

## Code of Conduct

### Aoop an NTT Data Company

#### PRESENTATION

This Code of Conduct for **Aoop an NTT Data Company** was established and approved by Management to set forth and clarify the values that guide **Aoop an NTT Data Company**.

It is a tool to guide the personal and professional conduct of **Aoop an NTT Data Company** managers, employees and regular service providers, and is considered a formal statement of **Aoop an NTT Data Company** employees commitment to the rules of business and competitive ethics, social ethics, as well as the principles of transparency, respect for equal rights, diversity, accountability and respect for the law, and must be fully complied with by all, both internally and externally.

This Code and its future updates will be available to all interested parties and its updated version is available on the **Aoop an NTT Data Company** website at:

<https://aooop.com.br/conduta/conduta-aooop.pdf>

If you have any questions regarding its application or if it is not clear what the best behavior is, or which conducts are allowed or forbidden, send the fact to your contact or immediate superior, or send your question to **Aoop an NTT Data Company** Human Resources Area.

#### GENERAL PRINCIPLES

**Aoop an NTT Data Company** is a socially responsible company, integrated into the market and community where it is established, building its image and actions based on the following principles.

- Ethics and transparency while conducting business;
- Quality and efficiency of its services;
- Respect as a practice in its internal and external relationships, with the continuous search to enhance the quality of life of everyone with whom it interacts;
- Confidentiality when processing clients' information and data;
- Respect for contracts;
- Responsibility in the preservation of its own image;
- Honesty when managing its physical assets; and
- Respect for law.

## RULES OF CONDUCT

The rules of conduct set forth in this Code aim to clarify the procedures and attitudes ethically accepted by **Aoop an NTT Data Company**.

For **Aoop an NTT Data Company**, it is ethically acceptable the professional behavior that respects the aforementioned principles and that does not put at risk the institution's operation, credibility, image or performance.

Thus, **Aoop an NTT Data Company** employees are forbidden to:

- Carry out any operation in clients serviced by **Aoop an NTT Data Company**, on their behalf or on behalf of relatives and friends, without following the specific rules provided in this Code and/or other internal rules of **Aoop an NTT Data Company**;
- Employ information they have or have access to due to their activities at **Aoop an NTT Data Company**, its clients or suppliers, benefiting themselves or third parties;
- Receive any kind of commission, reduction and/or personal favor, taking advantage of their position or role at **Aoop an NTT Data Company**;
- Act in violation of legislation in force;
- Act in violation of contractual exclusivity, when applicable;
- Act in disrespect and violation of contracts with **Aoop an NTT Data Company** clients;
- Use techniques or knowledge acquired while carrying out contracts kept by Aoop in strange businesses, contracts with third parties or other activities or Aoop competitors;
- Receive or give any kind of reciprocity, gain or personal advantage to clients, suppliers or third parties, taking advantage of their professional relationship with **Aoop an NTT Data Company**;
- Accept gifts from whoever due to position or role in the company. In this case, gifts are considered to be, in addition to any material goods, services, commissions, discounts, or any other type of advantage. Such prohibition does not apply to the receiving of freebies that do not have relevant commercial value (until R\$100.00) and that leave no doubt as to the intentions of those who offered or received the gift;
- Speak on behalf of **Aoop an NTT Data Company** when unauthorized or unqualified to do so;
- Maintain personal behavior incompatible with the socially acceptable standards and that may bring harm to the company's image or of its clients or suppliers;
- Smoke or consume any intoxicating substances at **Aoop an NTT Data Company** facilities, or of its clients or suppliers;
- Wear inadequate attire in the workplace;
- Default on personal business obligations.

## RELATIONSHIP WITH CLIENTS

The relationship between **Aoop an NTT Data Company** and all its clients is based on a high sense of ethics and professionalism, servicing all with courtesy, promptness and efficiency. No customer shall receive preferential treatment, and all procedures must comply with the ethical and operational guidelines of **Aoop an NTT Data Company**.

Any questions regarding convenience, legality or compliance with this Code of clients' requests must be submitted to your immediate superior or by means of the dedicated channel at the **Aoop an NTT Data Company** website.

## RELATIONSHIP WITH SUPPLIERS

All suppliers are guaranteed that their products will be handled by **Aoop an NTT Data Company** based exclusively on market and quality criteria, without interference from any aspect that could characterize privilege or discrimination.

The supplier that feels harmed by any **Aoop an NTT Data Company** employee is guaranteed the possibility of reporting the incident directly to the Board of Officers, any managers or via [aoop.conduta@aoop.com.br](mailto:aoop.conduta@aoop.com.br).

