

CODE OF ETHICS AND CONDUCT



FOUNDERS' TESTIMONY

Dear All,

ALTAVE was created in 2011, in the incubator of the Technological Institute of Aeronautics (ITA), out of a visionary dream. Innovation has been in our DNA from the start .

We were conceived with a focus on developing captive aerostats, but our journey has gone further.

Throughout the first five years, we dedicated ourselves to monitoring. Then we took a crucial step: we incorporated artificial intelligence into our solutions and expanded our portfolio.

Now, guided by the purpose of protecting people and resources with technology, we offer intelligent monitoring services with our own hardware and software. Focused on occupational, property and environmental safety and process improvements, our artificial intelligence provides our clients with relevant information in real time, enabling agile actions to mitigate risks and improve operational performance.

Currently, we have the CE mark, indicating the approval of the quality of our products for sale throughout the European Union. In addition, we are accredited as a Brazilian Strategic Defense Company and have the Petrobras CRC seal for supplying services to the company.

In this Code of Ethics and Conduct for ALTAVE, we reinforce our VALUES, PRINCIPLES and CONDUCT that must be followed by everyone and encouraged by our leadership, which plays a fundamental role in disseminating this culture, serving as an example in its own actions. Thus, we maintain our commitment to always doing more and better, with agility and excellence, with respect for people and integrity in conducting our business, preserving our credibility with all our stakeholders and achieving outstanding results every day.

We believe that ethics and responsibility are fundamental pillars for ALTAVE's success. This Code of Ethics and Conduct therefore applies to all employees, from the top to the bottom of the company, as well as all service providers and suppliers. Together, we will build an even brighter future for ALTAVE, aiming to grow in a sustainable way, generating and sharing wealth; seeking excellence in everything we do, with agility and quality; valuing people and conducting our business with integrity; counting on the dedication and commitment of everyone to comply with the Code of Ethics and Conduct.

Together, we will be stronger. Always!

**BRUNO AVENA EXECUTIVE
DIRECTOR**

**LEONARDO NOGUEIRA
MARKETING & SALES DIRECTOR**

PURPOSE

To protect lives and resources with technology

VISION

To be a global leader in intelligent solutions with real-world monitoring.

ALTAVE'S VALUES

They are our fundamental beliefs. It is our WAY OF BEING. In what we believe is the **essential basis** for conducting our business.

- ☐ **Relationships based on mutual trust;**
- ☐ **Challenge inspires us;**
- ☐ **We are witty;**
- ☐ **Autonomy based on will, responsibility and excellence;**
- ☐ **Integrity and honesty**

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INTRODUCTION

WHO THIS CODE OF CONDUCT IS FOR

This Code of Ethics and Conduct applies to ALTAVE HOLDING S.A, ALTAVE INDÚSTRIA, COMÉRCIO E EXPORTAÇÃO DE AERONAVES S/A, its subsidiaries and/or affiliates, alone or jointly, referred to in this Code as “ALTAVE”, as well as its directors, managing partners, partners, advisors, consultants, employees, trainees, apprentices and business partners, such as service providers, suppliers, among others.

USE OF THIS CODE OF ETHICS AND CONDUCT

ALTAVE’s Code of Ethics and Conduct is intended to guide daily activities, interactions and decisions based on the PRINCIPLES AND CONDUCT described and is a fundamental pillar of Compliance at ALTAVE.

The way we achieve our results is important for the sustainability of our business growth, which is why compliance with this Code is mandatory, and it is the responsibility of everyone to read it thoroughly and carefully, and to keep it close at hand for consultation.

The text may not contain definitive answers for all situations, so always reflect and question. Doubts regarding the application of day-to-day conduct or the interpretation of this Code can be clarified with ALTAVE’s **managers** and **Compliance** Committee via the **communication channel**.

ALTAVE will carry out periodic training, at least annually, for its employees, service providers and managers, with the aim of disseminating and solidifying the principles and rules contained in this code. As established by Law no. 13.303/16, the company’s directors must conduct annual training on the risk management policy.

This Code will be periodically reviewed and updated, at least every two years, under the responsibility of the **Compliance** area, with the Executive Director being responsible for its approval and the leadership for ensuring that the guidelines of this Code are applied.

GUIDING PRINCIPLES OF ALTAVE CULTURE

Our guiding principles are the basis for our conduct. We must ensure that all our actions and decisions follow the principles below:

1. COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL POLICIES

Complying with the laws and regulations in force in the places where we operate is a **non-negotiable** factor for any activity we carry out and any relationship we establish. **We exceed** the results of our business by **committing ourselves** to our values, principles, conduct and internal policies. The policies should be reviewed annually or as necessary, taking into account that all revisions should apply from the moment of publication.

