



Pitang

Code of Conduct

Pitang employees,

We present Pitang's Code of Conduct, which was created with the objective of establishing the standards of conduct for all Pitang employees, including employees, directors, interns, apprentices, scholars, service providers, or third parties working for Pitang. This code indicates how everyone should behave in various day-to-day situations at work and in relationships with leaders, colleagues, clients, and the general public.

The terms outlined in Pitang's Code of Conduct are aligned with our mission, principles, and values, as well as our commitment to being a reference in the national software services market, recognized for our agile and flexible operational model and the quality of our products. Read this document, understand it, and consult it. This material will not only serve to align our actions but primarily to unite our efforts and commitments to conduct. In this way, we can always improve our coexistence and foster an atmosphere of respect and well-being for all who collaborate with us.

It clearly and simply demonstrates the principles that should underpin everything we do at Pitang, committing ourselves to the highest ethical standards.

We count on each of you to experience and disseminate these best practices within our organization.

Best regards

Antônio Valença, CEO

SUMMARY

INTRODUCTION	5
OBJECTIVE	5
PITANG ORGANIZATIONAL IDENTITY	6
ESSENTIAL COMMITMENT	6
PITANG'S COMMITMENT TO DIVERSITY, INCLUSION AND EQUITY	6
CONDUCT GUIDELINES	10
RELATIONSHIP WITH SOCIETY	10
RELATIONSHIP WITH PITANG EMPLOYEES	10
HEALTH AND SAFETY AT WORK	10
PROHIBITION OF CHILD OR SLAVE LABOR	10
RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS	11
CONFIDENTIALITY AGREEMENT	11
INTELLECTUAL PROPERTY	12
CONFLICT OF INTERESTS	12
GIFTS AND ENTERTAINMENT	13
PURCHASING PRACTICES	13



PRACTICES AGAINST BRIBERY AND KICKBACKS	13
WORK ENVIRONMENT	14
PATRIMONY	14
PHYSICAL AND LOGICAL ACCESS SECURITY	15
USE OF ELECTRONIC COMMUNICATION SYSTEMS	15
NOT TOLERATED BY PITANG	16
DATA PROTECTION	16
COMMUNICATION GUIDELINES FOR SOCIAL NETWORKS	16
HARASSMENT AND ABUSE OF POWER	17
POLITICAL PARTICIPATION	17
TRADE INSIDE THE PITANG OFFICE	17
USE OF ALCOHOL AND ILLICIT DRUGS	18
AUDITS	18
REPRESENTATION OF PITANG BEFORE THE PRESS OR ANY OTHER BODY/INSTITUTION	18
OMBUDSMAN	19
VIOLATIONS AND PENALTIES	19
QUESTIONS, REPORTS AND SUGGESTIONS	19
FINAL PROVISIONS	20



INTRODUCTION

The Code of Conduct is an instrument intended to guide the behavior of all Pitang employees at Pitang, whether they are employees, interns, scholarship holders, service providers or third parties, hereinafter generically all called "Pitangueiros".

Thus, the norms established here must be interpreted within the specific context of each group, respecting the specificities of its interaction and the related hierarchical levels. This code does not intend to exhaust all possibilities and situations in the daily life of Pitangueiros, but rather to highlight relevant points that will serve as a reference to guide initiatives and decisions made on a daily basis.

OBJECTIVE

- ▶ To guide, in a simple and direct way, about the expected conduct of Pitangueiros and other members linked to Pitang, based on the company's mission, principles and values, as well as applicable legislation, such as the Anti-Corruption Law (Federal Law No. 12.846/2013).
- ▶ To reinforce honest and ethical conduct, including the ethical management of real or apparent conflicts of interest between personal and professional relationships;

PITANG ORGANIZATIONAL IDENTITY

► Mission

To be a reference in the national software services market, recognized for its agile and flexible operational model and the quality of its products.

► Vision

To provide solutions and knowledge in Information and Communication Technology, enhancing the results of our clients.

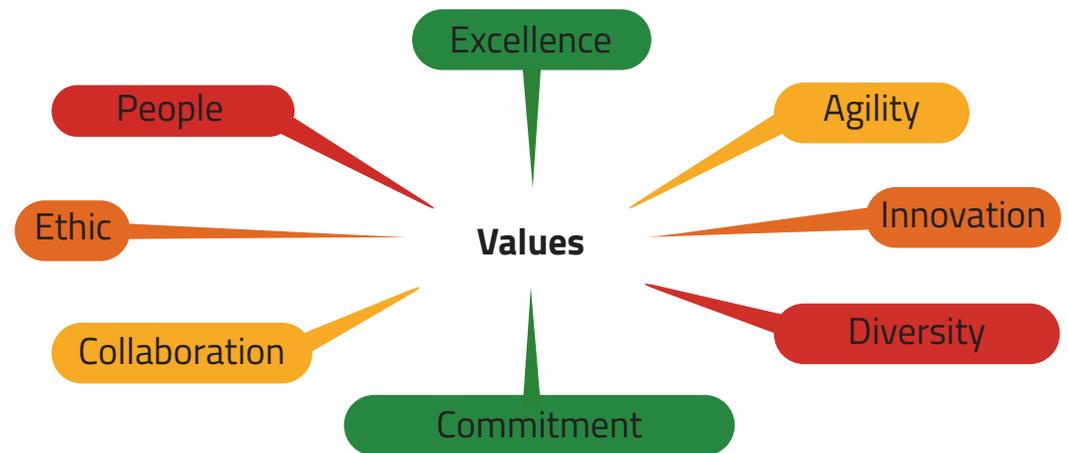
ESSENTIAL COMMITMENT

All the Pitangueiros assume the essential commitment to fully know and comply with the guidelines contained in this Code of Conduct and other norms and procedures established by the company.

It is essential that everyone acts correctly, in an honest, fair and ethical manner in all situations, even when circumstances seem unfavorable. In addition, it is of utmost importance that each Pitangueiro is aware of the importance of their role and the value that their work has for Pitang, always being attentive to the impact that their decisions and actions can have on the organization.

PITANG'S COMMITMENT TO DIVERSITY, INCLUSION AND EQUITY

Diversity is one of Pitang's corporate values, and it is there to make this debate even more present in the lives of Pitangueiros and our relationship audiences. We carry out continuous actions to promote an even more inclusive, diverse,



respectful, fair and safe work environment for all people. We have a diversity, inclusion and equity committee with strategic people representing all areas of Pitang.

We understand that diversity is a journey, the discussion about its impacts will always be present at the work with teams, because even though the Brazilian federal constitution affirms that all people are equal, we perceive that in our society some people are excluded and/or discriminated based on supposedly “natural” attributes such as color, sex, age, ethnic belonging, or even by their gender identity or sexual orientation.

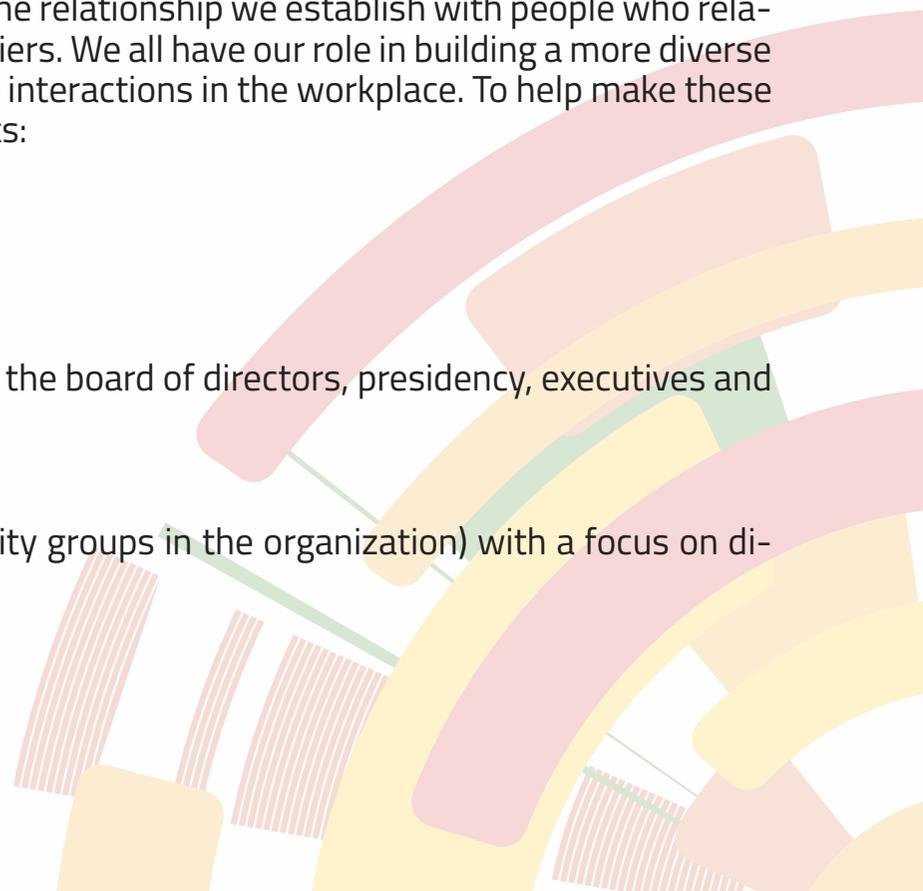
To transform this reality, here at Pitang we assume the commitment to have a diverse workforce and carry out actions to promote an inclusive work environment, offering development opportunities for all people, always considering their singularities. Thus, we believe that we will also influence and positively impact our clients and society.

We want a world with happy people in their jobs. This involves making diversity a factor of sustainability for the business, empowering teams with a plural view to generate more innovation, agility, solutions and results for Pitang.

As it is our positioning on the subject, these commitments must be part of the relationship we establish with people who relate to Pitang, whether they are employees, leaders, clients, partners or suppliers. We all have our role in building a more diverse and inclusive environment. We are all responsible for our daily behavior and interactions in the workplace. To help make these interactions more tangible, we have established the following commitments:

► INCLUSIVE LEADERSHIP

- Ensure respect and promotion of diversity, including the commitment of the board of directors, presidency, executives and other members of leadership;
- Assume public commitments in relation to diversity and inclusion;
- Encourage and strengthen internal communities (e.g. committees, affinity groups in the organization) with a focus on diversity;





▶ **INCLUSIVE CULTURE**

- Ensure the health, safety and well-being of all;
- Treat everyone fairly at work, respecting and supporting human rights and non-discrimination;
- Provide channels and mechanisms to enable reporting cases of deviation associated with diversity;
- Foster diversity and inclusion as a trait of organizational culture, fostering an anti-misogynistic, anti-racist, anti-ableist, anti-LGBTIphobic stance, saying no to all violations of rights.

▶ **REPRESENTATIVENESS**

- Offer equal opportunity and foster actions to enhance the attraction, recruitment and selection of diverse candidates.

▶ **EDUCATION AND EMPOWERMENT**

- Continuously raise awareness, train and educate employees and partners in favor of respect for difference and promotion of diversity (e.g. training, events, etc.);
- Always have a special look at professionals belonging to groups in vulnerable situations at programs promoted by the company evolving education, training and professional and career development;

▶ **ACCESSIBLE AND INCLUSIVE INFRASTRUCTURE AND PROCESSES**

- Ensure accessible and inclusive infrastructure (e.g. accessibility of spaces, bathrooms or others);
- Carry out actions to mitigate biases in the different decision-making processes of the organization;

- Offer benefits that contemplate an inclusive look and accommodate the needs of diverse audiences;
 - ▶ **INCLUSIVE COMMUNICATION**
- Build marketing, advertising and propaganda actions with an inclusive look and that promote active positioning in favor of diversity;
- Promote communication that enhances inclusion, both internally and externally.

- ▶ **INCLUSIVE BUSINESS**

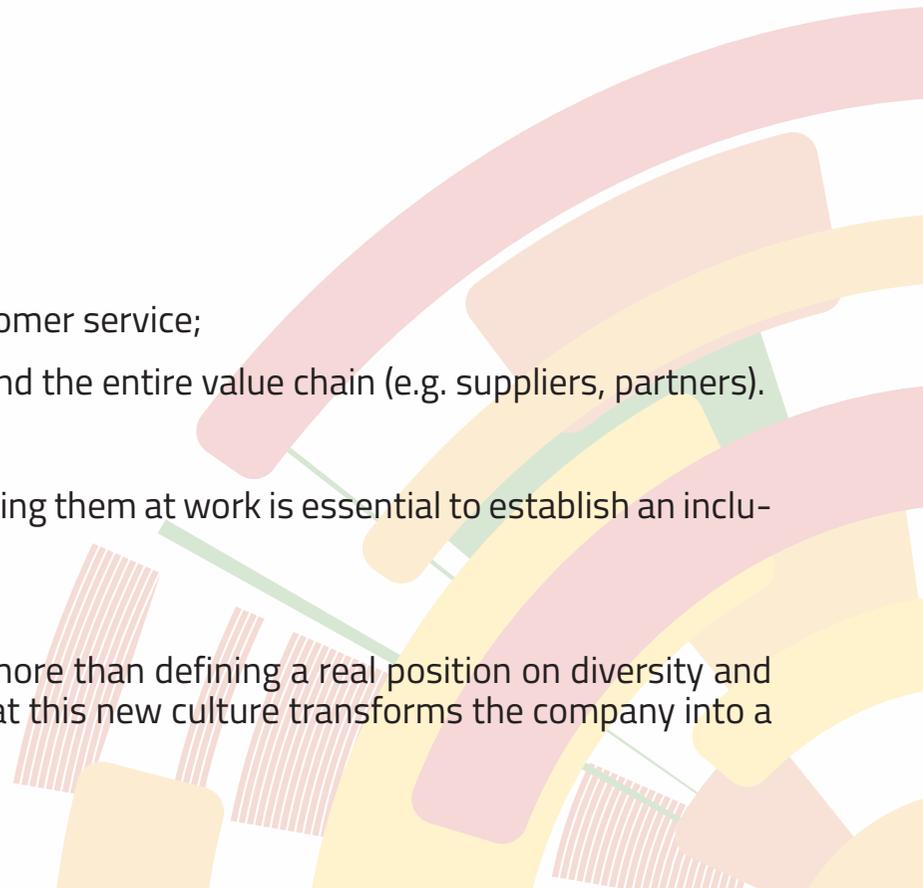
- Direct efforts, allocate teams and resources in favor of diversity;
- Set goals, measure, document and publish progress in diversity.

- ▶ **STRUCTURE AND GOVERNANCE**

- Promote an inclusive look in the planning of products, services and customer service;
- Support and promote policies to value diversity through supply chains and the entire value chain (e.g. suppliers, partners).

These commitments are applicable to all of us and intentionally demonstrating them at work is essential to establish an inclusive environment that allows us to grow as individuals and society.

We all share the responsibility of creating an inclusive culture. Therefore, more than defining a real position on diversity and inclusion, we are committing ourselves to concrete actions in the sense that this new culture transforms the company into a



truly inclusive environment, with equal opportunities for all, regardless of race, ethnicity, gender, sexual orientation or physical disabilities.

MAIN ATTITUDES AND INITIATIVES EXPECTED FROM EACH PITANGUEIRO

Below are guidelines regarding the main attitudes and initiatives expected from Pitangueiros, as well as some behaviors that are not accepted by the company.

▶ **RELATIONSHIP WITH SOCIETY**

No act that may cause harm or be contrary to public or company interests should ever be deliberately practiced, always striving for ethical and socially correct actions. Everyone must be treated with equality, respect, cordiality and commitment, without any discrimination.

▶ **RELATIONSHIP WITH PITANGUEIROS**

Pitang has "Diversity" as one of its values, because we believe that only in a work environment free of constraints and prejudices can we build diverse and inclusive teams. It is everyone's duty to always respect differences, different abilities, experiences and life stories that each of us brings to the company. Treating with respect and cordiality the other members of the company, its partners, or any person who maintains a relationship with Pitang. Any manifestation of discrimination and/or prejudice of any nature is prohibited, among them: age, gender identity or expression, race, religion, age, sex, political conviction, nationality, marital status, sexual orientation, physical condition, sports preferences, etc. Everyone must be treated equally.

▶ **WORK HEALTH AND SAFETY**

It is expected that everyone will assume responsible attitudes in complying with laws and internal norms related to medicine and work safety, in order to promote a healthy and quality work environment. In order to help the company maintain safety at work, each Pitangueiro must inform the leadership of any accident, injury, illness or incident that may represent a threat to their own safety or that of others.

► PROHIBITION OF CHILD OR SLAVE LABOR

The use of child labor is prohibited. No individual under 15 years of age (or under 14 years of age when permitted by local law) may be employed. Workers under 18 years of age may not perform work that may compromise their health or safety. Pitang also assumes the commitment not to allow the exploitation of slave labor and reserves the right not to hire or have commercial relations with companies or institutions that adopt this practice.

► RELATIONSHIP WITH CUSTOMERS AND SUPPLIERS

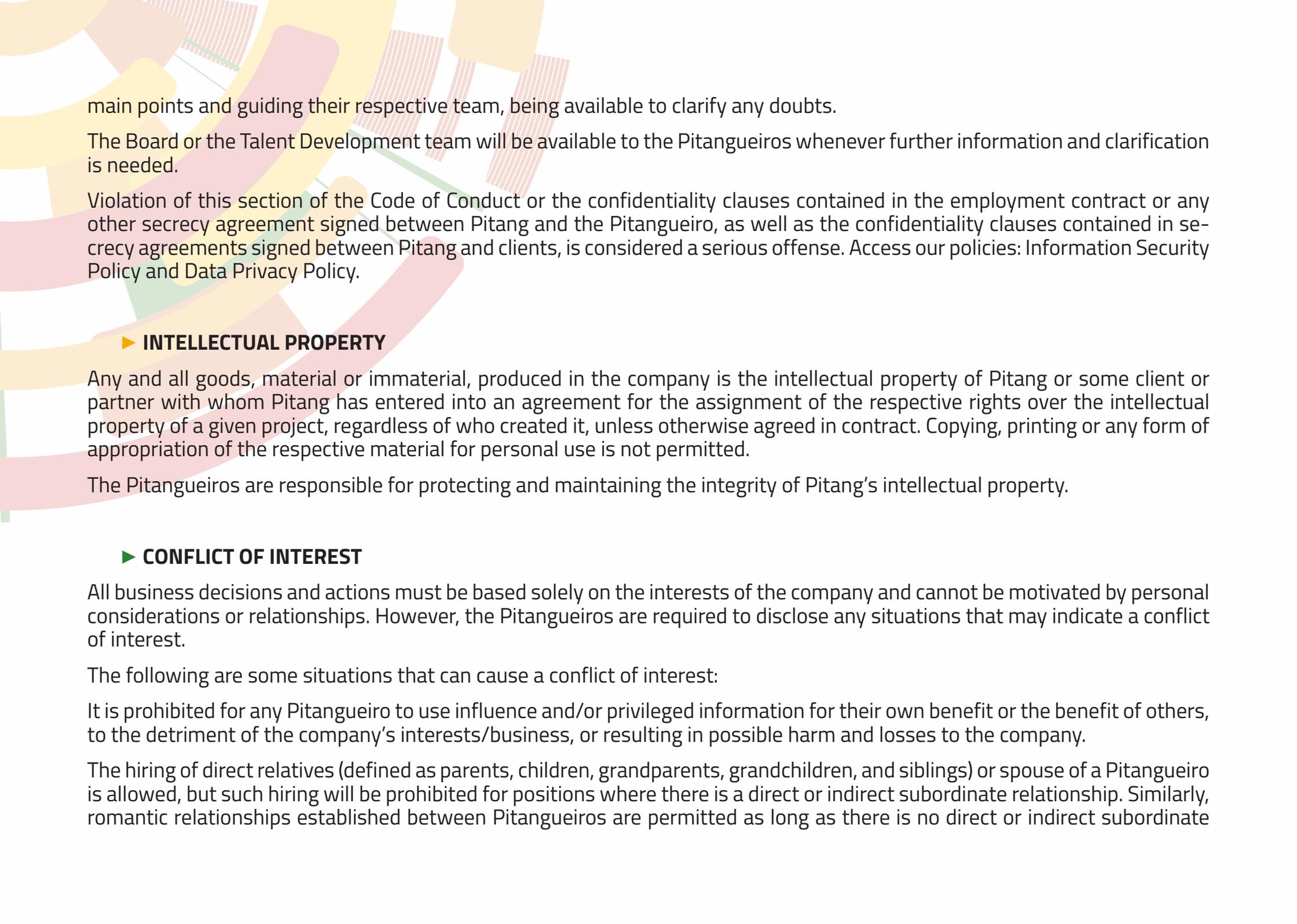
All commercial relations with customers and suppliers must be based on the guidelines contained in this Code of Conduct, as well as on the requirements of Pitang and the other party(ies) involved in the negotiation. The Pitangueiros must respect the guidelines described in commercial contracts, including the rights, duties, obligations and responsibilities of the parties involved in the business, as well as the provisions on possession and/or commercialization of any confidential information, product, process, research, confidentiality, document or intellectual property developed in the project. Everyone must strive to meet customer requirements and expectations by providing quality products and services and seeking the best cost-benefit ratio. This same posture should be requested as a practice from suppliers.

► CONFIDENTIALITY AGREEMENT

All information from Pitang and/or our customers and partners is considered confidential and must be kept in absolute secrecy, except when there is express guidance and authorization from the organization for disclosure. The confidentiality of information is of utmost importance to customers, given that any breach of confidentiality can cause them immense damage. For this reason, the Pitangueiros must understand the magnitude of this information and commit to preserving it and keeping it always protected, even when their employment relationship with Pitang ceases for any reason.

For the protection of this information, all Pitangueiros must know and respect the confidentiality provisions contained in the employment contract signed with Pitang, as well as in the confidentiality agreements entered into between the organization and its clients, which directly bind all Pitangueiros involved in the respective contracted projects.

In addition, the Pitangueiros must commit to signing specific confidentiality contract(s) when required by a client to participate in a given project. The confidentiality commitment is general and unique; however, as each project has its own peculiar characteristics, including regarding the confidentiality of information, the Project Manager will be responsible for presenting the



main points and guiding their respective team, being available to clarify any doubts.

The Board or the Talent Development team will be available to the Pitangueiros whenever further information and clarification is needed.

Violation of this section of the Code of Conduct or the confidentiality clauses contained in the employment contract or any other secrecy agreement signed between Pitang and the Pitangueiro, as well as the confidentiality clauses contained in secrecy agreements signed between Pitang and clients, is considered a serious offense. Access our policies: Information Security Policy and Data Privacy Policy.

► **INTELLECTUAL PROPERTY**

Any and all goods, material or immaterial, produced in the company is the intellectual property of Pitang or some client or partner with whom Pitang has entered into an agreement for the assignment of the respective rights over the intellectual property of a given project, regardless of who created it, unless otherwise agreed in contract. Copying, printing or any form of appropriation of the respective material for personal use is not permitted.

The Pitangueiros are responsible for protecting and maintaining the integrity of Pitang's intellectual property.

► **CONFLICT OF INTEREST**

All business decisions and actions must be based solely on the interests of the company and cannot be motivated by personal considerations or relationships. However, the Pitangueiros are required to disclose any situations that may indicate a conflict of interest.

The following are some situations that can cause a conflict of interest:

It is prohibited for any Pitangueiro to use influence and/or privileged information for their own benefit or the benefit of others, to the detriment of the company's interests/business, or resulting in possible harm and losses to the company.

The hiring of direct relatives (defined as parents, children, grandparents, grandchildren, and siblings) or spouse of a Pitangueiro is allowed, but such hiring will be prohibited for positions where there is a direct or indirect subordinate relationship. Similarly, romantic relationships established between Pitangueiros are permitted as long as there is no direct or indirect subordinate

relationship between the individuals involved.

The Pitangueiro must communicate to their immediate management and Talent Development if they have any conflicting parallel activities with Pitang's activities or their daily work schedule.

The Pitangueiros are not allowed to undertake projects related to Pitang's business or engage in activities for current or potential clients of the organization.

▶ GIFTS AND ENTERTAINMENT

Items (gifts or prizes) received from clients, suppliers, or any entity/institution affiliated with Pitang must be forwarded to the Talent Development Management for a draw among the Pitangueiros, except for promotional items of low value that bear the logo of another company (e.g., agendas, calendars, keychains, etc.).

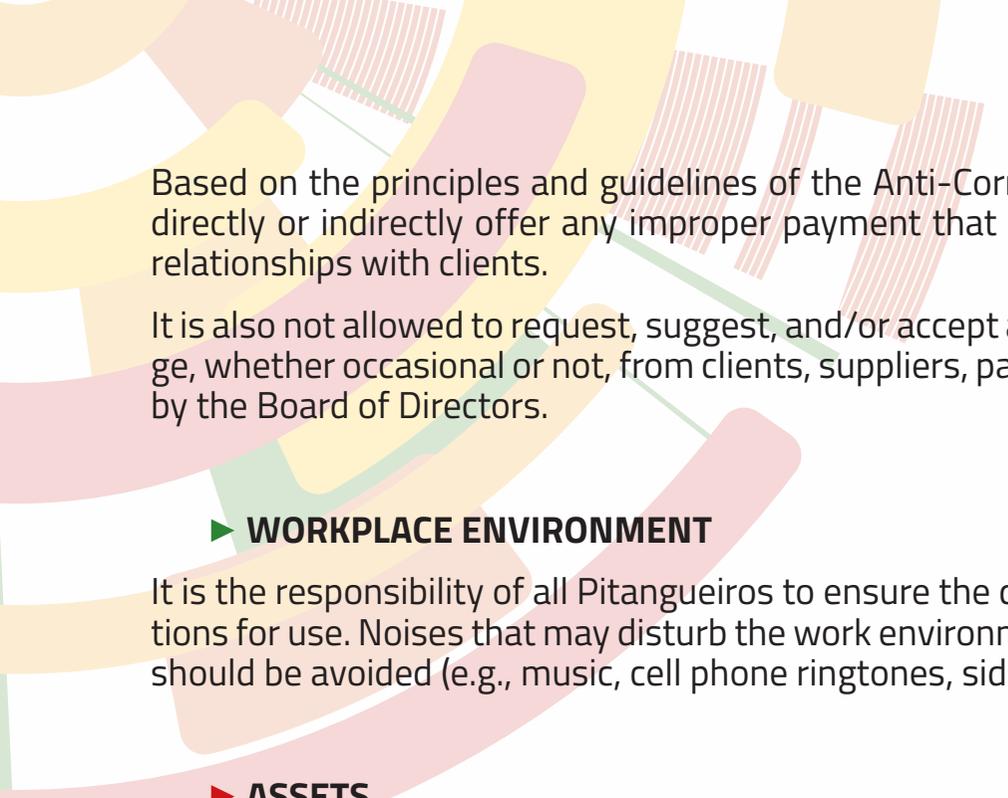
Gifts are understood to include merchandise, meals, trips, entertainment packages, or any direct or indirect benefits that may be offered by suppliers or clients to Pitangueiros, their families, or partners. Invitations to events with expenses covered by suppliers that constitute personal advantages can only be accepted with the approval of the Board of Directors. When in doubt, always consult immediate management or the Board of Directors.

▶ PURCHASING PRACTICES

All purchasing decisions must be made solely in the interests of Pitang. All commercial purchase agreements must be properly documented, clearly identifying the services or products to be provided, payment terms, cost, and the application of fees. The payment amount must correspond exactly to the documented and provided services or products.

▶ ANTI-BRIBERY AND KICKBACK PRACTICES

Corruption is considered the act of promising, offering, or giving, directly or indirectly, undue advantage to a public official or private employee, or to a third party related to them. It is not necessary to provide a cash advantage; offering a benefit, trip, or valuable object is sufficient. Another important aspect is financing or funding illegal acts as provided by law, as well as acting in a way that defrauds bidding processes or hinders the investigation or supervision activities of competent authorities.



Based on the principles and guidelines of the Anti-Corruption Law, No. 12,846/2013, we reaffirm that Pitangueiros cannot directly or indirectly offer any improper payment that may constitute a practice of corruption, bribery, or kickbacks in their relationships with clients.

It is also not allowed to request, suggest, and/or accept any type of financial remuneration, commission, donation, or advantage, whether occasional or not, from clients, suppliers, partners, or third parties. Exceptional cases will be individually evaluated by the Board of Directors.

▶ **WORKPLACE ENVIRONMENT**

It is the responsibility of all Pitangueiros to ensure the quality of the work environment by keeping it clean and in ideal conditions for use. Noises that may disturb the work environment and/or interfere with the performance of other Pitang employees should be avoided (e.g., music, cell phone ringtones, side conversations, meetings in corridors and common areas, etc.).

▶ **ASSETS**

All Pitang assets and facilities are exclusively intended for professional activities related to the company and should not be used for other purposes.

It is the responsibility of everyone to protect the company's assets against loss, damage, or theft and to ensure their proper use and preservation.

Keep the Pitang Controller's Office informed about any and all asset movements of the company, providing contracts, received and issued invoices, or any other document that supports the operations, so that the records comply with Brazilian accounting rules.

▶ **PHYSICAL AND LOGICAL ACCESS SECURITY**

It is the responsibility of Pitangueiros to ensure physical and logical (information) access security within the company. To do so, some basic measures must always be taken, such as:

Respecting the norms and procedures for physical and logical access control at Pitang.

When leaving the workstation, keep the cubicle clean, without documents, and with the computer screen locked.

Never provide passwords and/or access codes to others (e.g., badges, system passwords, etc.). These contents are restricted, personal, and non-transferable. The responsibility for misuse will be attributed to the Pitangueiro who holds these credentials. Access our policies: [Information Security Policy](#) and [Data Privacy Policy](#).

► **USE OF ELECTRONIC COMMUNICATION SYSTEMS**

Pitang allows moderate use of the Internet and electronic communication systems (Chat, Hangout, Social Networks, WhatsApp, and other similar programs) as long as there are no restrictions from the client, it complies with internal norms and procedures, and does not hinder workflow.

The use of electronic communication systems to access illegal, pornographic websites, gambling, send chain messages, spam, or any other type of message with derogatory or discriminatory content is prohibited.

The company reserves the right to monitor the use of information technology resources and provide information and reports for administrative and institutional management purposes.

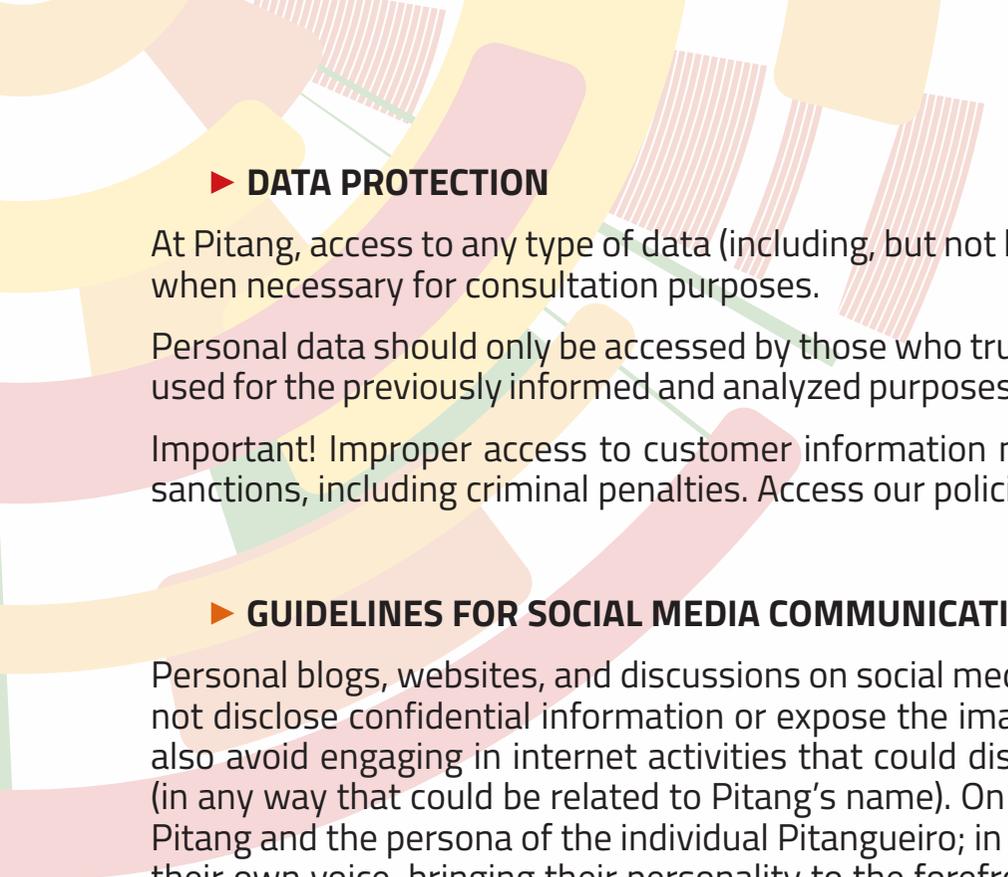
Only the use of software approved by Pitang is allowed. This rule applies to any software, platform, or service in any infrastructure, whether local, cloud-based, or virtualized. In case of special needs, the Pitangueirzo should contact the Support department for a request analysis.

► **The following actions are not tolerated by Pitang:**

Violation of copyrights, patents, and license agreements.

Use and/or copying of software obtained illegally. Only files related to the company's projects and areas should be stored on Pitang computers.

By default, remote access to Pitang's internal network resources is strictly prohibited. Exceptions will be thoroughly reviewed by the company's Support team, and if deemed appropriate, access will be granted to authorized users.



▶ **DATA PROTECTION**

At Pitang, access to any type of data (including, but not limited to, data of Pitangueiros, clients, or third parties) is only allowed when necessary for consultation purposes.

Personal data should only be accessed by those who truly need it to fulfill a specific purpose. Additionally, the data can only be used for the previously informed and analyzed purposes, meaning that any use of personal data must be evaluated in advance.

Important! Improper access to customer information may subject you and Pitang to a range of disciplinary and regulatory sanctions, including criminal penalties. Access our policies: Information Security Policy and Data Privacy Policy.

▶ **GUIDELINES FOR SOCIAL MEDIA COMMUNICATION**

Personal blogs, websites, and discussions on social media platforms such as Facebook, Google+, LinkedIn, and Twitter should not disclose confidential information or expose the image of Pitang, clients, partners, or prospects. The Pitangueiros should also avoid engaging in internet activities that could discredit Pitang, as well as posting deprecating or offensive comments (in any way that could be related to Pitang's name). On social media, it is important to differentiate between the presence of Pitang and the persona of the individual Pitangueiro; in the latter case, the employee should speak in the first person and use their own voice, bringing their personality to the forefront. It is suggested to use disclaimers such as "The messages posted on this site are my own and do not necessarily represent the views of Pitang."

In case of uncertainty about what may be ill-advised or confidential, the Pitangueiros should consult their immediate manager or the Marketing department.

▶ **HARASSMENT AND ABUSE OF POWER**

Any manifestation of moral or sexual harassment or any action that constitutes harassment or threat is not allowed at Pitang.

For the purposes of this Code, sexual harassment is defined as coercing someone with the intention of receiving sexual benefits or favors, as well as making unwanted sexual advances (verbal or physical) or jokes with sexual connotations. Sexual harassment is a crime and will be treated as such by Pitang.

The misuse of one's position or role, whether to mistreat, embarrass, intimidate, or physically harm any individual, is not to-

lerated in the company.

Pitang employees who feel harassed or assaulted should contact the Ombudsman or the Talent Development department to receive the necessary assistance.

▶ **CARRYING OF WEAPONS**

The carrying of any kind of weapon is not permitted on Pitang premises, except for duly trained and authorized professionals (e.g., security guards, police officers, etc.).

▶ **POLITICAL PARTICIPATION**

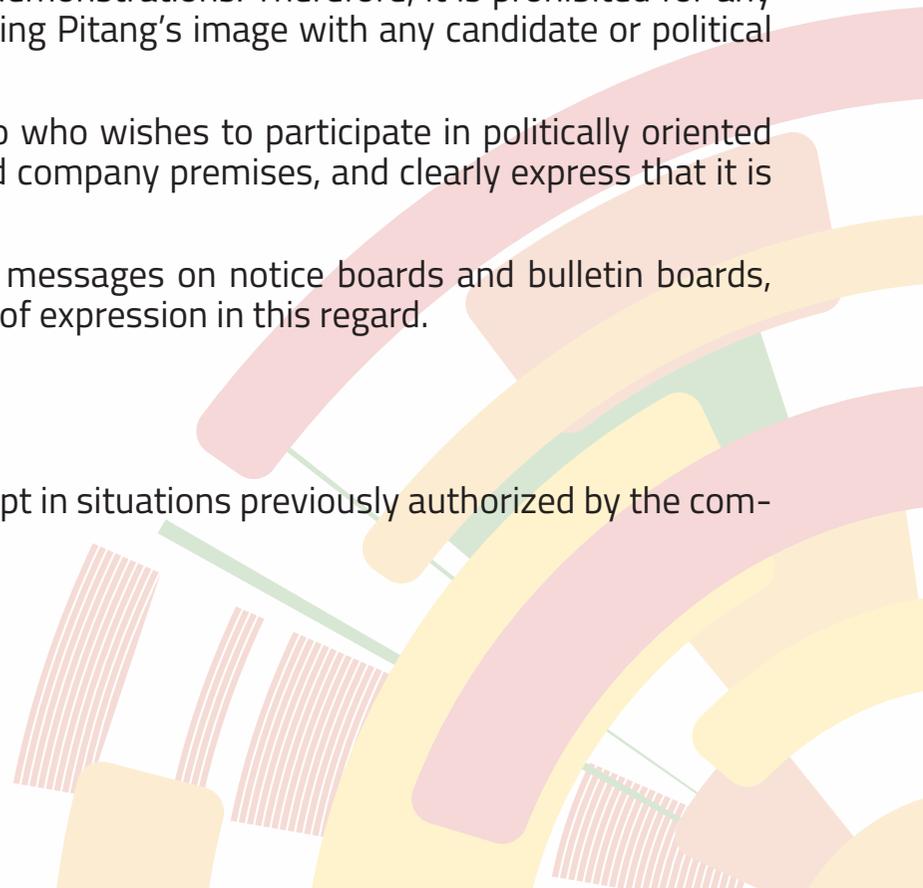
Pitang does not engage in political involvement or participate in partisan demonstrations. Therefore, it is prohibited for any Pitangueiro to engage in political actions and campaigns using or associating Pitang's image with any candidate or political party.

Pitang respects everyone's political preferences; however, any Pitangueiro who wishes to participate in politically oriented activities should do so during their free time, outside of working hours and company premises, and clearly express that it is their personal choice, without any connection to the company.

Political discourse within Pitang premises is also not tolerated, including messages on notice boards and bulletin boards, wearing candidate or party-related t-shirts and buttons, or any other form of expression in this regard.

▶ **TRADE WITHIN PITANG**

Formal or informal trading within the company premises is prohibited, except in situations previously authorized by the company.





► **USE OF ALCOHOL AND ILLEGAL DRUGS**

The use of alcohol and illegal drugs is permanently prohibited during working hours, and it is also not allowed to enter the company premises while under the influence of such substances. In Pitang-sponsored events, the consumption of alcoholic beverages will only be permitted in moderation.

► **AUDITS**

All Pitangueiros are requested to fully cooperate with audits conducted in the company. All provided information must be accurate and reliable. No documentation or records should be concealed or destroyed due to an audit. These principles also apply in the case of audits conducted by external organizations; however, in such cases, the Pitangueiro should seek guidance from their immediate management and/or the Board of Directors before answering any questions.

► **REPRESENTATION OF PITANG BEFORE THE PRESS OR ANY OTHER ENTITY/INSTITUTION**

Any contact with the press on behalf of Pitang, as well as the taking of photos and filming, can only be done with the prior knowledge of the Marketing department.

Whenever a Pitangueiro is going to speak and/or present any material on behalf of the company, they should consult their immediate management or the Marketing department to receive the necessary guidance and materials, unless explicit authorization has already been granted for the disclosure of the topic. It is important to highlight the need for express authorization from the organization for the use of logos in any product and/or means of communication.

► **OMBUDSMAN**

Everyone should make efforts to ensure that anyone under their leadership or authority complies with the laws, rules, regulations, and this Code, by informing Pitang about acts that are contrary to the current legislation and this Code of Conduct. If you have made a good-faith report, rest assured that your identity is strictly confidential, and you are protected from any form of retaliation.

► VIOLATIONS AND PENALTIES

Violations of the principles and norms of this Code of Conduct will be carefully evaluated by the Ethics Committee and may result in disciplinary measures provided for by applicable legislation and contractual relationships.

Failure to comply with the terms of this Code may subject the Pitangueiros to disciplinary measures, including warnings, suspensions, termination for just cause, and other penalties provided for by labor laws, regardless of any other actions that the company may take, whether in the civil, criminal, and/or labor spheres. In the application of disciplinary penalties, the nature and gravity of the offense will be considered, always observing the rules issued by the Talent Development department and applicable legislation.

► QUESTIONS, REPORTS, AND SUGGESTIONS

Do you have any questions about Pitang's Code of Conduct? Do you believe that another Pitangueiro, or even Pitang itself, is not following the expected standards of conduct? Do you want to make a report or address an issue?

Your first point of contact should be your immediate management or the Ethics Committee. If you do not feel comfortable discussing the matter and/or problem with your superior, please inform us through the Ombudsman, Pitang's reporting channel.

The Ombudsman is completely confidential and handled by an independent institution specialized in the field. To access it, call 0800 545 5008 (Monday to Friday, 7:00 AM to 8:00 PM), visit <https://relatoconfidencial.com.br/ouvidoriapitang/>, or send an email to ouvidoriapitang@relatoconfidencial.com.br.

► FINAL PROVISIONS

Always ask yourself: Are my actions in accordance with the Code of Conduct and Pitang's values?

The control and amendment of the Code of Conduct are the responsibility of Pitang's Ethics Committee. Any contributions



and suggestions for changes are highly welcome; however, they will be reviewed by the Board of Directors and, if approved, considered in the document. This code is also available for consultation at any time on the Intranet.