In order to ensure the premises set forth in this Code of Conduct, all Employees, workers or not, are expressly forbidden to:

- keep commercial relationship, as representative of **Aoop an NTT Data Company**, with a company in which they or a family member have a direct or indirect interests or shares;
- keep commercial relationship with any of **Aoop an NTT Data Company** competitors, unless if authorized in advance or if it is not considered conflict of interests;
- keep commercial relationship with **Aoop an NTT Data Company** supplier, if their position or role grants them powers to define and/or choose this kind of supplier; any commercial relationship with a supplier must be communicated in advance and in writing to the respective superior;
- accept personal benefit, such as cash payment or goods, trip, lunch, dinner or any advantage resulting from relationship with suppliers. Employees' travel expenses, accommodations and meals must be paid by **Aoop an NTT Data Company**, according to its internal rules, even if the invitation is made by the supplier.

In the case of employees working in the Commercial Board, products received as samples for commercial analysis are not considered gifts; these samples must remain within **Aoop an NTT Data Company** scope and be returned to the supplier as soon as a decision is made on whether or not to purchase them.

## RELATIONSHIPS WITH THE PUBLIC SECTOR

**Aoop an NTT Data Company** does not provide, directly or indirectly, any cash payment, gifts, services, entertainment or other benefit to authorities or servants from public, federal, state or municipal administration. Exceptions may include invitations to work lunches or dinners, events sponsored by **Aoop an NTT Data Company**, such as technical trips, congresses, lectures or celebrations, as long as it is not considered as improper influence.

All employees, when they are representing **Aoop an NTT Data Company**, must abstain from voicing their opinions regarding acts by public servants or making politically charged comments.

**Aoop an NTT Data Company** does not contribute financially to political parties or candidates for public office. Its employees, if they contribute financially to electoral campaigns (parties or candidates) shall proceed strictly in accordance with legislation in force and in a transparent manner. All employees must inform their immediate superior about the financial contributions made to electoral campaigns, including the amount donated.

## RELATIONSHIPS WITH INTERNAL PUBLIC AND WORKPLACE

### 1. Relationship at the Workplace

**Aoop an NTT Data Company's** Human Resources Policy is based on justice, transparency, impartiality and professionalism. At the workplace, all **Aoop an NTT Data Company** employees must build relationships based on courtesy and respect, in order to build bonds of loyalty and trust, as well as team spirit and constant search for results.

In order to avoid conflict of interests and suspicion of favoritism at the workplace, employees with sentimental involvement or family relationships [spouse, child, sibling, grandchild, grandparent, sister/brother-in-law, niece/nephew, aunt/uncle, cousin] are not allowed to work in the same Department, maintaining a subordinate relationship.

An employee that has a sentimental involvement or family relationship with another must abstain from practicing any acts, participating in any process or exerting influence over people responsible for decisions that may result in a benefit or application of a penalty to the person with whom they may have a relationship of this nature.

The following conducts are not acceptable:

- Practice any act of discrimination against color, race, religion, sex, sexual orientation, age etc., in recruitment and selection processes, training, remuneration, promotion, transfer or other fact related to the workplace;

- Hire relatives without expressive agreement from the Board of Officers, as well as recommend their hiring or lead someone else to do it, without informing the fact to the person responsible for the hiring;
- Use **Aoop an NTT Data Company** equipment and other resources for personal purposes not expressively authorized in advance;
- Act alongside any **Aoop an NTT Data Company** competitor; get involved in non-authorized private activities that interfere in the work time dedicated to **Aoop an NTT Data Company**.
- Use their position or role to ask for favors or special services to subordinates; and
- Make any decisions that affect the professional career of employees based only on personal relationship.

All functional performance evaluations must be based on merit, in order to provide equality of access to the existing professional development opportunities, according to the skills, competences and contributions of each professional.

## 2. Safety & Health

**Aoop an NTT Data Company** is committed to providing a safe and healthy work environment to its employees and visitors, adopting measures that avoid environment degradation and that minimize its activities' impact.

Each employee is responsible for caring for safe operation procedures, that must ensure their own health and of their coworkers, and they are prohibited to adopt any behavior that may represent a risk to the physical integrity of the other employees. To ensure safe and healthy working conditions, it is also necessary to adopt responsible attitudes when complying with laws and internal rules related to health and occupational safety.

## 3. Service Provision to Third Parties

Employees shall not carry out paid activity in parallel to the one carried out at **Aoop an NTT Data Company** if considered a conflict of interest or violation of the legal competitive principles. Cases in which the following apply may be admitted and considered as exceptions, subject to specific authorization from the area's Board of Officers:

- The nature of the work is different from the one carried out at **Aoop an NTT Data Company**.
- The activity is not carried out during working hours, does not affect the employee's performance at **Aoop an NTT Data Company** and does not use infrastructure and/or information from the company, its clients, suppliers or other employees.

Carrying out of unpaid activity, such as participation in philanthropic entities or non-profit associations, must be informed to the employee's hierarchical superior.

## **CONFIDENTIAL INFORMATION**

Because of the nature of its business, **Aoop an NTT Data Company** deals with security information of many clients. This information is confidential and must be used only for the performance of each Employee's role.

Documents and other data not disclosed to clients related to **Aoop an NTT Data Company business**, especially the ones of a financial nature, are also confidential.

Documents related to products, specification, softwares, hardwares and applications developed or in use, even if the employee has participated of its development are equally confidential and owned by **Aoop an NTT Data Company**.

Even information destined to public knowledge, whether on lectures to which **Aoop an NTT Data Company** employees have been invited to, or press contact, must be carefully assessed before being disclosed. It is always necessary and prudent to ensure that there are no restrictions or confidentiality issues surrounding the data or information to be released to the public.

Documents and information considered confidential can only be disclosed by expressive or in writing decision by the Board of Officers or legal demand or judicial order.

## **OPERATION RECORDS AND FINANCIAL AND ACCOUNTING INFORMATION**

The records of several operations and activities developed at **Aoop an NTT Data Company** must be created and reported with integrity and precision. Everyone is responsible or co-responsible for the integrity of **Aoop an NTT Data Company** information and records, whether they are operational, commercial, financial, accounting or administrative.

The reports and records (in paper or electronic) must be in compliance with the rules generally accepted and practiced by the market and in compliance with the internal rules and control systems of **Aoop an NTT Data Company**.

The financial and accounting records and information must be kept and preserved in accordance with applicable laws and policies related to the safeguarding of these kinds of records. Any potentially relevant record for a case of violation of law, or for any dispute or pending investigation, must not be destroyed.

Concrete situations and cases may be difficult to analyze. Any time you have questions, talk to your superior or contact us via specific channel available at the **Aoop an NTT Data Company** website.

## **RESPONSIBILITIES**

### **Board of Officers and management:**

- Behave ethically towards members of your team;
- Comply and enforce this Code of Conduct;
- Divulge this Code of Conduct to your team and make sure they read and understand it;
- Guide the professionals under your responsibility regarding actions or situations that represent possible questions or dilemmas of an ethics nature;
- Report any cases of violation of this Code of Conduct to the Board of Officers of **Aoop an NTT Data Company**;

### **All other employees:**

- Adopt an ethical behavior and conduct, in accordance with the provisions of this Code of Conduct;
- Comply with this Code of Conduct;
- Seek guidance from the immediate superior for any situations of dilemmas of an ethics nature;
- Report to your immediate superior the facts that you know and that represent illegal, dubious and non-ethical conduct, characterizing possible violations of this Code of Conduct.

## **COMPLAINTS AND CLARIFICATIONS REGARDING THIS CODE**

Whenever you have a question about the application of this Code, its interpretation or absent cases, the question must be submitted for solution by one of our managing partners at **Aoop an NTT Data Company**, whether by the company's hierarchical levels or by dedicated channel or via the e-mail [aoop.conduta@aoop.com.br](mailto:aoop.conduta@aoop.com.br).

All complaints made will be investigated by the specific commission for such purpose, who will prepare a report informing all proceedings made, their conclusions and proposal for actions to be taken and/or penalties to be applied by **Aoop an NTT Data**

**Company** Board of Officers. This commission will be constituted by one managing partner, one managerial-level employee and one external consultant.

Whenever requested, the anonymity of the whistleblower will be guaranteed, and it is ensured that no person who files a complaint, provided they do so in good faith, will suffer any kind of persecution or retaliation.

## **CODE COMPLIANCE**

Violation of this Code of Conduct shall determine the opening of a administrative investigation to ascertain possible irregularities, and it may subject employees to disciplinary measures, including termination for fair cause, indemnification of all damages caused, opening of investigations with public authorities and, where appropriate, professional associations, in addition to other penalties provided in the legislation in force, regardless of other actions **Aoop an NTT Data Company** may adopt.

Employees who deliberately decide to not report violations of this Code of Conduct or omit relevant information shall also be subject to disciplinary measures.

Barueri, July 8, 2025.