



ALLIED TECNOLOGIA S.A.
Companhia Aberta

CNPJ/ME nº 20.247322/0001-47
NIRE 35.300.465.369
Código CVM nº 02533-0

CUSTOMER AND BUSINESS PARTNER RISK MANAGEMENT POLICY

1. OBJECTIVE

1.1. This Customer and Business Partner Risk Management Policy "Policy," reviewed and approved at a meeting of the Board of Directors, aims to establish guidelines for the process of contracting and monitoring Business Partners within the scope of the activities carried out by the Company.

2. APPLICABILITY AND SCOPE

2.1 This Policy applies to administrators, Committee Members, contributors.

2.2. This Policy also applies to all customers and business partners that have a relationship with the company, especially those who work on behalf of the company before public agents.

3. DEFINITIONS

3.1 Whenever used in this Policy, terms with initials in capital letters will have, both in the singular and in the plural, as well as in the feminine or in the masculine, the following meanings:

"Administrators" means Members of the Board of Directors and the Statutory Board of Executive Officers.

"Public Agent" is defined for the purposes of this policy as any person who, even on a temporary or unpaid basis, (i) holds public office, (ii) works or holds a position in a Brazilian or foreign public agency, (iii) works or holds a position in a company or institution controlled or administered by the government, (iv) represents or holds a position in a political party, or (v) is a candidate for political office.

"*Background check*" means independent research based on public sources of information linked to companies or individuals with the aim of identifying non-conformities related to legal obligations or notes on integrity.

"Customers" means individuals or legal entities that purchase products or services through any of the Company's sales channels.

"Employees" means Company employees, of any hierarchical level, minor apprentices, interns and trainees.

"Company" or "Allied" means Allied Technology S.A. and its subsidiaries.

"Committee Members" means members of the Audit and Risk Management Committee or



other statutory Committees, if any.

“Business Partners” or “Third parties” means suppliers and providers of goods and services, representatives, intermediary agents, attorneys, technical consultants, brokers, external collaborators, distributors and/or any other third parties acting on behalf, benefit and/or interest of the Company.

4. GUIDELINES

4.1 The Company undertakes to do business only with Customers and Business Partners who act with integrity and transparency, complying with the provisions of Brazilian law in force, in particular the Anti-Corruption Law (Law 12,846/2013), the Decree regulating the Anti-Corruption Law (Decree 11,129/2022) , the FCPA - Foreign Corrupt Practices Act, the Code of Conduct, and the Company's Anti-Corruption Policy.

4.2 The Company undertakes to ensure that all its Business Partner contracts are made impartially, always giving priority to choices based on technical and professional criteria, business conditions, terms, and quality that best meet the Company's needs, as set forth in the Company's Policies.

4.3 All of the Company's contracts must fully and accurately reflect a legally conducted transaction, be based on a written contract or general terms and conditions of supply that comply with local laws, especially the Anti-Corruption Law and the General Data Protection Law, as well as acceptance of the Company's Code of Conduct, Anti-Corruption Policy, and Business Partner Risk Management Policy. Any exceptions must be provided for in a specific policy.

4.4 The Company expects its Customers and Business Partners to conduct their business ethically and in compliance with applicable law.

4.5 The area responsible for contracting must observe formal documentation procedures, such as creating, maintaining, and updating the registration of Customers and Business Partners, and ensure the availability of complete and auditable documentary records of all acts performed during the relationship with the Business Partner, with special attention to documentation proving the effective provision of services under the terms contracted by Business Partners.

4.6 The Company's Customers and Business Partners shall be subject to background checks prior to hiring and periodically during the term of the contract, in accordance with the Company's Internal Policies and Procedures.

4.7 The Company's Compliance department may, depending on the risk classification of any of the Clients or Business Partners evaluated, request that the Partner provide clarification on any issues identified in the background check report and additionally respond to a Compliance questionnaire.

4.8 The Company may extend the background check requirement, risks inherent to the legal relationship, or requirements defined by other Company Policies.

4.9 The definition of the background check risk classification criteria must be formalized in the Company's internal policy.



5. FINAL DISPOSITIONS

5.1 Any doubts about the provisions of this Policy should be addressed to the Company's Compliance area.

6. ACCOUNTABILITIES

6.1 It is the responsibility of all Managers to ensure compliance with this Policy. Evidence of non-compliance with this Policy or the Code of Conduct may be reported to the Employee's immediate manager, HR, or the Compliance department through the Compliance Channel, when applicable.

6.2 Allied does not tolerate any retaliation against any person, internal or external, who reports in good faith a violation or suspected violation of this Policy or its Code of Conduct, being guaranteed the confidentiality of the identity of any person who reports any violation.

7. BREACH OF POLICY

7.1 Failure to comply with this Policy subjects the violator to disciplinary sanctions, in accordance with the Company's internal rules, without prejudice to applicable administrative, civil and criminal sanctions.

8. REFERENCE DOCUMENTS

8.1 Company Code of Conduct

9. TERM AND CHANGES

9.1 This Policy comes into force on the date of its approval and can only be changed by resolution of the Board of Directors.

9.2 This Policy will be available on a document management system, accessible to Company Employees or on a public website.

9.3 This Policy will be reviewed by the Company's Compliance area every 24 months and submitted for approval by the Board of Directors, in case any changes occur.

9.4 This Policy will be archived indefinitely.

ANNEXES

Not applicable