

<b>Code of Conduct and Ethics / Compliance</b>		
Code MAN-AS-0002	Rev. 2.1	Page 1/19

## Code of Conduct and Ethics

**Ascenty – Compliance**

**Region – Global**

Rev.	Date	Review Description	Created by	Reviewed by	Approved by
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1.1	2021	Annual review. No changes	Fábio Trimarco	Gilson Granzier	Chris Torto
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2.1	01/12/2024	Update the CEO's message, add content to item 9.1, update item 9.4.	Ceres Andrade	Fábio Trimarco	Ethics Committee, and Investor Compliance Committee

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Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 2/19

## 1. Message from the President

Hello all,

Ascenty is a company that values flexibility, agility, and quality in the delivery of its services. We act ethically, maintaining transparent conduct with all stakeholders, including suppliers, customers, employees, regulatory bodies, and society in general. Our commitment is to deliver the best data center and connectivity services and solutions in Latin America, always in compliance with applicable legal and regulatory requirements.

We are committed to promoting ethics and integrity, taking on the responsibility of constantly looking after our reputation and our business in the market. We adopt a zero-tolerance stance towards acts of corruption, discrimination, and unethical behavior.

Careful reading of this Code of Conduct and Ethics is essential to ensure that everyone is aligned with our values, mission, and purpose, to conduct their activities according to the highest ethical standards, always protecting Ascenty's assets, information, and reputation. It also serves as a guide for us to make the right decisions regarding our business and our people, to increasingly live our values and DNA.

This document is not intended to provide all the answers, and it is necessary for each of us to constantly reflect on ethics and conduct. We encourage proactivity, seeking support through the official channels established to clarify doubts, send suggestions, alerts and, when necessary, complaints.

We thank you for your continued dedication to Ascenty, for following and maintaining the commitment to the standards established in this Code.

If you have any questions, please do not hesitate to consult the leadership of your area. The Compliance team is also available for clarification.

Thank you for your commitment and dedication to always practicing and preserving ethical principles.

**Gustavo Sousa**  
*Ascenty Data Centers e Telecomunicações*

## 2. Applicable Standards

- ISO 9001 - Quality Management System
- ISO 14001 - Environmental Management System
- ISO 20000-1 - Service Management System
- ISO 22301 - Business continuity management systems
- ISO 27001 - Information Security Management System
- ISO 27701 - Data Privacy Management System
- ISO 37001 - Anti-Bribery Management System
- ISO 37301 - Compliance Management System
- ISO 45001 - Occupational Health and Safety Management Systems
- ISO 50001 - Energy Management System
- Legal compliance management system

## 3. Purpose

This Code of Conduct and Ethics will help us live our values every day. It works as a guideline for us to make the right choices in each business situation. However, this document does not presume to offer all the answers, and each one of us should stop and reflect on whether our conduct is appropriate.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 3/19

Ascenty seeks to promote and maintain its reputation for honesty, transparency, trust, integrity, and professionalism. The trust that our Customers and investors place in Ascenty is something that we greatly appreciate and strive to protect. In many ways, our reputation is our most important asset. Therefore, all of our activities must be conducted with honesty and integrity and in compliance with applicable legal and regulatory requirements.

We have adopted this code and the aforementioned standards to preserve our culture and ensure compliance with the legal, regulatory and fiduciary requirements applicable to our activities. We expect and require you to comply with this Code (and related standards, policies and procedures). We need to be proactive and seek out support with the Department of Compliance and Quality to answer questions, submit suggestions, warnings, etc.

#### 4. Application

This Code of Conduct and Ethics (“Code”) applies to all board members, officers, directors, employees, temporary workers<sup>1</sup> and interns (all collectively defined in this Code as “Employees”) of Ascenty (“Company”), as well as all relevant service providers of Ascenty within the scope of their activities, duties and responsibilities. It is the obligation of every employee to know and adhere to the guidelines set forth herein.

#### 5. Ascenty Values

Ascenty is a company that values flexibility and agility when delivering its services. The company operates ethically and maintains its conduct towards all those involved in its business, be they suppliers, customers, employees, regulators, and society, always aiming to honor its commitment to deliver the best data center and telecommunications service in Latin America.

- We Are Flexible: We are open to change and to new ideas.
- We Are Ethical: We believe the means are just as important as the ends.
- We Are Agile: We don’t leave for later what we can do now.
- We Are Committed: We value the quality of our solutions, our team spirit, and our social and environmental responsibility.

#### 6. Ethical Relationships

Being ethical means everything pertaining to people’s moral behavior and our posture in social situations. Ethics guide our behavior as an organization. Doing the right thing is one of Ascenty’s strongest values.

Aspects that comprise ethical behavior:

- a. **Integrity:** Dedicating yourself completely and wholeheartedly. Acting ethically, consistently, and professionally.
- b. **Respect:** Being considerate of other people’s motivations and understanding every point of view involved. Hearing opinions and building consensus.
- c. **Confidence:** Judging yourself to be capable, understanding your potential and your limitations and always striving to overcome them. Believing in yourself and in others and contributing to the group.
- d. **Dignity:** Having self-respect and caring about yourself. Infusing respect with the authority resulting from knowledge and experience.

<sup>1</sup> For purposes of this Code, the term “temporary workers” includes employees, service providers, and consultants who do not work full time at our facilities. The area that hires a temporary worker is responsible for ensuring that the worker completes the declaration of commitment in compliance with this Code.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 4/19

- e. **Fairness:** Offering everyone what they are entitled to. Understanding the impact of each of our decisions. Positioning yourself with wisdom, courage, and generosity.
- f. **Independence:** Using knowledge to always offer the best solution. Being impartial. Being able to decide your own fate.
- g. **Equity:** Understanding you are part of something bigger. Recognizing everyone's contribution. Fighting any and all kinds of discrimination, including those based on race, creed, gender, and sexual orientation.
- h. **Positivity:** Being able to take a light-hearted and creative approach. Finding meaning and satisfaction in what you do.

## 7. Summary of the Principles of the Code<sup>2</sup>

### 7.1. Protection of company assets

We generally have confidential and sensitive information about Ascenty, other companies, our Customers, investors, directors, and employees. Preserving the integrity of this information is vital to our business and reputation and is one of the obligations set forth in data protection laws.

### 7.2. Accuracy of public records and disclosures

We must ensure that the Company's records are accurate and that all business transactions are duly authorized.

Since our investors are publicly traded companies abroad, we have obligations to them and must ensure that our communication and other market disclosures are true and accurate.

### 7.3. Duties to stakeholders

Reputation is everything. We must act responsibly when dealing with our investors, Customers, vendors, competitors and other stakeholders.

### 7.4. Communications and media

In the digital era in which we live, it is necessary to use the Company's information systems appropriately, remembering that the records are permanent.

Make sure that all of your online activities, including your use of social media, are appropriate and have no negative impact on Ascenty.

### 7.5. Conflict of interest and personal behavior

As a company representative, your personal behavior must be consistent with our values.

We must be aware of the risk that someone's personal interests may conflict or appear to conflict with the company's interests.

### 7.6. Positive work environment

For everyone to do their best on behalf of the Company, we must contribute to help create a positive work environment where everyone feels respected and productive.

Our success depends on the establishment of a culture free from discrimination, violence, harassment, and other negative influences.

### 7.7. Compliance with laws, standards, regulations, and policies

<sup>2</sup> These principles are for summary purposes only. For more detailed information on each of these items, refer to the Code of Conduct and Ethics and specific Policies.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 5/19

Along with our investors, we operate in different jurisdictions and are subject to different laws, standards, and regulations. You must be aware of and comply with those applicable to your position, and ignorance of them is not an excuse to not comply with.

The Company has corporate policies with which you should be familiar as they govern your trading activities, business practices and other conduct as an Ascenty Employee.

## 8. Frequently Asked Questions

### 8.1. Why do we have a code?

The Code serves as a guide on how you should act as an Ascenty Employee. By following the Code, you will contribute to preserving our corporate culture and ensuring compliance with legal, regulatory, and fiduciary obligations, which is vital for the Company.

### 8.2. Who should follow the code?

All Ascenty's board members, directors, employees and temporary workers<sup>3</sup> (collectively "Employees").

### 8.3. What are your Responsibilities?

You must follow all aspects of this Code and reaffirm your commitment annually. Additionally, if you suspect that someone may be violating the Code or the policies mentioned in this document, you have an obligation to report that suspicion. To make a report, follow the section of this Code entitled "Reporting Potential Code Violations".

### 8.4. How do you know if there is a problem?

The Code seeks to address the most common issues that may occur, but it may not cover all cases that you may encounter. When you're not sure what to do, ask yourself the following:

- Is this illegal?
- Does it seem like the wrong thing to do?
- Would you be uncomfortable if other people knew?
- Could it create a negative perception about you or the Company?
- Do you have a personal interest that could potentially conflict with the Company's interests?

If you answered "yes" to any of these questions, your conduct may likely violate the Code and you should ask for guidance.

### 8.5. How should I seek guidance?

If you have questions about the Code or other policies and guidelines mentioned in this document, or about the best course of action in a given situation, consult your immediate superior or the Compliance Department.

### 8.6. What if I want to make an anonymous report?

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<sup>3</sup> For purposes of this Policy, the term "temporary workers" includes employees, service providers, and consultants who do not work full time at our facilities. The area that hires a temporary worker is responsible for ensuring that the worker completes the declaration of commitment in compliance with this Policy.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 6/19

This can be done directly or through the Reporting Channel, which is operated by an independent third party and is available 24 hours a day, 7 days a week. Contact information for the Reporting Channel can be found in the “[Contact Information](#)” section of this Code. On this Channel, both internal and external audiences can confidentially and securely report conduct that may represent a violation of current legislation, this Code of Conduct and Ethics, or internal policies, processes and procedures.

The channel is also suitable for reporting fraud, anti-competitive practices, bribery or corruption under Laws No. 12,529/2011 (the Brazilian Competition Defense Law) and No. 12,846/2013 (the Brazilian Anti-Corruption Law).

If you choose to make an anonymous report, your anonymity will be protected as much as possible, in accordance with the law.

Please note, however, that maintaining your anonymity may limit the Company's ability to investigate your complaint.

### **8.7. What are the consequences of violating the code?**

Violating this Code may result in several consequences. As an Employee, as defined by the Ethics Committee, you may receive anything from guidance to immediate dismissal for cause and legal proceedings may even be filed against the offender.

If you are a board member or statutory officer, a violation can lead to your dismissal.

As for vendors and customers, we also reserve the right to immediate contract termination, and legal action may be taken.

Certain violations of this Code also violate applicable law and therefore may have serious consequences outside of Ascenty. Failure to comply with this Code may lead to civil or criminal proceedings, which may result in substantial fines, penalties, and/or imprisonment.

## **9. Business Conduct Standards**

Ascenty seeks to promote and maintain its reputation for honesty, transparency, trust, integrity, and professionalism. The trust that our Customers and investors place in Ascenty is something that we greatly appreciate and strive to protect. In many ways, our reputation is our most important asset. Therefore, all our activities must be conducted with honesty and integrity and in compliance with applicable legal and regulatory requirements.

### **9.1. Protection of Company Assets, Resources, and Data**

*The Company's assets must be used for legitimate business purposes.*

The Company's assets must be used for business purposes only, not for personal use. The Company's assets comprise several categories. Assets can be tangible physical assets, such as office supplies, furniture, computers, or intangible assets, such as intellectual property. Everyone has a responsibility to protect and safeguard Ascenty's assets from theft, loss, damage, theft, misuse, and waste. If you become aware of any of the aforementioned facts involving the Company's assets or have any questions about their proper use, talk to your superior. The Company's name (including its letterhead and logo), facilities and relationships are valuable assets and should only be used for authorized business purposes and never for personal activities. For more information, see the Ascenty Brand and Image Usage Policy (POL-AS-0015).

If you use the Company's assets for personal benefit or otherwise fail to care for or waste them, you will violate your duty to the Company. You must use the Company's resources that are reimbursable in the form of expenses in a measured and responsible manner. Reimbursement requests should only be made for legit business expenses, regarding the Reimbursement Process

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 7/19

(PRO-FN-0001). If you are unsure whether any expenses are legitimate, talk to your superior or consult the applicable rules and procedures.

*Confidential information must always be protected.*

We must protect confidential information that is in our possession – both information from Ascenty and from other companies, as well as Customers and investors. Confidential information includes, but is not limited to, non-public material information, all memos, notes, lists, records, and other confidential documents in your possession, whether in printed or digital format. All of these must be delivered to the Company immediately after the end of your relationship or whenever the Company requests it, and it is your obligation to protect this information even after the termination of your employment or contractual relationship with the Company. You must also protect hard and scanned copies of confidential information that is taken from the office (for example, for work outside the office).

It is important to be discreet when discussing the Company's business. This includes respecting information barrier protocols and discussing the Company's business only with individuals who need access to such information. Also, be careful when discussing the Company's business in public places, such as elevators, restaurants and public transportation, or when using the phone or email outside the office. You should also be careful not to leave confidential information in meeting rooms or in public places where others can access it. While at Ascenty, if you become aware of confidential information about another entity that you know or suspect has been inadvertently disclosed, follow the *Processo de Gerenciamento de Incidente e Requisição* (PRO-OP-0001) to open an Information Security Incident.

*Personal data held by the Company or on behalf of the Company must be used in compliance with data protection laws.*

The Company has access to the personal data<sup>4</sup> of people inside and outside the organization where we have a legal basis and prior authorization from the data subject to do so. This is necessary to effectively and efficiently administer and manage the operation of our business. Personal data may include, among others, personal and financial information. We must take all reasonable measures to keep personal data only for as long as we need to do so.

The processing of personal data is subject to several legal and regulatory requirements. You must take all reasonable and necessary steps to ensure that personal data is kept confidential and accessed only by individuals who need this information to perform their tasks. In addition, if disclosing personal data to a third party is necessary for conducting business (for example, so that a third party can provide services for the Company or acquire an asset or business from the Company), you must ensure that such disclosure complies with legal and regulatory requirements. This includes ensuring that the third party is subject to a written agreement containing confidentiality obligations and, where relevant, other obligations that must be included regarding

<sup>4</sup> "Personal Data" means any data relating to a living individual that can be identified from that data or from that data and other information that is in the possession or may be in the possession of the company (or its representatives or service providers).

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 8/19

the data protection laws of certain jurisdictions where we operate or have Customers and Investors. In other cases, you may only disclose personal data by legal or regulatory determination. You are responsible for ensuring that you understand and comply with our data protection and privacy policies. For more information on compliance with data protection laws, see the Data Privacy Policy (POL-AS-0017).

*All intellectual property belongs to the Company*

During your employment or contractual relationship, you may be involved in the creation, development, or invention of intellectual property, such as concepts, methods, processes, inventions, confidential information and trade secrets, know-how, merchandise, ideas, plans, programs, software, applications, code, works of authorship, trademarks, service and design marks, alone or together with third parties, including, among others, the improvement of existing intellectual property owned by the Company. All intellectual property and its associated rights are the property of the Company, and you will not be entitled to such intellectual property. You are responsible for collaborating with the Company and for providing all necessary assistance, including the preparation and execution of all necessary documentation, such as assignments and applications to register rights with the relevant government authorities on behalf of the Company, to ensure that all such intellectual property rights and related rights become or are recognized as the exclusive property of the Company.

*Company documents must be preserved*

It is critical that you help preserve our business records by following the guidelines set forth in any document maintenance policies and to comply with applicable legal and regulatory requirements. If you are notified that your documents are relevant to an ongoing or imminent judicial case, investigation, or audit, you must follow the guidelines stipulated by the Legal Department regarding document retention.

*Make sure that artificial intelligence (AI) tools are used properly.*

AI tools such as ChatGPT, Bard, Bing, Ernie and other products with pre-defined language models are powerful tools that can benefit our business if used properly. The use of these tools, however, can present significant risks related to the protection of confidential information and the reliability of the results generated by AI.

Any information entered into an AI tool is incorporated into the model. This creates the potential for information and data to be owned by the product supplier and for this information to be shared with other users outside the organization. In addition, an AI tool is limited to the data available for its development. This means that if this data is incomplete or out of date, it can cause the model to provide inaccurate or unreliable information.

As set out below, confidential, non-public or personal information should not be shared with AI tools. This includes information relating to:

- Specific individuals,
- Ascenty, including our Customers, suppliers, investors or counterparties, and
- Information protected by patent or copyright registrations.

In addition, any results generated by an AI tool must be carefully reviewed and evaluated for quality and accuracy. Ascenty and its Associates remain responsible for the quality and accuracy of these results, including any judgment or decision-making based on them.



Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 9/19

## 9.2. Accuracy of Public Records, Documents and Disclosures

*Ensure that the Company's books and records are always complete and accurate and that all business transactions are duly authorized.*

The Company's books and records must reflect all transactions in order to allow for the preparation of accurate financial statements. No information should be omitted (i) from external auditors; (ii) from internal auditors; (iii) from Ascenty Compliance; (iv) from the Ascenty Ethics Committee; or (v) from the Investor Compliance Committee. In addition, it is illegal for any person to fraudulently influence, coerce, manipulate, or mislead an external auditor of the Company.

The Company's contracts and agreements govern our business relations. Due to the number and complexity of the laws governing them, we implement policies and procedures to ensure that any contracts or agreements concluded by the Company have the appropriate approval level. Therefore, when signing them, you must have the proper authorization to do so and, before your signature and when required by the policies and procedures, they must have been reviewed by a Company lawyer. If you are unsure whether you have the appropriate authorizations to enter into an agreement on behalf of the Company, refer to the Contract Policy (POL-AS-0016).

*Ensure that the Company makes complete, truthful, and objective public disclosures in accordance with the Communication Process (PRO-AS-0005).*

All Employees responsible for preparing the Company's public information or who provide information as part of this process must ensure that public disclosures of information are made honestly, accurately, and in accordance with applicable legislation.

Employees must be aware and report actions involving:

- (a) Fraud or purposeful errors in the preparation, maintenance, assessment, review, or auditing, whether external or internal, of any financial statement or financial record;
- (b) Failures or non-compliance with internal accounting controls;
- (c) False statements or affirmations in any public release documents, such as annual or quarterly reports, prospectuses, circulars, and press releases; or
- (d) Failures or deviations in the reporting of accounting and financial information in a complete, truthful, and objective manner.

Additionally, Employees involved in the supervision of financial reports and their Family Members<sup>5</sup> are prohibited from obtaining any tax or other services from the external auditor, regardless of whether the Company or another person pays for such services.

## 9.3. Duties to Customers, Investors, Vendors, Competitors, and Other Persons

*Treat Customers, investors, vendors, competitors, and others fairly and in good faith.*

To preserve our reputation and relationships with Customers, investors, vendors, competitors, and others, Employees must not engage in any illegal or unethical conduct when conducting the Company's business.

Brazil's Antitrust Act (Law 12.529/2011) is intended to ensure fair and balanced competition in the marketplace, establishing it as a constitutional right. Our relationship with our competitors is respectful, ethical, and based on good business practices as well as Brazilian law.

The Company condemns any conduct that restricts competition, such as entering into agreements with competitors regarding bidding processes, conspiring to fix prices, share markets, or creating or maintaining monopolies or oligopolies.

<sup>5</sup> For purposes of this Code, "Family Members" are a spouse, partner, or other family member residing in the same household as you.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 10/19

When doing any business or acquiring any product or service on behalf of Ascenty, make sure you are not committing any economic violations. If you have any legal questions, please ask the Legal Department for guidance.

Excuse yourself from any meeting, including those of class associations or corporate entities, where you would be in the presence of representatives of competitors in your market segment and where matters pertaining to competition arise. In addition, make sure that there is a record of your exit. At the earliest opportunity, notify your manager and the Compliance Department about what transpired.

#### **9.4. Communications and Media**

*Use the various forms of communication or work tools provided by the Company in an appropriate and correct manner.*

All business matters requiring electronic or written communication must be conducted through the Company's email system or through other means offered and approved by the Company. You should always use our email, internet, phones, and other forms of communication appropriately and professionally. All Employees must comply with the Company's policies regarding information security. Although we understand the need for limited use of these tools for personal purposes, they should not be used excessively or in a way that interferes with or hinders your work or that of your colleagues. Employees must not send email containing business information from the Company to their personal email accounts, nor save a copy of the Company's business information on their personal computers or other electronic devices other than the Company's.

When using the means of communication and work tools provided by the Company, such as computers and mobile phones, do not expect the information sent or received to be private. Your activity may be monitored and stored to ensure that these resources are used appropriately or in accordance with applicable regulations.

In addition, employees must take care when using the Company's email system, other systems and devices, to ensure that no viruses, Trojans or similar are introduced into the Company's systems or devices, including avoiding clicking on links in phishing emails. They should also take special care when opening unsolicited emails from unknown sources or suspicious-looking emails. Open an information security incident or report it to IT immediately if you are unsure about the origin of an email or communication, or if you suspect that your IT equipment/device may have been hacked or corrupted by a virus.

You must be particularly vigilant when using our IT equipment/devices outside the workplace and regularly take the precautions required by the Company to avoid virus attacks or compromised systems security. The systems contain information that is confidential and subject to data protection laws. This information must be treated with extreme care.

#### *Be cautious when using Social Media*

The Company's Electronic Mail and Internet Policy (POL-AS-0003) states that, unless you are expressly authorized, it is strictly prohibited to comment, publish about the Company, or otherwise discuss the Company, its Customers, investors (and the clients of its investors) and/or securities, employees, investments, and other business matters in all social media forums, including but not limited to, social networks, chat rooms, wikis, virtual worlds, and blogs (collectively, "Social Media"). You are a representative of the Company when you are involved in online activities and must ensure that your online behavior, including on Social Media, is appropriate and consistent with our values.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 11/19

*Do not speak on behalf of Ascenty unless you are authorized to do so*

Our investors are publicly traded abroad. It is important to ensure that communication to the public is: (a) timely; (b) complete, true, and simple; and (c) consistent and widely disseminated, in accordance with all applicable legal and regulatory requirements.

You may not make public statements on behalf of Ascenty unless you have been officially designated as the Company's "spokesperson".

The Company has professionals who are trained and qualified as spokespersons to disseminate information to the public and the Legal Director, who is authorized to communicate with regulatory bodies, stock exchanges, other audiences, or the press. If any member of the media, investor, financial analyst, or other third party contacts you requesting information, even informally, do not reply unless authorized to do so. In this case, forward the request to the Marketing Department, which will seek guidance from individuals on the investor relations teams or communication from our investors.

For questions regarding the Company's communication, refer to the Communication Process (PRO-AS-0005).

### **9.5. Conflict of Interest and Personal Behavior**

*Behave in a manner that reinforces a positive image of yourself and the Company.*

Your behavior, both on and off the job, should reinforce a positive public image, both of yourself, the Company, and its business activities. It is essential to use common sense in all personal and business relationships. You must avoid participating in any activities that could damage your reputation or that of Ascenty, compromising the relationship of trust between you and the Company or between the Company and its Customers. Employees who exhibit inappropriate behavior are subject to the appropriate disciplinary measures, including dismissal for cause. For more information, see the Conflict-of-Interest Policy (POL-AS-0026).

*Remember your duties to Ascenty when engaging in personal activities outside the company; obtain permission before engaging in business activities beyond the scope of your role with the Company.*

The Company encourages Employees to be active members of their community. When engaging in personal, political, or similar activities, whether for-profit or not-for-profit, you must be aware that participation in any outside interest must not prevent you from properly performing your duties in the Company and must not conflict with or run counter to the Company's interests. In addition, you must ensure that when you are involved in these activities, you do not speak or act on behalf of the Company, regardless of cause or position.

"Outside Business Activities", referred to simply as "OBA", includes business activities that conflict with those of Ascenty, including any activity such as a director, board member, partner of another business organization, or other duly approved activities, regardless of whether compensation is involved. Employees must receive approval from the Company's CEO and Chief Compliance Officer before accepting an OBA. After such approval, notify the company's Human Resources department and file a new conflict of interest form.

Prior approval is not required to serve on the boards of charitable organizations or small family and private companies unrelated to the Company. For clarity, approval is not required to serve on the board of a family business that is an extension of a personal business; however, prior approval is required to serve on the board of a private company with significant operations. If in doubt as to whether you need to obtain permission, ask the Compliance department.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 12/19

*Avoid situations where your personal interests conflict or could conflict with the interests of the Company, its Customers or investors.*

A conflict of interest situation, for this purpose, occurs when a person’s private interests interfere, or even appear to interfere, with the Company’s interests. If you are involved in any activity that prevents you from properly performing your duties to the Company, or that could create a situation that would affect your ability to act objectively, effectively and in Ascenty’s best interests, you could be facing a conflict of interest situation. Therefore, you must place the Company’s interests in any activity above your own interests. Remember that the Company’s interests include its obligations to its Customers.

A “close personal relationship” with another Ascenty Employee may also constitute a conflict of interest or potential conflict of interest situation. To ensure that such relationships are handled properly and potential conflicts of interest are handled appropriately and responsibly, you must report any such relationships to the Ascenty’s Human Resources Department. For the purposes of this Code, a close personal relationship includes, but is not limited to, relationships with relatives or equivalents (for example, adoptive parent or cousin), close friend, spouse, fiancée, common-law partner, or any other person with whom you are or have been in an intimate or romantic relationship.

The best way to determine whether you may have a conflict of interest is to ask yourself whether a reasonably well-informed person would conclude that your interest in a subject, activity or personal relationship could in any way influence your decision or performance when exercising your role for the Company. To avoid conflict of interest situations, identify potential conflicts when they arise; contact the Compliance Department if you are unsure whether a specific interest or activity gives rise to a conflict situation, or contact the Human Resources Department to inform any close personal relationship that may generate a conflict. Directors should consult the Ascenty Ethics Committee. In addition, if you become aware of any conflict or potential conflict involving an Employee, consult the Human Resources Department or Compliance Department, as appropriate.

*Do not take advantage of the Company’s opportunities for your own benefit.*

You are prohibited from taking advantage of any property, assets, business or investment opportunities that you learn of through your work for the Company for your own benefit. You have a duty before Ascenty to promote the Company’s interests when an opportunity arises, but you should not take advantage of it for yourself.

## **9.6. Positive Work Environment**

*Commit to the development of a positive work environment free from discrimination, violence, and harassment.*

We value diversity and we must all do our part to keep our work environment respectful, where everyone feels safe, included and productive. The Company promotes fairness and inclusion and does not tolerate discrimination, violence or harassment in the workplace. All Employees must ensure that the Company has a safe and respectful environment where equality, diversity, fairness and dignity are highly valued. For more information on the Company’s commitment to a positive working environment, please refer to the Company’s values.

*It is your duty to report discrimination, violence, and harassment*

If you feel discriminated against, a victim of violence, or harassed, or become aware of discrimination or harassment, it is your duty to report it. An Employee must report such incidents in accordance with the “[Reporting Potential Code Violations](#)” section of this Code. Allegations of

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 13/19

discrimination, violence, or harassment will be taken seriously and investigated. Any Employee who harasses, acts or threatens to act violently, or discriminates against another person, or any Employee who knowingly tolerates discrimination, violence, or harassment from another person, will be subject to disciplinary measures, including dismissal.

The Company shall have the right to take disciplinary action against you if you deliberately make false accusations against an innocent person; however, you will not face retaliation for making a report in good faith or helping to investigate a complaint.

#### *Commit to ensuring Employee health and safety.*

Everyone has the right to work in a safe and healthy environment. To do so, we must:

- a) Strictly comply with all internal laws and procedures regarding occupational health and safety, in accordance with the Occupational Health and Safety Policy (POL-AS-0021);
- b) Do not engage in dangerous or illegal behavior, including any acts or threats of violence;
- c) Do not carry, distribute, or be under the influence of illegal substances while on the Company's premises or conducting its business; and
- d) Do not carry or use any type of weapon or any type of flammable material on the Company's premises or while conducting its business, unless expressly authorized by reason of your activity with the Company.

If you or someone you know is in immediate danger of serious bodily harm, call our Internal Security Department and report the occurrence in accordance with the "Reporting Potential Code Violations" section of this Code.

#### *Human Rights and Contemporary Slavery*

We are committed to conducting business in an ethical and responsible manner, including conducting our activities in a way that respects and supports the protection of human rights, including but not limited to: by:

- a) Operating with best health and safety practices to support the goal of zero serious incidents;
- b) Ensuring that the interests, safety and well-being of the communities in which we operate are integrated into our business decisions;
- c) Elimination of discrimination at work;
- d) Prohibition of child labor and forced labor; and
- e) Eradication of harassment and physical and mental abuse in the workplace.

We strive to integrate these standards into all our business activities, including training, communications, contracts and due diligence processes, as appropriate. These practices extend to our interactions with our key suppliers and other business partners.

#### *Environmental, Social and Governance Management ("ESG")*

Our ESG principles are embedded in all of our operations and help us ensure that our business model will be sustainable for the future. They include:

- Guaranteeing Employee well-being and safety;
- Being good assistants in the communities in which we operate;
- Mitigating the impact of our operations on the environment;
- Promote a positive working environment based on respect for human rights, appreciation of diversity and zero tolerance for discrimination, violence or harassment in the workplace; and
- Conducting business in accordance with the highest ethical and legal/regulatory standards.

Investment teams must consider ESG issues in Due Diligence procedures, including anti-bribery and anti-corruption, health and safety, and other ESG considerations.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 14/19

### 9.7. Compliance with Laws, Standards, Regulations, and Policies

*Know and comply with all laws, regulations, regulations, and policies applicable to your position.* Many of the Company's activities are governed by laws, regulations, and policies that are subject to change. If you have any questions regarding the applicability or interpretation of certain laws, standards, regulations, or policies related to your duties at Ascenty, you should consult the Company's Legal or Compliance Departments. If local laws, customs, or practices conflict with this Code, you must follow those that are more stringent. If you become aware that any practice of the Company may be illegal, you have a duty to report this fact. Lack of knowledge of laws, standards, and regulations in general is no justification for violating them. We hope that you will make every effort to familiarize yourself with the laws, standards, regulations, and policies that affect your activities and comply with them.

*Don't negotiate, promise, offer, facilitate, pay, authorize, provide, or receive bribes, including "facilitating payments".*

We value our reputation for conducting business with honesty and integrity. Maintaining this reputation is vital because it creates trust in our business with customers, investors, vendors, competitors, and others, which means being good for business. We do not negotiate, promise, offer, facilitate, pay, authorize, provide, or receive bribe payments for the benefit of our activities, directly or indirectly, and you are not authorized to do so or authorize third parties to do so on behalf of Ascenty. We have zero tolerance for bribery and other acts of corruption. This commitment to honesty and integrity comes from the highest levels of our Company and we expect you to meet the same high standards. We are committed to the Brazilian Anti-Corruption Law (Law No. 12.846/13).

Bribery is anything of value that is offered, promised, given, or received to improperly influence a decision or to obtain an undue or unfair advantage for the purpose of promoting, valuing, obtaining, or retaining business. Bribery does not always occur through cash payments and may take other forms, including gifts, travel, hospitality, political contributions, charitable donations, employment opportunities, internships, and temporary work. Facilitating payments are<sup>6</sup> also a form of bribery and are therefore prohibited. For more details, see the Compliance Program (MAN-AS-0001), and the Company's Anti-Bribery, Anti-Corruption and Compliance Policy (POL-AS-0025).

*Follow the Company's standards on giving or receiving giveaways, gifts, and entertainment.*

Gifts and entertainment given or received by persons who have a business relationship with the Company are generally accepted if follow the annual value established by the Company, appropriate to the business relationship and do not create the idea of inadequacy or possible conflict of interest.

Trips to congresses or fairs offered by clients or suppliers will be accepted as long as they are on subjects relevant to the Company's business and are authorized by the invited employee's immediate manager and communicated to the Ethics Committee.

No payment in cash or cash equivalent (e.g. check, gift certificate) should be made or received.

<sup>6</sup> Facilitating payments are small payments made to guarantee or accelerate routine actions or otherwise induce civil servants or third parties to perform routine actions that they are required to perform, such as issuing licenses, immigration controls, or releasing assets held at customs. This does not include legally applicable administrative fees. Employees are not authorized to make any facilitating payment, and must ensure that third parties, including agents and other consultants, do not make such payments on our behalf.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 15/19

Gifts and hospitality will not be offered to public officials, unless they are in the capacity of participants, only at trade fairs or congresses at which the Company is handing out gifts to participants.

Employees who do not comply with these requirements may be required to reimburse the Company for any gifts or benefits given or received. More information can be found in the Anti-Bribery, Anti-Corruption and Compliance Policy (POL-AS-0025).

*Restrictions on donations to candidates or political parties*

In Brazil, legal entities, in accordance with current legislation, are prohibited from making political donations.

Employees may not use the Company, the Company's name, or its resources to provide Social Program Assistance without prior and express approval. This directive includes, but is not limited to Public Officials, Third Parties, charities, political parties, political campaigns and/or candidates for public and political office, unions, or an entity controlled by a union. Any type of sponsorship is also prohibited.

Further information can be found in the Donations Policy (POL-AS-0011).

*We must prevent the use of our operations for money laundering purposes or any activity that facilitates money laundering, the financing of terrorism or other criminal activities.*

The Company is strongly committed to preventing the use of its operations for money laundering, financing of terrorism, or other criminal activities and will take appropriate measures to comply with applicable Brazilian and international anti-money laundering laws. We have zero tolerance for money laundering. Jurisdictions may publish lists of individuals and organizations from which the Company is prohibited from accepting or distributing funds in accordance with applicable anti-money laundering laws. Employees are expected to take reasonable care to ascertain that counterparties are not owned or controlled or acting on behalf of sanctioned governments, groups, individuals, or others. This includes requiring counterparties to make anti-money laundering statements in documents with the company, which in-house legal counsel (or the legal counsel of our investors) can provide upon request.

*You should consider your rights and obligations when providing information to government authorities.*

Whether during or after your contractual relationship with Ascenty, you may be contacted by government authorities (e.g., police forces, supervisory/regulatory bodies, etc.) that are seeking confidential information from you, which you obtained through your relationship with Ascenty. Regardless of your ability to answer inquiries, it is strongly recommended that, for your own protection, you do not speak to the authorities without first seeking legal counsel regarding your rights and obligations. In this situation, you can contact the Legal Department and/or the Compliance Department, which can help you obtain legal counsel to assist you.

Notwithstanding the foregoing, nothing in this Code prohibits or restricts you in any way from providing information to a government authority, pursuant to the *Procedimento de Registro de Interação com Agentes Públicos* (PRC-AS-0013).

*You have an obligation to report internally if you are convicted of a felony or misdemeanor.*

Our selection process at Ascenty is thorough. From the moment you join the Company, we expect you to continue to adhere to the principles of openness, honesty, and transparency. If, at any time

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 16/19

while you are associated with the Company, you are convicted of a crime, misdemeanor (or have been subject to any similar conviction in any jurisdiction) or are involved in any conduct that you consider relevant to your reputation, you have the obligation to report such fact to the Legal Department, Compliance Department, and your superior, so that it can be documented in an appropriate manner.

### 9.8. Reporting Potential Code Violations

*You must make reports in good faith.*

Reporting the facts internally is fundamental to the Company's success, and the Company expects and appreciates this behavior. You are required to be proactive and promptly report any violation or suspected violation of this Code, any illegal or unethical behavior, or misconduct that you become aware of or are involved in. When reporting a violation, you should include specific details and supporting documentation, where possible, to allow for proper investigation of the reported incident. Vague, non-specific, or unsupported allegations are more difficult to handle and may be dismissed due to lack of basis.

You have an obligation to immediately report actual or potential misconduct or violations to your immediate superior, as he/she is usually in the best position to resolve the issue. Alternatively, you can contact the Compliance Department or, if necessary, you can also relay the matter to the Ascenty Ethics Committee to report possible or concrete misconduct or a violation of this Code, or if you have any specific or general issues. Senior managers must promptly report violations to the Investor Compliance Committee.

*If you do not want to report violations to your immediate superior, the Compliance Department, or the Ethics Committee, you can always make a complaint through the Reporting Channel.*

The Reporting Channel is managed by a third-party company independent of Ascenty, which guarantees confidentiality and, if desired, anonymity when reporting suspected unethical, illegal, or inappropriate behavior. The contact number for the Reporting Channel is toll-free 24 hours a day, 7 days a week, or access the website. Information on accessing the Reporting Channel can be found in the "[Contact Information](#)" section of this Code. If you choose to make an anonymous report, anonymity will be preserved to the maximum extent possible as permitted by applicable law.

*All reports will be kept confidential and treated appropriately.*

The confidentiality of reports and complaints will be maintained to the maximum extent possible, but in a manner compatible with the needs of conducting a proper investigation and in accordance with the law. You may want to identify yourself to facilitate our investigation. However, you can make a report or complain anonymously through existing channels.

The Compliance Department will handle the complaint. Compliance will report all illegal and unethical conduct in violation of this Code to the Ethics Committee, which will report to the Investor Compliance Committee.

More information can be found in the *Procedimento de Investigação de Denúncias* (PRC-AS-0014).

*Ascenty prohibits retaliation against anyone who in good faith reports suspected violations of this Code or of any law or regulation.*

There will be no retaliation against any person who has made a report or complaint in good faith and with reasonable belief that a violation of this Code or any other law or regulation has occurred,



Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 17/19

is occurring, or will occur; however, making a report does not absolve you (if you are involved) or anyone else of a violation or suspected violation of this Code.

The Company reserves the right to apply disciplinary measures if you make a complaint providing false information or make an accusation that you know to be false. This does not mean that the information you provide must be correct, but it does mean that you must reasonably believe that the information is true and demonstrates at least a possibility of violating this Code. If you believe that you have been treated unfairly or are suffering repercussions or retaliation following your complaint, you must report such fact through the Reporting Channel or in person with an employee from the Compliance Department.

*You have a duty to cooperate with internal investigations.*

It is the responsibility of all Employees, when required, to cooperate in any internal investigation involving allegations of unlawful or unethical behavior or misconduct. In relation to any internal investigation, you must undertake to provide honest, accurate and complete information.

*Legal and Disciplinary Measures for Violations of this Code*

We reserve the right to take appropriate legal and disciplinary action for violations of this Code. This may result in immediate dismissal for cause and, as the case may be, legal action may be taken against you.

## **10. Statement of Compliance**

Upon joining Ascenty, each Employee who is subject to this Code will receive a copy of it and of the regulations mentioned herein and will be asked to read and declare receipt of this document. This statement must be maintained by the Compliance Department. The Employee will also be requested to confirm adherence to this Code and to the Company's policies and standards on an annual basis.

The annual signing of the Statement of Compliance with the Code must be a condition for the continuation of the employment relationship or your relationship, in the case of temporary workers, with the Company.

The Compliance Department reviews and submits this Code for approval by the Ethics Committee at least once a year. The Ascenty Ethics Committee is ultimately responsible for monitoring compliance with this Code.

## **11. Notification to the Reader**

The Company reserves the right, in whole or in part, to modify, suspend, or revoke this Code and any related policies, procedures, and programs at any time. The Company also reserves the right to interpret and amend this Code and its policies at its own discretion.

Any changes to this Code will be disclosed and reported as required by law. The Company employs unionized employees. If this Code conflicts with a specific provision of a collective bargaining agreement governing wages, terms, and/or conditions of employment for Employees who are part of or represented by unions, the collective bargaining agreement will prevail over this Code. If a collective bargaining agreement is omitted in relation to any part of this Code, or if this Code supplements a collective bargaining agreement, Employees who are party to or are represented by unions must comply with this Code.

Neither this Code, nor any policies mentioned by it, confer any rights, privileges, or benefits to the Employee, or create the right to maintain an employment relationship with the Company, establish employment conditions, or create, expressly or implicitly, an employment relationship of any kind

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 18/19

between Employees and the Company. In addition, this Code does not modify the employment relationship between Employees and the Company.

This Code is published on our website and intranet. The version of this Code published on our website and/or intranet may be more up-to-date and replaces any printed version if there is any discrepancy between the printed version and what is provided on our website and/or intranet.

## 12. List of attachments (form templates, etc.)

- MAN-AS-0001 - Compliance Program
- POL-AS-0003 - Company Email and Internet Policy
- POL-AS-0011 - Donation Policy
- POL-AS-0015 - Ascenty Brand Usage Policy
- POL-AS-0016 - Contract Policy
- POL-AS-0017 - Data Privacy Policy
- POL-AS-0021 - Occupational Health and Safety Policy
- POL-AS-0025 - Anti-Bribery, Anti-Corruption and Compliance Policy
- POL-AS-0026 - Conflict of Interest Policy
- PRC-AS-0014 – *Procedimento de Investigação de Denúncias*
- PRO-AS-0005 - Communication Process

## 13. Definitions, Acronyms and Abbreviations

**Ethics Committee** – the Ethics Committee is composed of the President, at least two appointed Vice Presidents (VP) and the Compliance Officer. The Committee is part of Ascenty's Compliance Program, which is not limited to, but is responsible for, deliberating on issues involving Compliance, whistleblowing and evaluating the hiring of people or suppliers who have any negative points in Due Diligence;

**Investor Compliance Committee** – consists of the Compliance Department and Ascenty and Investor representatives;

**Compliance** – action to comply with the rules, procedures, regulations, etc., created by the institution or external parties that affect the institution's activities;

**Due Diligence** – the search for and prior analysis of information about a company or candidate. Detailed research into financial life, work history, legal and administrative proceedings and personal relationships with people connected with the company.

Code of Conduct and Ethics / Compliance		
Code MAN-AS-0002	Rev. 2.1	Page 19/19

## Attachment A — Contact Information

### Reporting Channel

0800 300 4729 (Brazil)  
800 914 018 (Chile)  
01-800-5189245 (Colombia)  
800 099 1550 (Mexico)  
Ascenty Intranet  
[www.ascenty.com/compliance](http://www.ascenty.com/compliance)