2. COMMITMENT TO INTEGRITY

To conduct our activities **correctly, honestly and transparently**. We want to earn and maintain **trust** in all our relationships. **We cooperate** to achieve ALTAVE's **purposes** and interests above personal interests in decisions about work and **we fight** fraud and corruption in all its forms, because we want to **grow with integrity** and be part of **building** a fairer and more prosperous society.

3. RESPONSIBILITY WITH OUR ASSETS

To cherish, preserve and protect our brand, our resources, eliminate waste and take on innovation as an attitude of seeking opportunities and ways to **always be better**, thinking about the new, **without neglecting** what we have today. **We respect** the assets of ALTAVE and **third parties**.

4. PRESERVATION OF OUR INFORMATION

Acting **responsibly and confidentially** when dealing with confidential information produced or received, valuable assets for the **perpetuity** of our business.

5. RESPECT FOR PEOPLE AND THE WORKPLACE

Respect people, dignity, diversity, individuality and privacy. We encourage constant development and the recognition of those who work hard, exceed expectations and want to grow with us. We are all **responsible** for the quality of the working environment by cultivating **positive attitudes and relationships**.

6. HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

Protecting the lives and health of our professionals and all those we interact with in our environments is our permanent **commitment**. **We prioritize preventive** actions to guarantee health and **safety** at work, rigorously assessing the consequences of our actions on people's lives.

Avoiding environmental **impacts** on our activities in the places where we operate is our premise, or if this is not possible, seeking to minimize them. We know that the future depends on the decisions we

make today, and that **caring for the environment** around us means **caring for** our future **generations**.

7. HEALTHY RELATIONSHIPS WITH EXTERNAL AUDIENCES

Establish **lasting** relationships with all our external stakeholders based on our COMMITMENT TO INTEGRITY, with **respect** and **cooperation**. Our **credibility** depends on the positive relationships **we build** and **maintain** with our stakeholders, which are fundamental to the **sustainability** of our growth.

8. SOCIAL RESPONSIBILITY

To be an **agent of social evolution** among the various stakeholders with whom we work, striving for **harmonious coexistence** and the **common good**, with **transparency** and **integrity**. ALTAVE was born **caring for people**, and we want to keep it that way.

OUR CONDUCT

These are our guidelines for professional conduct.

1 COMPLIANCE WITH LAWS, REGULATIONS AND INTERNAL POLICIES

1.1. LEGISLATION AND REGULATIONS

- We do not condone non-compliance with any applicable laws or regulations in force, including international ones, or conduct that influences others to comply.
- We must know and comply with all the laws and regulations that affect our daily work in a complete and constant manner, ensuring that activities are updated in a timely manner.

LEARN MORE: Doubts regarding compliance with any law or regulation should be directed to **managers** for clarification or referral to the **responsible areas**.

1.2. INTERNAL POLICIES

- It is the duty of all ALTAVE professionals to comply with the internal policies in force, which involve guidelines and approval levels, the need for signatures from legal representatives, as well as any other regulations, standards and procedures. We do not tolerate conduct that influences others not to comply.
- No activity or project should be started without first checking that there is an internal policy or procedure in place.

LEARN MORE: Doubts about the application of ALTAVE's internal policies and other documents should be clarified with the **managers** or **areas** that **authored** the documents.

2 COMMITMENT TO INTEGRITY

2.1. CONFLICT OF INTEREST

- We do not tolerate situations in which there is a conflict of interest, i.e. those in which personal interests clash and overlap with ALTAVE's interests.
- It is the duty of each professional to avoid or immediately inform the **manager** and the *Compliance* Committee of any situation of actual or potential conflict of interest for assessment and appropriate treatment.

2.2. KINSHIP AND LOVE RELATIONSHIPS

- Direct Subordination: Working in the same area and/or direct subordination between relatives or professionals involved in romantic relationships is not forbidden. However, any kind of influence that benefits one of the parties is prohibited. The performance of activities or decisions regarding the hiring and/or career (merit, promotion, etc.) of these employees must be based on professional performance.
 - Pre-Existing Relationships: Relationships or romantic relationships that existed prior to employment must be disclosed to the Company. These will be assessed to ensure that there are no conflicts of interest.
 - Exceptional Cases: Exceptional cases may be authorized by the Company's Board of Directors, provided that the facts are communicated in advance.
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- ALTAVE's professionals are prohibited from entering into, managing negotiations with or being responsible for relationships with suppliers, service providers, clients or any other business partners who are related to* or have a romantic relationship with the other party (examples: partner, administrator, executive, business manager), or with a company in which the ALTAVE professional has a stake, which could influence their decision.

LEARN MORE: We consider the following as relatives*: spouse/partner; father/mother-in-law, stepfather/stepmother, child, stepchild, son/daughter-in-law; sibling, grandparent, grandchild.

