

Aoop Cloud Solutions Code of Conduct

PRESENTATION

This **Aoop Cloud Solutions** Code of Conduct was instituted and approved by the Administration to establish and clarify the values that guide **Aoop Cloud Solutions**.

It is a tool to guide the personal and professional conduct of administrators, employees and regular service providers of **Aoop Cloud Solutions**, being considered as a formal declaration of the commitment of **Aoop Cloud Solutions** collaborators to the rules of business ethics and competition, to the social ethics, as well as the principles of transparency, respect for equal rights, diversity, accountability and respect for the law, which must be fully complied with by all, both internally and externally.

This Code and its future updates will be accessible to all interested parties, and its updated version is available on the **Aoop Cloud Solutions** website at the address:

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

In case of doubts about its application or if it is not clear what the best way to act, or what conduct is allowed or prohibited, forward the fact to your contact or your immediate superior, or forward your question to the Human Resources area of **Aoop Cloud Solutions**.

GENERAL PRINCIPLES

Aoop Cloud Solutions is a socially responsible company, inserted in the market and in the community where it is established, building its image and actions based on the following principles:

- Ethics and transparency in conducting business;
- Quality and efficient services;
- Respect as a practice in its internal or external relationships, with the permanent search for improvement in the quality of life of everyone with whom it relates;
- Confidentiality in dealing with customers information and data;
- Respect for contracts;
- Responsibility in preserving its own image;
- Honesty in managing its physical assets; and
- Respect for the law.

RULES OF CONDUCT

The rules of conduct stated in this Code aim to clarify the procedures and attitudes ethically accepted by **Aoop Cloud Solutions**.

For **Aoop Cloud Solutions**, a professional attitude that respects the principles described above and that does not jeopardize the functioning, credibility, image or performance of the institution is ethically accepted.

Thus, **Aoop Cloud Solutions** employees are prohibited from:

- Perform any operation on customers served by **Aoop Cloud Solutions**, on their behalf or on behalf of relatives and friends, without following the specific rules set forth in this Code and/or other internal rules of **Aoop Cloud Solutions**;
- Use information they have or have access to due to their activities at **Aoop Cloud Solutions**, their customers or suppliers, to own benefit or third parties;
- Receive any type of commission, rebate and/or personal favor, using their position or role at **Aoop Cloud Solutions**;
- Act in violation of current legislation;
- Act in disagreement with contractual exclusivity, when applicable;
- Acts in disrespect and disagreement with contracts with **Aoop Cloud Solutions** customers;
- Use techniques or knowledge acquired in the execution of contracts maintained by **Aoop** in foreign businesses, contracts with third parties or other activities or companies competing with **Aoop**;
- Earn or grant any form of reciprocity, gain or personal advantage to customers, suppliers or third parties using their professional relationship with **Aoop Cloud Solutions**;
- Accepting gifts from anyone due to their position or role in the company. In this case, are considered gifts, in addition to any material goods, services, commissions, discounts or any other type of advantage. This prohibition does not apply to receiving gifts that do not have a relevant commercial value (up to BRL 100.00) and that do not leave room for doubt about the intentions of those who offered or received the gift;
- Manifest on behalf of **Aoop Cloud Solutions** when not authorized or enabled to do so;
- Maintain personal behavior that is incompatible with socially accepted standards and that may harm the company image, its customers or suppliers;
- Smoking or consuming any intoxicating substances on the premises of **Aoop Cloud Solutions**, its customers or suppliers;
- Wear inappropriate attire in the work environment;
- Delinquency in their personal business.

CUSTOMERS RELATIONS

Aoop Cloud Solutions' relationship with all its customers is guided by a high sense of ethics and professionalism, serving everyone with courtesy, promptness and efficiency. There will be no preferential treatment for any customer, and all procedures must comply with the ethical and operational guidelines of **Aoop Cloud Solutions**.

Any doubt as to the convenience, legality or suitability of this Customer Request Code must be submitted to the immediate superior or through a specific channel on the **Aoop Cloud Solutions** website.

SUPPLIERS RELATIONS

All suppliers have the guarantee that their products will be treated by **Aoop Cloud Solutions** based exclusively on marketing and quality criteria, with no interference of any aspect that may characterize privilege or discrimination.

Suppliers who feel harmed by any employee of **Aoop Cloud Solutions** are assured the possibility of reporting the occurrence directly to the board, any managers, or using the e-mail address Aoop.conduta@aoop.com.br.

In order to guarantee the premises stated in this Code of Conduct, all collaborators, employees or not, are expressly prohibited from:

- maintain a commercial relationship, as a representative of **Aoop Cloud Solutions**, with a company in which they or a family member has an interest or direct or indirect participation;
- maintain a commercial relationship with any competitor of **Aoop Cloud Solutions**, unless previously authorized and if there is no conflict of interest;
- maintain a business relationship with a supplier of **Aoop Cloud Solutions**, if their position or role gives the power to define and/or choose this type of provider;
- Any commercial relationship with a supplier must be previously and obligatorily communicated, in written form, to the respective superior;
- accept personal benefit, such as payment in cash or merchandise, travel, lunch, dinner or any advantage arising from relationships with suppliers. Expenses with travel, accommodation and meals for its employees must always be paid by **Aoop Cloud Solutions**, in accordance with its internal rules, even if the invitation comes from the supplier.

In the case of employees working in the Commercial Department, products received as a sample for commercial analysis are not considered gifts, samples that must remain within the scope of **Aoop Cloud Solutions** and be returned to the supplier as soon as it is concluded whether or not to purchase them.

PUBLIC SECTOR RELATIONS

Aoop Cloud Solutions does not offer, directly or indirectly, any payment in cash, gifts, services, entertainment or any other benefit to authorities or servants of the public, federal, state or municipal administration. Exceptions may be invitations to work lunches or dinners and events sponsored by **Aoop Cloud Solutions**, such as technical trips, congresses, seminars or celebrations, provided that this cannot be considered as undue influence.

All employees and collaborators, when representing **Aoop Cloud Solutions**, must refrain from expressing opinions about the actions of public officials or making comments of a political nature.

Aoop Cloud Solutions does not contribute financially to political parties or candidates for public office. If its employees contribute financially to election campaigns (for parties or candidates), they must proceed strictly in accordance with current legislation, and in a transparent manner. All employees must inform their immediate superior about financial contributions made to election campaigns, including the amount donated.

INTERNAL COMMUNITY AND WORK ENVIRONMENT RELATIONS

1. Relations in work environment

Aoop Cloud Solutions' Human Resources Policy is guided by fairness, transparency, impartiality and professionalism. All **Aoop Cloud Solutions** employees must establish relationships of courtesy and respect in the work environment so that it is possible to build bonds of loyalty and trust, as well as team spirit and permanent search for results.

In order to avoid conflicts of interest and suspicion of favoritism in the work environment, it is not allowed for collaborators sentimental involvement or a kinship relationship [(spouse, child,

sibling, grandchild, grandparent), brother-in-law, nephew, uncle, cousin], work in the same Board, maintaining a relationship of subordination.

An employee who has a sentimental involvement or a kinship relationship with another must refrain from performing any act, participating in any process or exerting influence over people responsible for decisions that may result in a benefit or penalty for the person with whom they have relationships of this nature.

The following behaviors are not acceptable:

- Practicing any discrimination in relation to color, race, religious creed, sex, sexual preference, age, etc., in the recruitment and selection processes, training, remuneration, promotion, transfer or other factor related to the work environment;
- Hire relatives without the express consent of the Board of Directors, as well as indicate their hiring or lead another person to do so, without informing the person responsible for hiring;
- Use equipment and other resources of **Aoop Cloud Solutions** for private purposes not expressly authorized;
- Acting with any competitor of **Aoop Cloud Solutions**;
- Engage in unauthorized private activities that interfere with the work time dedicated to **Aoop Cloud Solutions**;
- Using the title or role to request personal favors or services from subordinates; and
- Taking any decision that affects the professional career of employees based solely on personal relationships.

All functional performance assessments must be guided by merit, in order to provide equal access to existing professional development opportunities, according to the skills, competencies and contributions of each professional.

2. Safety and Health

Aoop Cloud Solutions is committed to providing a safe and healthy work environment for its employees and visitors, adopting measures that prevent environmental degradation and minimize the impact of its activities.

Each employee is responsible for ensuring safe operating procedures, which must ensure their own health and that of their co-workers, and it is forbidden to adopt any behavior that may pose a risk to the physical integrity of other employees. In order to guarantee safe and healthy working conditions, it is also necessary to adopt responsible attitudes in complying with laws and internal regulations related to medicine and occupational safety.

3. Services provision to third parties

Collaborators may not perform remunerated activity parallel to that performed at **Aoop Cloud Solutions** if there is a conflict of interest or an affront to the legal principles of competition. The cases in which:

- The nature of the work is different from that performed at **Aoop Cloud Solutions**;

- The activity is not performed during working hours, does not affect the performance of the employee at **Aoop Cloud Solutions** and does not use infrastructure and/or information from **Aoop**, its customers, suppliers or other employees.
- The exercise of unpaid activity, such as participation in philanthropic entities or non-profit associations, must be informed to the employee's hierarchical superior.

CONFIDENTIAL INFORMATION

Due to the nature of its business, **Aoop Cloud Solutions** handles security information from various customers. This information is confidential and must only be used for the performance of the functions of each collaborator.

Documents and other data not disclosed to customers regarding **Aoop Cloud Solutions'** business, especially those of a financial nature, are also confidential.

Documents referring to the specification of products, software, hardware and applications developed or in use are also confidential and property of **Aoop Cloud Solutions**, even if the employee has participated in their development.

Even information intended for public knowledge, both in seminars to which **Aoop Cloud Solutions** employees have been invited, and in contacts with the press, must be carefully evaluated before being disclosed. It is always necessary and prudent to ensure that there are no restrictions or secrecy involving the data or information to be released to the public.

Documents and information considered confidential can only be disclosed by express and written decision of the board of directors or by legal requirement or court order.

RECORDS OF OPERATIONS AND FINANCIAL AND ACCOUNTING INFORMATION

Records of the various operations and activities performed by **Aoop Cloud Solutions** must be created and reported with integrity and accuracy. Everyone is responsible or co-responsible for the integrity of **Aoop Cloud Solutions'** information and records, whether operational, commercial, financial, accounting or administrative.

Reports and records (paper or electronic) must comply with generally accepted standards practiced by the market and in compliance with **Aoop Cloud Solutions'** rules and internal control system.

Financial and accounting records and information must be maintained and preserved in accordance with applicable laws and policies regarding the safekeeping of these types of records. Any record potentially relevant to a case of breach of law, or to any pending litigation or investigation, may not be destroyed.

Concrete situations and cases can be difficult to analyze. Whenever in doubt, talk to your superior or get in touch through the specific channel available on the **Aoop Cloud Solutions** website.

RESPONSIBILITIES

Boards and management:

- Follow ethical conduct towards your team members;
- Comply with and enforce this Code of Conduct;
- Disclose this Code of Conduct to your team and make sure they read and understand it;

- Guide the professionals under their responsibility regarding actions or situations that represent possible doubts or dilemmas of an ethical nature;
- Communicate any cases of non-compliance with this Code of Conduct to the Board of **Aoop Cloud Solutions**;

All other Collaborators:

- Adopt ethical behavior and posture, in accordance with the precepts of this Code of Conduct;
- Comply with this Code of Conduct;
- Seek guidance from the immediate superior for any situations or dilemmas of an ethical nature;
- Communicate to the immediate superior the facts that he/she is aware of and that represent illegal, doubtful and unethical conduct, characterizing possible violations of this Code of Conduct.

DENOUNCEMENTS AND CLARIFICATIONS OF THIS CODE

Whenever there is doubt about the application of this Code, its interpretation or omissions, the question must be forwarded for solution by one of the managing partners of **Aoop Cloud Solutions**, either through the hierarchical levels of the company, either through its own channel or the e-mail. aoop.conduta@aoop.com.br.

All complaints made will be investigated by means of a specific commission for this purpose, which in the end will prepare a report informing all the steps taken, its conclusions and proposed actions to be taken and/or penalties to be applied by the board of **Aoop Cloud Solutions**. This committee will consist of one of the managing partners, a managerial-level employee and an external consultant.

Whenever requested, the denunciator's anonymity will be guaranteed, as well as it is ensured that no person who makes a complaint, as long as they do so in good faith, will suffer any type of persecution or retaliation.

COMPLIANCE WITH THE CODE

Non-compliance with this Code of Conduct will determine the opening of an administrative inquiry to investigate possible irregularities, which may subject employees to disciplinary measures, including dismissal for just cause, compensation for all damages caused, opening of inquiries with the Government and eventually the class bodies, in addition to other penalties provided for in current legislation, regardless of other actions that **Aoop Cloud Solutions** may adopt.

Employees who deliberately fail to report violations of this Code of Conduct or omit relevant information will also be subject to disciplinary measures.

Barueri, April 3rd, 2023.

Aoop Digital Solutions Ltd.

Aoop Cloud Solutions

FOR MORE INFORMATION

send an e-mail to

contato@aoop.com.br or access www.aoop.com.br