



CODE OF CONDUCT

1. Mission

Innovate, Integrate, and rationalize business globally with the aim of raising the quality of life of people and companies.

2. Vision

To be the best global information technology services company through innovation, quality, and commitment of its professionals.

3. Principles

Customer Focus

- Exist depending on the Client.
- Putting yourself in the customer's shoes, we seek to understand your needs and exceed expectations.
- Prioritize actions and attitudes that value the customer.

People and Teams

- Respect the individual, encourage diversity, and value teamwork.

Make it happen

- Be proactive and find alternatives to overcome barriers and fulfill what was promised.

Ethic

- Act with honesty, transparency, and responsibility.
- Comply with the agreement.
- Simplicity.
- Act in a practical and objective way.

Excellence

- Passion for always doing the best.
- Learn from mistakes and value success.
- Stimulate innovation and continuous improvement.
- Optimize the return on all investments made.

4. Alignment Object

This code is intended to be an institutional reference for the conduct of all employees, partners, and suppliers of L8 GROUP S/A and its subsidiaries.

5. L8 GROUP S/A employee conduct

The principles below confirm the importance of respect for the individual, ensuring equal treatment for all and the exclusion of any form of discrimination.

It is the duty of employees:

1. Respect the Law;
2. Always act in good faith;
3. Respect others regardless of color, race, sexual orientation, disability, sex, creed, or function;
4. Be honest;
5. Preserve our material (physical) or immaterial assets (the brand and distinctive signs);
6. Do not manipulate, distort, hide or misuse the information;





7. Avoid conflicts of a professional or personal nature, always seeking conciliation;
8. Never induce anyone to proceed contrary to this Code;
9. Seek clarification on any doubts regarding the content of this code;
10. Cooperate with any investigation regarding possible violation of this Code;
11. Denounce, report the violation or suspected violation of this Code;

5.1. Respect for others

Respect for others is essential for harmonious coexistence between employees, customers, and partners.

L8 GROUP S/A does not admit or tolerate:

12. The use of child labor and work under the age of 18, except as an "apprentice" (so considered, in the form of the applicable special legislation in force);
13. The exploitation of forced or slave labor, whether paid or not;
14. Illegal embarrassment, intimidation, sexual harassment, psychological or physical aggression in the employment relationship;
15. Any and all forms of discrimination or prejudice whether by age, race, color, belief, nationality, sexual orientation, political option or related to disability or physical or mental limitations;
16. Possession and/or consumption of narcotic substances or alcoholic beverages during the working day or at the service of the company;
17. Violence any aggressive or illegal behavior such as, threat, insult, moral or sexual harassment, extortion, theft, misappropriation, or any conduct that may affect the personal safety or the assets of L8 GROUP S/A.
18. Possession or use of firearms or bladed weapons at the company's facilities, except in the case of partners or collaborators able and legitimate to carry them that performs a security function and that is expressly authorized by the Board of L8 GROUP S/A;

5.2. Equal opportunities

L8 GROUP S/A is a company committed to providing career and work opportunities on an equal basis to all employees, according to their performance, skills, and aptitudes.

Employees must be treated according to the skills required by their function, and all decisions will be free from any form of discrimination, whether by sex, age, color, race, creed, nationality, or personal preferences.

5.3. Workplace

L8 GROUP S/A employees must observe and comply with all laws and regulations regarding occupational health and safety, respecting L8 GROUP S/A's warnings and recommendations.

To enable a harmonious and risk-free work environment, employees must inform their superiors, or through the means of communication provided by L8 GROUP S/A, any situations that may directly or indirectly affect the health of any person or property of L8 GROUP S/A.

6. Relationship with customers





In order to satisfy customers' expectations, the Company considers essential:

- serve customers with efficiency, transparency, and courtesy;
- ensure the quality of your products or services;
- watch over the interests of clients;
- respond quickly to customer complaints and requests;
- conduct periodic surveys in order to assess the efficiency of customer service channels;
- analyze customer criticism in the permanent quest to improve the quality of its products or services.

7. Relationship with partners

When selecting partners, L8 GROUP S/A seeks those who offer: the best technical quality, innovation, competitive costs, terms, and conditions suitable for the purpose and ethical posture, thus guaranteeing the maximum satisfaction of its customers.

Considering that it is of fundamental importance for L8 GROUP S/A that its partners share the same values contained in this Code, employees must select those who have the profile most suited to the needs of L8 GROUP S/A, taking into account the summarized values in this Code.