2.3. PARALLEL ACTIVITIES

- Activities carried out by our professionals that are not related to ALTAVE, whether paid or not, must not compromise their professional performance in the daily execution of their duties. It is forbidden for ALTAVE professionals to be partners, exercise any function, or carry out parallel activities, paid or unpaid, that constitute competition with ALTAVE.

- It is forbidden to carry out any kind of commercial advertising on ALTAVE premises, using the status of employee (service provider) or administrator.

- ALTAVE's professionals should not hold any position in a supplier, competitor or service provider company, such as companies that work with video analytics, monitoring, which would conflict with the activities carried out by ALTAVE.

- Not to use the company's assets for personal or private activities of buying and selling, offering services or advertising, nor to induce or encourage colleagues to do so.

2.4. POLITICAL AND RELIGIOUS ACTIVITIES

- It is forbidden to carry out any political or religious activity during working hours, using ALTAVE resources or on ALTAVE's premises, even in the form of an individual demonstration.

- Participation in political or religious activities must not be linked to ALTAVE or any of its companies.

- If they decide to run for political office, ALTAVE professionals must take unpaid leave from their professional activities.

2.5. ABUSE OF POWER

- It is forbidden to use one's position or function at ALTAVE to obtain personal favors or services from subordinates or other professionals, or to favor any other personal interests or those of third parties.

- Hiring suppliers or service providers must be based on objective, technical and commercial criteria. It is not permitted to request or accept any advantage, benefit or gift for oneself or a related person, from suppliers or service providers in the negotiation and contracting process.

2.6 GIFTS, PRESENTS AND OTHER COURTESIES

- It is forbidden to request or receive gifts, presents or other courtesies during the bidding process, except for institutional materials with the logo of the supplier or service provider (e.g. diaries or pens) or materials related to the item (e.g. books or videos). Such exceptions shall not exceed the nominal value of one hundred Reais (R\$ 100.00).

- It is expressly forbidden to receive any money by way of gifts, presents or courtesies, regardless of the provider.

- The receipt of gifts, presents or other courtesies as a result of the function performed at ALTAVE, must not exceed the value of five hundred Reais (R\$ 500.00) per year by the same provider, and must not characterize ALTAVE's professional commitment.

- Cases that contravene the above must be rejected and the offeror notified by the recipient

that the item is being rejected in accordance with ALTAVE's Code of Ethics and Conduct. Exceptions,

when dealing with situations of institutional representativeness in which refusal would constitute an offense, or items received without prior knowledge should be forwarded to the Administrative area (ADM) for proper disposal.

- Offers of gifts, presents or other courtesies must not be made for the purpose of influencing decisions, facilitating business that would not originally be carried out or obtaining any advantage (financial or otherwise) for oneself, for third parties or for ALTAVE or any of its companies.
- It is forbidden to offer any amount of money as a gift, present or courtesy.

2.7. INVITATIONS TO EVENTS, TRAVEL AND ACCOMMODATION

- It is permissible to accept lodging, travel (airfare and transfers) and/or invitations to events funded by external entities for professional purposes, which add to the activities performed, which are not linked to any situation of favoritism, and provided that participation is submitted in advance by the Compliance Committee.

- Accommodation, travel and/or invitations to nominal entertainment events funded by external parties must be refused and the offeror must be informed by the guest that the item is being refused in accordance with ALTAVE's Code of Ethics and Conduct. If they are not nominal, or if they cannot be refused, as per the exceptions in the previous item, they must be sent to the *Administrative (ADM)* area for proper disposal.

- ALTAVE's funding of travel and accommodation must not be done with the intention of obtaining personal advantages or advantages for third parties, including monetary or non-monetary benefits, in such a way as to be perceived or interpreted as an attempt at bribery or unethical influence.

- It is forbidden to use ALTAVE resources to pay or reimburse extra costs arising from personal preferences or choices. Intentional misreporting of expenses is a violation of the Code of Ethics and Conduct.

2.8. FRAUD PREVENTION

- We prohibit any conduct which, in the exercise of professional duties, is aimed at obtaining personal gain, for third parties or for ALTAVE through fraud.

- Internal controls are management tools and any attempts to circumvent controls will not be tolerated.

LEARN MORE: Examples of **fraud include, but are not limited to:** acts of cheating, manipulating, falsifying, adulterating, evading, deceiving, among others.

2.9. FIGHTING CORRUPTION

- It is strictly forbidden to promise, offer or give a bribe, kickback or any other type of advantage to an external party, whether public or private, as a result of their position, office or function. This policy will be enforced by the Compliance Committee and violations will result in disciplinary action, including termination of employment and possible legal consequences.

