

# **Code of Ethics and Conduct**

**of**

**Bemobi Mobile Tech S.A  
And Affiliated Companies**

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## **1. OBJECTIVE**

The Code of Ethics and Conduct (“Code”) of Bemobi Mobile Tech S.A. and its affiliated companies (“Company”) aims to align the Company, its employees, clients, partners, and suppliers with the best practices and conduct rules, in order to conduct the Company's business in a transparent, professional, ethical manner, and with mutual respect.

Compliance with this Code is essential to maintain a prominent and sustainable role in our market, aiming to generate wealth and income in a socially responsible manner through relationships characterized by the highest level of integrity and honesty.

## **2. APPLICATION**

This Code serves as a guide for the personal and professional conduct of administrators, committee members, members of the fiscal council, employees, interns, and apprentices (“Employees”) as well as those who provide any type of product or service to the Company, such as suppliers, partners, consultants, agents, lawyers, advisors, among others, as well as those who have any business relationship (referred to as “Third Parties”), without exception, and should be regarded as a formal declaration of the Employees' commitment to the principles and rules of business and social ethics, and must be fully complied with by Employees and Third Parties, ensuring that:

- Everyone is aware of the guidelines established by the Company for the performance of their professional activities and bases their conduct on compliance with the provisions of this Code;
- The Company’s image is valued, ensuring the maintenance of trust and respect from its Employees, Third Parties, shareholders, and the general community regarding the proper conduct of its business and activities; and

- Conduct and behavior are guided and formalized at all levels of relationship within the Company, minimizing subjectivity in personal interpretations of moral and ethical principles.

Employees and Third Parties must always perform their activities on behalf of the Company in compliance with this Code. For this reason, all Employees and Third Parties must sign a Commitment Agreement declaring they are aware of and agree with the content of this Code and commit to fully observe and comply with it.

### **3. GUIDELINES, PRINCIPLES AND ETHICAL VALUES**

The Company values fulfilling its commitments to its clients, suppliers, and partners, and maintaining its reputation with the general community. Therefore, all Employees and Third Parties acting on its behalf or with whom it maintains a relationship must be aware that transparency must permeate everyday practices both internally and externally.

Each Employee's and Third Party's roles must be performed in accordance with justice, legality, consistency, transparency, ethics, and honesty in all practices and decisions. Employees and Third Parties must respect all applicable legislation or regulations and combat any type of fraud, corruption, or practices harmful to the Company, its clients, suppliers, partners, shareholders, and public administration.

Similarly, Employees and Third Parties must observe the high ethical standards, principles, and values that guide the Company's activities, including integrity, innovation, customer and market focus, quality, respect for human dignity, respect for labor relations, social responsibility, and sustainable growth.

### **4. GENERAL CONSIDERATIONS**

Any act or omission that violates the Company’s laws, regulations, and internal policies will be considered a serious offense, subject to the application of legal and regulatory sanctions and disciplinary measures. If an Employee has any questions or identifies a situation that violates this Code, the policies, internal procedures, and/or any applicable legislation or regulation, they should contact their immediate superior or, if preferred, report the case to the Company’s whistleblower channel (“Report Channel”).

The information provided through the Report Channel will always be treated with confidentiality and discretion. In case of conflict of interest, the Company’s interests must prevail over personal interests, in accordance with the Related Parties Policy and the Conflict of Interest Policy.

All decision-making, regardless of the hierarchical level and activity performed, must respect the ethical principles set out in this Code.

## **5. INTERNAL RELATIONSHIP**

### **Appropriate Conduct, Environment, Quality of Life and Safety**

The Company is committed to promoting an ethical, safe, non-discriminatory, and healthy work environment for everyone. To this end, all Employees must base their attitudes on the Company’s principles and values and observe this Code, policies, internal procedures, and/or any applicable legislation or regulation in the conduct of their activities on behalf of the Company.

