



CODE OF CONDUCT.





Message from the CEO.

“Our Code of Conduct was built based on our values and, for this reason, it is a fundamental tool that guides our employees in making decisions and choosing the right paths. Furthermore, our Code is a commitment undertaken by the Softplan Group for the responsible management of its operations.

We are one of the largest software companies in Brazil and this position gives us great responsibilities for the security of our systems, products, and information. Having ethics as the basis of our relationships, this diligence must be reflected in daily actions, guaranteeing our commitment to all customers, partners, employees, and shareholders.

We are growing and we have major strategic goals for the coming years. Therefore, we have reason to believe that the success of our business presupposes a commitment to ethics, diversity and doing what is right, maintaining the organic and consistent growth of our current operations and accelerating our M&A processes.

Our Code of Conduct offers an accessible content to readers, and it has a team of professionals to manage, guide and answer questions about how to act in accordance with the values of the Softplan Group.”

Eduardo Smith – CEO



SOFTPLAN PURPOSE.

**TO PROMOTE
FUNDAMENTAL
CHANGES IN
PEOPLE'S LIVES.**

SOFTPLAN VALUES.



SOFTPLAYERS ARE OUR FOUNDATION.

We value people, their differences, and the difference each one makes.



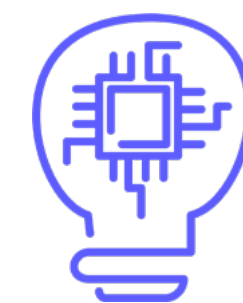
FOCUS ON CUSTOMER SUCCESS.

We deliver value to customers, who represent our key success indicator.



SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.

We are eager for the best results, we act with a sense of ownership, and we are future-oriented.



TRANSFORMATION-ORIENTED INNOVATION.

We value a culture of learning and improvement, focused on the best solutions and innovation.



WE ARE STRONGER TOGETHER.

We collaborate with each other and we have a lot to share and grow together.

SOFTPLAN
ETHICAL
PRINCIPLES

HONESTY

RELIABILITY

RESPECT

COMMON SENSE

RESPONSIBILITY

DIVERSITY

WHAT IS THE PURPOSE OF THE CODE?

The Code of Conduct, which was build based on the Softplan Group's Values, aims to present the conduct guidelines that guide and direct the company's performance in the relationship with all publics as a legal duty, and mainly in compliance with its commitment to do what is right.



WHO MUST COMPLY WITH THE CODE?

The compliance and practice of the conduct and ethical principles defined in this Code apply to all people who have a relationship with the Softplan Group, which, for the purposes of this Policy, comprises its controlled, affiliated and invested companies, including all shareholders, directors, committee members, members of the Board of Directors, employees, suppliers, service providers, business partners, representatives and distributors who act on behalf or in the interest of these companies in the national or international market.

DOUBTS ABOUT MAKING ETHICAL DECISIONS.

If you are ever in doubt about what to do regarding ethical conduct, whether in the professional environment or outside of it, ask yourself the following questions:

- Is it within the limits of the Law?
- Does it comply with Softplan's policies?
- Does it reflect the values and ethical principles of the Softplan Group?
- Does it respect employees, shareholders, customers, partners, communities, and the planet?
- Would you post your decision on your social media?

If the answer to any of these questions is “no”, it is very likely that the behavior or attitude at hand is inappropriate and not tolerated by the Softplan Group. If you still have any doubts, look for your leader and ask for help, he is prepared to provide you with the necessary guidance and support. You can also consult the Anti-Corruption Policy and contact the Compliance area by email compliance@softplan.com.br.



ADDITIONAL RESPONSIBILITIES FOR LEADERS.

Leaders are a strong reference for their teams, and, for this reason, they have a transforming role in the work environment. Therefore, it is up to the leader to have an exemplary ethical conduct, promote a respectful work environment, ensure that his/her subordinates read, understand, and sign the commitment to act in accordance with the Code of Conduct, and always guide and act if he/she becomes aware of any attitude in non-compliance with this Code.

COMMITMENT TO EMPLOYEES.

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We value people, their differences, and the difference each one makes.

EXPECTED BEHAVIORS (Dos)

- Respect people and their differences
- Recognize the work and celebrate the achievements of softplayers and teams
- Value quality of life and personal and professional balance

NON-TOLERATED BEHAVIORS (Don'ts)

- Say one thing and do another, demonstrating inconsistency
- Ignore people and act with favoritism
- Not empathize and not take different opinions into account



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Healthy and respectful work environment

In all modalities (face-to-face, hybrid or virtual), the Softplan Group encourages a respectful, pleasant, and productive work environment, with full freedom to clarify doubts and/or receive suggestions through open and transparent conversations.

Your duty

- Act with empathy, a collaborative spirit and professionalism, regardless of the position or professional activity held.
- Resolve issues professionally and respectfully, never with intimidation or violence.
- Report irregularities or violations of the Code of Conduct via the Ethics Channel.

Diversity and inclusion

The Softplan Group encourages and supports diversity and inclusion actions, respecting and valuing differences between people, and it does not tolerate any action and/or omission behavior that may reflect prejudice or any form of discrimination, due to nationality, color, gender identity, sexual orientation, age, disability, marital status, pregnancy, social class, religion, hierarchy, or any other type not mentioned here.

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Your duty

- Respect the differences of each individual, ensuring equal treatment and providing an environment where everyone feels welcomed.
- Do not base your actions on pre-judgments because, intentionally or not, some actions, such as creating nicknames, making jokes or derogatory comments with any reference to nationality, color, expression and/or gender identity, sexual orientation, age, physical and/or mental condition, marital status, pregnancy, social class, and religion, can embarrass and generate a hostile work environment.

Prevention of harassment and other forms of violence

Everyone has the right to work free from intimidating, hostile or offensive behavior by anyone, including superiors, other employees, suppliers, partners, and customers. Therefore, the Softplan Group does not tolerate abuse of power, moral and/or sexual harassment, and other forms of violence in the workplace.

Moral harassment can be defined as all abusive conduct, such as gestures, words and attitudes that are repeated over time, affecting the dignity or psychological or physical integrity of a worker. Some examples are, but not limited to:

- _Constantly contesting or criticizing a person's work.
- _Overwhelm him/her with excessive tasks or purposely leave him/her idle, causing a feeling of uselessness and incompetence.
- _Deliberately ignoring the person's presence.
- _Spreading offensive rumors about the person.
- _Address the person screaming.

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_Threaten the person's physical integrity.

Sexual harassment is a conduct of sexual nature, physically manifested by words, gestures or other means, proposed or imposed on people against their will, causing embarrassment and violating their sexual freedom. Harassment becomes a crime when practiced by a hierarchical superior; however, this type of conduct practiced by people without a hierarchical relationship can be considered other crimes. Examples of sexual harassment conduct:

_Requiring some sexual conduct in exchange for benefits or to avoid harm in the employment relationship.

_Inopportune sexual provocation with the aim of harming a person's work performance or creating an offensive, intimidating, or humiliating situation.

Allegations of harassment, as well as other violations to this Code, must be reported to the Ethics Channel so that they can be investigated and dealt with under the terms of the items "Reporting Concerns or Violations" and "Applicable Sanctions".

Your duty

- Address people respectfully.
- Value the work.
- Report situations of any type of harassment via the Ethics Channel.
- Respect everyone's space.
- Do not touch a person without their free and express consent.
- Do not practice any conduct that could constitute moral or sexual harassment or other forms of violence.
- Do not question the victim's word or blame him/her for what happened.

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- Promote a safe work environment.

Workplace health and safety

Softplan Group believes that health, quality of life and occupational safety are essential for its employees to live a more harmonious, happy, and long-lasting life. Thus, contemplating health in the physical, mental, and emotional spheres, the Group understands that employees must work in a safe and sustainable way, which will enable a better performance of their daily activities and favor the maintenance of their personal and professional growth.

In order to achieve these goals, the People & Culture area has a team specialized in Occupational Health and Safety (OHS), which works to promote and raise awareness of essential daily care for the well-being of each employee. In addition to all this care, the Group also complies with legislation related to labor rights and working conditions in force in the places where it maintains its operations.

Your duty

- Know the company's safety standards and perform your work in a professional and responsible manner.
- Take care of yourself and your peers to prevent any risks arising from work, and wear, whenever necessary, personal protective equipment (PPE).
- Carry out occupational medical examinations when called upon.
- Notify your superior of your absences due to illnesses and work disabilities, observing the deadlines defined by the applicable Collective Norms and Policies.
- Participate, whenever possible, in actions promoted by the Occupational Health and Safety (OHS) team and by the Softplan+Saúde program, such as health webinars, review reading and labor gymnastics.

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- If you have any questions, please contact us via email: segurancadotrabalho@softplan.com.br.

Alcohol, illicit drugs, illegal possession of weapons and violence

The Softplan Group understands that alcohol, illicit drugs, illegal possession of weapons and violence can negatively affect the safety, productivity, attitude, reliability, and discernment capacity of its employees, who must promote and enjoy a safe work environment, without any type of negative interference that affects the full performance of their roles. Below, see some important conduct guidelines for conducting your posture in relation to these topics.

Your duty

- **Alcohol:** Know that it is forbidden to remain under the influence of alcohol or consume it on the premises of the Softplan Group during working hours, including the home office or any other place where you are representing the Softplan Group. Eventual exceptions for the consumption of alcohol may occur in specific situations, such as celebrations or corporate events, provided that with prior authorization from the board and/or the People & Culture area. On these occasions, use common sense and consume in moderation.
- **Illicit drugs:** Know that it is forbidden the consumption, possession, and storage of illicit drugs, under any circumstances, on the premises of the Softplan Group or any other place where you are representing the Softplan Group. It is also forbidden to remain under the influence of illicit drugs during working hours, even at home offices or any other location.
- **Possession of weapons:** Know that it is forbidden to carry and/or keep a weapon of any kind on the premises of the Softplan Group or in any other place where you are representing the Softplan Group, except if the use of a weapon is part of the attributions of the position you hold.

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- Violence: Know that it is forbidden any type of violence, whether physical or verbal, both through communication tools and in person, on the premises of the Softplan Group or in any other place where you are representing the Softplan Group.

Respect for the privacy of personal and/or sensitive information of each person

The establishment of the company/employee relationship allows the Softplan Group to collect personal information from its employees (such as names, RG and CPF numbers, bank account, email addresses, IP, among others), which are collected, processed, and stored securely, with the aim of preventing leaks or misuse of this data, in compliance with the privacy and data protection laws in force in the places where it operates.

Your duty

- Do not share any personal information or other private data from Softplan Group's employees, unless you have authorization from your immediate leader to do so.
- Perform your activities ethically and responsibly, as the information you have access to is your responsibility.
- Follow the guidelines provided by the Information Security and Personal Data Governance area.

Respect for each person's opinion and individual activities

The Softplan Group recognizes the limits of its employees' private lives and respects freedom of expression and the plurality of opinions, in addition to understanding that all forms of communication and expression must be sent and received in a respectful and polite manner, regardless of the circumstances. In this sense, as a member of the company or a related third party, you must act responsibly, looking out for your image and the image of the Softplan Group, given that some individual and/or personal actions inside and outside work can be associated

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with the professional activity and negatively affect the reputation and commercial interests of the Softplan Group. Below, see some important conduct guidelines for conducting your individual activities.

Your duty

- **Social media:** Know that content published on personal media and social networks (Facebook, Instagram, Twitter, WhatsApp, among others) that is related to business activities can be associated with the company's image, so be careful that your communication is aligned with the values of the company, respecting all people, especially if it is to express a value judgment.
- **Press:** Only spokespersons are authorized to speak on behalf of the Softplan Group or its companies. Therefore, if you are not one of these people and are asked to give statements or grant interviews to entities or the press (newspapers, radios, television, websites, blogs, or other vehicles) that involve your professional activity in the companies of the Softplan Group or that are about company, you should direct it to your immediate leadership and to the Marketing area, so that the situation is evaluated. In cases where a prior arrangement is not possible, thank them for the opportunity and say that you are not authorized to carry out such a practice.
- **External activities:** When being invited to participate in external events to act as a lecturer, special guest, debater, mediator, presenter, or any other functions due to your professional position in the Softplan Group, such as live, webinar, among others, you must request the authorization of your immediate leader before accepting the invitation, to avoid any interpretation of conflict of interest. On these occasions, you must be careful so that no confidential information is exposed.
- **Political positioning:** The Softplan Group respects the political positioning of its employees and expects everyone to ensure that its image of independence and neutrality regarding the issue is maintained. In this way, it does not allow political manifestations within the company or through any communication tool used for work. Be careful when expressing yourself publicly, so that your personal statement is not confused with the company's position nor gives the impression that the company supports or endorses any campaign, candidate, or political party.

COMMITMENT TO SHAREHOLDERS AND FUTURE INVESTORS.

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.

We are eager for the best results, we act with a sense of ownership, and we are future-oriented.

EXPECTED BEHAVIORS (Dos)

- Deliver value and the best results
- Do what needs to be done, considering deadline, cost, and quality
- Plan, prioritize and decide with a short, medium, and long-term vision

NON-TOLERATED BEHAVIORS (Don'ts)

- Be more concerned with just following the process than really understanding the whole and delivering value
- Have initiatives without “finishiatives”
- Make decisions based on guesses

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.

Conflicts of interest

A conflict of interest is configured when, for their own interest or that of third parties, a person acts or is influenced to act against the goals and principles of the company for which he/she works, provides services, or has another type of relationship, making some kind of inappropriate decision in which he/she prioritizes personal interests or those of third parties, failing to fulfill his/her professional responsibilities.

The Softplan Group disapproves of any activities and/or situations that imply a threat to the integrity of its values and ethical principles, or that may raise suspicions about the full exercise of the activities it performs.

Examples of conflict of interest situations:

- Use Softplan Group equipment or resources (including confidential information or intellectual property of the company or its customers and third parties) for their own benefit or that of others.
- Engage in any parallel activity that competes with the Softplan Group, that violates confidentiality, intellectual property, or other obligations to the Group, or that is illegal, immoral or that could generate negative impacts for the company.
- Carry out business, without the knowledge or not authorized by the Softplan Group, with business partners, suppliers, or active customers, with whom you have had contact through the Softplan Group.

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.



- Participate in the boards of for-profit companies, whether publicly traded or privately held, unless approved by the CEO and indicated by the Board of Directors of the Softplan Group.
- Have a family or loving relationship with public agents or politically exposed persons, especially those who exercise a relevant role in entities that are related to the Softplan Group, including a leader, subordinate, colleague in the same area or colleague whose professional relationship includes a relationship of subordination or power of influence on the activities performed.
- Use confidential or restricted information to obtain any kind of advantage for yourself or third parties or to harm the Softplan Group.
- Trade any type of securities of the Softplan Group based on privileged information, such as debentures, shares, subscription bonus, subscription rights, promissory notes, call or put options, indexes, and derivatives of any kind, or even any other securities or collective investment agreements issued by the Softplan Group or referenced thereto, which, by legal determination, are considered securities.

Your duty

- Be careful not to put yourself in situations of conflict of interest, preventing your credibility from being questioned.
- Remember that situations that may give rise to a conflict of interest are subjective and may vary depending on your personal relationships, side jobs, business partnerships, investments, personal business, or the exercise of outside roles as board members and governance.
- Inform any of your relationships, associations or activities that may create an actual or potential conflict of interest to your leader or to the Compliance area, so that the situation can be assessed and dealt with appropriately.



Intellectual Property

All works developed by the Softplan Group through its administrators, employees and third parties are protected by law and must have their confidentiality, integrity and availability ensured, and sharing them without express consent from the competent authority is forbidden.

The property and moral rights related to the intellectual property created by its employees in the performance of their professional activities will be considered the exclusive property of the Softplan Group, which includes source and executable programs, components and classes developed, business models, sales strategies, patents and trademarks, copyright of artistic or literary works, documentation, manuals, journalistic texts, content for portals and blogs, videos, photographs and any other products and by-products generated.

The Softplan Group not only protects its intellectual property, but also complies with the legislation and treats with confidentiality the intellectual property of third parties with whom it relates (clients, business partners or other parties) due to professional activities.

Your duty

- Take care of the intellectual property of the Softplan Group and/or third parties, refraining from keeping and sharing unauthorized copies or disclosing them to third parties.
- Never copy, disclose, or use protected information in any way without proper authorization.
- Reveal or receive confidential information only when supported by a confidentiality term prepared or validated by the Corporate Legal Department, in order to avoid infringement of intellectual property against the Softplan Group.
- Never encourage piracy or unauthorized reproduction of any materials, source codes, systems, or software.



Use of Softplan Group assets

The Softplan Group offers its professionals all the necessary resources to carry out their activities, which includes the provision of assets owned by it, including physical assets (physical premises, furniture, technology equipment, among others) and non-physical assets (software, information systems, digital files, email, internet, intellectual property, confidential information, among others).

The use of company assets must be restricted to professional purposes, therefore, in accordance with local legislation, the Softplan Group reserves the right to monitor the use of its assets, including information technology resources, at any time, without prior notice, subject to the limits of the law.

Access, transmission and archiving of inappropriate and illegal content, including pornography, games, discrimination, and activities against public property or third parties, are prohibited.

Your duty

- Value the integrity, security, and proper use of any and all company assets, especially those entrusted to you.
- Use office materials, paper, as well as water, electricity, and other company assets, responsibly and conscientiously, avoiding waste and misuse.
- Keep workstations clean and organized.
- Use assets for business purposes only and do not keep personal data, messages, or private information on company-owned assets.
- Follow the determinations of internal policies and procedures and information security guidelines: never install programs not licensed by the company; use strong passwords; lock your equipment when you leave your workplace; use only software approved by TI Corporativa; turn off your equipment at the end of the day. These attitudes are important to ensure the application of IT and Information Security policies.

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.



- Under no circumstances should you lend, donate, sell, or dispose of the assets, regardless of value, physical or economic condition in which they are found. If you verify the need to dispose of an asset, always follow the internal procedures for formalizing the process.
- Never use company assets to access, store or share offensive, pornographic, or immoral content.

Information security

Confidential information

The Softplan Group's confidential information are indispensable assets for the success of the business and consist of patents, trade secrets, copyrights and other intellectual properties developed, licensed, or acquired by the Softplan Group. It may also consist of information belonging to or about customers, associates or other interested parties that were revealed to the Softplan Group under an obligation of confidentiality. Examples of confidential information are personal data of employees (health, salary, and performance), customer information, customer list, technical information, specifications (of products, projects, and prices), business strategies, internal policies and management practices of business, legal proceedings, financial results, mergers, acquisitions or joint ventures (envisaged or contemplated).

Everyone who has access to any type of confidential information is responsible for the protection, management, and use of this information, in accordance with the applicable legislation and the Softplan Group's internal regulations.

Your duty

- Comply with all internal regulations on Information Security.
- Store Softplan Group information in authorized physical locations or electronic locations, using tools authorized by the company.

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.



- Maintain the secrecy of confidential or restricted information to which you have access, including that of Softplan Group's customers and business partners.
- Reveal or receive confidential information only when supported by a confidentiality term prepared or validated by the Corporate Legal Department.

Gifts, presents, hospitality and corporate courtesies

The Softplan Group conducts its business ethically and with integrity, complying with all legal requirements regarding the granting and acceptance of gifts, presents, hospitality and corporate courtesies in all the places where it operates. No employee or third party is authorized to promise, offer, give, request, demand or accept benefits in exchange for undue advantages, favors or business guarantees. The guidelines for granting and accepting gifts, presents, hospitality and corporate courtesies may vary, depending on the type and situation at hand. These situations, when permitted, must occur in a transparent manner and in accordance with the Policy on Gifts, Presents, Hospitality and Corporate Courtesies, mandatory for all employees and third parties acting on behalf of or in the interest of the Softplan Group.

Your duty

- Never promise, offer, give, request, demand or accept any kind of tangible or intangible benefit in exchange for undue advantages, favors or business guarantees.
- Do not accept any gift, present, hospitality or corporate courtesy if you are in a situation of conflict of interest.
- Do not accept gifts or presents whose value exceeds BRL 200.00 in the Brazilian market or US\$ 40.00 in the international market.
- Do not promise, offer, or give presents to public agents and politically exposed persons (PEP).

SUSTAINABLE, RESULT-ORIENTED STRATEGIC VISION.



- Consult in advance the local legislation and the internal rules of the receiving party whenever you intend to make any concession and always follow the strictest rule if there is more than one guideline.
- Do not accept gifts, presents, hospitality and corporate courtesies frequently.
- Politely refuse any gift, present, hospitality or corporate courtesy that is above the allowed amount, reinforcing compliance with the Softplan Group's internal guidelines. If it is not possible to refuse upon delivery, report the situation to the Compliance area for proper disposal.
- Follow the guidelines of the Policy on Gifts, Presents, Hospitality and Corporate Courtesies.

Financial records and accounting books

The Softplan Group understands that the integrity of its financial statements and other regulatory files is crucial for the continuity of the business and for the establishment of a relationship of trust with its employees, customers, commercial partners, inspection entities and other interested parties; therefore, it issues reports and balance sheets correctly, truthfully and in accordance with applicable legislation.

Your duty

- Faithfully follow all implemented control processes, in full, so that all financial records are correctly accounted for.

Risk management and auditing

At the Softplan Group, all leaders are responsible for managing the risks of the processes for which they are responsible, which may occur through compliance with external and internal regulations, as well as monitoring and applying internal controls relevant to the process.

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In addition, the Softplan Group submits its processes to external and internal audits, in order to promote continuous improvements that strengthen the perpetuity of its companies.

Your duty

- Reflect on the impact of your actions and how they may affect the Softplan Group, so that your decision-making is secure.
- Constantly observe the rules and procedures of the Softplan Group.
- Carry out your activities in accordance with internal regulatory documents, always cooperating with audit, compliance, and risk professionals, if requested.
- Report risks to your leader or to the Compliance area.

COMMITMENT TO SHAREHOLDERS AND FUTURE INVESTORS.

TRANSFORMATION-ORIENTED INNOVATION.

We value a culture of learning and improvement, focused on the best solutions and innovation.

EXPECTED BEHAVIORS (Dos)

- Be curious and always want to learn more
- Adopt an analytical and agile approach when evaluating problems and finding a solution
- Use experimentation, collaboration, and data to innovate and develop solutions

NON-TOLERATED BEHAVIORS (Don'ts)

- Show attachment to the way things have always been done and resist to changes
- Lack of time, openness and patience for exchanges and updates
- Decide on immediate action and start doing things without long-term analysis – (XGH) eXtreme Go Horse!



TRANSFORMATION-ORIENTED INNOVATION.

Acquisitions, mergers, and other business transactions

The Softplan Group's participation in mergers, acquisitions, joint ventures, and corporate reorganizations requires, in addition to an economic and financial assessment, other prior diligences related to the verification of any irregularities or illegal acts. All processes are approved by the Board of Directors and any interaction prior to the completion of the transaction must be safeguarded by the appropriate contractual documents relevant to the transaction.

Your duty

- Interact with employees of companies involved in mergers, acquisitions, and joint ventures with due caution, in case you are called upon.
- Welcome employees from companies integrated into the Softplan Group with empathy, prioritizing the culture of learning on both sides.

COMMITMENT TO CUSTOMERS.

FOCUS ON CUSTOMER SUCCESS.

We deliver value to customers, who represent our key success indicator.

EXPECTED BEHAVIORS (Dos)

- Listen, empathize, and understand the customer's need
- Deliver what the customer needs
- Propose solutions for future needs

NON-TOLERATED BEHAVIORS (Don'ts)

- Build the solutions without understanding the customer
- Not prioritize tools and processes that facilitate the customer's journey and make their experience positive
- Make promises that cannot be kept, just to initially please the customer



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Lasting relationships, keeping promises, and providing safe and reliable solutions

For the Softplan Group, customers are its reason for existing and before them it assumes the commitment to do business in a fair, honest, lawful, and ethical manner anywhere in the world, complying with all laws that protect the consumer relationship and prohibit misleading commercial practices. Additionally, knowing its importance and responsibility in the development of software that simplify and generate value for the solution of complex problems that benefit society as a whole, all Softplan Group solutions are developed in compliance with applicable regulations and standards; therefore, they are safe and reliable.

Your duty

- Conduct negotiations and contracts in accordance with current laws and regulations, valuing ethics, transparency, integrity, and honesty in interactions, from the promise of a solution to the final delivery.
- Offer the best solutions for customer success.
- Never promise solutions that you are not sure can be fulfilled.
- Communicate clearly and be available to clarify doubts.

Protection of personal data and confidentiality of customer information

The Softplan Group takes its responsibilities regarding the protection of customer data very seriously, since sometimes, depending on the contract, it may have access to private and personal information that, in addition to being highly

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confidential, is protected by law. In this sense, the Softplan Group complies with all Brazilian laws and regulations on the protection of personal data, including the Civil Internet Framework and the General Data Protection Law, as well as the international legislation in force in the countries where it operates.

Your duty

- Comply with the legislation as well as the policies, contractual obligations and standards adopted by the Softplan Group when dealing with customer data.
- Maintain the integrity and confidentiality of customer data to which you have access and not disclose it to others or use it for other purposes.
- Use only responsible and legal means when collecting information from customers or potential customers on behalf of the Softplan Group, making sure that any personal information collected is only for legitimate business-related purposes.
- Team members who work at the customer's location or directly with the customer's information technology resources must also comply with the policies and rules of the Softplan Group and the customer for the protection of personal information.
- Know that the misuse of customer data can result in serious consequences for the Softplan Group and for you.

Compliance with public procurement requirements

The Softplan Group's businesses are marked by a strong relationship with the public sector through the provision of technological solutions that help improve the lives of citizens in different locations. In addition to being crucial for the Softplan Group to conduct business lawfully, fully and in compliance with the laws that regulate activities in the Brazilian market and abroad, contracts with the Public Sector require additional obligations so that all interfaces and negotiations are carried out with due transparency. In this sense, only employees and formally authorized third parties can carry out commercial dealings with the Public Sector on behalf of or in the interest of the Softplan Group.

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Your duty

- Comply with the legislation, as well as with the policies, contractual obligations and norms voluntarily adopted by the Softplan Group when relating to the Public Sector in all interactions, regarding offers, preliminary technical studies, bids, waiver of bids, negotiations, renegotiations of contracts or provision of services.
- Provide correct and accurate information, within the previously agreed deadlines, in all interactions.
- Comply with the Public Sector Relationship Policy, if involved with the topic.

COMMITMENT TO THIRD PARTIES, THE COMMUNITY AND THE PLANET.

WE ARE STRONGER TOGETHER.

We collaborate with each other, and we have a lot to share and grow together.

EXPECTED BEHAVIORS (Dos)

- Show commitment to Softplan
- Collaborate and be open to difficult and constructive conversations
- Share insights and information that add value

NON-TOLERATED BEHAVIORS (Don'ts)

- Ignore requests for help by understanding that “it’s not my problem”, simply
- Make decisions without considering different perspectives
- Not share knowledge and not know how to do it together

WE ARE STRONGER TOGETHER.

Intolerance towards corruption and heinous crimes

The Softplan Group is committed to ethics and rejects corruption, whether active or passive, regardless of where commercial negotiations are carried out. In this sense, it acts in accordance with all applicable anti-corruption laws, in particular the Anti-Corruption Law 12846/2013 and its decrees, and does not tolerate the direct or indirect involvement of employees, third parties or business partners in practices and conduct related to corruption and heinous crimes.

Your duty

- Never promise, offer, pay, or accept, directly or indirectly, bribes, kickbacks, or any other undue advantage in order to obtain favor in any commercial contract/agreement, even if requested, whether in the public sector or in the private sector.
- Never offer, give, or promise any gift or undue advantage to Public Agents or Politically Exposed Persons or persons related to them, even if indirectly or through others.
- Never sponsor, directly or indirectly, personal interests or those of the Softplan Group with the aim of winning bids or entering into public contracts with the Public Sector.
- Notify the Softplan Group in case you become involved in matters related to corruption or heinous crimes.
- Act with good faith and transparency in all interactions, in accordance with the Anti-Corruption Policy.



Political activities and contributions to parties and candidates

The Softplan Group respects the position and political activity of its employees; however, it adopts a position of impartiality and exemption in relation to any political party or candidate for elected office. Furthermore, the Softplan Group does not make donations nor sponsors political parties or political candidates.

Your duty

- Participate in civic and political activities of personal interest only during off-hours, without any connection to the image of the Softplan Group.
- Do not use the Softplan Group's financial resources or assets, including facilities, equipment, or trademarks, to carry out personal political activities or for your own interest, such as making contributions to political parties or campaigns.
- Be careful not to give the false impression that the Softplan Group supports or endorses any candidate, campaign, or political party.
- Inform the company if you want to run for a public office and request that you withdraw from your professional activities during the election period; if elected, request that you leave the Softplan Group.

Donations and sponsorships

The Softplan Group understands its social role and acts as a promoter of the common good by also supporting social actions and projects that are aligned with its values, strategic objectives, and budget limits. In this sense, it makes donations and sponsorships according to clear criteria for granting, monitoring and accountability, and it does not make donations to political parties or projects of a political, racial, discriminatory

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or any other nature that are not in compliance with the law.

Your duty

- Comply with the Donations and Sponsorships Policy, if you are involved with the topic.

Relationship with competitors

The Softplan Group complies with all laws and regulations applicable to free competition and works with professionalism and respect for its competitors, as it understands that a fair and competitive market generates a healthy competitive environment that brings benefits to all.

Aiming at the common objective of fulfilling public contracts, the Softplan Group may, in certain situations, enter into agreements with competitors, establishing additional relationships such as a “commercial partnership” or “provision of services”, subject to the limits of the law. These situations are permissible, but require care in the relationship, even if both deal with matters of common interest.

Your duty

- Conduct business in compliance with fair competition and antitrust laws and regulations.
- Maintain the confidentiality of information belonging to the Softplan Group, such as prices, sales conditions, commercial strategy, as well as other strategic and/or confidential information of the organization.
- Never use improper means, such as spying or hiring former employees, to gain access to competitors' confidential information.
- Never spread rumors or false information to harm competitors.
- Never engage in cartel practices or any type of price fixing.



Relationship with suppliers and service providers

The Softplan Group's relationship with suppliers and service providers is guided by ethics, transparency, and impartiality in hiring, as all are considered important strategic agents in the Group's relationship with the market and contribute to the success of the business. Seeking to take care of the selection process, the Softplan Group applies a rigorous evaluation process that aims to analyze the reputation and compliance with the Law in all areas and mitigate any risks.

Your duty

- Comply with the Purchasing Policy if you are involved in hiring processes.
- Do not get involved in hiring processes if you are in a situation of conflict of interest.
- Request due diligence for hiring, in accordance with the Softplan Group Due Diligence Policy, and remain alert to possible signs of non-compliance (red flags) even after hiring, reporting them to the Compliance area whenever identified.

Third party intellectual property

The Softplan Group respects the rights inherent to the intellectual property of third parties, as well as protects its own intellectual property, not admitting the unauthorized reproduction of any materials, systems, and software, as well as piracy of any nature, under penalty of civil (damages) and criminal sanctions.

Your duty

- Never use any type of piracy or unauthorized reproductions of any materials, source codes, systems, or software. Failure to comply with this item exposes the offender to the penalties provided for in the legislation.

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- Check in advance whether you have proper authorization to copy, disclose or use protected information in any way.

Environmental protection

The Softplan Group understands that preserving the environment is fundamental so that the next generations can develop in an increasingly better planet, and it is proud of the contribution it makes, together with its customers, when developing technological solutions that impact on the reduction of the use of paper, including other initiatives in the technology field.

In addition, the Softplan Group respects the applicable environmental legislation, minimizing risks and impacts to the environment; it has balance and care in the use and reuse of natural resources, combating forms of waste, including the proper disposal of waste and the preference for suppliers and service providers that have the same goals.

Your duty

- Conscientiously use resources such as water, energy, paper, and others, as well as give preference to the use of recyclable materials.
- Dispose of rubbish and waste appropriately and according to their classifications.



REPORTING CONCERNS OR VIOLATIONS.

The Softplan Group is committed to integrity and truth, conducting its business ethically in all situations.

The Ethics Channel is the official means for safe and confidential communication, which can be used anonymously or confidentially, and is available to all people who wish to report concerns or denounce any unethical, illegal, or non-compliant conduct with the Code of Conduct.

All reports are received and analyzed in an impartial, secure, and completely confidential manner, with the aim of seeking all the necessary measures to investigate, prevent and punish inappropriate conduct, not admitting any type of retaliation against those who have reported irregularities in good faith.

Your duty

- Report any suspicion and/or proof of non-compliance with the precepts established in this Code of Conduct, considering that your leader is usually in the best position to direct the issues and should be sought in the first place. However, if you do not feel comfortable reporting a concern or have already done so and the issue still concerns you, use the Ethics Channel. For more information about this process, access the Ethics Channel Reporting Policy.

APPLICABLE SANCTIONS.



Employees who prove to be in breach of the Code of Conduct guidelines will be subject to the disciplinary and legal measures provided for in the Consequences Policy, which may include warning, suspension, dismissal, and legal action, depending on the severity.

With regard to suppliers and service providers, proven non-compliance with the guidelines established in the Code of Conduct may lead, in addition to the penalties provided for in the contract, to termination, without prejudice to repairing the damage caused.