- Inducing or persuading colleagues to act improperly or illegally on behalf of the company is strictly forbidden. Violations will be subject to disciplinary action, including termination and legal proceedings.

- Omitting to deal with situations of fraud and corruption (national or transnational), in any form, direct or indirect, active or passive, whether or not involving monetary values. Any omission must be immediately reported to the Committee, and failure to do so will result in disciplinary action, including possible termination and legal consequences.

- Financing, funding, sponsoring or in any way subsidizing the commission of illegal acts.

- Adopting, in relation to the public sector, national or foreign, any initiative that could be interpreted as influence peddling and as an act harmful to the Public Administration, as described in Article 5 of Federal Law No. 12.846 of 2013.

- We repudiate any form of corruption that may be conducted by business partners such as service providers, suppliers or any other intermediary.

- Our professionals must never solicit or accept bribes, kickbacks or any other type of benefit or courtesy with the aim of influencing decisions or granting any other advantage (financial or otherwise) to the offeror.

- ALTAVE is firmly committed to promoting integrity in public and private environments, operating in full compliance with applicable national and international legislation. This includes the Law for the Defense of Administrative Probity in Brazil, the Brazilian Corporate Anti-Corruption Law, the FCPA (Foreign Corrupt Practices Act) in the United States, the UK Anti-Bribery Act in the United Kingdom and the Sarbanes-Oxley Act in the US, as well as other relevant anti-corruption regulations.

3 RESPONSIBILITY WITH OUR ASSETS

3.1. USE OF ALTAVE's RESOURCES

- ALTAVE's resources must be used appropriately for the performance of professional activities, as authorized.

- Everyone who uses ALTAVE's assets inside and outside the workplace must protect them from unsafe situations, damage, wear and tear and unnecessary costs, taking care to preserve them.
- It is forbidden to abuse or waste ALTAVE's resources, using more than necessary to carry out activities and acts of vandalism are not tolerated.
- It is forbidden to misappropriate or misuse ALTAVE's resources for private purposes or for the benefit of third parties. The theft, loss or robbery of any asset under the professional's responsibility must be reported immediately to the manager in charge, who must take the appropriate action.
- All technological devices of ALTAVE and its companies (internet, telephone, cell phone, e-mails, software, hardware, among others), as well as the files and information generated or transmitted from these resources, are for professional use and may be inspected by ALTAVE at any time, without prior notification.

LEARN MORE: ALTAVE's assets are all property it owns, possesses or uses, including, **but not limited to:** real estate, furniture and vehicles; technological devices, utensils, materials and apparatus in general; documents and information; inputs, raw materials and products; financial resources; among others.

3.2. INTELLECTUAL PROPERTY

- We must guarantee the protection and intellectual property rights of ALTAVE and its companies, whether it is developed internally or not, and respect the intellectual property rights of third parties.
- Works created or developed by professionals, in whole or in part, related to their professional activity at ALTAVE and its entire economic group of companies, must be protected.

LEARN MORE: Examples of intellectual property include, but are not limited to: trademarks and patents, manufacturing formulas and processes, innovations, inventions, artistic, literary or scientific works, computer programs, domain names, trade secrets, inventions, know-how, technology, industrial design, among others.

4 INFORMATION PRESERVATION

4.1. INFORMATION CONFIDENTIALITY

All professionals are responsible for the safeguarding and secrecy of physical (paper) or logical (computer, e-mail, cell phone, etc.) information generated or acquired at ALTAVE, and maintain this commitment after the end of their employment contract.

All ALTAVE employees have a duty to protect all information entrusted to them by the company, whether

it is in their custody or obtained during meetings and negotiations. This especially includes privileged information, which must be treated with appropriate security in accordance with the applicable internal rules. The duties of all employees are to:

- a) Follow ALTAVE's Information Security rules and guidelines governing the protection of corporate information and data processing, as stipulated in internal regulations.
- b) Only use ALTAVE's corporate information to carry out their professional activities.
- c) Take the necessary precautions, especially in non-corporate environments, when dealing with ALTAVE's information, especially that which is relevant to decision-making processes that impact economic, financial, image and reputation aspects, technical issues and product development. ALTAVE has a certified supplier for document disposal.
- d) Maintain absolute professional secrecy, not sharing or disclosing information to which they have access in the course of their activities, unless duly authorized by the competent authority or in accordance with Information Security standards and guidelines.
- e) Ensure that the information included in documents and communications is accurate and complies with ALTAVE's Information Security standards.
- f) Refrain from using information obtained at work to trade securities or obtain personal advantages or advantages for third parties and avoid sharing such information with third parties for this purpose.
- g) Immediately report any violation of Information Security rules, disappearance or suspected loss of information and/or equipment containing data to their superior.
- h) Not intentionally modifying or destroying original documents with probative value, preferably filing them in digital format, as established by law in terms of form and retention periods.
- i) Any information that is not in the public domain must be protected. It is strictly forbidden for all professionals to disclose, discuss or use any information generated or acquired at ALTAVE and its companies for any unauthorized purpose in line with the interests of ALTAVE and its companies.
- j) Sharing passwords is prohibited. Passwords for computers, systems and electronic devices are personal and confidential.
- k) Professional communication must be conducted through ALTAVE's professional tools and channels and ALTAVE's information must be properly stored.
- l) Documents or electronic files must be disposed of properly before being thrown away.

LEARN MORE: The information included or altered in ALTAVE's systems, as well as the

approvals made, are the sole responsibility of the electronic user who accessed the system.

4.2 Social Networks

ALTAVE recognizes the power of social networks to connect people and share information. However, it is essential that the use of these platforms is done responsibly and ethically, preserving the image and reputation of the company and its employees.

Guidelines for the Use of Social Networks:

- a) **Identity:** When participating in social networks, do so as an individual, not as a representative of ALTAVE. Avoid using personal profiles that mention the company or its products/services.
- b) **Content:** Do not share copyrighted content without permission and give appropriate credit where necessary. Refrain from disclosing confidential company information or customer data.
- c) **Respect:** Try to maintain a cordial tone in your online interactions. Avoid negative, offensive or discriminatory comments about ALTAVE, its employees or partners.
- d) **Intellectual Property:** Do not use ALTAVE's brands, images, products or services in your personal profiles without prior authorization from the department responsible.
- e) **Third-parties' content:** Be cautious when sharing third-party content, especially if it is of a dubious nature or damaging to the company's reputation. Also be aware of the LGPD and image rights.
- f) **Professional Performance:** Avoid using social networks for personal purposes that interfere with your professional performance.
- g) **Information Verification:** Before sharing news or information, check its veracity with reliable sources and official company channels.

4.3 INSTITUTIONAL AND ADVERTISING INFORMATION

ALTAVE's communication with external audiences must be carried out strategically and in line with the company's image and values. In order to guarantee the quality and cohesion of the information, responsibility for the production and dissemination of institutional and advertising content rests with the authorized areas:

- a) **Marketing and Communication:** Responsible for creating and managing the company's image, including advertising campaigns, press releases and content for ALTAVE's official channels.
- b) **Other relevant areas:** In specific cases, other areas of the company can be involved in content production, subject to prior approval from Marketing and Communications.

Remarks:

- a) ALTAVE's social media and institutional information policy aims at protecting the company's image, promoting an ethical and professional working environment and guarantee the quality of the information disclosed to the public.
- b) It is important that all employees are aware of these guidelines and follow them strictly.
- c) If you have any questions, please contact Human Resources or the Marketing and Communications department.
- d) Only authorized areas can carry out advertising campaigns or provide information through the institutional communication channels of ALTAVE and its companies.

5 RESPECT FOR PEOPLE AND THE WORKPLACE

5.1 ROLE AND LEADERSHIP

Decisions on people management at ALTAVE (such as hiring, promotion, dismissal, transfer and remuneration) must be made on the basis of professional criteria in line with ALTAVE's interests.

Managers must promote the development of their teams and ensure compliance with the Code of Ethics and Conduct and the employment contract by their subordinates, acting immediately when they identify deviations and seeking to apply the appropriate disciplinary measures.

5.2 PROFESSIONAL ATTITUDE

Conduct and relationships in the workplace must be guided by mutual respect, honesty, courtesy, a collaborative and professional attitude.

Disrespectful or inappropriate behavior that causes embarrassment, offenses to modesty, pornography, obscenity, or situations that could lead to confrontation or physical or verbal aggression, including gestures, insults, rumors, slander, defamation, threats, among others, are intolerable.

5.3 DISCRIMINATION AND PREJUDICE

Prejudiced or discriminatory behavior in the workplace based on race, color, ethnicity, religion,

nationality, gender, marital status, sexual orientation, politics, age, physical disability or any other condition that differentiates individuals is prohibited.

5.4 MORAL HARASSMENT

Any form of moral harassment (gestures, words, writings, behavior or attitudes) against any person in the exercise of their function, inside or outside ALTAVE and its companies, by any professional is prohibited.

LEARN MORE: Mobbing is considered to be any conduct that interferes inappropriately, offends the dignity and physical or psychological integrity of any person, with repeated and frequent actions aimed at humiliating or embarrassing someone during the working day, destabilizing the professional's relationship with the work environment and with ALTAVE. Moral harassment does not depend on any hierarchical subordination relationship to occur and abusive conduct between professionals can be considered mobbing regardless of hierarchical level. Examples of mobbing include, but are not limited to: Defamation, threats, intimidation, hostility, isolation, stalking, visual aggression such as exposure to offensive images, or verbal aggression such as insults or humiliation.

5.5 SEXUAL HARASSMENT

☐ Inappropriate postures (gestures, words, writings, behaviors or attitudes) that cause embarrassment with the intention of obtaining any sexual advantages or favors inside or outside the work environment, while in professional activity, are prohibited.

LEARN MORE: Sexual harassment occurs when someone is embarrassed in order to obtain a sexual advantage or favor, and the harassed person does not consent. Situations of sexual harassment can include, but are not limited to: insinuations, impertinent invitations, proposals, exposure to offensive images or gestures, sending messages, writings, offers, forced physical contact, unwanted fondling, pressure to perform sexual favors as a condition of keeping a job, to influence career promotions; threatening and making the victim give in for fear of reporting the abuse; among others.

6 HEALTH, SAFETY AND ENVIRONMENTAL PROTECTION

6.2 OCCUPATIONAL HEALTH AND SAFETY

☐ We must ensure our own safety and the safety of others when carrying out our professional activities, taking the necessary precautions to prevent accidents and occupational illnesses and complying

with all occupational health and safety regulations.

- The use and correct use of protective equipment is mandatory whenever necessary.

□ Unsafe situations that threaten the physical integrity of any person must be stopped immediately.

□ Any unsafe working conditions, situations of non-compliance with health and safety regulations and accidents at work that occur must be reported to the manager and to the Services area (Workplace Safety).

6.3 USE OF ALCOHOL AND DRUGS

6.3.1 It is forbidden to use and/or work under the influence of alcohol or illicit drugs on our premises or in external professional activities. The consumption of alcoholic beverages is authorized only at specific events, such as: customer relations, business lunches, and external or internal events authorized in advance by ALTAVE.

6.3.2 Smoking is prohibited on ALTAVE's premises, except in the areas designated for this purpose.

6.4 CARRYING WEAPONS

6.4.1 It is forbidden to carry weapons of any kind on ALTAVE's premises or during external professional activities.

6.4.2 Professionals who use weapons as a working tool must prove that they are technically qualified, that they are properly identified and that the carrying of weapons is formally authorized by ALTAVE and/or the company for which the service is to be provided.

6.5 ENVIRONMENT

- Natural resources must be used efficiently, reducing the environmental impact of our activities and respecting the legal rules for protecting the environment.
- All professionals and visitors must ensure the cleanliness and organization of the facilities and work tools.
- Inform the area responsible of any situations identified that threaten or negatively impact

the environment.

- The company must seek to prevent any damage to the environment and ensure that its potential impacts are taken into account in the decision-making process;
- Identify, report and control any environmental risks and impacts in accordance with applicable legislation throughout the business activity cycle;
- Maintain standards of excellence in the environment in order to guarantee products and services that meet our customers' expectations and environmental legislation in Brazil and in the countries where it operates.

6.6 PROPERTY SECURITY

6.6.1 The badge must be worn visibly on all ALTAVE premises and sharing access badges is not permitted. Computers should be kept locked if the user is not present and using them, sensitive documents should not be visible on the desk, and doors should be locked.

6.6.2 Visitors must be accompanied throughout their stay on ALTAVE's premises, ensuring that they only pass through permitted areas.

7 HEALTHY RELATIONSHIPS WITH EXTERNAL AUDIENCES

7.2 CUSTOMERS AND CONSUMERS

- Our customers and consumers must be given the best possible service, with quality, clarity, courtesy and agility, in order to respond to their interests, requests, complaints and suggestions appropriately, whether in person or via relationship channels.
- Only truthful information must be provided, and the strict confidentiality of customer and consumer information must be maintained.
- We respect the rights of the consumer established in current legislation.
- It is forbidden to offer, negotiate or promise anything to customers or consumers that does not comply with this Code and ALTAVE's objectives.

7.3 SUPPLIERS AND SERVICE PROVIDERS

- It is forbidden to negotiate or promise anything to suppliers or service providers that does not comply with this Code, with the objectives of ALTAVE and its companies, or by means of intimidation, embarrassment or manipulation of information.
- We repudiate slave, forced or informal labor, child exploitation and inhumane working conditions in our company and in the links in our chain.

- Suppliers or service providers must comply with legislation and occupational health and safety standards and undertake to comply with this Code of Ethics and Conduct in their commercial relations with ALTAVE, just as we must seek to respect the Code of those with whom we negotiate.

7.4 COMPETITORS

7.4.1 Relationships with professionals from competing companies must be respectful in order to establish healthy competition. It is forbidden to disseminate misleading information about competitors, espionage, theft of information, exchange of confidential information or any illegal act of unfair competition.

