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Code of Conduct and Ethics

Ascenty – Compliance

Region – Global

Revision 3.1 | 2/9/2026

Approved by:

Evandro Spadari

Legal & Compliance Manager

Ethics Committee

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1. Message from the CEO

To all Ascenty's directors, managers and employees,

Ascenty is a company that values agility and flexibility in the delivery of its services, maintaining, in a non-negotiable manner, ethics as an essential principle in all its relationships. Our conduct reflects respect and commitment to each party involved in our ecosystem: Clients, suppliers, employees, regulatory bodies and society.

We act responsibly and with integrity, always in compliance with applicable legal and regulatory requirements. This commitment is directly connected to our mission to be recognized by our Clients as the best data center and connectivity provider in Latin America.

Promoting ethics, ensuring institutional reputation and protecting our assets and information are collective and permanent duties. Therefore, we adopt a zero-tolerance policy for any practice of corruption, discrimination, harassment or unethical conduct.

Careful reading of this Code of Conduct and Ethics is essential for everyone to be fully aligned with our values and prepared to act with discernment and responsibility in the most diverse situations of corporate day-to-day life. This document should be used as a practical reference, capable of guiding our decisions and strengthening the trust we have earned in the market.

We know that no guideline covers all possible situations, so it is essential to maintain a proactive posture, seeking guidance whenever necessary. The integrity channel is available to answer questions, receive suggestions, alerts and complaints, in a safe and confidential manner.

I thank everyone for their commitment to ethical conduct and continuous dedication to building a solid, upright company in line with the highest standards of governance.

If you have any questions after reading this Code, please contact the leadership of your area or contact the Compliance Department.

*Best regards
Chris Torto
CEO of Ascenty*

2. Applicable Rules

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

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3. Objective

This Code of Conduct and Ethics will help us live our values daily. It works as a guide for us to make the right choices in each business situation. However, this document does not intend to provide all the answers, and each one should reflect on the adequacy of their own conduct.

Ascenty seeks to promote and maintain its reputation for honesty, transparency, trust, integrity and professionalism. The trust that our Clients and investors place in Ascenty is something that we value enormously 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.

We have adopted this Code and the standards listed above 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). It is necessary to be proactive, seeking help from the Compliance Department to clarify doubts, forward suggestions, alerts, etc. This Department is responsible for Ascenty's Code of Conduct and Ethics and is prepared to answer any questions about it.

4. Application

This Code of Conduct and Ethics ("Code") applies to all directors, officers, employees, temporary workers¹ and interns (all collectively defined in this Code as "Employees") of Ascenty ("Company"), as well as to 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 practice the guidelines set forth herein.

5. Ascenty's values

Ascenty is a company that values flexibility and agility in the delivery of its services. The company acts ethically and maintains conduct towards all those involved in its business, whether suppliers, clients, employees, regulatory bodies and society, always aiming to honor the commitment to deliver the best data center and telecommunications service in Latin America.

- We are Flexible: We are open to change and new ideas.
- We are Ethical: We believe that the means are as important as the ends.
- We are Agile: We act promptly and decisively.
- We are Committed: We value the quality of our solutions, team spirit, social responsibility and the environment.

6. Ethics in relationships

Being ethical means everything that is related to the moral behavior of human beings and their posture in the social environment. Ethics guides our behavior as an organization, and acting correctly is one of Ascenty's strongest values.

Ingredients that make up ethical behavior:

- a. **Integrity:** Dedicate oneself entirely, completely. Act ethically, consistently, and professionally.
- b. **Respect:** Consider the other's motivation, understand all the points of view involved. Listen to opinions, build consensus.

¹ For purposes of this Code, the term "contingent workers" includes employees, contractors, and consultants who do not work full-time at our facilities. The area that hires a temporary worker is responsible for ensuring that he completes the declaration of commitment of compliance with this Code.

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- c. **Confidence:** Consider yourself capable, understand your potential and limitations, seek your permanent overcoming. Believe in yourself and in the other, contribute to the group.
- d. **Dignity:** Seeing oneself with respect and self-love. Infuse respect, build on authority arising from knowledge and experience.
- e. **Justice:** Offer each one what is right, understand the impact of a decision. To position oneself with wisdom, courage and generosity.
- f. **Independence:** Use knowledge to always offer the best solution, act impartially. Be able to decide your fate.
- g. **Equity:** Perceiving oneself as part of a whole, recognizing the contribution of each one. Combat any type of discrimination, including those originating in prejudices of race, creed, gender and sexual option.
- h. **Good humor:** Can see lightly and creatively. To find meaning and satisfaction in what you do.

7. Summary of the Code's Principles²

7.1. Protection of company assets

We generally have confidential and sensitive information about Ascenty, other companies, our Clients, investors, managers and Employees. Preserving the integrity of this information is vital to our business and reputation and is one of the obligations under data protection laws.

7.2. Accuracy of records and public disclosures

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

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

7.3. Duties towards stakeholders

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

7.4. Communications and media

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

Please ensure that all your online activities, including your use of social media, are appropriate and do not have a negative impact on Ascenty.

7.5. Conflicts of interest and personal behavior

As a representative of the company, your personal behavior must be consistent with our values. We must be aware that there is a risk that someone's personal interests may conflict or appear to conflict with the interests of the company.

7.6. Positive working environment

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

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

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

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

We, including our investors, operate in different jurisdictions and are subject to different laws, rules and regulations. You must know and comply with those applicable to your position and ignorance of them is not a justification for your non-compliance.

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. FAQ

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 are vital to the Company.

8.2. What are your Responsibilities?

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

8.3. How do you know if there is a problem?

The Code seeks to deal with the most common issues that may occur, but it may not cover all the issues 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 yourself or the Company?
- Do you have a personal interest that could potentially conflict with the interests of the Company?

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

8.4. How should I seek guidance?

If you have questions about the Code or other policies and guidance referenced in this document, or about how best to proceed in each situation, please consult your immediate superior or the Compliance Department.

8.5. What if I want to make an anonymous report?

This can be done directly or through the Whistleblowing Channel, which is operated by an independent third party and is available 24/7. The contact information for the Whistleblowing Channel can be found in the "[Contact Information](#)" section of this Code. In this Channel, both the internal and external public can communicate, in a confidential and secure manner, conduct that may represent a violation of current legislation, this Code of Conduct and Ethics, or internal policies, processes and procedures.

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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 report.

8.6. What are the consequences of violating the code?

Violating this Code can have several consequences.

As an Employee, as defined by the Ethics Committee, you may receive guidance to immediate dismissal for cause, and legal proceedings may even be initiated against the offender.

If you are a Statutory Director or Officer, a violation may lead to your dismissal.

With Suppliers and Clients, we also reserve the right to immediate contractual termination, and it is possible to open legal proceedings.

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

9. Protection of Company Assets, Resources, and Data

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

The Company's assets are to be used for business purposes only, not for personal use. The Company's assets encompass several categories. Assets can be tangible physical goods, such as office supplies, furniture, computers, or intangible goods, 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 foregoing facts involving the Company's assets or have any questions about the proper use of them, please speak with your superior. The Company's name (including its letterhead and logo), facilities and relationships are valuable assets and should be used only for authorized business purposes and never for personal activities.

If you use the Company's assets for personal benefit or otherwise fail to care for or waste the same, you will breach your duty to the Company. You must use in a measured and responsible manner the Company's resources that are reimbursable in the form of expenses. Reimbursement requests should only be made for legitimate business expenses. If you are unsure whether any expenses are legitimate, please speak with your superior or refer to the rules and procedures applicable to the case.

Confidential information must always be protected.

We must protect the confidential information in our possession – both information from Ascenty, other companies and from Clients and investors. Confidential information includes, but is not limited to material non-public information, all confidential memos, notes, lists, records and other documents in your possession, whether in printed or digital form. All of these must be delivered to the Company immediately upon the end of your employment or whenever the Company requests it, and it is your obligation to protect this information even after your employment or contractual relationship with the Company has ended. You should also protect hard and scanned copies of sensitive 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 people who have a

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need to have access to the information. Also, be careful when discussing Company 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 sensitive 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, please contact the Legal Department.

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 personal data³ 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, but is not limited to, personal and financial information. We shall take all reasonable steps to keep personal data only for as long as we have a need to do so.

The processing of personal data is subject to various legal and regulatory requirements. You must take all reasonable and necessary steps to ensure that personal data is kept confidential and only accessed by people who need that information to carry out their tasks. In addition, if it is necessary for the conduct of business to disclose personal data to a third party (e.g., for a third party to provide services to the Company or acquire an asset or business of 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 that contains confidentiality obligations and, where relevant, other obligations that must be included under the data protection laws of certain jurisdictions where we operate or have Clients 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.

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*, goods, ideas, plans, programs, software, applications, code, works of authorship, trademarks, service marks, and design, alone or in conjunction with third parties, including, but not limited to, enhancing ownership intellectual property belonging to the Company. All intellectual property and its rights are owned by the Company, and you will have no right 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.

³ "Personal Data" means any data relating to a living individual who can be identified from such data or such data and other information that is in the possession or may be in the possession of the Company (or its representatives or service providers).

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Company documents must be preserved

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

Ensure artificial intelligence (AI) tools are used appropriately

AI tools, such as 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 sensitive information and the reliability of the results generated by AI.

Any information entered an AI tool is incorporated into the model. This creates the potential for the information and data to be owned by the product vendor and for that 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 outdated, it can cause the model to provide inaccurate or unreliable information.

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

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

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

Finally, only use AI tools approved by our IT. The use of any non-approved tool is prohibited.

10. Accuracy of Records, Documents, and Public Disclosures

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

The Company's books and records should reflect all transactions to enable the preparation of accurate financial statements. No information should be omitted from (i) the external auditors; (ii) internal auditors; (iii) Ascenty's Compliance during investigations and other investigations; (iv) Ascenty's Ethics Committee; or (v) 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 relationships. Due to the number and complexity of the laws that govern them, we have implemented policies and procedures to ensure that any contracts or agreements entered by the Company have the appropriate level of approval. Therefore, when entering them, you must have the proper authorization to do so, and, prior to your signature and where required by policies and procedures, have been reviewed by an attorney of the Company. If you are unsure whether you have the proper authorization to enter a contract on behalf of the Company, please consult the Legal Department.

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Ensure that the Company makes complete, truthful, and objective public disclosures.

All Employees, who are 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 law.

Employees must be aware and report actions involving:

- (a) Fraud or willful errors in preparation, maintenance, evaluation, review or audit, whether external or internal, of any financial statement or financial record.
- (b) Failures or non-conformities in internal accounting controls.
- (c) False statements or assertions in any public disclosure 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.

In addition, Employees involved in the supervision of financial reporting and their Family Members⁴ 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.

11. Duties to Clients, Investors, Suppliers, Competitors and Other Persons

Treat Clients, investors, suppliers, competitors, and others fairly and in good faith

To preserve our reputation and relationship with Clients, investors, suppliers, competitors and other people, Employees must not engage in any illegal or unethical conduct in conducting the Company's business.

Legislation that deals with free competition guarantees the opportunity for fair and balanced competition in the market. The relationship with competitors is guided by respect, ethics, good business practices and the laws of each country. The Company repudiates any conduct that restricts competition, such as entering into bidding agreements between competitors, conspiracy to fix prices, market sharing, formation and maintenance of monopolies or oligopolies.

12. Communications and Media

Use the various forms of communication or work tools made available by the Company appropriately and correctly

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, telephones, and other forms of communication appropriately and professionally. All Employees must comply with the Company's policies regarding information security. While 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 harms your work or that of your colleagues. Contributors must not send e-mail containing Company business information to their personal e-mail accounts, nor save a copy of Company's business information on their personal computers or other non-Company electronic devices.

⁴ For purposes of this Code, "Family Members" are a spouse, common-law partner, or other family member who resides in the same household as you.

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When using the means of communication and work tools made available by the Company, such as computers and cell phones, we 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 should exercise caution 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 be especially careful when opening unsolicited emails from unknown sources or suspicious-looking emails.

Open an information security incident or report it to the IT Department immediately if you are unsure of 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 remain particularly alert when using our IT equipment/devices outside the workplace and regularly take the precautions required by the Company to avoid virus attacks or compromise the security of the systems. The systems contain information that is confidential and subject to data protection laws. This information should be treated with extreme care.

Be Cautious When Using Social Media

Unless you are expressly authorized, it is strictly prohibited to comment on, post about the Company, or otherwise discuss the Company, its Clients, its investors (and its investors' clients) and/or its securities, its employees, investments and other business matters in all social media forums, including but not limited to social media, chat rooms, wikis, virtual worlds, and blogs (collectively, "Social Media"). You are a representative of the Company when you are engaged in online activities and you must ensure that your online behavior, including on Social Media, is appropriate and consistent with our values.

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 a "spokesperson" for the Company.

The Company has professionals who are trained and qualified as spokespersons to disseminate information to the public. If any member of the media, investor, financial analyst or other third-party contacts you requesting information, even informally, do not respond unless you are authorized to do so. In this case, please forward the request to the Marketing Department or your superior.

13. Conflicts of Interest and Personal Behavior

Avoid situations in which your personal interests are or may conflict with the interests of the Company, its Clients or investors

A "conflict of interest" situation, for this purpose, occurs when a person's private interest interferes, or even appears to interfere, with the interests of the Company. If you are involved in any activity that prevents you from performing your duties before the Company properly or that may create a

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situation that would affect your ability to act objectively, effectively and in the best interest of Ascenty, you may be facing a situation of conflict of interest. Therefore, you must put the interests of the Company in any business above your own interests. Remember that the Company's interest includes its obligations to its Clients.

The best way to judge whether you may have a conflict-of-interest situation is to ask yourself whether a reasonably well-informed person would conclude that your interest in a personal matter, activity or relationship could in any way influence your decision or performance during your role for the Company.

To avoid situations of conflict of interest, identify possible conflicts when they arise; contact the Compliance Department if you are unsure whether a specific interest or activity gives rise to a conflict situation; and formally inform the Compliance Department and your superior.

Present personal behavior reinforces a positive image of you and the Company.

Your personal behavior, both inside and outside of work, should reinforce a positive public image of you, the Company and your business activities. It is essential to use common sense in all your personal and business relationships. You must avoid engaging in any activities that may damage your reputation or the reputation of Ascenty and compromise the relationship of trust between you and the Company or between the Company and its Clients. Employees who have acted improperly are subject to appropriate disciplinary measures, including dismissal for cause.

Remember your duties to Ascenty when participating in personal external activities

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

Obtain permission before engaging in business activities outside the scope of your role within the Company

"Other Business Activities", referred to simply as "OBC", include business activities that conflict with those of Ascenty, including activities as an officer, board member, partner of another business organization or other duly approved activities, regardless of whether there is compensation involved. Employees must receive approval from Ascenty's Compliance Department before accepting an OBC.

Prior approval is not required to serve on the boards of charities or small families and private companies that are not related to the Company. For clarity, approval is not required to serve on a board of a family business that is an extension of personal business; However, prior approval is required to serve on a board of a private company with significant operations. If you are unsure whether you need to obtain permission, ask the Compliance Department.

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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 become aware of through your work with the Company. You have a duty to Ascenty to promote the Company's interests when an opportunity arises, but you must not take advantage of it for yourself.

14. Positive Work Environment

Commit to developing a positive work environment free from discrimination⁵, violence,⁶ and harassment⁷

We value diversity, and we should all do our part to maintain our respectful work environment where everyone feels safe, included, and productive. The Company promotes equality and inclusion and does not tolerate discrimination, violence, and harassment in the workplace. All Employees must ensure that the Company has a safe and respectful environment, where great value is placed on equality, diversity, justice and dignity.

It is your duty to report discrimination, violence and harassment

If you feel discriminated against, victims of violence or harassed, or become aware of discrimination or harassment, it is your duty to report it. A Contributor must report such incidents in accordance with the "Reporting Potential Code Violations" section of this Code. Reports of 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 of another person, will be subject to disciplinary action, up to and including termination.

The Company shall have the right to take disciplinary action against you if you deliberately make false accusations about an innocent person; However, you will not face retaliation for making a report in good faith or assisting in the investigation of a report.

Commitment to ensuring the health and safety of Employees

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

⁵ "Discrimination" means unequal or different treatment of an individual or group based on prescribed characteristics protected by law, including denial of opportunity or harassment. Prescribed characteristics typically include age, color, race, religion, marital status, ancestry, sexual orientation, nationality, disability. It doesn't matter if the discrimination is intentional, but the effect of the behavior that matters

⁶ "Violence" in the workplace generally means the exercise of physical force by a person against an Employee that causes or may cause harm, physical injury or illness to the Employee. It includes an attempt to exert physical force against an Employee that may cause harm, injury, or illness to the Employee; and a statement or behavior that an employee could reasonably interpret as a threat that could cause harm, physical injury, or illness.

⁷ "Harassment" generally means a range of offensive verbal or physical conduct that segregates a person against their will, including sexual harassment. It encompasses a wide range of behaviors, from direct sexual approaches to insults, offensive jokes or mockery, and even *bullying*. Harassment can occur in many forms and may, in some circumstances, be unintentional. Regardless of the intention, all types of harassment affect or may negatively affect individual professional performance or the work environment as a whole and are not tolerated.

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- a) Strictly obey all laws and internal procedures on occupational health and safety, according to the Occupational Health and Safety Policy (POL-SSO-0002).
- b) Not to engage in dangerous or illegal behavior, including any acts or threats of violence.
- c) Not to possess, distribute or be under the influence of illicit substances while on the Company's premises or conducting business with the Company; and
- d) Not to carry or use any type of weapon or any type of flammable material on the Company's premises or at the service of the Company, unless expressly authorized by reason of your activity in the Company.

If you or someone you know is in immediate danger of serious bodily harm, please contact 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 manner that respects and supports the protection of human rights, including but not limited to:

- a) Operate with health and safety best practices to support the goal of zero serious incidents.
- b) Ensure 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, as well as trafficking in persons; and
- e) Eradicating physical and mental harassment and abuse in the workplace.

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

Environmental, Social and Governance ("ESG") Management

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

- a) Ensure the well-being and safety of Employees.
- b) To be good assistants in the communities in which we operate.
- c) Mitigate the impact of our operations on the environment.
- d) Promote a positive work environment based on respect for human rights, appreciation of diversity and zero tolerance for discrimination, violence or harassment in the workplace and
- e) Conduct business in accordance with the highest ethical and legal/regulatory standards.

Investment teams should consider ESG issues in due diligence procedures, including anti-bribery and anti-corruption, health and safety, and other ESG considerations.

15. Compliance with Laws, Standards, Regulations and Policies

Know and obey all laws, rules, regulations, and policies applicable to your role

Many of the Company's activities are governed by laws, rules, regulations and policies that are subject to change. If you have any questions about the applicability or interpretation of certain laws, rules, regulations or policies related to your duties at Ascenty, you should consult the Company's

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Legal Department. If local laws, customs, or practices conflict with this Code, you must follow the stricter laws. If you become aware that any practice of the Company may be illegal, you have a duty to report it. Not knowing the laws, rules and regulations in general is not a defense to justify a violation of them. We expect you to make every effort to familiarize yourself with and comply with the laws, rules, regulations, and policies that affect your activities.

Do not negotiate, promise, offer, facilitate, pay, authorize, provide, or receive bribes, including "facilitation payments"

We value our reputation for conducting business with honesty and integrity. It is vital to maintain this reputation as it builds trust in our business with Clients, investors, suppliers, competitors and others, which means being good for business.

We do not negotiate, promise, offer, enable, 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 all applicable Anti-Corruption legislation, including:

Brazil - Law No. 12,846/2013 (Corporate Anti-Corruption Law), Law No. 8,429/1992 (Administrative Improbity Law); Penal Code (arts. 317 and 333); Chile - Law No. 20,393/2009; Chilean Penal Code; Mexico - General Law of Administrative Responsibilities (LGRA), General Law of the National Anti-Corruption System, Federal Penal Code; United States - Foreign Corrupt Practices Act (FCPA), Sarbanes-Oxley Act (SOX); European Union - Directive (EU) 2017/1371 (PIF Directive). In addition to the OECD Convention against Transnational Bribery, the UN Convention against Corruption (UNCAC), the OECD Convention on Combating Bribery of Foreign Public Officials, and the Inter-American Convention against Corruption (OAS)

Facilitation payments⁸ are also a form of bribery and therefore prohibited.

Follow the Company's rules for giving or receiving gifts, gifts, and entertainment

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

Trips to congresses or fairs offered by Clients or suppliers will be accepted if they are on matters relevant to the Company's business and they have authorization from the immediate manager of the invited employees and that they are communicated to the Compliance Department.

No cash or cash equivalent payments (e.g. check gift card) should be made or received.

Gifts and hospitality will not be offered to public officials, unless they are only participating in fairs or congresses in which the Company is delivering gifts to participants.

Employees who fail to comply with these requirements may be required to reimburse the Company for the value of any gifts or benefits given or received.

⁸ Facilitator payments are small payments made to secure or expedite routine actions or otherwise induce government officials or third parties to perform routine actions that they are required to perform, such as issuing permits, immigration controls, or clearing goods held at customs. This does not include legally applicable administrative fees. Employees are not allowed to make any facilitation payments, and must ensure that third parties, including agents and other consultants, do not make such payments on our behalf.

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Restrictions on donations to candidates or political parties

In Brazil, legal entities, according to the legislation in force, are prohibited from making political donations.

Employees may not use the Company, the Company's name or its resources to make Social Program Aid, without prior and express approval. This guideline includes, but is not limited to, Public Official, Third Party, charities, political parties, political campaigns, and/or candidates for public and political office, unions, or entity controlled by a union.

Sponsorship is also prohibited, except in the case of fairs and congresses handled and organized by the Marketing Department.

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

The Company is strongly committed to preventing the use of its operations for money laundering, terrorist financing 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 under applicable anti-money laundering laws. Employees are expected to take reasonable care to verify that counterparties are not owned or controlled by 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, inspection/regulatory bodies, etc.) who are seeking confidential information from you, which you have obtained through your relationship with Ascenty. Regardless of your ability to respond to inquiries, it is strongly recommended that, for your own protection, you do not speak to the authorities without first seeking legal advice about your rights and obligations. In this situation, you may be able to contact the Legal & Compliance Department, who will be able to help you obtain legal advice to assist you.

Notwithstanding the foregoing, nothing in this Code prohibits or restricts you in any way from providing information to a governmental authority.

You have an obligation to report internally if you are convicted of a serious misdemeanor or misdemeanor

Our selection process at Ascenty is meticulous. 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 while you are associated with the Company you are convicted of a felony, 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 an obligation to report such to the Legal

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Department, Compliance Department and your superior, so that it can be documented in an appropriate manner.

15.1. Reporting Potential Code Violations

You must make reports in good faith

Reporting the facts internally is essential for the Company's success, in addition to being the expected and valued conduct. You are required to be proactive and promptly report any violation or suspected violation of this Code, any illegal, unethical behavior, or misconduct that you become aware of or are involved in. When making a report, you should include specific details and support documentation, where possible, to allow for proper investigation of the reported conduct. Vague, non-specific, or unsupported allegations are more difficult to address and can be dismissed for lack of foundation.

You have an obligation to report actual or potential misconduct or violations of this Code promptly to your immediate superior, as he or she is usually in the best position to resolve the issue. Alternatively, you can contact the Compliance Department. Administrators and Senior Leadership should promptly report violations to the Ethics Committee.

In case you do not want to report violations to your immediate superior, you can always make a report through the Whistleblowing Channel

The Whistleblowing Channel is managed by a third-party company, independent of Ascenty, which guarantees confidentiality, impartiality and, if desired, anonymity, in the report of suspected unethical or illegal attitudes or inappropriate behavior. The contact phone number of the Whistleblowing Channel works free of charge 24 hours a day, 7 days a week, or access the website. Information for accessing the Whistleblowing Channel can be found in the "[Contact Information](#)" section of this Code.

The Whistleblowing Channel is indicated for complaints about fraud, anticompetitive practices, bribery or corruption provided for in the Anti-Corruption Laws of the countries where we operate and other applicable legislation. In addition, the Channel can be used to report undeclared conflicts of interest; moral or sexual harassment; discrimination or prejudice; misuse of confidential information; violation of laws, regulations or this code; retaliation against those who made a complaint in good faith; irregularities in audits, contracts or bids; among others.

All complaints will be kept confidential and will be handled appropriately

The confidentiality of the reported complaints and complaints will be maintained to the maximum, but in a manner compatible with the needs of conducting an adequate investigation and in accordance with the law. You may want to identify yourself to facilitate our investigation. However, you can make the complaint or complaint anonymously through the 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 deliberate on the corrective measures applicable to the case.

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

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No reprisal or retaliation shall be taken against any person who has made a report or claim in good faith and with reasonable belief that violation of this Code or any other law or regulation has occurred, is occurring or will occur; however, making a report does not absolve you (if you are involved) or anyone else for violating or suspected violation of this Code.

The Company reserves the right to apply disciplinary action if you make a report 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 demonstrate at least one possibility of violation of this Code. If you believe that you have been treated unfairly or are suffering reprisals or retaliation following your report, you should file your report through the Whistleblowing Channel.

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 connection with any internal investigation, you must commit to providing honest, accurate and complete information.

16. Legal and Disciplinary Measures for Violations of this Code

We reserve the right to take the appropriate legal and disciplinary measures for violations of this Code.

If, after internal investigations, it is concluded that there has been a violation of Ascenty's Code of Conduct and Ethics or Policies or the practice of unlawful acts, and the authorship of the facts is proven, the employees or third parties involved will be subject to the application of disciplinary measures depending on the seriousness of the act, such as:

- 1) Collaborators: Warning – verbal or written; Suspension of the employment contract; Dismissal without cause; Dismissal for cause
- 2) Suppliers: Suspension of supply/partnership or application of possible penalties; Application of fine; Contract termination

In addition, legal proceedings may be initiated against the offender.

17. Declaration of Conformity

Upon joining Ascenty, each Employee who is subject to this Code will receive a copy of this Code, as well as will be asked to read and declare receipt of this document. Such statement must be maintained by the Compliance Department. The Employee will also be asked annually to confirm that he or she adheres to this Code, the Company's policies and standards.

The annual signature of the Declaration of Compliance with the Code shall be a condition for the continuity of the employment relationship or its 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. Ascenty's Ethics Committee is ultimately responsible for monitoring compliance with this Code.

18. Notice to Reader

The Company reserves the right, as a 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 sole discretion.

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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 or convention governing wages, terms and/or conditions of employment for Employees who are part of or represented by trade unions, the collective bargaining agreement or convention will prevail over this Code. If a collective bargaining agreement or convention is silent in relation to any part of this Code, or if this Code supplements a collective bargaining agreement, Employees who are part of or represented by trade unions must comply with this Code.

This Code does not confer any rights, privileges or benefits on Employees, or create the right to maintain the employment relationship with the Company, establish employment conditions or create, expressly or implicitly, an employment relationship of any kind 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 replace any printed version in the event of any discrepancy between the printed version and what is available on our website and/or intranet.

19. Definitions, Acronyms & Abbreviations

Ethics Committee - Committee that is part of Ascenty's Compliance Program, which is not limited to, but is responsible for deliberating on issues involving Compliance matters, on complaints and evaluating the hiring of people or suppliers who have any negative point in the Due Diligence.

Investor Compliance Committee - Committee formed by Compliance and Ascenty's representatives and Investors' representatives.

Due Diligence - The search and prior analysis of information about a company or candidate. Detailed research on financial life, work history, judicial and administrative proceedings and personal relationships with people who have a connection with the Company.

20. Revision History

Rev.	Date	Review Description	Prepared by	Reviewed by	Approved by
1.0	2018	Initial Issue	Fábio Trimarco	Gilson Granzier	Chris Torto
1.1	2021	Annual review. No changes	Fábio Trimarco	Gilson Granzier	Chris Torto
1.2	2/01/2022	Inclusion of new terms regarding conflict of interest	Fábio Trimarco	Gilson Granzier	Chris Torto
2.0	12/19/2022	General revision of the document and change of format	Ceres Andrade	Fábio Trimarco	Chris Torto, Investor Ethics Committee and Compliance Committee
2.1	1/12/2024	Update of the president's message, inclusion of content in item 9.1, update of item 9.4.	Ceres Andrade	Fábio Trimarco	Ethics Committee and Investor Compliance Committee
2.2	1/10/2025	Review without content change	Ceres Andrade	Fábio Trimarco	Ethics Committee and Investor Compliance Committee
3.0	8/29/2025	Review of the CEO's message, the Legal and Disciplinary Measures for Violations of this Code and the content to be reported on the Whistleblowing Channel.	Ceres Andrade	Flavia Rodrigues	Evandro Spadari Ethics Committee
3.1	2/9/2026	Change of code MAN-AS-0002 to MAN-CPC-0002	Ceres Andrade	Flavia Rodrigues	Evandro Spadari Ethics Committee

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Appendix A – Contact Information

Whistleblowing Channel

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

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