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## INTRODUCTION

The Code of Conduct of TIVIT and its subsidiaries reflects the commitments made by the company, which should also be upheld by its employees in their interactions with various stakeholders. The ethical principles guide TIVIT's actions and underpin its reputation as a solid, ethical, and trustworthy organization in all the activities it carries out.

The purpose of this code is to uphold the values of TIVIT, maintaining a demeanor consistent with its image and emphasizing the importance of fostering good relationships with employees, clients, partners, shareholders, suppliers, associations, public bodies, media, and society at large.

This code applies **to all areas of TIVIT Brazil and LATAM, as well as TIVIT VENTURES**. Individuals contracted by suppliers while providing services to TIVIT must also align their behaviors with the principles outlined in this code.

Employees should conduct themselves in accordance with this code, becoming champions of ethics and the primary drivers of its dissemination and assimilation, while adhering to TIVIT's mission, vision, and values described below:

**Our mission is:** "To leverage the success of our clients, shareholders, and employees."

**Our vision is:** "To be the benchmark company in integrated technology solutions for critical operations."

**Our core values include:** Ethics, Flexibility, Agility, Commitment, and Entrepreneurship.

## RELATIONSHIP WITH STAKEHOLDERS


### 1. EMPLOYEES

TIVIT treats its employees with dignity and provides a work environment that offers equal opportunities for personal and professional growth, as well as respect for individual freedom.

#### 1.1.1. Conflict of Interest

A conflict of interest in the *employee*-company relationship occurs when an *employee* uses their influence or engages in acts with the intention of benefiting personal interests.

Employees are prohibited from engaging in external activities such as consulting or holding positions in organizations, particularly those with conflicting interests or business dealings with TIVIT, unless prior written authorization has been obtained from the director of their department at TIVIT.

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Employees are also not allowed to have ownership interests, either personally or through their spouse or relatives<sup>1</sup>, especially in suppliers or competitors of TIVIT if their position grants them the power to influence transactions or gain access to privileged information.

If an employee holds positions in external entities or has a spouse, relatives, or romantic partner who also works at TIVIT, competitors, suppliers, or clients, they must communicate this in writing to their immediate supervisor, who will assess any conflicts of interest and their impact on working hours.

Employees who, by virtue of their position or responsibilities, have access to *non-public information and data about TIVIT's clients, strategic commercial information, or confidential<sup>2</sup> information* regarding TIVIT, affiliated companies, or subsidiaries, are prohibited from disclosing such information to third parties or any other employee not involved in the relevant project/issue. They are also prohibited from trading securities or shares of these companies based on relevant information from TIVIT and its clients, during and after their employment or contractual relationship with TIVIT.

In such cases, it is the employee's duty to prevent anyone from accessing such information, taking extra care with documents and even materials left on desks or in drawers and cabinets.

Any situations that may give rise to conflicts of interest not explicitly addressed in this Code should be reported to immediate supervisors for guidance.

### **1.1.2. Conduct outside the company**

As a member of TIVIT's workforce, employees must exercise caution in their conduct in public settings, whether in the course of their professional activities or in their personal lives, acting with prudence and diligence, and not exposing the company or their own career to risk. Information about TIVIT's clients, commercial information, pricing terms, business strategies, and decisions are confidential and should not be discussed outside of TIVIT, whether in writing or verbally, with friends and relatives.

Whether in internal or external environments, such as participation in training or events, the use of company vehicles, or other situations that allow for identification of the employer, employees' conduct in work-related situations should align with TIVIT's values, contributing to the recognition of its positive corporate image.


Employees are expected to exhibit behavior consistent with the conduct described in this Code.

## **1.2. Prejudice**

TIVIT values diversity in workplace relationships. Therefore, all individuals should be treated respectfully, courteously, and fairly, regardless of their position or role.

<sup>1</sup> Family members include relatives up to the third degree: father, mother, son, daughter, brother, sister, grandfather, grandmother, greatgrandfather, great-grandmother, grandson, granddaughter, uncle, and aunt. For the purposes of this Code, relatives by marriage are also considered, namely: spouse, partner, son-in-law, daughter-in-law, father-in-law, mother-in-law, stepfather, stepmother, stepchild, and brother-in-law.

<sup>2</sup> Strategic or confidential information refers to information not known to the market and whose disclosure could impact the company's operations. Examples of such information include financial results, ongoing or contemplated acquisitions or sales, trade secrets, investments, and related matters.

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The company does not tolerate any form of discrimination or prejudice, whether based on race, religion, age, gender, political belief, nationality, birthplace, marital status, sexual orientation, physical condition, or any other characteristic, including HIV status.

During recruitment, selection, and promotion processes, candidates should be evaluated solely based on their ability to meet the job requirements and *align with the job profiles*<sup>3</sup>. It is the responsibility of the manager to update the profiles, and the Compensation department is responsible for publishing them.