Work relationships at the Company should be based on cordiality, discipline, empathy, mutual respect, and trust, regardless of the position or function exercised. Equity in the treatment among Employees is also essential.

The Company does not tolerate conduct driven by discrimination or prejudice, such as those related to race, color, age, gender, gender identity, sexual orientation, marital status, ancestry, ethnicity or

national origin, religion, disability, union affiliation, or political conviction, or any other discriminatory condition.

The Company does not tolerate any type of harassment, including moral, sexual, or economic harassment, or other abusive conduct in relationships between employees, administrators, and suppliers that induce a hostile, intimidating, or embarrassing environment, either physically or psychologically.

The Company does not tolerate any conduct related to money laundering, terrorism financing, arms and narcotics smuggling, sexual exploitation, child exploitation, or services analogous to slavery.

The Company's Employees must comply with the laws and regulations that address this issue in the locations where they operate and immediately report any suspicious activities related to the above to the Report Channel.

All Employees and administrators must be aware of safety and protection measures and practice them while at the Company's premises or when working on its behalf, including while commuting to the workplace or service location. They must also immediately report any unsafe conditions, accidents, or incidents they become aware of.

### **Social Media**

The use of social media should be done responsibly, avoiding disrespectful, discriminatory, or offensive approaches that could harm the image of the Employee, Third Party, or the Company. Images of internal presentations, videos, printed materials, or any other document containing any type of information that may be considered confidential or strategic to the Company should not be disclosed on social media.

It is not recommended to associate the Company and its names/brands with an Employee's profile on

their social media, except for those of an exclusively professional nature. Employees may repost publications already circulated in the media by the Company's marketing department or otherwise, as long as expressly authorized by the marketing department.

### **Assets and Resources**

Workplace facilities, such as furniture and computer equipment, are the property of the Company and should be used responsibly and exclusively for their intended purposes.

The Company may, at its sole discretion, monitor the professional emails and computer equipment of its Employees, as they are intended for professional use. It is strictly prohibited to use them to access inappropriate content, such as illegal or obscene websites.

The use of company emails and mobile phones for personal purposes is tolerated as long as it is reasonable, sensible, and not abusive. In the event of a complaint of violating any norm established by this Code or the Anti-Corruption Policy, professional emails and mobile phones may be monitored and used for proper investigation, inquiry, and accountability.

### **Intellectual Property**

The result of each Employee's work, except as otherwise provided in the contract concluded with the Employee, including intellectual property, such as but not limited to technical improvements, system and software developments, is the property of the Company, and the Company holds the exclusive right to use and patent it, if applicable. The same applies to any and all material produced by the company, including contracts, reports, presentations, know-how, etc.

## **6. EXTERNAL RELATIONSHIP**

## **Clients**

The client is the focus of our business and the key to the Company's success. For this reason, we are committed to building solid and trustworthy relationships and improving the service and quality of products and services offered by the Company.

Customer service should be conducted with courtesy, respect, and transparency. Employees must act ethically, prioritize good relationships among themselves and with clients at all times, and preserve the Company's image.

Additionally, Company Employees may not offer or advertise any product or service that is not provided for in the Company's corporate purpose. All issues raised by clients must be analyzed and responded to within a timeframe compatible with their expectations and needs, following the processes established by the Company.

## **Shareholders, Capital Markets and Corporate Governance**

Communication between the Company, its shareholders, and the capital market should be accurate, transparent, and timely. Only the Investor Relations Department and the Chief Executive Officer are authorized to disclose financial information and/or business strategies to the market.

Employees must refer any requests from financial analysts, investors, shareholders, and the press to the Company's Executive Board, which will analyze and respond to the request. Company Employees should also observe, as applicable, the Company's Information Disclosure and Securities Trading Policy.

The Company follows regulatory models that promote transparency, fairness, accountability, and corporate responsibility. It is the duty of the Company and its Employees to: (i) Ensure good relations

between the Company and its shareholders, investors, and the market in general, observing current regulations and applicable laws; (ii) Always act in the best interest of the Company's business, with a view to maintaining the financial security of its operations; (iii) Provide accurate, sufficient, and transparent information to its shareholders, investors, and the market in general through the competent department about the main actions or decisions, in line with applicable legislation and regulation; (iv) Fully and faithfully comply with the provisions of Law No. 12.846/2013 and any other applicable anti-corruption regulations ("Anti-Corruption Law") and other integrity standards applicable to its business; (v) Conduct the Company's activities responsibly regarding health protection and environmental preservation, seeking, whenever feasible and over time, to reduce and minimize the environmental impact caused by its operations, as well as disseminate this commitment to sustainability among its employees, administrators, suppliers, clients, and the general community.

The Company will also seek to support the socioeconomic and cultural development of the communities in which it operates, encouraging and valuing the voluntary participation of its Employees in community actions and activities that promote citizenship.

### **Operation Records**

All operations conducted by the Company are recorded in accordance with applicable legal, accounting rules, and CVM provisions.

It is prohibited for Employees or Third Parties to alter any accounting record or make unrealistic or fraudulent entries, or for operation receipts to be tampered with. Therefore, any alteration of accounting and financial records or any act that may conceal transactions conducted by the Company is strictly prohibited.

It is essential that Employees and Third Parties ensure that all contracts are in writing. When submitting expenses for reimbursement, they must ensure that they are accurate, complete, and in

compliance with this Code and other internal policies.

### **Suppliers and Service Providers**

The Company maintains a relationship with its suppliers and service providers based on professionalism and mutual respect, guided by impartiality, and founded on basic principles for the procurement process of materials and services that formalize the Company's ethical commitment.

The process of contracting suppliers and service providers is the sole responsibility of the respective area of the Company that requested the services. No Employee from another area is authorized to make contracts without the consent of the relevant area. Work should be directed with transparent selection criteria, aiming to meet all the legal and ethical requirements defined in this Code and the Company's other internal policies and procedures.

All acquisitions of goods and services must seek the best balance in cost-benefit ratio, always maintaining quality within technical standards and applicable legislation, and meeting the established commitments and schedules.

The Company does not condone corruption, fraud, or any other illegal activities and adopts internal policies to prevent and monitor any suspicious occurrences. Suppliers and service providers must not be connected or involved in any illegal activities. If the practice of any act or omission that results in corruption, fraud, or other illegal activities is identified, it will be duly reported to the competent authorities.

Failure to comply with labor laws and failure to provide collective or individual protective equipment by service providers may result in contract termination. The use of Company supplier services for personal purposes, if applicable, must occur independently of the service contracted by the Company, with all expenses related to such service paid by the Employee, and always with the consent of their

immediate superior.

### **Competitors**

The Company believes in fair competition. Therefore, the competitiveness of its Employees must be based on negotiation skills with suppliers and ethical business management.

The Company condemns acts of corruption, cartel formation, or acts that may defraud sector oversight mechanisms.

The Company does not allow its Employees to make comments about competitors' products or services, whether direct or indirect, with the intent to publicly and/or internally defame a competitor's image.

Any actions considered anti-competitive, such as price-fixing, customer and market division, refusal to sell, among others, are prohibited and should be reported to the immediate superior of the person who identified such actions or reported to the Whistleblower Channel.

### **Communication Channels**

The Company's relationship with the press is based on trust, mutual respect, ethics, and professionalism. The disclosure of information to the public will be the responsibility of the marketing department or the investor relations department, as the case may be. Except with the authorization of the Company's management, only the aforementioned departments may communicate with the media.

Recordings and interviews may only occur after the knowledge and evaluation of the marketing or investor relations department, as applicable. If an Employee identifies any information disclosed incorrectly or that appears to have the potential to generate negative repercussions and consequently

harm the Company's image and reputation, such Employee must immediately notify the marketing department so that appropriate measures can be taken.

### **Gifts, Presents, Hospitality and Donations**

Gifts, presents, hospitality, and other corporate courtesies, whether monetary or not, may occasionally be offered or received transparently and may not be used to influence any business decision of the Company or confer a private gain, benefit, or advantage on a specific person.

The receipt and offering of gifts, presents, hospitality, and other corporate courtesies must follow the rules and values set forth in the Corporate Courtesies Policy and other internal Company regulations. No one acting on behalf of the Company, including but not limited to employees, service providers, suppliers, or partners, whether a natural or legal person, is authorized to make donations or political-party contributions on behalf of the Company.

### **Public Entities and Government Agencies**

The Company's Employees are obligated to comply with all laws applicable to their sectors of activity (laws, regulations, and general rules), as well as all laws prohibiting corrupt practices that may result in the Company's liability, including the Anti-Corruption Law and Law No. 8.429/1992 (Administrative Improbity Law).

The Company repudiates and does not tolerate acts of corruption by its Employees and Third Parties. Employees are prohibited from making any financial contributions or any other form of contribution to political parties or candidates for elected office on behalf of or with the resources or assets of the Company.

Employees may join clubs, political parties, and other social or political institutions, provided that

such association does not impair the fulfillment of their duties as a Company Employee.

The Company does not allow the promotion of campaigns, nor the use of symbols suggesting the above themes, on its premises.

The use of uniforms, shirts with logos, badges, or any emblem that associates the Company's brand with participation in events or interviews unrelated to the Company or in political acts is prohibited.

We do not tolerate corrupt acts under any circumstances, either in the Public Sector or in the Private Sector, whether through the transfer of resources or financial assets or through any undue advantages (such as gifts, hospitality, transportation, meals, and all logistics expenses, donations, or sponsorships).

Corruption occurs whenever someone gives or receives an undue advantage, especially to perform or refrain from performing a particular act. We must be vigilant in all cases involving promising, offering, giving, or authorizing, as well as soliciting, receiving, or accepting a promise of resources or money, as well as gifts, meals, trips, hospitality, transportation, meals, and all logistics expenses, favors, entertainment, among others.

To assist in understanding, do not forget to consult the Company's PLDFT Policy and Corporate Courtesies Policy.

### **Conflict of Interests**

A conflict of interest will exist whenever an Employee or Third Party has personal, financial, or other interests that may interfere with their ability to make decisions under market conditions, impartially and objectively on behalf of the Company.

A potential conflict of interest arises when a person is involved in a decision-making process where

their independent judgment may be compromised because: (i) On one hand, this person has the power to influence the outcome of the decision, and at the same time; (ii) There may be a gain, benefit, or advantage for them, for a close family member, or; (iii) For a third party with whom the person is involved.

In the case of the Company, potential conflicts of interest are those in which the personal objectives of decision-makers, for any reason, may not be aligned with the Company's objectives and interests or those of its shareholders in specific matters. Given the potential conflict of interest in these situations, the Company will seek to ensure that all decisions are made with complete transparency, respecting the Company's interest.

Not every conflict of interest situation represents a violation of the law, this Code, policies, and other internal regulations or our principles. But its concealment does. Therefore, whenever there are doubts or new situations that may represent a conflict of interest, immediately bring it to the Compliance Department or use the Whistleblower Channel.

For more details on conflict of interest situations, review the current Conflict of Interest Policy.

## **7. PERIODIC TRAININGS**

The Company has a periodic training program, mandatory for all Employees, with the objective of ensuring qualification and awareness regarding the conduct, principles, concepts, and procedures provided for in this Code and other integrity policies.

## **8. CONFIDENTIALITY**

“Confidential Information” is considered to be: (i) All commercial, technical, strategic, and professional information related to the Company, its clients, and/or partners; (ii) Any existing intellectual property rights, including, without limitation, copyright, rights to inventions, trademark

rights, computer program rights, and rights to confidential information, trade secrets, and know-how; (iii) Standards, compilations, methods, techniques, processes, or knowledge that gain economic value because they are not generally known or easily determinable by third parties by their own means; and (iv) Any information of the Company that, by its nature, is reasonably expected to be treated as confidential.

Confidential Information, whether in physical, electronic, or oral form, is valuable assets and must be treated with due confidentiality, considering that its improper use, disclosure, or premature revelation may pose risks and damages to the Company's image and results. It is the duty of all Employees to: (i) Maintain the confidentiality of Confidential Information and prevent the leakage of Confidential Information; (ii) Instruct suppliers, third parties, and/or partner companies to respect the Confidential Information to which they have access; and (iii) Adopt practices that preserve the confidentiality of Confidential Information, protecting them from unauthorized access, limiting the use of information to the contracted purpose.

All Employees are prohibited from: (i) Disclosing or sharing Confidential Information with other Employees or third parties who do not need such information to perform their activities, regardless of the medium (printed, electronic, or oral); and (ii) Distributing (in electronic or printed format) and using the Company's templates/forms for their own purposes and/or for third parties not linked to the Company.

## **9. REPORTING CHANNEL**

The Company encourages all its Employees and Third Parties to report any identified or suspected act of non-compliance with this Code, internal regulations, or applicable legislation.

It is the responsibility of all Employees and Third Parties to immediately report any conduct that

violates or may violate any law.

The Company provides the following communication channel for reporting any violations of this Code:

### **Reporting Channel**

This channel allows the whistleblower to anonymously or non-anonymously report situations such as corruption, bribery, fraud, conflict of interest, among others.

<https://canaldedenuncia.com.br/bemobi/>

The Company is committed to investigating and addressing any reported cases. However, when the misuse of the whistleblower channel is proven for registering false and malicious situations, the application of disciplinary sanctions described in the following item will be provided.

It is worth emphasizing that the Company expressly guarantees confidentiality, within the limits of the law, regarding the identity of those who use the reporting channel and does not tolerate, under any circumstances, any form of retaliation against those who use it.

If any of the acts mentioned above are identified, they should be reported to the Compliance Department for proper investigation and handling.

## **10. DISCIPLINARY MEASURES**

The practice of illegal or unlawful acts that violate or may violate applicable laws and regulations, as well as any violations or suspected violations of this Code and the Company's internal policies and procedures, subject Employees to the following disciplinary measures, as applicable: (i) Oral or written warning; (ii) Suspension; (iii) Dismissal, termination for cause, or termination of the

contractual relationship (as applicable), without prejudice to the adoption of legal measures related to the compensation of damages and communication of the facts to the competent authorities.

Disciplinary measures will be applied by: (i) The Company's Ethics Committee, if established; or by the Director responsible for the Employee's area in question; (ii) The Chief Executive Officer, in the case of non-compliance by a Director; (iii) The Board of Directors, in the case of non-compliance by the Chief Executive Officer or a member of an advisory committee; (iv) Other members of the Board of Directors, in the case of non-compliance by a member of the Board of Directors.

## **11. FINAL CONSIDERATIONS**

The ethical principles and values present in this Code underlie the negotiation of contracts, agreements, proposals to amend the Company's Bylaws, as well as the drafting of policies that guide the entire Company.

In the event of a conflict between the provisions of this Code and the Company's Bylaws, the provisions of the Bylaws shall prevail, and the Board of Directors shall take all necessary measures to adapt this Code to the provisions of the Bylaws.

The Company's internal regulations may eventually establish conduct obligations in addition to those established in this Code, without the content of this Code being exhaustive.

This Code is available on the Company's Investor Relations website and on the Brazilian Securities Commission (CVM) website (<http://www.cvm.gov.br>).

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	<b>Approvals</b>	<b>Date</b>
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