

MOBLY SA

CNPJ/ME 31.553.627/0001-01

NIRE 35300561201

ANTI-CORRUPTION POLICY

1. OBJECTIVE

This Anti-Corruption Policy ("**Policy**") aims to define guidelines, within the scope of all relations of Mobly SA ("**Company**"), its controlled companies and subsidiaries, whether private entities or public agents, to ensure compliance with the requirements of the Anti-Corruption Law (Law No. 12,846/13) within ethical, legal, professional and transparent standards.

2. SCOPE

This Policy covers, but is not limited to, all administrators of the Company and its direct or indirect subsidiaries, as well as their respective attorneys, technical and/or administrative officers, employees, collaborators, consultants, franchisees, partners, suppliers and third parties, in national and/or international territory.

3. DEFINITIONS

Administrators: members of the Executive Board, members of the Board of Directors and any bodies with technical or advisory functions, created or to be created by the Company, its Controlled Companies and Subsidiaries, by statutory provision.

Public Agent: any individual who exercises, even if temporarily or without remuneration, by election, appointment, designation, hiring or any other form of investiture or bond, mandate, position, employment or function in the entities of the public administration.

Code of Ethical Conduct: the Company's code of ethical conduct that establishes standards of Integrity that go beyond those required by law.

Collaborators: any executives, employees, third parties or collaborators of the Company, its Subsidiaries and Controlled Companies.

Subsidiaries: companies in which the Company has significant influence, under the Brazilian Corporate Law.

Audit Committee: the Company's audit committee

Company: Mobly S.A.

Board of Directors: the Company's board of directors.

Controlled Companies: companies in which the Company has direct or indirect control power, which is the power effectively used to direct social activities and direct the operation of the Company's bodies, directly or indirectly.

Corruption: promise, offer, delivery or request, direct or indirect, of undue advantage to a public agent, or a third party related to it.

Executive Board: the Company's Executive Board.

Suppliers: any individual and/or legal entity that provides services or supplies products to the Company, its Subsidiaries and Controlled Companies.

Franchisees: any legal entity that operates a business franchise agreement with the Company.

Anti-Corruption Laws: Brazilian Federal Law No. 12,846/13, which provides for the administrative and civil liability of legal entities for the practice of acts against the public administration, national or foreign, and, as applicable, Law No. 8.429/1992 (Administrative Impropriety Law) and Law No. 8.666/1993 (Bidding Law).

Partners: any individual and/or legal entity with whom the Company maintains a formal relationship through agreements, terms of cooperation or similar instruments, which are neither Suppliers nor Franchisees.

Bribery: offering or charging someone money for the purpose of getting something illegal or reprehensible.

Third parties: every individual and/or legal entity with which the Company has any relationship.

Undue advantage: any gain, profit, privilege or benefit obtained illegally or even contrary to good practice. Such advantage is not limited to cash payments and may include, depending on the circumstances, for example, gifts, meals, offers of employment, among others.

4. PRINCIPLES

The Company is committed to ensuring the fight against Corruption within the scope of all relations of its Administrators, Executive Board, Subsidiaries and Controlled Companies, as well as their respective attorneys, technical and/or administrative officers, employees, Collaborators, consultants, Franchisees, Partners and Third Parties, in national and/or international territory, with Public Agents, from the direct and/or indirect Public Administration, valuing the principles of ethics, morals, honesty, professionalism, transparency and in compliance with Anti-Corruption Laws and the Company's Code of Ethical Conduct.

The Company is also committed to seeking the constant improvement of an Anti-Corruption Culture within its work environment and its relations with Third Parties, Suppliers, Partners and Franchisees, including tools that promote the security and legality of transactions and

documents and adopting rules, strict procedures and standards to respond to any and all Corruption attempts or practices.

5. RULES FOR PREVENTING AND FIGHTING CORRUPTION

5.1. HARMFUL ACTS

The Anti-Corruption Law defines as harmful acts to the public administration, national or foreign, that harm national or foreign public assets, against principles of public administration or the international commitments signed by Brazil, the following, within and others:

- i. Promising, offering or giving, directly or indirectly, an undue advantage to a public official, or a third person related to them;
- ii. Financing, funding, sponsoring or otherwise subsidizing, demonstrably, the practice of illegal acts provided for by law;
- iii. Making it difficult to investigate or inspect public bodies, entities or agents, or intervene in their performance, including within the scope of regulatory agencies and inspection bodies of the national financial system.

5.2. RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION, SUPPLIERS, THIRD PARTIES, FRANCHISEES AND PARTNERS

The Company's relationship with any Third Party, Franchisee, Supplier or Partner must observe the assumptions and requirements listed below:

- i. Due diligence to analyze the suitability of said Third Parties, Franchisees, Suppliers or Partners;
- ii. Inclusion of an Anti-Corruption Clause in all contracts signed by the Company with Third Parties, Franchisees, Suppliers or Partners, as well as a termination clause in case of suspected acts of Corruption;
- iii. Evaluation, registration, approval, contracting and monitoring process with Third Parties, Franchisees, Suppliers or Partners.

In cases of merger, incorporation, acquisition of any organization or asset, formation of partnerships, joint ventures or consortia, the Company must also carry out, before the conclusion of said operation, a due diligence to analyze the suitability and integrity of the companies.

The relationship with Public Agents will be transparent and formally carried out, with transparency and ethics, preferably:

- i. With a prior appointment and with the presence of two or more representatives of the Company;
- ii. On official premises and during standard office hours of the public agency or on the Company's premises;
- iii. With clear and objective communication about the Company's interests, avoiding noise or misinterpretation of messages;

- iv. Through official channels such as official emails, professional telephones and digital meetings platforms commonly used by the Company or by the public body.

Meetings and/or communications with Public Agents must be registered with the “Term of Relationship with Public Authorities”, available in Annex I to this Policy, which must inform the purpose of the contact and the discussion/decisions taken on behalf of the Company. The filling of this statement is not necessary for situations where the relationship with the Government is merely routine and/or bureaucratic for business development.

The Company repeatedly rejects and does not tolerate the offering, promising, delivering or receiving, directly or indirectly, by its Administrators, Collaborators, Franchisees, Suppliers, Third Parties and Partners of any item of value to or from a Public Agent or Public Administration, with the intention of improperly influence, facilitate or reward any decision for the benefit of oneself or the Company.

Every Administrator, Collaborator, Franchisee, Supplier, Third Party or Partner will be encouraged to report activities that they consider suspicious and will not suffer any type of retaliation or penalty due to the delay or loss of business resulting from their refusal to participate in an act of Corruption.

5.3. BIDDING AND ADMINISTRATIVE CONTRACTS

The Company, its Administrators, Executive Board, Subsidiaries and Controlled Companies, as well as their respective attorneys, technical and/or administrative officers, employees, Collaborators, consultants, Franchisees, Partners and Third Parties, in national and/or international territory, must strictly observe the ethical, legal and transparent principles, in compliance with applicable laws and contractual clauses in all their respective participation in bidding processes and execution of administrative contracts.

Thus, it is prohibited to:

- i. frustrate or defraud, by adjustment, combination or any other expedient, the competitive nature of the bidding procedure;
- ii. obstruct, disturb or defraud the performance of any act of bidding procedure;
- iii. defraud public bidding or any contract with the Public Administration;
- iv. create, fraudulently or irregularly, a legal entity to participate in a bidding process or enter into an administrative contract;
- v. obtain undue advantage or undue benefits, fraudulently, from modifications or extensions of contracts entered into with the Public Administration, without authorization by law, in the summoning act of the public bidding or the respective contractual instruments;
- vi. remove or seek to remove a bidder, through violence, serious threat, fraud or offer of advantages of any kind;
- vii. impair inspections, investigations or other demands of Public Agents;
- viii. destroy any documents that may be useful or necessary for investigations;
- ix. provide false or incorrect information to Public Agents and Public Administration, including those as a result of inspections.

5.4. PROCESS FOR OBTAINING LICENSES

Any licenses, authorizations and/or permissions requested by the Company, its Administrators, Collaborators and Franchisees to public bodies must be requested based on the legislation in force and to the extent necessary, and must be documented.

5.5. PAYMENTS

Any payments made by the Company must be compatible with the service contracted or the product purchased, being made to the beneficiary contractually established or documented.

6. TOOLS FOR PREVENTING AND FIGHTING CORRUPTION

6.1. ANTI-CORRUPTION CLAUSE

All contracts signed with Franchisees, Suppliers, Third Parties or Partners must establish an Anti-Corruption Clause, as well as respect to the Company's Code of Ethical Conduct, to prevent acts considered as harmful.

6.2. CODE OF ETHICAL CONDUCT

The Company's Code of Ethical Conduct establishes standards of Integrity that go beyond those required by law, using professional practices as an example to demonstrate the Company's moral diligence.

The Company's values are present in business decision-making and corporate governance. The actions of directors, employees, attorneys and all those who carry out activities for or on behalf of the Company must always be guided by the principles of legality, justice, impersonality, morality, publicity, transparency, probity, efficiency, good principles, honesty, loyalty and in alignment with the principles, values and social objectives reflected in the Code of Ethical Conduct and in all the policies that helped shape the Company in all these years of operation, which are available on the Company's Investor Relations portal, which can be accessed through the link <https://investors.mobly.com.br/>. It is the obligation of those responsible for hiring employees, interns, service providers, third parties and agents in general to include in their respective contracts the full knowledge and observance of the provisions herein.

6.3. ETHICS COMMITTEE

In case of doubts regarding the practices and applications of the Company's Code of Ethical Conduct and Anti-Corruption Policy, the employee may contact the Company's Compliance area through its Ethics Channel, by telephone 0800 700 1818 or via website <https://www.contatoseguro.com.br/mobly> and the mobile app "Contato Seguro", or by email compliance@mobly.com.br.

6.4. TRAINING

The Company will always seek to incorporate a solid anti-corruption culture, in order to disseminate its mission, vision and values widely to all its Administrators and Collaborators, in order to provide a commitment to comply with Anti-Corruption Laws.

Therefore, the Company periodically promotes training for its employees to disseminate the best practices that must be adopted in the work environment and relations and raise awareness and reinforce the importance of complying with the rules of this Policy, the Code of Ethical Conduct and Anti-Corruption Laws.

7. ETHICS CHANNEL

The Ethics Channel is the specific channel made available by the Company for receiving reports of non-compliance with the Code of Ethical Conduct, the Company's internal policies and procedures and/or current legislation.

Employees have the duty to immediately report in the Ethics Channel any signs of irregularities or mistrust that they identify in their routines, preventing acts of corruption and bribery. As determined in the Code of Ethical Conduct, there will be no retaliation against those who give any information in good faith about an alleged violation of the Code of Ethical Conduct, which also includes violation of laws, regulations and internal policies.

Reports must be communicated and followed up through the channels below:

- Telephone: 0800 700 1818;
- <https://www.contatoseguro.com.br/mobly>;
- "Contact Secure" mobile application.

8. RESPONSIBILITIES BY FUNCTION OR AREA

Collaborators and Administrators: must know and follow the guidelines of this Policy; participate in the training promoted by the Company; ensure that all Third Parties, Partners, Suppliers and Franchisees observe its content in the execution of contracts signed with the Company; and report any violations and suspected violations of the Anti-Corruption Laws. The reports of violations must be made identified or anonymously through the Ethics Channel.

Legal Department: must interpret and monitor changes in legislation related to this Policy, as well as prepare contractual provisions regarding the subject.

Board of Directors: must approve the guidelines of this Policy.

Compliance Area: must monitor and seek the resolution of reports sent via the Ethics Channel, evaluate complaints received and decide, together with the Ethics Committee, the penalty and monitor the compliance with policies and procedures related to the prevention of Corruption and any deviations.

Franchisees, Partners, Suppliers and Third Parties: must comply with all provisions of this Policy.

9. VIOLATIONS AND PENALTIES

In the case of non-compliance with the Anti-Corruption Laws and consequent violation of this Policy, Code of Ethical Conduct, additional regulations and internal rules of the Company may

result in serious penalties for the Company, its Collaborators, Administrators, Franchisees, Suppliers, Partners and/or Third Parties, including administrative, civil, criminal liability or other measures applicable to the person involved, disciplinary actions by the Company, including removal from office, termination of employment and termination of the business relationship and/or service provision.

10. FINAL PROVISIONS

Any situations, exceptions and/or clarifications regarding the application of this Policy may be directed to the Ethics Committee through the Ethics Channel.

11. RELATED DOCUMENTS

- i. Mobly S.A. Code of Ethical Conduct;
- ii. Risk Management Policy;
- iii. Anti-Corruption Law – Federal Law No. 12,846/13, as regulated by Federal Decree No. 8,420/2015;
- iv. Administrative Misconduct Law – Law No. 8429/1992;
- v. Bidding Law - Law No. 8.666/1993.

ANNEX I - TERM OF RELATIONSHIP WITH PUBLIC POWER

Date and Time:

Location:

On behalf of Mobly S.A., and/or its Controlled Companies and Subsidiaries, [insert name, position and CPF of the Company's representatives] were present. On behalf of [insert the name of Public Agency], [insert name, position and CPF of representatives of Public Agency] were present.

On the day and location indicated above, the Collaborators of Mobly S.A., and/or its Controlled Companies and Subsidiaries, and the Public Agents indicated met, with the objective of [insert reason for contact], to discuss the following*:

i.

As the entire content of this document is true, all those present sign this declaration.

MOBLY SA

[PUBLIC AGENCY]

*Note: insert the meeting summary in the listed items.

**Note: fill in the fields in yellow before signing this Declaration.