### 1.3. Slave labor or minors

TIVIT does not tolerate, including from its suppliers and partners with whom it maintains business relationships, the use of workers below the legal minimum age, including minors under 16 years of age, except in cases of special employment under the terms of the applicable legislation. Furthermore, TIVIT does not tolerate any form of forced or unpaid labor, as well as violations of legal provisions regarding minimum wage, working hours, and other conditions stipulated by labor laws.

### 1.4. Management approach

When an employee expresses interest in participating in an internal recruitment process after holding their current position for a minimum of eighteen months, their leadership should understand this as a natural career advancement option and not give rise to any form of retaliation.


Leadership should point out any errors made by employees, providing them with the necessary information and guidance to prevent recurrence. Repeat errors resulting from carelessness, negligence, or lack of interest should be addressed rigorously.

It is expected that all individuals listen to and consider new ideas, diverse opinions, questions, and arguments that contribute to learning and process improvement.

TIVIT values synergy between departments, cooperation among employees from all units, and the sharing of knowledge as a means of learning and disseminating best practices, while respecting the confidentiality criteria outlined in the section on *Confidential Information*.

Employees, including those in leadership positions such as managers, directors, and statutory directors, must maintain a balance in their personal accounts and financial obligations in order not to interfere with the smooth execution of their responsibilities and their impartiality when dealing with partners, suppliers, and other business situations while representing TIVIT.

<sup>3</sup> The purpose is to outline the main activities performed by the job holder, available in the MOGIT-Online system, such as: REM-DOC001-001 - Job Profiles - Corporate; REM-DOC-001-002 - Job Profiles - Application Management; REM-DOC-001-003 - Job Profiles - IT Infrastructure Management.

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**1.5. Harassment and abuse of power**

TIVIT does not tolerate any form of *harassment*<sup>4</sup>, including sexual, economic, moral, or any other type, nor any situations that involve disrespect, intimidation, or threats in relationships between employees at all levels, regardless of their hierarchical position.

An employee who feels discriminated against, humiliated, subjected to prejudice, pressure, abusive practices, or disrespectful situations and is reluctant to discuss the matter with their immediate supervisor should report the incident through the Ethics Channel, as outlined in item 13 of the code of conduct.

**1.6. Use of alcohol, drugs, firearms, and sale of goods**

The consumption of alcoholic beverages during working hours, as well as performing job duties while under the influence of alcohol, is prohibited. The use and possession of drugs and being present in the workplace while under the influence of such substances, which could affect the safety and performance of both the employee and their colleagues, are also prohibited.

Weapons of any kind are not allowed on the company premises, except for professionals expressly authorized to carry them.

The sale or exchange of goods, such as food and other personal items, within the company premises is prohibited in a way that does not compromise the professional duties assigned to the employee.

**1.7. Political participation**

Employees are prohibited from making any contributions, in terms of monetary value, assets, or services, on behalf of TIVIT for political campaigns or causes, except as approved by the Board of Directors. Such contributions must comply with applicable laws.

TIVIT respects the individual right of employees to engage in civic affairs and participate in the political process. However, this participation should occur in their free time and at their own expense, without compromising their professional performance. In such situations, employees should make it clear that their opinions are personal and not representative of the company, and they should not mention the name of TIVIT in any context.

Company resources such as computers, printers, copiers, office supplies, space, and the company's image should not be used to further personal or partisan political interests.


TIVIT respects and encourages political participation by its employees and does not tolerate any discrimination against employees based on their party preference, political beliefs, or candidate choices within the electoral process.

**1.8. Labor unions**

TIVIT respects the freedom of association, recognizes labor unions as the legal representatives of employees, and seeks constant dialogue with both employers' and workers' unions.

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<sup>4</sup> Harassment occurs when someone in a privileged position uses that advantage to humiliate, disrespect, or embarrass others. Workplace bullying refers to exposing someone to humiliating situations during the workday. Sexual harassment aims to obtain sexual favors or advantages.

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Negotiations and dialogue with these partners on behalf of TIVIT should only be conducted by employees or representatives formally authorized to do so.

### 1.9. Company assets

Company assets, equipment, and facilities are solely intended for use in company operations and should not be used for personal purposes, except in specific situations defined by the company.

Employees are responsible for the proper use, care, and maintenance of the company's assets assigned to them, ensuring their organization and preservation.

Matters related to the donation, sale, or transfer of use of any movable or immovable property should be evaluated by the Legal Department. All commercial transactions involving TIVIT's assets should be conducted by the Finance Department, with prior approval from TIVIT's Chief Financial Officer and support from the technical areas of the company, such as Infrastructure, Operations, or IT.

TIVIT reserves the right to charge employees for the costs of maintenance, repair, or replacement of assets if it is proven that misuse, incompetence, negligence, or recklessness led to damage to the assets provided to the employee.

### 1.10. Information Security

The Information Security department is responsible for establishing the Information Security Policy, defining, implementing, disseminating, and controlling guidelines for the protection of TIVIT's information assets or assets under its custody against internal or external threats, intentional or accidental.