The relationship policy with partners consists of:

- Grant equal opportunities to all;
- Act with transparency and impartiality;
- Encourage them to adopt practices that respect and preserve the environment;
- Disclose the provisions of this Code and demand compliance;
- Maintain a respectful, lasting and trusting relationship;
- Demand the constant improvement of the quality and productivity of its processes and products;
- Do not infringe on the intellectual property of others;
- Do not accept partners who do not comply with current legislation, especially the one that deals with the use of child labor, forced, involuntary and compulsory labor.

8. Relationship with Government and Political Bodies

The establishment of relations with public agencies should only be carried out by areas or by persons specially designated by L8 GROUP S/A. Such relations must be supported by legality and will be established with the highest levels of transparency, in compliance with Law 12846/13 and in particular the Corporate Policies for Preventing Corruption of L8 GROUP S/A.

All L8 GROUP S/A employees and partners have a duty to act honestly, transparently and with integrity in contacts with public sector bodies and/or entities related to the activities of L8 GROUP S/A.

In relations or contacts with public agents, L8 GROUP S/A does not authorize:

- the granting of advantages and/or privileges of any kind or modality, depending on the position held;
- that contributions are made or government officials, political parties or candidates are presented, except under the conditions defined by law and provided that it is authorized by the Chief Executive Officer;
- support for participation in political and/or party campaigns or activities using the name and prestige of L8 GROUP S/A, without the action being duly authorized by the CEO;

Any contact, contribution or support of an institutional nature involving an agent, agency or public





entity must be authorized by the Chief Executive Officer.

9. Relationship with competitors

L8 GROUP S/A believes that fair competition is a constant stimulus for innovation and the pursuit of excellence in the quality of its products and services.

For L8 GROUP S/A, competitiveness should be exercised based on the ability to negotiate with partners, on technical competence, on the agility of its team and on the ethical management of its business.

10. Regarding private interests

The following conducts are disapproved by employees, administrators and partners, thus, being considered such conduct as very serious absences for labor, contractual and corporate purposes and effects:

- use the prestige of the position or name of the company for their own benefit or that of others;
- develop, in parallel with your work in the company, directly or indirectly, competing activities and/or complementary to L8 GROUP S/A's business, without its express authorization, even those of an academic nature
- being a holder or partner of a company or any economic activity whose development may result in a conflict of interest with L8 GROUP S/A;
- use confidential information from L8 GROUP S/A for the purpose of promoting its own or third parties' business.

11. Regarding relatives of employees

A L8 GROUP S/A does not accept or authorize:

- The hiring of relatives in a straight or collateral line, without prior assessment of the human resources area and competition on equal terms with other candidates;
- Relatives are considered for the purposes of applying this Code: spouse and consanguineous in the first line of kinship.

12. Regarding gifts, favors and other amenities

The acceptance of gifts, invitations in general and gifts by employees, Directors and Vice-Presidents of L8 GROUP S/A must strictly comply with the provisions below:

- They may be received as long as they are not frequent and excessive;
- Don't be motivated by the attempt to influence the decision to hire the supplier;
- They do not go beyond the common courtesy normally associated with business practice and do not subject the person who accepted them to being a debtor of obligations to a third party, with a supplier, customer or other business partner who works or wishes to work with L8 GROUP S/A;
- Only promotional and/or institutional gifts can be accepted, with no commercial value, whose added value does not exceed the estimated amount of R \$ 150.00 (one hundred and fifty reais). Above this value, the employee, for the sake of transparency and impartiality in professional relations, should send him / her to the Human Resources area so that he / she is in charge of donating, drawing or possibly, rewarding an exemplary employee;
- Invitations made by customers, partners or competitors to participate in events, presentations, visits, courses, lectures and similar activities may be accepted, as long as they are in line with the company's interests and approved by the Director of the area and the Chief Executive Officer;



- The objects received as a prize, gifts and gifts that directly or indirectly represent distinction or homage to L8 GROUP S/A must be sent to the Human Resources area, upon receipt;
- Offering or receiving cash offers for any reason is prohibited;
- Drinks or meals during the business procedure, if they are not frequent and not excessive; and, recreational excursions and tickets to cultural, theatrical or sporting events, provided that they are not frequent, that the costs are not excessive, that the employees are on their free time and have permission from the Director of the area.

13. Donations and sponsorships

Sponsorships and donations must be linked to the institutional and marketing interests of L8 GROUP S/A, in order to enhance the corporate image of L8 GROUP S/A and take into account the benefits generated to the community.

Donations and sponsorship can only be made with the approval of the members.

14. Information Security and Intellectual Property

Employees and partners must use any information and especially confidential information that is revealed to them for the sole purpose of meeting the interests of L8 GROUP S/A.

Confidential information is considered: industry secrets, processes, products, formulas, technologies, "know-how", inventions, improvements, electronic systems, copyrights among others, balance sheets, financial results of L8 GROUP S/A not yet disclosed, potential business, market analysis, prices, costs, contracts, plans, drawings, name of distributors, resellers, list of suppliers, ideas, algorithms, agreements, among others that are characterized as "confidential" by L8 GROUP S/A.

The assignment or disclosure by partners and collaborators of confidential information belonging to L8 GROUP S/A or to third parties, by virtue of a confidentiality agreement, will only be allowed with the authorization of L8 GROUP S/A and under the terms of the contractual instruments signed between the parties .

It is reproachable by L8 GROUP S/A:

- the disclosure or use of confidential, privileged and / or relevant information from L8 GROUP S/A in order to obtain a personal advantage or for the benefit of a third party;
- the disclosure of unofficial information (rumors) of any kind;
- conducting lectures, seminars or academic work on L8 GROUP S/A processes and business, without formal authorization from the area's board of directors;

15. Company assets and resources

The assets and resources of L8 GROUP S/A made available to employees must be used with care, efficiency and in order to protect their value, exclusively for professional purposes, respecting the law and ethical principles.

The assets and resources include: equipment, furniture, email, internet, telephone, etc.

The following behaviors are reprehensible and, therefore, subject to disciplinary action by L8 GROUP S/A:

- damage the property owned by L8 GROUP S/A;
- defame employees, partners or third parties in general;





- use the email tool to send mass messages (spam), with content that is offensive, discriminatory or contrary to the Law;
- store personal and/or third party files in network folders, use languages, images or files that are offensive, immoral or induce any form of discrimination;
- use resources from L8 GROUP S/A, such as office supplies, meeting rooms and communication tools (email, telephone, internet, etc.), for: personal purposes, among others, for collecting signatures on lists or donations, sale or promotion of products that conflict with or with the interests of L8 GROUP S/A;
- access pornography, immoral or illegal sites;
- use email tools to threaten or harass employees;
- use third-party emails to send messages;
- filming or photographing the premises of L8 GROUP S/A (factory or offices), without prior and express authorization from Patrimonial Security (GRC);
- smoking inside the company's facilities, except in places expressly authorized by the Company for that purpose;
- remove from the company any equipment or material that is owned by him, without written authorization from his superior, always observing the procedures defined by Patrimonial Security (GRC);

Access to any Internet site using the resources made available by the company is restricted to activities necessary for employees to perform their duties. The company reserves the right, at any time and without prior notice, to block or monitor the use of the Internet by employees.

16. Financial Information and Accounting Records

All operations and businesses carried out by L8 GROUP S/A are duly supported by the respective documentation.

All transactions must be immediately recorded in the company's official books and records, in strict compliance with the law and generally accepted accounting principles. These documents will be filed for the periods required by law.

17. Conduct Management

17.1. Conduct Committee

The L8 GROUP S/A Conduct Committee is formed by the partners. This Committee has the function, among others, of evaluating and deciding on infractions committed by company employees to this code and to the other Policies of L8 GROUP S/A.

Senders will have their contacts kept strictly confidential, and their identity is not known to anyone other than the Committee members.

17.2. Complaints

Employee complaints, whether anonymous or not, can be made to the channel below provided by L8 GROUP S/A: legal@l8group.net

The whistleblower's identity will be preserved by L8 GROUP S/A.

18. Approval, Term and Disclosure

This Code becomes an integral part of the contracts of the employees of L8 GROUP S/A, upon signature of the Term of adhesion.

The Code will be made available on L8 GROUP S/A's intranet and internet for periodic knowledge and reading by its employees.

ANEXX I



TERM OF RESPONSIBILITY AND COMMITMENT TO ADHERENCE TO THE L8 GROUP S/A ALIGNMENT CODE OF CONDUCT

I hereby declare that I have received, acknowledged the entire content, understood its content and agree with all the terms and conditions of the Code of Conduct Alignment and the Corporate Policy for the Prevention of Corruption of L8 GROUP S/A.

I commit to:

a) comply with the provisions of the L8 GROUP S/A Code of Conduct Alignment and the Corporate Policy for Preventing Corruption;

b) to report violations evidenced by the Code;

c) contribute to the investigation of possible violations.

Name:
Occupation:
Area:
Local:
Date:
Signature:

