

CODE OF **ETHICS** & **CONDUCT**

A MESSAGE FROM **MANOEL TRABUCO**

Our company specializes in innovation and digital transformation consulting, as well as solutions that integrate systems, processes and people. That's why we align our key corporate strategies with a team of highly competent professionals who work daily to make everyday life easier for companies and people.

Our reputation and quality are the most important assets we have to offer our clients and employees. This Code of Ethics & Conduct establishes the ethical principles and standards of conduct that guide our relations within and outside SIS Innov & Tech, which must be followed by of all our managers, employees and service providers.

SIS' mission is to be a benchmark in providing integrated solutions with ethics, transparency, social responsibility and quality of life for all of our stakeholders. Thus, we strictly adhere to our philosophy of integrating technology, processes and people on a daily basis!

We strive to base our business on the values we believe in, which is why we develop relationships with employees, partners and suppliers with respect, cordiality and efficiency. We are therefore committed to acting in accordance with ethical principles, transparency, human appreciation, innovation, quality and commitment, all to build sustainable partnerships.

Our individual commitment to the principles and values described in this code will ensure that SIS conducts operations and improvements within the market's good governance practices.

I would like to thank everyone for their care and commitment to these essential principles so that we can grow more and more within the tech world.

Best wishes,

Manoel Trabuco
CEO

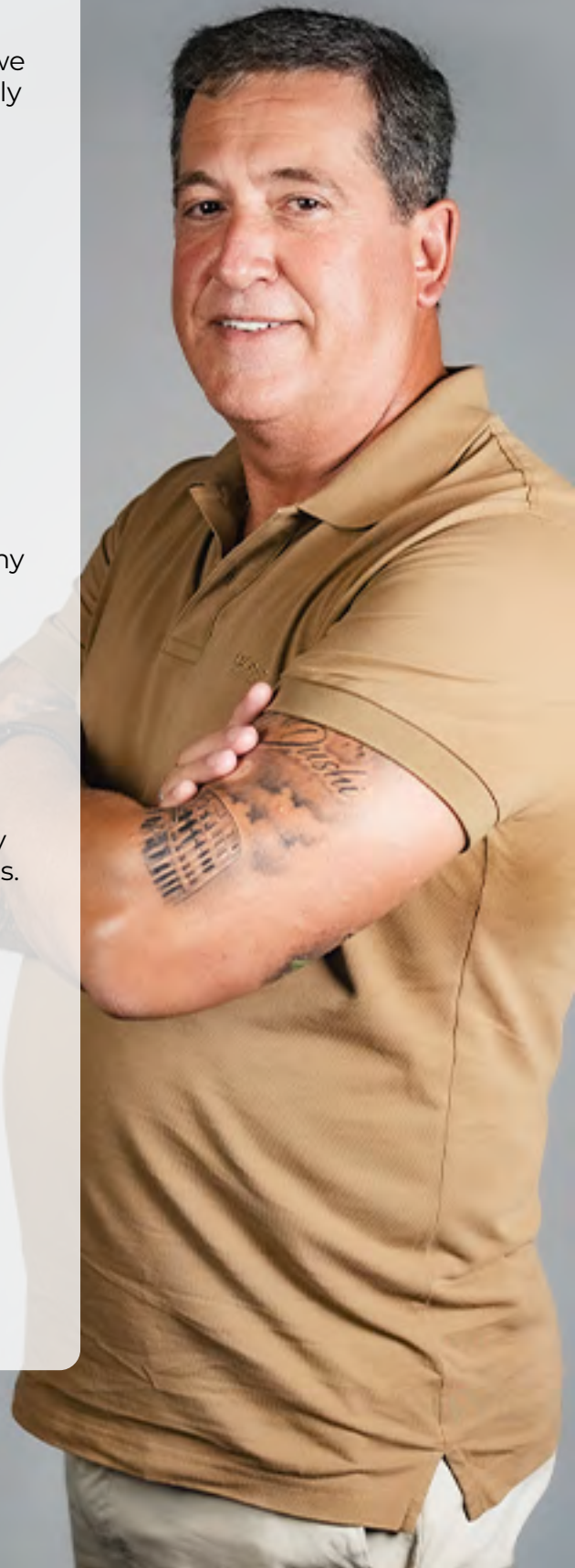


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1. OBJECTIVE

SIS conducts all its internal and external activities on the basis of this Code of Ethics & Conduct (“Code”). The purpose of this Code is to ensure that the day-to-day conduct and practices of all public acting on behalf of SIS, as well as our partners, are in line with our values and what we believe is right.

“...ensure that the day-to-day conduct and practices of all public acting on behalf of SIS, as well as our partners, are in line with our values...”

By disseminating this Code, we hope that managers, employees, suppliers and partners can adopt a uniform standard of conduct based on the values we share. The following are SIS values:

- **Ethics**
- **Transparency**
- **Human appreciation**
- **Integration**
- **Innovation**
- **Quality**
- **Commitment**

This Code should be used to guide all our actions, and in case of doubt, the conduct that best reflects SIS’ values.

This Code does not cover all the topics to which it refers, with its reading being complementary to all other SIS policies.

1.1. Scope:

All SIS employees, partners, contractors and suppliers must conduct themselves in accordance with this Code. This means that all individuals or companies with whom SIS has dealings must comply with the conduct set out here, and are subject to the consequences of noncompliance.

1.2. SIS integrity:

This Code is included in SIS’ integrity program, which consists of various practices aimed at respecting people, the law and SIS’ values.

This Code has been approved by SIS’ C-Level and must be observed and applied in all relationships and conduct to which SIS is a party. The Code must be made available to all SIS employees, suppliers, contractors, managers and partners at the beginning of their formal relationship with SIS.



The updated version of this Code will be **available on the SIS Portal**, on the SIS Website, and on the Internal Communication Platform - Konviva.



The Code Adherence Agreement **must be signed by all employees** and all contracts with suppliers must expressly provide for a commitment to comply with the Code.

2. GENERAL PRINCIPLES

The conduct of SIS employees, contractors, suppliers and partners, regardless of their hierarchical level, type of relationship, or the amounts involved in the transaction, must always be guided by the utmost respect for people, the law and SIS' values.

In practice, we want to ensure that SIS' actions, in all of its dealings, are guided by the following principles:

ETHICS IN RELATIONSHIPS AND
CONDUCT

TRANSPARENCY

DIVERSITY

HUMAN APPRECIATION AND
QUALITY OF LIFE

2. GENERAL PRINCIPLES



2.1. Ethics in relationships and conduct:

We're aware that the word "ethics" can have a very broad concept. However, when we refer to ethics, we mean that SIS develops all its relationships and acts on the basis of actions that express what is fair, right and honest.

In practice, this means that we don't get involved in dealings whose purpose is exploitation, or that result in the generation of undue profits. We always act by observing the correct conduct from the context in which it is inserted, and by observing all the rules and precepts pertinent to each of the areas in which we operate.

SIS does not promote or tolerate any dishonest or unfair behavior, always using in its practices, criteria that value human beings, the business environment and society.

We demand the same commitment from our Partners, Providers and Suppliers in all of our dealings. Whenever, while conducting business, regardless of its phase or the financial amounts involved, SIS employees identify signs or evidence of ethical deviations, whether in conducting the matter or in the intended purpose, they must report this situation through the Whistleblower Channel provided for in this Code, and terminate any relationship until their immediate manager and the SIS Compliance Department have given their consent.

SIS also reserves the right not to initiate, as well as terminate, any relationship with individuals or organizations that have a negative track record with the market, or are currently involved in situations that may affect SIS' image negatively. To this end, SIS will carry out, whenever it deems necessary, all checks and validations in the process of hiring professionals and Partners.

"...we do not get involved in dealings with the purpose of exploitation, or that result in the generation of undue gains."



2.2. Transparency:

One of SIS' institutional values is transparency. This means that we conduct our relationships based on honesty, directness and giving everyone the necessary and sufficient amount of information.

In practice, we do not omit relevant information, we do not defraud or tamper with information, and we bring to the attention of the people responsible all the information we deem necessary.

This practice ensures that everyone we interact with has a correct and clear vision of our expectations, limitations, our capacity and our potential in each of our deliveries.

You must inform SIS, through your Immediate Manager, of any information that you deem sensitive and that may have an impact, even if positive, on SIS, as well as keeping a faithful, organized and accurate record of all the projects in which you are involved.

Commitment to transparency must, in any case, be balanced with care for confidential information, understood as that which concerns clients, strategic information, business secrets, and exclusively internal information. If you have any doubts as to whether any information is considered confidential, you should ask your immediate manager or the SIS legal department.

2. GENERAL PRINCIPLES

2.3. Diversity:

SIS believes that diversity maximizes results, and for this reason, does not tolerate discriminatory behavior, and expects



its Employees, Suppliers and Partners to act in the same way, guaranteeing equal conditions and competitiveness.

In practice, we must constantly seek to identify our biases, basing our decisions, whenever possible, on well documented criteria and objectives. Whenever it's necessary to make a decision based on subjective criteria, this decision should be made jointly in order to minimize the possible impact of conscious or unconscious biases.

SIS will review its processes and

policies periodically to ensure that discriminatory practices or procedures that could create unjustified advantages, or expand inequalities, are excluded.

All SIS Employees, Suppliers, Providers and Partners must respect and act to prevent any discriminatory acts regarding gender, origin, ethnicity, race, sexual orientation, beliefs, religious practices, political or ideological conviction, social class, people with special needs, marital status, age, among others.



2. GENERAL PRINCIPLES

2.4. Human Appreciation and Quality of Life:



SIS recognizes that people are at the heart of its priorities, and seeks to ensure this through a sense of human appreciation, providing quality of life for its Employees, Suppliers, Providers, Partners and Clients.



In practice, this means that we respect people's individuality, as well as recognizing that all of our employees, suppliers and service providers, Partners and clients have personal lives.

We recognize that, despite our commitment to our deliveries and to our clients, we all have the right to a balanced life, one that allows for rest periods, family life and the development of hobbies and private interests.



SIS will adopt, in all its dealings with individuals, the recognition of the dignity of the human beings in all of its aspects, and will always prioritize a comprehensive evaluation of each person's needs when making decisions.



SIS promotes the 360° program, which offers Employees actions that can improve their quality of life, in addition to constant meetups related to employees' personal and professional lives, it also offers partnerships and agreements with educational institutions, as well as actions focused on healthcare.



3. LABOR AND EMPLOYEE RELATIONS

SIS recognizes that its employees are a key part of its success. As a result, SIS adopts the above principles in all its dealings with its employees, ensuring an ethical and transparent relationship that values their individuality.

SIS employees include trainees, apprentices, registered professionals and SIS administrators, who are collectively referred to as Employees throughout this Code.

SIS strives for a physically and mentally healthy environment, adhering to good occupational safety and health practices, as well as providing its registered professionals with a health plan that enables employees to take care of their health, in addition to specific Mental Health Programs.

SIS complies with the labor legislation in force, guaranteeing Employees the rights to the fair payment of wages, paid vacation, and other rights provided for in the Federal Constitution, the Consolidation of Labor Laws and other applicable labor laws, and submits to the rules and collective bargaining agreements published by the trade union representing the professional category.

SIS values cordiality and informality among its Employees. However, Employees must behave respectfully, avoiding the use of expressions that may generate discomfort or offend. Expressions that relate to physical appearance, sexual orientation, condition or disability, religion or any other particular condition.

The above behaviors must be observed even outside the workplace, remotely or through technological means.

3.1. Respectful Conduct and Zero Tolerance with Abusive Behavior

Employees will be treated in a respectful manner, and acts that constitute or may be interpreted as moral or sexual harassment will not be permitted.

Moral or sexual harassment occurs both vertically (when it is committed by a direct or indirect superior), but also in horizontally (when committed by a co-worker or someone without direct hierarchy). Both forms are repudiated by SIS, and if identified, will be immediately investigated by the SIS Ethics Committee and penalized.

“... acts that constitute or could be interpreted as moral or sexual harassment will not be permitted.”

Sexual harassment encompasses not only direct physical contact, but any act of harassment, insinuation or indecent behavior.

SIS allows romantic relationships among its employees, but requests that such relationships be guided by respectful conduct, and that they be duly and immediately communicated to the Immediate Manager.

A blue-tinted photograph of two men in a meeting, looking at a screen. The man on the left is wearing glasses and a light-colored shirt, while the man on the right is wearing a dark shirt. They are both looking down and to the right, presumably at a presentation or document on a screen.

3.3. LABOR AND EMPLOYEE RELATIONS

If you have been a victim or have witnessed situations in which there's suspicion or evidence of moral or sexual harassment, this should be reported by means of the Whistleblower Channel, and all reports of this nature will be investigated.

If the above practices are found to have occurred, those involved will be penalized, and in the event of sexual harassment, SIS reserves the right to report the fact and all the evidence collected during the internal investigation procedure to the competent police authorities.

If SIS is found guilty of moral or sexual harassment caused by an Employee, the latter may be sued under the law for compensation for such damage.

4. RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS (“PARTNERS”)

SIS understands that its suppliers and service providers are an essential part of pursuing and guaranteeing the satisfaction of its Clients, and for this reason, we must observe the rules of the Code when dealing with our suppliers and service providers. In addition, we must ensure that all suppliers and service providers expressly adhere to the commitments of this Code and any applicable policies, as part of the supplier contracting process.



Suppliers are any type of company, irrespective of its legal form in which it is constituted, and is dedicated to offering any type of goods and services to SIS.



Providers are self-employed professionals, who operate in a legally organized manner, assuming the risks of the economic activity, offering specialized services that, at SIS' discretion, are considered strategic and relevant to its business.

The hiring of SIS Suppliers and Providers must take place solely on the basis of technical and objective criteria, in order to deal with real and budgeted needs, or duly authorized by the relevant board, following the guidelines of the Supplier Approval Standard and Service Provider Hiring Policy.

The Providers will be selected on the basis of the criteria in force for Hiring and Dismissing Providers, and will be subject to background

checks in order to verify adherence to the principles of this Code.

“The hiring of SIS Suppliers and Providers must take place exclusively on the basis of technical and objective criteria...”

SIS respects human rights and does not tolerate the practice or encouragement of child, slave or forced labor, and all other unacceptable forms of treatment of workers, and this principle applies to the relationship with all Suppliers, Providers and Partners.

Remuneration for SIS Suppliers, Providers and Partners will be based on acceptable market standards, and any significant price variation upwards or downwards must be justified in advance to the relevant board.

All relations with Suppliers, Service Providers and Partners must be formalized through written contracts, duly signed, and the contracts are subject to audits in a periodicity to be defined in its own policy.

Before entering into a relationship involving the **sharing of personal data or confidential information, a Confidentiality Agreement must be signed** by the Supplier, Provider and/or Partner. If in doubt as to whether a specific relationship requires a Confidentiality Agreement, SIS' Legal Department should

4. RELATIONSHIP WITH SUPPLIERS AND SERVICE PROVIDERS (“PARTNERS”)

be consulted.

Suppliers, service providers and partners **may not be hired** in situations where there is a conflict of interest, i.e. when the SIS Employee has at the same time a direct or indirect interest in the Suppliers, Providers and/or Partner and in the performance of their activities as an SIS employee.



Situations that constitute or may constitute a conflict of interest will be dealt with in the Conflict of Interest Policy. In these situations, such links must be reported to the SIS Executive Board and Compliance, before any contract is signed.

If there's any doubt as to whether a specific relationship constitutes a conflict of interest, the SIS Legal Department should be consulted.

In order to ensure impartiality and minimize interference in the objectivity of the dealings, the **acceptance of gifts, whether monetary or otherwise, is not permitted.** The rules restricting and/or permitting the receiving of gifts are set out in SIS' Anti-Corruption Policy.

The above concept includes the funding of courses, invitations to take part in events, workshops and seminars. In this case, however, such an invitation must be informed to SIS' Compliance Area for authorization of participation, and will be subject to the rules of SIS' Anti-Corruption Policy.



In order to avoid embarrassment, this rule must be communicated to SIS Suppliers, Providers and Partners in advance.

The acceptance of gifts, entertainment and hospitality, the value of which exceeds the allowed amount, must be reported to the Compliance Area for guidance on how to proceed.

5. RELATIONSHIP WITH CLIENTS AND PROSPECTS

SIS' main mission is to satisfy its clients and expand its business.

Clients are companies with which SIS already has a formal business relationship.

“Prospects are companies with which SIS is still in the relationship-building phase, without any formalization of the contract.”

The relationship with each and every client will be based on SIS values, this Code, and the applicable Policies.

SIS conducts its business on the basis of transparency and reliability, not making false statements or making commitments it knows in advance it will not be able to comply with.

The relationship with all clients must be based strictly on the documentation related to the project, such as, but not limited to, the RFI - Request for Information, RFP - Request for Proposal, Commercial Proposal, Contract, etc.

The services must be provided using good practices and the best techniques available, and in the event of any doubts, the Employee or Provider must report to their immediate Manager.

Commitments made to clients regarding deadlines, form and results must be honored, or in the event of proven and

irremediable impossibility, must be communicated in advance to Clients.



All SIS Employees, Suppliers, Partners and Providers must treat all Client information, to which they have access, as confidential, unless it has

been expressly and formally informed of the public nature of the information, strictly observing the SIS Information Security Policy.

Also, SIS will not offer its Clients and/or Prospects gifts and advantages whose market value is higher than R\$ 200.00 (two hundred reais).



For clarification purposes, a gift is understood as being any gain or advantage in the form of goods, services or cash that is offered, regardless of their motivation. The following items are excluded from this definition: day planners, pens (as long as they aren't luxury or high-value items) and squeeze water bottles, since these items are common market practices.



6. RELATIONSHIP WITH PUBLIC AUTHORITIES AND ANTI-CORRUPTION PRACTICES

SIS recognizes the obligation of the Laws and the importance of an impersonal and ethical relationship with all national and foreign Public Administration bodies at all levels, whether at the municipal, state or federal level, and regardless of whether they are part of the Executive, Legislative or Judicial branches.

Any Public Agent, understood as anyone working for or on behalf of a Government Entity, as well as any candidate for political office, leader or employee of a political party, or any political party, must be treated exclusively under the terms of this Code and the legislation in force, with no other form of treatment being allowed other than that expressly permitted or not prohibited by law.

SIS has an Anti-Corruption Policy which should be consulted every time we deal with any Public Agent, and in the event of any doubts, you should contact the SIS Legal Department.

SIS also maps all its Employees who are related to public office or direct or collateral relatives, up to the second degree, who are involved in public office.

6. RELATIONSHIP WITH PUBLIC AUTHORITIES AND ANTI-CORRUPTION PRACTICES

SIS does not accept any of the following conducts to be carried out by any of its Employees, Suppliers, Providers or Partners:



- **Promising, offering or giving, directly or indirectly, an undue advantage** to a Public Agent, or to a third party related to them.
- **The proven financing, funding, sponsoring or in any way subsidizing the practice** of the illegal acts provided for in Law 12.842/13 and Decree Law 8.240/15.
- **The proven use of a natural or legal person to hide or conceal their real interests** or the identity of the beneficiaries of the acts carried out.
- **Interfere in the investigative or inspection activities** of public bodies, entities or agents; or interfere in their activities, including within the scope of regulatory agencies and supervision bodies of the national financial system.

If SIS participates in any public tenders or contracts with the public administration, **the following practices are totally prohibited:**



- **Frustrate or defraud, by means of an arrangement, agreement, or any other expedient,** the competitive nature of the public bidding procedure.
- **Remove or seek to remove a bidder** by means of fraud or offering an

advantage of any kind.

- **Prevent, disturb or defraud** any act of a public bidding procedure.
- **Defraud public tenders** or contracts arising from them.
- **Create, in a fraudulent or irregular manner,** a legal entity in order to participate in a public tender or enter into an administrative contract.
- **Obtain undue advantage or benefit,** by means of fraud, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the public tender invitation or in the respective contractual instruments; or
- **Manipulate or defraud the economic and financial balance** of contracts entered into with the public administration.



6. RELATIONSHIP WITH PUBLIC AUTHORITIES AND ANTI-CORRUPTION PRACTICES

If the Employee witnesses or has knowledge of any act in which there's suspicion or evidence that any of the above conducts are being practiced, it must be reported immediately to the SIS Compliance Department.

The Employee is also authorized to end any meeting, whether face-to-face or remote, as well as any dealings in progress, if any collusion or the purpose of engaging in any of the conducts listed in this section becomes evident.

In addition to the internal sanctions applied by SIS, it **reserves the right to bring the following to the attention of the investigative bodies** for the appropriate measures.

7. COMMUNICATION AND WHISTLEBLOWING CHANNEL

SIS understands that it is essential to provide efficient means of communication, which should be used whenever you have a question about how to act in a specific situation, or if you need to clear up any conceptual doubts about any topic related to this Code or any of our Policies.

Everyone who has dealings with SIS should also use the Whistleblowing Channel whenever they are a victim or become aware of a situation that could be considered a breach of the Code or the Policies.

Report practices that do not comply with the Code, especially those that refer to violations regarding the item on Relations with Public Authorities and Anti-Corruption Practices is not only a possibility, but a duty of all SIS Employees.

The Employee, Supplier, Partner, Provider or Client does not need to carry out any prior investigation or even be certain about any practice before using the Whistleblowing Channel. The investigation will be conducted by the SIS Ethics Committee.

All complaints will be treated as confidential, so there's no need for the whistleblower to identify themselves in a definitive manner, but, depending on the case, additional information might be required, which will be requested via the platform used by the Channel.

All complaints made will be investigated and responded by the SIS Compliance Department via the Channel platform within no more than 7 (seven) days. If it's not possible to conclude the result of the investigation within the above timeframe, the investigation will be continued and the reasons for non-completion will be documented.

“...Reporting practices that do not comply with the Code,... is not just a possibility, but everyone's duty...”

Any action that hinders or prevents a report from being made is not permitted, nor is any act of retaliation in any form against the Employee who has made a complaint, even if, after the result of the investigations, the content reported is found to be unsubstantiated, in accordance with SIS' Policy for Whistleblower Protection in Good Faith.

Complaints must be made through the official SIS Whistleblowing Channel, which can be done anonymously or not, via the WhatsApp channel or web platform, by accessing the link below:

Access the link via QR Code as well





8. CONSEQUENCES AND PUNISHMENTS FOR NONCOMPLIANCE WITH THE CODE

SIS will take all possible measures to ensure that any practice or conduct that doesn't comply with this Code is stopped. In the event of any complaint, the people involved may be removed from their duties during the investigation phase.

At the end of the investigations, if the violation of the Code is proven, SIS may apply the appropriate penalties, which, depending on the seriousness of the violation, may include the following:

- **Warning**
- **Suspension; or**
- **Termination with or without cause; or**
- **Termination of the contractual relationship.**

Notwithstanding the above punishments, considering SIS' commitment to always acting in cooperation with national or foreign public authorities, if the infraction committed represents a civil, administrative or criminal offense, it can be brought to the attention of the regulatory bodies and the competent public authorities.

A man with a shaved head, wearing a light blue button-down shirt, is sitting and looking down at a tablet device he is holding. The background is a soft, out-of-focus indoor setting with warm lighting.

9. MECHANISMS TO ENFORCE THE CODE

The Code of Ethics & Conduct is part of SIS' integrity plan and corporate governance practices, in such a way that all of its Policies, Manuals and other documents must reflect the values expressed herein. All materials published prior to the publication of the Code will be reviewed and, if necessary, updated in order to comply with the terms of the Code.

This Code **may be reviewed and updated on the basis of legislative updates** affecting any of its provisions or whenever the SIS Board of Directors makes a provision to this effect.

The Code will be available on the SIS Portal, in the documents area, and on the SIS - Konviva Internal Communication Platform, and will be made available to all SIS Employees, Partners, Suppliers, Providers and Clients, on its institutional website at <https://sis-it.com/odigo-de-etica-e-conduta>, as well as being attached to or cited in all contracts signed by SIS.


All SIS Employees and Service Providers will be trained in the content of this Code upon being hired and/or periodically.



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