7.4.2 All proposals and/or the conclusion of business on behalf of ALTAVE and its companies must strictly comply with legal regulations and be aligned with the strategic objectives of ALTAVE and its companies. Employees involved in these activities are responsible for ensuring compliance with all relevant laws and policies and must seek the approval of the relevant department managers or the Committee before finalizing any contract agreement.

7.5 CLASS ASSOCIATIONS AND ENTITIES

7.5.1 We recognize the role of legally constituted associations and trade bodies, following their initiatives and practices, and are always willing to engage in dialogue in any situation involving ALTAVE's business, always aiming for a solution that suits both parties.

7.6 PUBLIC OFFICIALS

7.6.1 Relations with public officials must be established with integrity and transparency. It is unacceptable to promise, offer or give, directly or indirectly, any financial or non-financial advantage of any kind to a public official or to a third party related to them, by reason of their function, whether or not with a view to obtaining any favor or expectation of favor.

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7.6.2 The actions of any supervisory, regulatory or collection bodies or entities must be respected, and the information must be made available by the responsible areas whenever requested and within the strict legality and timeframe.

LEARN MORE: Examples of positive relationships with public agents include, **but are not limited to:** technical discussions, participation in study forums, seminars, working groups, participation in tenders, as long as they adhere to the applicable legislation in each country.

7.7 Press

7.7.1 Any employee or representative who is not a designated spokesperson is prohibited from making statements, granting interviews, presenting or disclosing any information on behalf of ALTAVE or its companies to the press. All contact with journalists, whether in person, by telephone or in virtual environments on behalf of ALTAVE, must be handled exclusively by these designated spokespersons.

7.7.2 Invitations for statements or interviews that have nothing to do with ALTAVE, nor link the professional's public image to ALTAVE or its companies, can be accepted by mentioning that it is a personal opinion. Spokespeople, on the other hand, are prevented from giving their personal opinions in any situation, as they are public figures who directly represent ALTAVE or its companies.

8 SOCIAL RESPONSIBILITY

8.2 DONATIONS AND SPONSORSHIPS

8.2.1 Donations of funds, products or services to public or private entities, or sponsorships on behalf of ALTAVE, must be made transparently and recorded appropriately.

8.2.2 Any charitable contribution, support, donation or sponsorship aimed at influencing business decisions in order to obtain advantages or personal benefits of any kind is prohibited.

8.2.3 ALTAVE is prohibited from donating to electoral campaigns or political parties. Donations of a political nature made by professionals on a personal basis to candidates or parties must not be made in ALTAVE's name.

8.3 SOCIAL ACTIONS

8.3.1 Investment in social, environmental, sporting or cultural projects must be guided by the real demands of the communities, in line with ALTAVE's purpose and values. Partnerships must not be entered into in the social field that could influence or compromise ALTAVE's image and/or professional relations.

9.0 COMMERCIAL COMPLIANCE

In compliance with the principles of integrity and commitment to legality that govern our activities,

ALTAVE maintains a strict commitment to commercial compliance to ensure that all international trade activities comply with applicable laws, regulations and standards. This includes, but is not limited to, customs laws, export control laws, sanctions and trade embargoes. ALTAVE undertakes to do the following:

Compliance with Commercial Laws: ALTAVE will conduct its export, import and trade activities in strict compliance with applicable international and national trade compliance laws. This includes adherence to all laws governing the export and import of goods, services and technology, as well as compliance with sanctions and embargoes imposed by the competent authorities.

Licensing and Authorization: ALTAVE will obtain all necessary export and import licenses, permits and authorizations before proceeding with any transaction requiring such documentation. The company will ensure that all its products, services and technologies are correctly classified in accordance with applicable trade regulations.

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Due Diligence and Screening: ALTAVE will conduct thorough due diligence and screening processes to ensure compliance with trade laws. This includes screening customers, suppliers and other third parties against watch lists provided by the government to prevent unauthorized transactions, when necessary.

Training and Awareness: ALTAVE will provide regular training to its employees and relevant third parties on trade compliance issues. This training will aim to raise awareness of legal requirements and the company's policies and procedures relating to trade compliance.

Reporting and Violation Management: Employees and third parties are encouraged to report any suspected violation of trade compliance laws or company policies through the established communication channels. ALTAVE undertakes to investigate all complaints promptly and to take appropriate corrective measures when necessary.

Record keeping: ALTAVE will keep accurate and comprehensive records of all international business transactions for the period required by applicable laws. This includes license records, declarations, shipping documents and due diligence efforts.

CODE OF CONDUCT MANAGEMENT

The guidelines of this Code must be followed in all the company's activities. However, there may be situations where these guidelines are not enough. In such cases, employees are encouraged to consult their manager or the Compliance Committee to ensure that decisions are in line with ALTAVE's values and legal compliance. Use your circumstances, your personal talent, creativity and ability to initiate innovations on behalf of ALTAVE, but always with care, can help you make decisions, always assessing the risks and consequences of your actions.

DECISION-MAKING

- If in doubt, before proceeding with a decision or action, question yourself: Is my conduct in line with the company's interests and values?
- Am I sure I can explain that I did the right thing?
- Does my conduct serve as an example to my coworkers?
- Does my conduct comply with current legislation and regulations? What about existing internal policies? Considering all the information available, have I made the best possible decision?
- Have I assessed the risks involved, and is my decision the right one for the company?

- If you answer yes to all these questions, it is a strong indication that your attitude is in line with and contributes to strengthening integrity at ALTAVE.

Negative responses are warning signs that the decision or activity in question is inappropriate. If in doubt, always ask your **manager** or the *Compliance department* first.

[!] We value attitudes of integrity. Errors must be dealt with honestly, so always notify your manager as soon as possible so that deviations do not worsen, and the causes are corrected.

NON-RETALIATION POLICY

We value transparency, which is why we encourage communication and do not accept retaliation against anyone who, in good faith, reports what they believe to be a violation of the Code, laws, regulations or internal policies; cooperates by providing truthful information or participates in an investigation; raises doubts about the content of the Code, conduct or decisions; makes suggestions, compliments or other contributions. Retaliation is a violation of the Code of Ethics and Conduct. Any cases of retaliation must

be reported through the secure and confidential communication channel, which guarantees the anonymity and protection of the whistleblower.

CONSEQUENCE MANAGEMENT

VIOLATIONS

Conduct not in line with the items described in this Code, practiced by any professional to whom it applies, are violations subject to penalties.

If you are asked to do something that does not comply with this Code, laws, regulations or ALTAVE's internal policies, try to clarify this with the person asking. If the requester insists, inform their **manager** or the **communication channel** directly.

Changes to the Code of Ethics and Conduct are approved by the **Compliance Committee**.

PENALTIES

Violations of the Code of Ethics and Conduct are subject to penalties such as:

- o Warnings, suspensions, dismissals without fair cause or with fair cause;
- o Termination of contract, severance of future commercial and/or partnership relationships;
- o Legal action in accordance with the law.

This Code does not cover all conduct related to professional activity, so it does not restrict ALTAVE to applying penalties guided by current legislation and regulations.

COMMUNICATION CHANEL

The guarantee of compliance with the Code of Ethics and Conduct is a good understanding of its principles and guidelines through reading, reflecting and seeking guidance in case of doubts preventively, i.e. before errors or deviations occur.

Doubts about the application of conduct or the interpretation of this Code can be clarified with **managers** or directly through the communication channel made available by ALTAVE's **Compliance Committee**, made up of members of the areas: People & Culture, Information Security, Administrative and Strategic Execution, which is also responsible for updating and disseminating this Code, and for receiving complaints, suggestions or compliments to improve its content.

Acts, facts, concrete practices or suspected violations of any item in the Code of Ethics and Conduct must be reported through the same channel, available to all our professionals and external audiences.

Everyone has a responsibility to protect the company against any deviations that become known, even if they seem insignificant. Therefore, if you identify situations that may constitute non-compliance,

it is essential that you report them to the Whistleblowing Channel quickly, honestly, sensibly and responsibly. Detail any actions or practices that are not in line with the guidelines of this Code, internal company rules or current legislation.

Our communication channels are secure and reliable, ensuring the anonymity of the whistleblower and the confidentiality of the information provided. We promote an environment that protects against any form of retaliation for those who, in good faith, report irregularities.

Forms of contact:

8.3.2 *Complaint form available on the website* www.altave.com.br

8.3.3 *Email for questions:* compliance@altave.com.br

[!] Any suspicion or violation of the Code of Conduct must be reported immediately. Failing to report a known violation, failing to cooperate with an investigation by lying when answering questions or filing a false report in bad faith, whether to harm another person, gain an advantage in a personal conflict or for any other reason are violations of the Code of Ethics and Conduct.

COMPLEMENTARY DOCUMENTS

Internal Regulations with detailed conduct specific to each business or location must always be in line with the essential and sovereign guidelines of this Code of Ethics and Conduct.

TERM OF ADHESION AND COMMITMENT



TERM OF ADHESION AND COMMITMENT TO ALTAVE'S CODE OF ETHICS AND CONDUCT

I hereby declare that I have received ALTAVE's Code of Ethics and Conduct on this date and that I am aware of all its contents and the implications in the event of non-compliance.

I undertake to comply fully with the principles and guidelines of conduct described in this document, and to use the communication channel responsibly and in good faith.

Corporate Name (in block letters):_

CNPJ [National Registration of Legal Entities]:

Address: