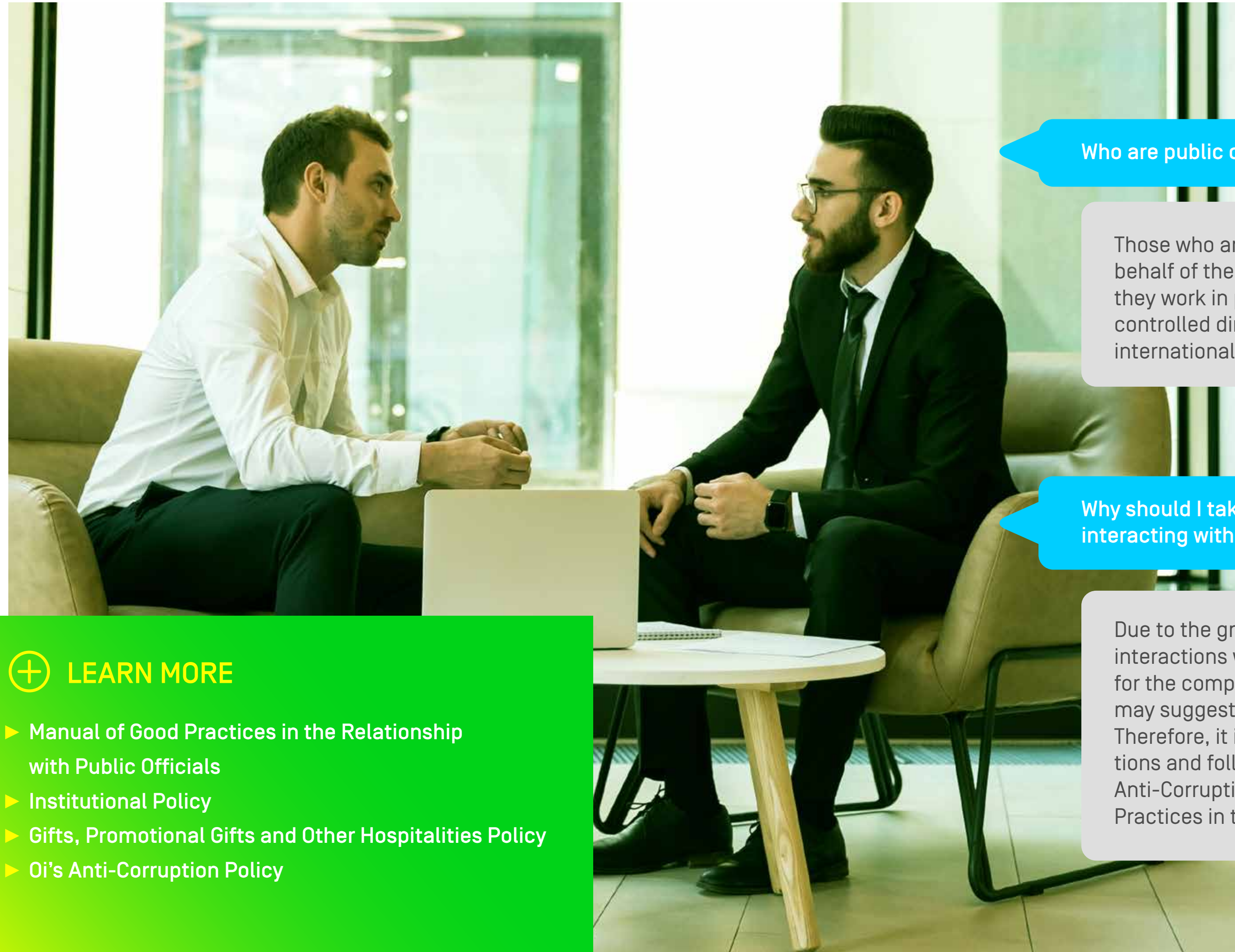
🔌 STAY TUNED!

WE COMPLY WITH OI'S ETHICAL PRINCIPLES WHEN:

- Our interactions with public officials take place for legitimate reasons. In other words, with a lawful, relevant, ethical motive and with interlocutors with appropriate jurisdiction and role for this representation.
- We use impersonal dialogue and more formal, clear and concise language.
- We are very transparent and record all meetings in the corporate agenda or in the internal controls created by the area.
- We comply with Oi's and the public sector's policies when offering or accepting lunches, coffees, dinners and other amenities.

⚠️ STAY TUNED

Oi does not sponsor, finance or donate to political campaigns, candidates or political parties. Any individual campaign or distribution of material that involves politics or religion must not be carried out in our work environment or with our resources.



 **SPEAK UP!**

Who are public officials?

Those who are providing a service, paid or unpaid, on behalf of the Government, even if temporarily. That is, they work in public institutions - companies or entities controlled directly or indirectly by national or international governments.

Why should I take precautions when interacting with public officials?

Due to the greater exposure to the risk of corruption, interactions with public officials are a source of risks for the company. A contact made without proper care may suggest or even appear to break integrity. Therefore, it is very important that you take precautions and follow all internal guidelines defined in the Anti-Corruption Policy and the Manual of Good Practices in the Relationship with Public Officials.

What precautions should I take with court orders and demands?

They must be sent immediately to Oi's Legal Board or Restricted Shares Management - depending on each case. Demands from other bodies can be referred to the Institutional Relations Board. If you don't know who is the right recipient, contact your regional Messaging department or send an email to msg.rj.supervisor@2fgs.com.br. It is important to stress that timing is more than crucial in this process.

 **LEARN MORE**

- ▶ Manual of Good Practices in the Relationship with Public Officials
- ▶ Institutional Policy
- ▶ Gifts, Promotional Gifts and Other Hospitalities Policy
- ▶ Oi's Anti-Corruption Policy

OUR RELATIONSHIPS

3.2 CLIENTS

We have a direct responsibility to build solid and lasting relationships with our clients, delivering the products and services they want in the way they need it. That is why we always pay attention to identify and meet their needs. Straight conversations, always, no false promises. Just like our offers. We keep everything simple and straightforward, doing our utmost to meet what was agreed and ensure the best experience and confidence to our clients.

STAY TUNED!

WE GAIN THE CONFIDENCE OF OUR CLIENTS WHEN:

- We treat clients with an “owner attitude” regardless of our role or department at Oi.
- We are always committed to deliver the highest quality, ensuring good results in everything we do.
- We are one step ahead, proactively helping clients when they need us.
- We try to simplify things, reducing bureaucracies and making everything more agile and efficient.
- We protect our clients’ personal data and comply with related laws.
- We reject any form of bribery or influence from clients to favor negotiations or obtain undue advantages.

SPEAK UP!

What should I do if a client reports a problem or trouble to me?

Oi offers Eu Resolvo, an internal and direct channel that you should use to help a friend or acquaintance with any issue to be solved. Register and monitor the demand.

 **LEARN MORE**

▶ [Eu Resolvo – App](#)

OUR RELATIONSHIPS

3.3 SUPPLIERS AND PARTNERS

In our business, many deliveries depend on a large network of suppliers of goods and services. Choosing and hiring these partners must be based on technical, professional, ethical and integrity criteria.

To ensure that this process runs as smoothly as we need, Oi uses formally defined procedures that ensure the best cost-benefit and fair competition. All of this without allowing decisions of personal interest.

STAY TUNED!

OI AND ITS SUPPLIERS FOLLOW STRICT CONTROL STANDARDS. STAY TUNED TO EACH PARTY'S PROCEDURES:

COMMITMENTS OF OI AND ITS EMPLOYEES

- Ensuring the technical excellence of bidding processes, without allowing personal interference, such as favoring a supplier.
- Respecting the separation of positions between the business area and procurement department.
- Keeping information about the hiring process confidential.
- Evaluating the partner's qualification, reputation and integrity before starting a negotiation/contract.
- Eliminating conflicts of interest, such as hiring family members, as well as companies that they manage or control.
- Working closely with each supplier to ensure compliance with requirements and agreements and keeping records updated.

 **SPEAK UP!**

- Whenever you notice, report via the Whistleblowing channel any signs of the supplier's involvement in illegal practices or contrary to Oi's ethical precepts.

COMMITMENTS FROM OUR SUPPLIERS

- Always have the responsible attitude to follow ethical standards similar to Oi's. This goes for when you are operating with the company or on our behalf.
- Adopt measures to always improve your integrity mechanisms and fight corruption and other illicit acts.
- If there is a subcontracting authorized by Oi, widely disseminate this Code and the Conduct Manual for Contracted Third Parties to suppliers and partners.

My area is hiring a supplier and I have questions about a competitor's integrity. What should I do?

You must inform the Procurement Department and the Integrity Management whenever you suspect a bad reputation, integrity breach or unethical behavior of the competing supplier. For cases in which the partner is already hired, formalize a complaint so that the company can investigate.

Can I contact the supplier during a procurement process?

It is mandatory that the requesting areas are in line with the separation of duties defined for the procurement and hiring process. The purpose is to ensure the equality and transparency of the process. For this reason, you should not, for example, interfere with price surveys or call a supplier to ask for discounts. Keep yourself updated about the Procurement Policy guidelines and, in case of questions, contact the Procurement Department.

 **STAY TUNED**

Oi's expectation is that our suppliers have values and conduct guidelines compatible with those of Oi. More than that, we encourage them to be committed to complying with the laws applicable to the contracted product or service, as well as to develop integrity mechanisms in their businesses. It is worth noting that suppliers who disrespect the Code must be disqualified.

 **LEARN MORE**

- ▶ **Conduct Manual for Contracted Third Parties**
- ▶ **Procurement Policy for Goods and Services**



OUR RELATIONSHIPS

MARKET AND COMPETITORS

Adequate competitive practices are those that privilege competition for merit and put the customer first.

We not only believe in this, but create opportunities for clients to choose quality products and services that best meet their needs. At Oi, we support free enterprise and free competition and recognize the importance of a competitive market. Together, we are committed to competing ethically and fairly, in accordance with competition law and market rules.

STAY TUNED!

EXERCISING OUR COMMITMENT TO FREE COMPETITION AND A COMPETITIVE MARKET INCLUDES NEVER ACTING IN WAYS PROHIBITED BY LAW AND AGAINST OI'S ETHICAL PRINCIPLES, AS:

- Establish an agreement, formal or informal, with competitors to fix, increase or stabilize prices or profit margins. This includes agreements on ranges, initiatives or price recommendations.
- Set minimum prices for products and services for distributors and resellers.
- Divide the market or avoid competition for certain clients or accounts - or in certain geographic areas.
- Avoid participating or defrauding the free dispute in bids or bidding processes.
- Combine prices in bids, bidding processes or other terms and conditions of the offer.
- Restrict or eliminate the production or offer of products and services.
- Restrict the hiring of suppliers or clients.

SPEAK UP!

How to comply with Oi's ethical principles in this field?

First of all, you must seek to know and apply the laws of the markets in which we operate. You should also not misuse customer information, obtained due to our position in the segment, to eliminate competition.

How to proceed with confidential information?

Do not share or discuss Oi's confidential or sensitive information with third parties, either directly or in associations and unions. This applies to prices, marketing campaigns, costs, level of capacity, current sales or sales and investments forecasts, among others. You must also not accept to receive confidential or sensitive information from our competitors, nor encourage third parties or former employees of competitors to share such information or other more sensitive information that should be kept confidential.

STAY TUNED

Competition laws apply to all Oi Group businesses and activities and to employees, non-employees, clients and suppliers.

LEARN MORE

▶ [IR Portal - Oi website](#)

OUR RELATIONSHIPS

3.5 INVESTORS AND SHAREHOLDERS

Ensuring the trust of our shareholders and investors is one of our commitments. Therefore, when making decisions, we must ask ourselves if this strengthens or damages Oi's reputation with this relationship audience. It is worth noting that the company has areas specially trained to talk to investors and that should be activated whenever necessary.

STAY TUNED!

WE BETTER RELATE WITH INVESTORS AND ANALYSTS AND WE ARE IN LINE WITH OI'S ETHICAL PRINCIPLES WHEN:

- We act with transparency, communicating honestly and being direct about the position of the company.
- We are open and attentive to hearing opinions and questions from investors and other interested parties.
- We make accurate and reliable records of our financial and accounting transactions, always in compliance with current laws.
- We disclose reliable and easy-to-understand information about our financial results, all in line with the reports we submit to CVM.
- We keep the confidentiality of privileged information and, under no circumstances, do we negotiate or use it for our own benefit.

- We protect the company's resources and assets.
- We respect blackout periods, when Subject Persons foreseen in the Securities Trading Policy cannot buy or sell Oi's shares, knowing that this conduct violates policies and is illegal (learn more).

! STAY TUNED

Requests from investors and shareholders must be sent to the Investor Relations Department (IRD). For this, there is an official email and phone number displayed on the company's IR website. Requests for equity positions must be sent to the Board responsible for financial services. Also, remember that we have the Whistleblowing channel and specific committees to receive and handle complaints by employees and related parties.

Important: The IR department must monitor any and all communications with capital market agents.

☰ SPEAK UP!

Can I invest in Oi's shares?

Employees can trade Oi's securities. But, if you are a Subject Person, you must be aware of the blackout period, as well as restrictive conditions of the Securities Trading Policy.

Who are the Subject Persons provided for in the Trading Policy?

Subject Persons are those that have a direct or indirect relationship with Oi and that need to follow certain legal guidelines on privileged information and when trading company securities. Among them, we highlight members of the Board of Directors, N1 and N2 officers, employees and interns of the Controllershship, M&A, Investor Relations, Accounting and Corporate Legal departments. You can find the full list in the Securities Trading Policy.

When I'm not sure if the information is privileged and not public, who should I ask?

"Privileged information" is the information related to a material act or fact of the company, but which has not yet been disclosed to the investing audience and the market in general. On Oi's IR website there is a specific space where Material Facts are published. If the information you have has not been published yet, consult the Investor Relations area.

+ LEARN MORE

- ▶ [IR Portal - Oi website](#)
- ▶ [Trading Policy for Securities](#)

OUR RELATIONSHIPS

3.6 PRESS

Our communication is direct, simple, consistent with reality and ethics. We are careful in everything we say and how we say it. All this to ensure the quality of the messages we want to convey and the results they bring to Oi. But it is always important to note that we do not speak on behalf of Oi without authorization. For this, we have departments specially trained to speak to the press that can be activated whenever necessary.

🔌 STAY TUNED!

FOLLOW THESE STEPS FOR PRESS RELATIONS:

- Do not grant interviews or make statements that quote Oi, directly or indirectly, without prior authorization. Such conduct may even result in penalties.
- Employees authorized to speak to the press must activate the Institutional Communication department before providing any information to journalists or the media.
- Send media requests and interview requests to the Board responsible for Institutional Communication.

💬 SPEAK UP!

I was approached by a journalist with questions about Oi. Can I answer them?

No, only the Institutional Communication department can answer questions from the press. Therefore, if you are not in this department, inform the professional that you are not authorized to answer questions about the company and direct them to the responsible department.

⊕ LEARN MORE

- ▶ Institutional Policy
- ▶ Relationship Policy in Social Media

A young woman with dark hair tied back, wearing a light blue button-down shirt, is smiling broadly at the camera. She is in an office environment with other people working at desks in the background, which is softly blurred. The lighting is warm and natural.

4

OUR COMMITMENT

How we work on a daily basis to build
an increasingly responsible company
and a fairer society



OUR COMMITMENT

ETHICS AND INTEGRITY

It doesn't matter where we're doing business. We will always respect the laws, internal and external, and the game rules, striving to act with ethics and integrity in everything we do. We are talking about practicing the Compliance on a daily basis. Thus, we encourage building trusting relationships with investors, governments, clients and partners. We are doing our part for a more just society. Everyone, together and individually, has this responsibility, this commitment.

🔊 STAY TUNED!

STAY ON TOP OF OUR ATTITUDES:

- If you need to know the rules to do the right thing, we strive to know them and, above all, to apply them.
- To expand our knowledge, we are dedicated to providing the training that the company offers to us.
- Before making a decision, we always assess if it complies with ethical guidelines and business rules.

⚠️ STAY TUNED

The company created Oi's Compliance Program, several measures to encourage compliance on a daily basis and strengthen ethics and integrity. Access the Compliance Manual at Interativa to learn more about the pillars and goals of the Program.

💬 SPEAK UP!

Who are the Ethics Agents?

They are part of Oi's Compliance Program and are employees whose mission is to contribute to the dissemination of the ethical culture and integrity in the company. They are appointed by other employees, then selected by the Compliance Board, with knowledge of the Ethics Committee [learn more at the side], for a voluntary activity of one year - renewal is authorized.

When to activate an Ethics Agent?

The Ethics Agent is a partner of the departments and can be activated whenever we need support to answer questions about issues related to the Compliance Code or Program. They are present in many areas of the company. To find one of them, just search Interativa. For more serious situations, such as misconduct, follow the guidelines to use the Whistleblowing channel.

What is the Ethics Committee?

It is the highest body responsible for assessing issues related to responsibility, behavior and ethics at Oi. The Ethics Committee resolves on disciplinary measures and ensures the management and review of this Code. Its structure includes five Oi's officers, who may be statutory or not, with a term of office of one year each, which may be extended for another year. It is worth noting that the disciplinary measures decided by the Committee will follow the disciplinary system of the People and Management Board and can be applied as a verbal or written warning, suspension or termination of the labor agreement, without prejudice to the filing of lawsuits.

➕ LEARN MORE

- ▶ Compliance Manual
- ▶ Compliance Page – Interativa
- ▶ Integrity and Ethics at Oi
- ▶ Oi's Ethics Agents – Interativa
- ▶ Oi's Ethics Committee – Interativa
- ▶ Regulation - Election of New Ethics Agents

OUR COMMITMENT

4.2 RISK MANAGEMENT

Risks are part of any business and you are key element to prevent them. We encourage our employees to be agents, identifying possible problems and promoting the discussion of solutions. The first step is to talk more about the situations that pose risks and how to deal with them. The Code of Ethics and Conduct protects you from any type of retaliation, so that you can watch over our company and speak openly about anything that could harm it. At Oi, we understand that everyone is an integral part of risk management and that preventing them is the smartest way to help us achieve our goals. With that in mind, the best thing to do is to roll up your sleeves, identify the risks, assess how they can harm our strategy and what we can do to overcome their negative effects.

 STAY TUNED!

DISCOVER WHAT YOU CAN DO:

- Protect the company and people, reporting problems with potential risks so that the best solution is found.
- Before making a decision, correctly identify and assess risks, seeking and anticipating the best response strategies.
- Contribute openly and collaboratively to the process of corporate risk management for Oi's protection and benefits.

 LEARN MORE

- ▶ Risk Management and Controls - Interativa
- ▶ Policy on Risk Management and Internal Controls

 SPEAK UP!

How does Oi manage its risks?

In our routine, we deal with risks on a daily basis and take actions to minimize negative effects. In addition to its individual activities, Oi has a structured system and process to manage corporate risks (ERM). There, the main risks identified in the company are recorded and monitored. It works as a dynamic matrix, prepared by the business areas and updated whenever necessary. It is reported to the senior management periodically and gives rise to different strategic decisions and preventive measures.

How do I contribute to risk management?

Each of us can and must contribute to this process, identifying and solving problems and risks. You are Oi's first line of defense in risk control and prevention. This means that your role is crucial. For this reason, whenever you identify potential risks, talk to your immediate manager and Risk Management. Thus, you will always have specialized support to assess and study the most appropriate response.



4.3

OUR COMMITMENT

FIGHTING CORRUPTION AND OTHER ILLICIT ACTS

At Oi and its businesses, we do not accept corruption (active or passive), fraud, money laundering and financing of terrorism and other illicit acts. We have already signed many agreements and initiatives to fight corruption, such as the Global Compact, making this a public commitment of the company.

STAY TUNED!

IN LINE WITH OUR COMMITMENTS, WITH OI'S COMPLIANCE PROGRAM AND APPLICABLE NATIONAL AND INTERNATIONAL LAWS, IT IS UNACCEPTABLE FOR ANY OI GROUP'S PROFESSIONAL – OR THIRD PARTIES THAT WORK ON OUR BEHALF OR IN PARTNERSHIP WITH US – TO PRACTICE ILLICIT ACTS. IT IS EXPRESSLY PROHIBITED:

- Any kind of bribe: promising, offering or giving, directly or indirectly, an undue advantage to a public official, domestic or foreign – or person related to the official – or accepting a bribe. Bribery is also unacceptable in relations between private companies, and the most common types include facilitation payments, bribes, donations and sponsorships, political contributions and gifts, among others.
- Obstruction to investigation or inspection processes: Establishing any type of obstruction, intervention or difficulty to the work of agencies, entities or public agents in their work, investigations or inspections. This is true even within regulatory agencies and supervisory bodies in the national financial system.
- Money laundering: Camouflaging the illicit source of funds using the company's legal operations or assets to make the money appear as legal.
- Fraud in bidding processes: Engaging in fraud in bids and contracts with the government, domestic or foreign, or offering an undue advantage to a bidder, as follows:
 - > Frustrate or defraud the competitive nature of a public bidding procedure, through adjustment, agreement or any other means;
 - > Prevent, disturb or defraud any act of public bidding procedure;
 - > Remove or seek to remove a bidder through fraud or offering an advantage of any kind;
 - > Defraud a public bidding or contract resulting from it;

STAY TUNED

As Oi issues public securities in the United States, besides complying with Brazilian Anti-Corruption Law 12846/13 and Regulation Decree 8420/15, we are also subject to the US Foreign Corrupt Practices Act (FCPA).

- > Create, in a fraudulent or irregular manner, a legal entity to participate in public bidding or enter into an administrative contract;
- > Obtain an improper advantage or benefit, in a fraudulent manner, of amendments or extensions of agreements entered into with the government, without authorization by law, in the call for bids or in the respective contractual instruments;
- > Manipulate or defraud the economic and financial balance of contracts entered into with the government.

 **SPEAK UP!**

A public official offered to speed up the release of a license in exchange for an extra fee. Is that corruption?

Yes. The collection of extra fees not provided for in the public service can be requested by a public agent for his/her private benefit. Accepting this type of behavior, making facilitation payments or offering any other type of undue advantage, such as a gift, means committing an unlawful act against the government. It is worth noting that the simple offer of an undue advantage to a public official is already consider a corruption.

Can a third party acting on behalf of Oi, when bribing a public official, expose the company to the penalties provided for in the Anticorruption Law?

Yes. The company can be held responsible for harmful acts performed by third parties for their interest, regardless of the nature of the relationship. Therefore, prevention and control mechanisms are key.

When establishing trade relations outside Brazil, are we subject to anti-corruption laws in other countries?

Yes. Therefore, pay even more attention to this issue. payment or offer of improper advantage to a foreign civil official can be considered a transnational bribe. The simple offer of gifts, promotional gifts or hospitalities to these officials can be interpreted, depending on the case, as an undue advantage, exposing Oi to the risk of being liable for corruption in Brazil and abroad.

 **CHECKLIST**
Meet Oi's Initiatives:

- ▶ Global Pact
- ▶ Business Pact for Integrity and Against Corruption

 **LEARN MORE**

- ▶ Anticorruption Policy
- ▶ Compliance Manual
- ▶ **E-learning Compliance Path - Oi Educa**
- ▶ **E-learning Compliance Path - UVV [Stores]**
- ▶ Oi's Annual Sustainability Report



4.4

OUR COMMITMENT

GIFTS, PROMOTIONAL GIFTS AND HOSPITALITIES

We know that giving or receiving courtesies is a common business practice. But we cannot fail to comment on the risks entailed by this. And that goes for gifts, low-value promotional gifts and even invitations to events or meals. Even a courtesy can be used to hopefully influence a decision or characterized as an improper advantage payment. For this reason, we are very cautious and transparent, taking care to follow the best practices established for this.

STAY TUNED!

WHAT YOU NEED TO KNOW AND DO:

- Understand the risks of courtesies and act transparently and in compliance with internal rules.
- Refuse any gift, promotional gift, invitation, travel and other courtesy that does not comply with the rules - especially if you think there is a potential attempt to influence, expectation of retribution, a condition for carrying out or promising a business or any of the conditions prohibited in the policy.
- Before offering courtesies, make sure you follow the guidelines of the Gifts, Promotional Gifts and other Hospitalities Policy, as well as the policy of the third parties who will receive it.
- Pay special attention when dealing with public officials, respecting Oi's policy and public sector rules.

CHECKLIST

Before receiving a courtesy, stop and think:

- Does the price of the gift or the sum of the items exceed what is allowed in the Gifts, Promotional Gifts and other Hospitalities Policy?
- Is the hospitality limited to leisure? In other words, does not meet the criteria to promote business and institutional opportunities?
- Will I feel forced to give back?
- Can the third party be interested in favoritism, influence a decision, receive some remuneration, establish a condition or make an exchange?

- Receiving or giving this courtesy may generate an unfavorable understanding and harm Oi?

If you answered yes to one of these questions, it is advisable to cordially refuse the gift, promotional gift or other hospitality.

Know each item:



PROMOTIONAL GIFTS

Objects without commercial resale value used as advertising, disclosure or small courtesy.



GIFTS

Items or services for personal use that have commercial value.



OTHER HOSPITALITIES

Includes meals, travel and entertainment, among others.

 **SPEAK UP!**

! STAY TUNED

Courtesy cannot be in cash, check or bond, be habitual or, when involving public officials, be in non-compliance with public sector rules.

Important: Oi establishes specific rules for the subject involving public agents. See the Policy on Gifts, Promotional Gifts and other Hospitalities.

I received a gift worth more than the value allowed. What should I do?

In situations where the immediate refusal of the gift is not feasible - as in items delivered to an address or that lead to a great discomfort in formal or protocol situations - the return must be made later. It will be a good idea to also include a letter of thanks. If it is not feasible to return, transfer the gift to the Compliance department to provide the best destination. They will always do this with the Ethics Committee.

Can I accept an invitation to a workshop/training?

It can be accepted with prior approval from the duly authorized Manager and in line with the guidelines of this Code and policies.

A supplier who expects to close a contract with Oi invited me to attend an event. Can I accept?

It is inappropriate to accept invitations to social events with a supplier, either during a contracting process or when submitting proposals. This puts at risk the impartiality of decisions and may generate an unfavorable understanding to Oi.

+ LEARN MORE

- ▶ Gifts, Promotional Gifts and other Hospitalities Policy
- ▶ Anti-Corruption Policy
- ▶ Guide to Grant and Receive Gifts

OUR COMMITMENT

4.5

COMMITMENT TO SOCIAL AND ENVIRONMENTAL INITIATIVES

Our commitment to ethics and integrity includes responsibility for sustainable development. To help develop a more sustainable and smart society, we always promote initiatives to prevent and mitigate impacts on the environment, besides investing in social measures in education, social innovation and sports.

STAY TUNED!

WE EXERCISE OUR SOCIAL AND ENVIRONMENTAL RESPONSIBILITY AND COMPLY WITH OI'S ETHICAL PRINCIPLES WHEN:

- We comply with the environmental laws applicable to our operations.
- We make optimum use of natural resources, such as water, electricity and fuel.
- We contribute to the selective collection and recycling of waste by correctly disposing discarded materials.
- We seek to avoid unnecessary printing, use of disposable cups and waste of materials.
- We prefer to encourage and practice diversity and inclusion.
- We choose suppliers that, like us, are also committed to sustainability.

STAY TUNED

Discover other initiatives in Oi's Annual Sustainability Report available on the company's website, under Investor Relations.

 CHECKLIST

Learn more about our initiatives:

- We created the Innovation and Creativity Institute - Oi Futuro to work on projects in education, culture, social innovation and sports.
- We have been signatories to the Global Compact since 2009. An initiative developed by the UN to mobilize the business community with the adoption of key values in environment, human rights, labor relations and fight against corruption.
- Annually, we publish our inventory of greenhouse gas emissions and respond to CDP's Climate Change questionnaire.
- We work under the Mutual Cooperation Agreement against Pedophilia.
- We signed the Business Pact for Integrity and Against Corruption.

 SPEAK UP!

What type of environmental protection measures does Oi already adopt?

Actions to reduce pollutant emissions, minimize the use of finite resources (such as energy, water, and raw materials) and appropriately store hazardous materials are already part of our sustainable strategy, as well as the environmentally appropriate disposal of products and waste.

How can I optimize the use of natural resources?

Small attitudes will make a difference. Want examples? Avoid unnecessary trips, preferring, whenever possible, call or video conferences. Another good tip is to avoid wasting water and electricity in your day to day and in our operations. Also, try to replace disposable cups for more durable ones and do not waste paper with unnecessary prints. In addition, separate the garbage and dispose waste in the right containers.

How can I manage suppliers on sustainability issues?

Ensure that our suppliers and partners are committed to sustainable development. This applies to the economic, environmental and social spheres. And don't forget to confirm that they meet the laws and regulations applicable to their activities.

 LEARN MORE

- ▶ Oi's Sustainability Policy
- ▶ Annual Sustainability Report
- ▶ Electricity Management and Use Policy
- ▶ Climate Change Policy

 **STAY TUNED**

APPLICABILITY

This code applies to all people who are part of Oi, regardless of their position or role - employees, members of Boards and Committees, officers and interns - as well as Oi's Subsidiaries.

The subsidiaries of Oi S.A., with operating procedures of a specific nature, must have their own Codes of Ethics, covering these details and observing the general guidelines and principles in this Code.

Suppliers, contractors, representatives and business partners must also be guided by this Code in all their activities with Oi.

The Code is applicable to all persons previously listed during leave, as well as for a period of six (6) months from dismissal, resignation or retirement, except in cases expressly and specifically authorized by the Ethics Committee or by law.

QUESTIONS, CRITICISM AND SUGGESTIONS

This Code does not end here. Your participation is important to improve Oi. Collaborate and present your questions, criticisms or suggestions about this Code to your immediate superior, Ethics Agents or Integrity Management [LDcompliance@oi.net.br].

For more information, go to Interativa.

We are counting on you!

FINAL CONSIDERATIONS

Oi's internal policies, rules and procedures complement this Code and must also be observed. When necessary, we must be guided by the most restrictive rule.

Upon entering the company, every employee must seek to understand and know all guidelines of this Code and other internal policies so that he or she can guide their behavior.

Formal agreement to comply with this Code and mandatory corporate policies, as well as mandatory

training, is a standard procedure that applies to everyone. This act represents the formalization of the knowledge and commitment of each employee to comply with them.

Not knowing or not complying with the Code and policies does not make you exempt from the responsibility to act according to Oi's guidelines.

TERM

The Code of Ethics and Conduct comes into force after published and will be reviewed every two years.

At each review, all employees must formalize the "Knowledge and New Acceptance" on the People Portal [Portal de Gente].

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