It is the responsibility of every TIVIT employee to be familiar with the Information Security Policy and other related policies in order to protect information assets. Employees must report to their immediate supervisor and the Cyber Security team any situation that represents or may represent a security deviation or violation, such as receiving suspicious emails (phishing), unauthorized access attempts, exposure of user logins or passwords, among others.

Except for information classified as public, no information from TIVIT or its clients can be disclosed or published externally, such as on social networking sites. TIVIT provides information storage resources through Microsoft services with Office365. TIVIT and client data should be stored on these platforms (OneDrive, SharePoint, and Teams) with the proper classification of distribution. This ensures data encryption in these services. Professionals are not allowed to use other cloud storage platforms such as Dropbox, Box, iCloud, among others.

For the exchange of internal, sector-specific, or confidential information with clients, partners, and suppliers, formalization through a Confidentiality Agreement<sup>5</sup> or contractual clause is required, always respecting the controls provided by the General Data Protection Law (LGPD). It is important to note that information exchange and technical discussions in TIVIT's premises or external environments may be witnessed by clients, so employees must be cautious about the information discussed in certain locations such as restaurants, elevators, corridors, and informal gatherings.

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<sup>5</sup> Confidentiality Agreement is an integral part of the employment contract.

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Failure to observe and adhere to the security rules defined in this document, as well as in the security policy, may result in sanctions as provided in this Code of Ethics, ranging from warning to termination for just cause.

Corporate security policies are available on MOGIT-Online. If an employee does not have access to this system, they should contact their immediate supervisor for further information.

### 1.11. Acceptable Use of Computer Assets

Computer assets<sup>6</sup> are an increasingly important part of the company's strategy to increase productivity, collaboration, and access to critical information, but all of this must be done with security and common sense.

The equipment provided by TIVIT should not be tampered with or have components replaced by the employee. In case of maintenance, upgrades, or replacement needs, the employee should contact the Help Desk team to handle these tasks.

It is important to emphasize that the following are prohibited: exchange, retrieval, storage, or use of obscene, pornographic, violent, discriminatory, racist, defamatory content, or any content that disrespects individuals or entities and/or goes against TIVIT's policies and interests.

This rule covers written information or information stored in electronic systems and any other associated medium. It also includes technically developed information acquired through associations, acquisitions, licensing, purchases, or entrusted to the company.

TIVIT may, at its discretion, use and monitor any information transmitted or residing on these systems. Therefore, employees in general should not have an expectation of privacy when using these systems and resources.

All files and information related to professional activities created, received, or stored in electronic systems are the property of TIVIT and constitute commercial and legal assets. Therefore, in the event of an employee's change or departure, such information held by the employee must be forwarded to their immediate supervisor for safekeeping or disposal.


Every employee must manage the use of computer assets provided by the company, and their authorized use of any webpage, area, service, or content constitutes acceptance of the conditions established in this document:

1. TIVIT has implemented software and systems that can monitor and record all uses of the assets it provides, such as telephones, internet, email, Teams, Zoom, Google Meeting, Skype, etc.
2. TIVIT reserves the right to inspect workstations and any stored files without prior notice.
3. Downloading files whose content is unknown or whose reliability is uncertain is prohibited.
4. No employee may use TIVIT's resources to download or distribute unlicensed or "pirated" software or data, nor attempt unauthorized access to communication devices through the network.

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<sup>6</sup> Computational assets refer to all items within the organization where information is created, processed, stored, transmitted, or disposed of.



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5. Advertising or promoting private products and services through the company's email system is prohibited.
6. Only employees authorized to speak on behalf of the company to the media may write on behalf of the company on chat rooms, chat groups, or public discussion forums.
7. It is in TIVIT's interest for its employees to be well-informed, so the use of news websites or services is acceptable as long as it does not compromise network bandwidth usage and productivity.
8. Employees with internet access can only download programs directly related to TIVIT's activities and must ensure the necessary licensing and registration for these programs.
9. Downloading entertainment programs or games via TIVIT's internet connections is not allowed.
10. The network and intranet content is for professional and exclusive use and requires a login and password for access.
11. Login and password information is personal and confidential, and sharing them or
12. Any support or maintenance activities related to TIVIT's assets (servers, telecommunications equipment, networks, etc.) must be performed exclusively through officially provided gateways managed by the password vault. Any direct access to these assets must be notified in advance with a proper justification.
13. Creating or configuring additional access gateways other than those officially provided by TIVIT will be considered a serious violation.
14. The use of any company resource for illegal activities may result in disciplinary action and immediate contract termination, and the company will actively cooperate with authorities in such cases.
15. In situations such as a pandemic, emergency, or other business-related needs, where it is in TIVIT's interest for its employees to connect remotely (e.g., working from home) to its systems, network resources, and intranet, employees may be authorized to do so, provided they use equipment with approved security conditions.

Note: Workplace Management users do not have the same permissions or access levels as other areas. This usage is restricted due to the nature of the service, which can result in productivity loss.


For eligible employees, daily time tracking is a legal requirement and is determined by TIVIT's policy, which must be followed by the employee.

TIVIT's governance process will provide monthly reports to Directors, Executives, and the HR department regarding deviations by any employee who misuses the assets.

## 1.12. Privacy and Personal Data Protection

TIVIT is committed to protecting the rights and freedoms of natural persons (customers, employees, collaborators, and other involved third parties). In this context, and with the purpose of affirming its commitment and respect for privacy and personal data protection rules, it is governed by strict compliance with applicable laws in the countries where it operates.

Therefore, it is the responsibility of every TIVIT employee and service provider to be familiar with the Privacy and Personal Data Governance Policy, processing and protecting personal data they have access to in accordance with

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data privacy laws, using the information and data responsibly, as well as new technologies including, but not limited to, artificial intelligence.

Our customers and business partners entrust us with processing their data, including the data of their employees and customers. Each employee must assume the role of a guardian of this data, using it to enhance our operations for the benefit of TIVIT, our customers, and partners, without ever disrespecting or exceeding the limits of data subjects' freedoms and rights.

For all personal data, where TIVIT acts as the Controller, employees in their processes must know or question:

1. What personal data can be collected and for what purposes?
2. How should they be used, stored, and when should they be deleted?
3. What notifications should be provided to demonstrate transparency?
4. When and what types of consents should be obtained?
5. If there are other legal bases for processing, besides consent?
6. When can they be disclosed or shared with third parties?
7. When can they be transferred outside the borders of a country?
8. What protective measures are taken?
9. How are the rights of individuals related to their personal data ensured, including the rights of access, correction, and deletion, where applicable?
10. Maintain proper records of personal data risk assessments (DPIA) up to date.

In the case of hiring Data Processors or Sub-processors, they must be contractually bound to process data only as instructed and to maintain data protection security plans. They must maintain security procedures equivalent to those of TIVIT and its Controller clients, dealing with suspicions of personal data breaches, unauthorized access, or disclosure or loss of personal data. They may be held jointly liable for possible personal data breaches and must be accountable to the relevant regulatory authorities.


### 1.13. Relationship with Business Partners and Competitors

TIVIT adheres to the principle of free competition. All market and competitor information, legitimate and necessary for business purposes, must be obtained through transparent and ethical practices, and its acquisition through *illicit means* is not permitted.

Employees are prohibited from adopting any actions that would harm the image of competitors or business partners of the company. TIVIT's business activities must comply with laws, TIVIT's values, and the Code of Conduct, and it is the responsibility of all employees to ensure compliance.

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<sup>7</sup> *Illicit means* are illegal and morally unacceptable ways of accessing confidential information.

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Engaging in understandings with competitors for the purpose of abuse of economic power or arbitrary business practices, such as negotiations on market prices with competitors, bidding negotiations (RFP - Request for Proposal), and public tenders, among others, is not allowed.

#### **1.14. Sale of Company Products to Employees**

The sale of company products to employees must be carried out in accordance with specific policies, such as automobiles, personal computers, cell phones, or any other available asset. Any sale or donation of assets, even if fully depreciated, requires prior formal approval from the Chief Financial Officer of TIVIT.

### **2. SHAREHOLDERS**

#### **2.1. BUSINESS RELATIONSHIPS BETWEEN SHAREHOLDERS AND FAMILY MEMBERS**

Shareholders and their family members must follow the same rules that apply to employees when buying or selling products or services from TIVIT.

Commercial relationships between TIVIT, shareholders, and their family members are allowed, whether as individuals or through companies in which they are directly or indirectly involved.

The aforementioned business transactions must always strictly adhere to principles of price coherence and commercial conditions in line with market practices, impartiality and transparency, ethics, competitiveness, and the absence of conflicts of interest. Shareholders and their family members should not engage in business or activities that depend solely on TIVIT for viability.


TIVIT applies the same rules (disclosure, pricing, payment terms, contractual deadlines, quality, etc.) to shareholders' family members as it does to third parties (customers/suppliers).

Persons or companies interested in developing commercial relationships with TIVIT should inform, when such occurrence exists, the existence of the aforementioned family ties.

All transactions covered in this section will require prior approval from TIVIT. Proposals should be submitted by the main executive of the area, presenting their considerations when the premises contained in the above paragraphs are met.

#### **2.2. RELATIONSHIPS WITH COMPANIES IN WHICH TIVIT HAS A STAKE**

In companies where TIVIT has control, relationships with other partners should be conducted only by legally appointed representatives designated by TIVIT. Confidentiality regarding the topics discussed must always be observed.

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Contact with external investors of TIVIT's companies should be made solely by the area specifically responsible for this function, according to specific rules assigned to it.

### 3. CUSTOMERS

TIVIT is committed to contributing to the value creation process of its customers by meeting their expectations and developing innovative solutions.

The requirements and expectations of customers must be considered, and all those agreed upon in contracts must be rigorously fulfilled.

TIVIT does not discriminate against customers based on their origin, economic size, or location. However, it reserves the right to terminate any commercial relationship when its interests are not being met or when the relationship poses legal, social, or environmental risks.

Information about our products and services must always be clear and truthful. Technical data, especially safety, health, and environmental requirements, must be provided to customers.

Each product must strictly adhere to the legal requirements of the market it is intended for.

It is prohibited to make improper payments or offer favors to any person to facilitate the sale of our products or services, even at the cost of losing business opportunities.

We have an absolute responsibility for the confidentiality of confidential information entrusted to us by our customers and partners.

### 4. COMMUNITIES

*TIVIT is committed to the economic and social development of the communities in which it operates.*


It is the commitment of all employees to act in accordance with TIVIT's values and to keep communication channels permanently open with all the communities in which we are present.

Investments in social, cultural, and environmental projects should be guided by the real needs of the communities and aligned with TIVIT's guidelines to support projects that are genuinely committed to promoting social transformation.

TIVIT encourages the participation of its employees in volunteer programs.

### 5. SUPPLIERS

The relationship with our suppliers should be based on respect and the ongoing pursuit of developing products and services that add value to TIVIT and strengthen the competitive position of the suppliers.

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TIVIT's suppliers should be evaluated based on clear criteria and without discrimination. All decisions must be supported by technical and economic justifications, and no form of favoritism is allowed.

Suppliers of TIVIT must be aware of the company's values and have a conduct compatible with the principles of this Code of Conduct and Information Security policies.

To be accepted as a supplier to TIVIT, the company must declare that it does not employ child labor and respects compliance with the requirements set forth in the Consolidation of Labor Laws.

The hiring of companies owned or managed by former employees must be handled with the necessary precautions to avoid exposing TIVIT to labor risks. A minimum period of 6 (six) months from the last working day of the former employee must be respected before such hiring as a supplier through a legal entity.

TIVIT expects its suppliers to provide clear descriptions of products and services, as well as take precautions regarding the confidentiality of information, health, safety, and the environment.

TIVIT may terminate a business relationship with a supplier if its interests are being harmed or if there is disregard for confidentiality, legal, tax, environmental, health, and safety matters.

We are responsible for maintaining the confidentiality of confidential information provided to us by our suppliers.

The hiring of suppliers with a value exceeding R\$20,000.00 (twenty thousand reais) must be accompanied by a competitive process involving at least three suppliers with the minimum qualifications to perform the services. Exceptions must be previously approved by TIVIT's Chief Executive Officer or Chief Financial Officer.


## 6. COMPLIANCE

TIVIT is committed to maintaining the highest standards of integrity, ethics, and governance in conducting its business and establishes through this Policy and other currently effective policies the guidelines for combating corruption, bribery, money laundering, financing of terrorism, and the proliferation of weapons of mass destruction, both in relation to its relationship with public institutions and private companies.

### 6.1. ANTI-CORRUPTION

TIVIT is committed to combating corruption in all its forms. Unlawful conduct, especially those that may result in theft, fraud, bribery, misappropriation, or diversion of TIVIT's assets, government agencies, competent authorities, customers, suppliers, or third parties, in accordance with anti-corruption laws, including Law No. 12,846 of August 1, 2013, *Foreign Corrupt Practices Act*, *UK Bribery Act*, among others ("*Anti-Corruption Laws*"), will not be tolerated. Non-compliance by TIVIT employees or third parties with whom TIVIT has a business relationship with applicable Anti-Corruption Laws may be considered a violation of this Code of Conduct and may constitute serious misconduct subject to termination or contract termination, depending on the case, always subject to compliance with other applicable regulatory and contractual conditions and without prejudice to relevant civil and criminal liabilities.

### 6.2. ANTI-BRIBERY

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TIVIT prohibits the payment of bribes of any kind, including facilitation payments. A facilitation payment is a small payment made to ensure or expedite a routine government action by a Government Official. The Customer will not retaliate against anyone who has in good faith reported a possible violation of this subsection or refused to participate in activities that violate it. If the Customer violates this subsection, TIVIT may report the Customer to the competent authorities for criminal proceedings or other enforcement actions or initiate legal action for damages.

### 6.3. MONEY LAUNDERING COMBAT

Money laundering is the process by which resources derived from illegal activities are transformed into assets with an apparently legal origin. TIVIT is committed to transparency and legality in financial transactions. Therefore, employees or third parties who have evidence or suspicions of money laundering practices should immediately contact TIVIT's Confidential Ethics Channel.

### 6.4. FINANCING OF TERRORISM AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION


The financing of terrorism and the proliferation of weapons of mass destruction can be defined as the financial support, by any means, to terrorism and the proliferation of weapons of mass destruction or those who encourage, plan, or commit such acts. Therefore, the financing of terrorism and the proliferation of weapons of mass destruction aim to provide funds or capital for terrorist activities and other related and analogous practices. This fundraising can occur in various ways, including legal means such as association contributions, donations, or profits from various commercial activities, as well as from criminal sources, such as drug trafficking. In this sense, Employees, Customers, Suppliers, and other third parties are invited to exercise greater vigilance and take a stance against these illicit acts, whether in relation to TIVIT or within their own structure.

## 7. GOVERNANCE

Periodic internal audits occur, which may initiate internal investigations, i.e., investigative and supervisory actions, with the purpose of verifying whether the internal procedures adopted are appropriate and whether the legislation is being adequately applied.

Internal and external audits are important control and risk management tools, ensuring transparency and effectiveness in the conduct of the Organization's business and its positioning in relation to the guidelines of the Management and its shareholder. The Organization's Compliance and CSIRT programs also meet these premises through diligent mechanisms for compliance with the law and provide security against fraud, direct administrative actions for the application of penalties provided in this code, and provide subsidies for the appropriate legal actions provided for in current legislation. TIVIT's Legal department guides and supports the areas responsible for its compliance and audits, contributing to the updating of internal policies and audit criteria.

TIVIT, through its employees, always values transparency and ethics in its business relationships, individual and corporate responsibilities, confidentiality, and agreements made with its customers, suppliers, government, and regulatory entities, following the legislation and business guidelines. The Organization cooperates and effectively collaborates with internal or external investigations, especially in the application of the law.

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The Computer Security Incident Response Team (CSIRT) is responsible for receiving, analyzing, and responding to notifications and activities related to computer security incidents.

## **8. PRESS, ADVERTISING, IMAGE, AND REPUTATION**

TIVIT adopts an objective and clear position in the disclosure of information and seeks to satisfy the interests of the parties involved.

### **8.1. ADVERTISING**

All TIVIT advertising must be truthful and avoid exaggeration. Arrogance, haughtiness, and prejudice are not tolerated.

TIVIT's institutional advertising must be appropriate to the company's positioning and follow the guidance of the Communication department.

Misleading advertising is condemned. Marketing and communication initiatives for TIVIT's products are characterized by compliance with applicable laws, ethics, and local and international reference standards.

### **8.2. PRESS**

Contacts with the press will be made exclusively by the spokespersons designated by the company, with guidance from the Communication department. Therefore, unauthorized persons are prohibited from contacting the press on behalf of TIVIT.


Employees must not disclose confidential or false information to the press or through social media, even on their private accounts.

Contact with the press should never be treated as a commercial relationship. Thus, it does not involve favors or any form of payment.

The relationship with the press should prioritize the disclosure of relevant facts and the promotion of the company's business activities. The emphasis should always be directed to TIVIT's activities whenever possible. The Press Communication Manual establishes the guidelines for the correct contact of our spokespersons with the press.

### **8.3. IMAGE AND REPUTATION**

The construction and strengthening of TIVIT's image and reputation also depend on our dialogue and behavior towards the stakeholders with whom we interact. Therefore, our actions, both within and outside the company, must always be in line with TIVIT's principles and values.

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The management of TIVIT's image and reputation should follow the positioning defined and detailed in the Brand Guide, under the guidance of the Communication department.

It is important to know which company information cannot be disclosed on social media. Confidential documents, internal matters, and criticisms of the company's structure or processes should be discussed and resolved internally. TIVIT employees must respect and comply with all provisions of the Social Media Code of Conduct (MKT-MPR-011-001).

## 9. CONTRACTS AND ACCOUNTING RECORDS

All financial and commercial transactions will be promptly and accurately recorded in TIVIT's books and records.

Employees must not engage in irregular financial agreements with customers or suppliers, such as over or underbilling.

Contracts in which TIVIT is involved must be written as precisely as possible, leaving no room for ambiguous interpretations. Documents not attached to the main text can only be accepted or provided with the assistance of TIVIT's legal department.

All payments and commitments must be authorized by the appropriate hierarchical level and supported by legal documentation.

## 10. INTELLECTUAL PROPERTY

Intellectual property is a strategic asset for TIVIT. It includes patents, registered or unregistered trademarks, know-how<sup>8</sup>, technical data, and market information, among other items that would benefit a competitor if they were known.

The results of intellectual work and strategic information generated within the company are the exclusive property of TIVIT.


Employees are responsible for treating confidential information about intellectual property to which they have access as a result of their work with care. The disclosure of this information without the express authorization of the company's management is not allowed.

Confidential information may be provided in response to legitimate requests from government authorities only after considering whether they will be treated confidentially and taking appropriate measures to protect their confidentiality, with the assistance of the company's Legal department.

## 11. HEALTH, SAFETY, AND ENVIRONMENT

<sup>8</sup> Know-how is an English term that refers to the knowledge and skills required to perform a specific task, often known as procedural knowledge.



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Health, employee physical integrity, and environmental protection are priorities for TIVIT.

TIVIT complies with and enforces occupational safety and health standards, especially through continuous training for its employees and contracted service providers.

To efficiently fulfill routines and responsibilities, it is TIVIT's practice to transparently communicate preventive and/or corrective information regarding health, safety, and the environment that may impact its employees, the community, or the environment.

Health, safety, and environmental policies, procedures, and practices are available through communication channels and properly published on MOGIT-OnLine to strictly ensure their proper implementation in daily activities.

Ensuring a safe working environment is the responsibility of all TIVIT employees, and they should report any potential risk situations to the company's Occupational Safety, Health, and Environmental department, as well as their immediate leadership. The TIVIT team, with the support of the Occupational Safety, Health, and Environmental department, will take all necessary measures to eliminate or mitigate situations that expose the work environment to risks or potential irregularities.

In emergency situations such as *environmental*<sup>9</sup> or *workplace accidents*, those involved should follow the procedures provided for the situation and promptly report the facts to the local Occupational Safety, Health, and Environmental department. Only officially appointed spokespersons may give interviews or make statements to authorities and the community.

## 12. GIFTS AND INVITATIONS

Institutional gifts and invitations are acts of kindness and cordiality accepted within a reasonable and nonexcessive value and as part of a business relationship.

Institutional gifts that represent acts of kindness and cordiality between parties in a business relationship and do not involve obtaining benefits in any negotiations may be accepted by employees.


Invitations to events with expenses covered by clients, suppliers, government agencies, and other relevant stakeholders may only be accepted when there is a real opportunity for developing a business relationship and when professionals from other companies have also been invited, with authorization from the leadership.

Items received as awards that represent distinction or tribute to TIVIT and its companies should be forwarded to the Communication department.

Employees must not accept gifts or advantages that compromise them, either in their own name or on behalf of their families. In such cases, the gifts should be returned to the sending company.

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<sup>9</sup> *Environmental accidents* are unexpected and unwanted events that can cause direct or indirect harm to the environment, health, and life.

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Everyone should be attentive to the context of receiving gifts, not just their value. In case of doubts, they should consult their immediate leadership. Accepting cash offers for any reason is prohibited.

Employees should inform the entities with whom they have relationships on behalf of TIVIT about the company's policies regarding gifts or presents.

The same principles should be applied when TIVIT offers gifts and invitations to its partners.

### 13. EXTERNAL SPEECHES AND PRESENTATIONS

During speeches and participation in seminars and other public events, the confidentiality of company-related information, including information about its clients, suppliers, and business, must be strictly maintained.

Both participation as a speaker at events and the topics to be presented must be previously approved by the involved employee's leadership and the Communication department.

For presentations about TIVIT, the Institutional Presentation document available on the intranet should be used.

### 14. CLARIFICATIONS AND REPORTS

*Questions of interpretation, unforeseen cases, and reports of non-compliance with this Code should be registered in the TIVIT Ethics Channel, available to employees, clients, and external providers in Brazil and LATAM.*


Reports of fraud, misuse of computer assets, embezzlement, bribery in acts or business transactions, as well as non-compliance with any item of this Code of Conduct involving employees, suppliers, contractors, and business partners, should be accompanied, whenever possible, by concrete facts and data.

All reports received by TIVIT will be treated confidentially. No retaliation against the employee will be accepted for reporting in good faith. If an employee experiences any form of retaliation, they should immediately inform the TIVIT Ethics Channel.

The Ethics Channel ensures uniformity in the criteria used to resolve similar cases, verifies the validity of the raised issue, takes appropriate action when necessary, and responds to the requester when identified. The analysis and recommendations are conducted by an independent company.

The objective of this channel is to safeguard the maintenance and compliance with the TIVIT Code of Conduct, which aims to:

- Clarify doubts related to the Code;
- Correct misconduct;
- Investigate the veracity of possible reports;
- Recommend the application of disciplinary actions when necessary;
- Evaluate opportunities for improvement regarding the code of conduct and suggestions.

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The reporter may choose to identify themselves or remain anonymous. In cases where the reporter chooses to identify themselves, their identity will be treated confidentially.

The submitted messages will be pre-analyzed by an independent company and handled by a restricted team from the Operational Excellence, as detailed in QP-PRO-008 - TIVIT Ethics Channel.

TIVIT ensures that all cases will receive feedback resulting from the investigative analysis when necessary.

## 15. ETHICS COMMITTEE

*It is the responsibility of the Committee to analyze and adjudicate matters related to the Code of Conduct submitted to the Ethics Channel with impartiality and seriousness, seeking solutions to the situations presented to them.*

The Ethics Committee<sup>10</sup> is composed of members of the TIVIT Executive Committee. The committee is responsible for addressing cases referred to it, ensuring the uniformity of criteria used in resolving similar cases through the incident report, whether or not they are foreseen in the Code, and for its proper functioning.

## 16. DISCIPLINARY MEASURES

The existence of rules, policies, and procedures is an essential condition for a successful company. It is the responsibility of leadership to ensure that they are followed for the harmonious and efficient functioning of the organization. Deviations or non-compliance may result in disciplinary measures that, when applied, should serve as educational and culture-building elements.

Leadership is responsible for informing, guiding, and preparing their team for the proper application of the organization's policies and rules, setting an example to be followed.


Non-compliance with TIVIT's rules and regulations cannot be tolerated and is subject to punishment, including termination of employment. Repeat offenses, after appropriate guidance, are also subject to disciplinary measures.

The P&C structure determines the application of each punishment in conjunction with the Legal Department. The following punishments may be applied:

1. Verbal warning
2. Written warning
3. Suspension
4. Termination without cause
5. Termination with cause

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<sup>10</sup> The Ethics Committee is responsible for receiving reports such as complaints, allegations, criticisms, and non-compliance with the company's code of conduct.

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The imposition of penalties should be done as soon as possible after the offense, as failing to do so may constitute *tacit forgiveness*<sup>11</sup>. The imposition of penalties should be done as soon as possible after the offense, as failing to do so may constitute tacit forgiveness. A longer period of time for imposing penalties is allowed when the offense requires an investigation of facts and responsibilities. Sanctions should be fair, reasonable, and proportional to the offense committed. Similar offenses should receive similar sanctions.

If an employee believes that a particular rule is dysfunctional, they should appeal to their leadership and request a review of that rule. The rule will be reevaluated by the appropriate department and may be revised.

In cases where, due to a lack of infrastructure or adequate resources, the employee is unable to comply with a rule, they should seek guidance from their immediate manager. The manager should then escalate the case to an appropriate level within the organization to find a definitive solution.

The immediate manager of an employee who violates a rule or procedure of the company will be notified by the Ethics Committee. In the event of another violation in the same area, the immediate manager will be notified, and the immediate manager and the employees involved will receive a written warning.

If there is a repeated violation of the same rule in the same area, the director will be notified and, based on the information from the Ethics Committee, will decide what action to take, with the first action being a written warning to the immediate manager.

The P&C department should always be consulted regarding the disciplinary measure to be applied and, when necessary, should seek guidance from the Legal Department.

Positive results due to compliance with the rules should be recognized through TIVIT's recognition systems, which, accompanied by communication actions, contribute to the formation of a culture of respect and discipline. Similarly, the disclosure of disciplinary measures taken has a positive effect as it demonstrates the seriousness with which TIVIT addresses such issues. In any of these situations, respect for the individual should guide the conduct of leaders.

## 17. CODE OF CONDUCT MANAGEMENT


*The approval of this Code and its updates are the responsibility of TIVIT.*

It is the responsibility of leaders at all levels to ensure that their employees and contractors are aware of and adhere to the principles of this Code, which should serve as an example of conduct to be followed by all employees.

The publication and updating of the Code of Conduct are the responsibility of the Organizational Development department.

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<sup>11</sup> Tacit forgiveness refers to the absence of immediate punishment for an employee who commits an offense, without a clear and immediate connection between the knowledge of the offense and the punishment.

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The acceptance form referencing the code is the responsibility of local P&C representatives. The management of the internal whistleblowing channel is the responsibility of the P&C Directorate.

### **18. AVAILABILITY OF THE CODE OF CONDUCT**

The code of conduct is available through the MOGIT-Online system. For employees who do not have access to the corporate network, they should contact their immediate management to obtain a copy.

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## 19. REFERENCE TO OTHER DOCUMENTS

DO-FOR-000-001	Acceptance of Policies and Guidelines
DO-POL-000-002	Government Relations Policy
JUR-PRO-001	Legal
MKT-MPR-007-005	Press Communication Manual
MKT-MPR-007-006	Simplified Brand Manual
MKT-MPR-007-007	Social Media Code of Conduct
MKT-POL-000-002	Yammer Social Network Usage Policy
MKT-PRO-006	External Communication
QP-DOC-000-006	TIVIT Vision, Mission, and Values
PE-DOC-000-001	TIVIT Strategic Map
QP-POL-000-001	Quality Policy
QP-PRO-003	Audits
QP-PRO-008	TIVIT Ethics Channel
REM-DOC-001-001	Corporate Job Profiles
REM-DOC-001-002	Application Management Job Profiles
REM-DOC-001-003	IT Infrastructure Management Job Profiles
SEG-DOC-001-002	Code of Conduct for Service Providers
SEG-MPR-001-001	Best Practices for Social Media Security
SEG-POL-001-001	Information Security Policy
SEG-POL-001-002	Information Classification and Handling Policy
SEG-POL-001-005	Logical Access Control Policy
SEG-POL-001-006	Legal and Regulatory Guidelines
SEG-POL-001-019	Privacy Policy
SEG-POL-002-001	IT Risk Management Policy