

CODE OF CONDUCT OF ALLIED TECNOLOGIA S.A.



MESSAGE FROM THE BOARD OF DIRECTORS

With great satisfaction, we present the new version of the Code of Conduct of Allied Tecnologia S.A. ("Allied"). In its activities, Allied must always respect the laws and regulations that apply to it and repudiate any illegal or unethical practices.

This Code of Conduct reflects Allied's values and its concern and commitment to fully comply with the applicable legislation, formalizing the standards of conduct and ethics that must be known and adopted by all its employees and related third parties, including business partners.

This version of the Code of Conduct results from an extensive review carried out by various areas of Allied, approved by the Board of Directors at a meeting on [date], becoming effective as of that date.

We want to thank everyone for their support and dedication in yet another successful effort to ensure that our Code of Conduct remains up-to-date and consistent with the best compliance practices, guiding Allied's ethical and transparent relationship with society.

PATRICE ETLIN

Chairman of the Board of Directors

SILVIO STAGNI

Chief Executive Officer

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I.DEFINITIONS

1. DEFINITIONS

For purposes of this Code of Conduct, the following terms have the following meanings, whether singular or plural:

“Allied”: Allied Tecnologia S.A., its subsidiaries, and subsidiaries.

“Public Agents”: any person who, even if temporarily or without remuneration, performs a public function, works or holds a position in a Brazilian or foreign public body, results or holds a job in a company or institution controlled or administered by the government, represents or has a position in a political party, or are candidates for political office.

“Contributors”: All Allied employees of any hierarchical level, also including members of boards and committees, statutory directors, trainees, interns, and apprentices;

“Business partners”: suppliers and providers of goods and services, representatives, intermediary agents, attorneys-in-fact, technical consultants, brokers, external collaborators, distributors, and/or any other third parties acting on behalf, benefit, and/or interest of Allied.

“Undue advantage”: It is any advantage promised, offered, or given to a person, directly or indirectly, in exchange for or in anticipation of a benefit. Such advantage is not limited to cash payments but may include, for example, gifts, meals, entertainment, hospitality, discounts, and job offers.

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| SCOPE

All customers are essential to Allied, whether external or internal. We must exemplify service, integrity, and transparency in every contact and business established.

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**MISSION,
VISION,
AND VALUES**

3. MISSION, VISION, AND VALUES

MISSION	
	Bring the digital universe within everyone's reach.
VISION	
	Provide the best solutions for our customers.
VALUES	
	Prioritize the customer
	Focus on results
	Meritocracy
	Sense of urgency
	Respect
	Transparency
	Integrity

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GUIDELINES OF CONDUCT

4. GUIDELINES OF CONDUCT

WHY DO WE NEED A CODE OF CONDUCT?

This Code of Conduct provides the necessary guidance on how we should act on behalf of Allied, always respecting all laws and internal policies. We are all responsible for building the best possible working environment and maintaining Allied's good reputation in society and with its counterparts.

By defining the behaviors expected in conducting our business, this Code of Conduct puts our values and commitment to ethics and integrity into practice in everything we do. Thus, we minimize the possibility of conduct incompatible with what we believe or want for Allied.

LEADING WITH INTEGRITY

In addition to fulfilling their responsibilities as Employees, Allied's directors, directors, and managers have the fundamental role of setting an example and engaging the teams to disseminate a philosophy of honest and upright acting, sharing the guidelines of this Code of Conduct and strengthening compliance with all internal laws and policies.

4. GUIDELINES OF CONDUCT

ALLIED LEADERSHIP MUST ALWAYS:



(i) Valuing and encouraging the ethical actions of Employees;



(ii) Guidance on local laws and regulations;



(iii) Transmit accurate information under our internal policies;



(iv) Promote a cohesive and honest work environment.

MAKING THE RIGHT DECISIONS

Whenever an Employee is deciding on Allied business or activities, it is essential to think:

“May my conduct violate Allied's Code of Conduct or internal policies?”

“Is my conduct in conflict with my duties or responsibilities?”

4. GUIDELINES OF CONDUCT

"May my conduct be or appear unethical, or may lead to a violation of any law applicable to Allied's activities?"

"Could my conduct harm my reputation or Allied's reputation or assets?"

If the answer to the above questions is "YES," do not proceed further and immediately contact the Director of Compliance for guidance.

Collaborators can always contact their managers or direct leaders, or the Human Resources or Compliance Departments to obtain more information about the content of this Code of Conduct.

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OUR WORK ENVIRONMENT

5. OUR WORK ENVIRONMENT

5.1 COMMITMENT TO INTEGRITY

Allied is a company immersed in the digital universe. To carry out our activities with agility and precision, we rely on everyone's commitment to comply with the laws and regulations in force.

All Employees and Business Partners are part of this network of commitment to integrity.

5.2 DIVERSITY AND RESPECT

Respect is one of the essential pillars of our relationships. We do not accept discriminatory behavior based on race, color, gender, sexual orientation, health condition, special needs, political party position, age, nationality, religion, or any other state.

Allied supports: Fair and equal treatment for all, providing equal development opportunities. Everyone must contribute to an inclusive environment that values the plurality of ideas.

5. OUR WORK ENVIRONMENT

5.3 MORAL HARASSMENT AND VIOLENCE

Allied is committed to providing a safe work environment free from bullying and violence. Abusive conduct that offends the dignity of Employees is not tolerated. All reported behavior will be investigated, and if proven, the disciplinary measures provided for by law and in our internal policies will be applied.

WAYS TO IDENTIFY A SITUATION OF MORAL HARASSMENT

Examples:



(i) Situations in which the Collaborator is obliged to carry out tasks under threat dismissal or other punishments;



(ii) Embarrassment and verbal and physical offenses;



(iii) Act in such a way as to hinder or impede the work of others;



(iv) Criticize an Employee's work unfairly, diminishing its value;

5. OUR WORK ENVIRONMENT



(v) Threats, veiled or explicit, of reprisals, such as losing one's job.

5.4 SEXUAL HARASSMENT OR SEXUAL ABUSE

Situations of sexual harassment or abuse are characterized by unwanted verbal or physical behavior of a sexual nature (explicit or implicit) incompatible with professional relationships. Allied repudiates any practice in this regard and requires everyone to maintain an appropriate and respectful attitude, regardless of their hierarchical position.

WAYS TO IDENTIFY A SITUATION OF SEXUAL HARASSMENT OR SEXUAL ABUSE

Examples:



(i) Requests, suggestions, or invitations of a physical or sexual nature;



(ii) Display of content or material of a sexual nature;

5. OUR WORK ENVIRONMENT



(iii) Inappropriate comments about appearance, body, and sexual orientation;



(iv) Threats, veiled or explicit, of reprisals related to physical or sexual behavior

5.5 HEALTH AND SAFETY

Allied seeks to control risks related to health and safety within its facilities, with a commitment to providing a safe and healthy work environment for all. Each Employee is also responsible for observing and complying with the safety standards and practices that are part of their day-to-day work and applicable to their activities. With that in mind, we promote actions to remind everyone of the importance of well-being and health.

Learn about CIPA: Our Internal Commission for Accident Prevention, made up of a group of representatives from Allied and Employees, acts to prevent accidents at work and preserve the physical integrity of all.

5.6 HUMAN RIGHTS

We respect people and do not condone abuses or violations of human rights in any way. Allied does not support any enslaved person, child, degrading conditions, or involuntary, forced, or threatened work.

Allied Commitment: Our business has an extensive distribution chain. Therefore, we expect all our Business Partners to act with integrity, effectively combating any enslaved person/illegal labor conditions wherever they exist.

6.

CONFLICT OF INTERESTS

6. CONFLICT OF INTERESTS

Conflict of interest arises when the personal interests of our Employees or third parties related to them affect or may affect the ability to decide impartially and act in pursuit of Allied's interests.

We must all act with responsibility and transparency, always seeking to preserve Allied's interests, reputation, and assets, avoiding, in the exercise of our professional attributions, situations of potential, a real or apparent conflict of interest or concerns that may generate undue favoritism either personally or third parties to the detriment of Allied.

In operations and transactions with related parties and Business Partners, those involved must observe rules outlined in our internal policies, contractual clauses, and current laws to guarantee respect for ethics and equal and impartial treatment of the parties.

In the event of a potential, natural, or apparent conflict of interest situation, these must be promptly communicated to Allied's Compliance Department so that it can assess and take the appropriate measures.

Please note: Making decisions for your benefit or that of others to the detriment of Allied's interests goes against our principle of integrity.

A large, light orange number '7' is positioned on the left side of the page. To its right, there are several abstract, overlapping shapes in various shades of orange, creating a dynamic background. The text '7. PRESS STATEMENTS' is written in a bold, white, sans-serif font, with a vertical line to its left.

7. PRESS STATEMENTS

7. PRESS STATEMENTS

Often, statements or press releases are of an undetermined scope and/or may impact Allied's reputation and assets or even subject it to legal liabilities. Statements to any communication vehicle can only be made by people previously authorized by Allied, observing the internal policies on the subject.

In other words, if you have yet to receive express authorization from Allied, you must under no circumstances make any statement (oral or written) to the press on behalf of Allied. If you receive a request from the media to this effect, state that you are not authorized to make statements on Allied's behalf and immediately report this to Allied's Compliance Officer.

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**SOCIAL
MEDIA**

8. SOCIAL MEDIA

Allied respects its employees' privacy and freedom of expression but warns of the importance of responsible use of social media. All digital communication channels that allow the creation, publication and sharing of content and comments are considered social media for this Code of Conduct.

The internet is a public space, and everyone can freely share content if their publications do not violate norms, laws, and third-party rights. Before sharing any content (message, image, video, etc.) related to Allied, confirm that there is an authorization for publication and that the publication does not involve Allied confidential and/or strategic content (such as, for example, numbers, results not yet announcements, plans, and the like). If in doubt, do not share, and contact Allied's Compliance Department.

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ASSET PROTECTION

9. ASSET PROTECTION

Allied people rely on various assets to do their jobs, including brands, business strategies, information technology systems, electronic equipment, intellectual property, computers, corporate email accounts, motor vehicles, tools, financial resources, facilities, inventory, and supplies.

Everyone must care for, preserve, and adequately use Allied assets for business purposes only. Allied can monitor and inspect the correct use of its equipment and professional assets made available for its employees' benefit whenever it deems necessary.

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**RELATIONSHIP
WITH SOCIETY**

10. RELATIONSHIP WITH SOCIETY

Allied believes in the positive impact it can promote with its actions. We are committed to being a citizen company with integrity and trust and attentive to the responsibilities we must fulfill for society.

10.1. CARE FOR THE ENVIRONMENT

We act following current environmental laws and are committed to increasingly supporting the sustainable development of our businesses. Reducing environmental impacts is part of our commitment. Respect for the environment begins with our attitudes, and it is everyone's duty to responsibly use resources, including water, paper, and energy.

The background is a solid purple color. On the left side, there is a stylized bar chart with three vertical bars of increasing height from left to right. The top bar has a rounded top. To the right of the bars, a large, faint number '10' is visible in the background. The main text is centered in the lower half of the image.

RELATIONSHIP WITH THE MARKET

11. RELATIONSHIP WITH THE MARKET

11.1. CUSTOMERS

Our activities seek to promote the best solutions for our customers. Therefore, we value our relationships and believe everyone should be treated equally and honestly.

All customers are essential to Allied, whether external or internal. We must exemplify service, integrity, and transparency in every contact and business established.

11.2. SHAREHOLDERS AND INVESTORS

The relationship with shareholders and investors takes place through the Investor Relations area and must be based on transparent, timely, and equitable communication, so as to allow them to monitor its activities and performance.

Intending to help its shareholders and investors to make the best investment decisions, Allied seeks to comply with the best corporate governance practices and is committed to respecting current legislation, including the determinations of the Brazilian Securities Commission (CVM) concerning the disclosure of material facts and the quarterly disclosure of its results.

11.3. BUSINESS PARTNERS

Partnerships are essential to our business, and we work to make them beneficial to everyone involved. Therefore, we choose companies and people committed to our values, who act with integrity, respecting the legislation in force, especially the anti-corruption laws applicable to Allied's activities.

The selection and maintenance of Business Partners to provide services to Allied must be guided by technical, financial, and socio-environmental criteria and respect for applicable laws and regulations. The Collaborator responsible for hiring any Business Partner must ensure that the contractor has a good reputation and the necessary expertise and that he will receive values consistent with market standards.

For more information, consult the Business Partners Risk Management Policy.

#Please note: Our Business Partners must also observe the provisions of this Code of Conduct and other Allied policies.

11.4. FAIR COMPETITION

Competition ensures that markets operate competitively and efficiently, creating opportunities for choice and customer innovation. Allied believes in the importance of fair competition and is committed to developing proper and legal competitive practices based on the quality of our products and services.

We do not condone actions that imply or may result in violation of the economic order under the terms of the legislation in force, such as price fixing, abuse of dominant power over the market, cartel, tie-in sales, influence of uniform conduct, among others, which are strictly prohibited.

#Think about it: Collaborators must not engage in conduct that hinders fair competition, such as price fixing and market sharing, nor an offer, request, or exchange of confidential information with competitors.

FUSIONS AND ACQUISITIONS

Allied seeks to participate in mergers and acquisitions with companies that act with integrity and transparency and respect current legislation. With that in mind, our merger and acquisition processes must necessarily be preceded by proper due diligence and background check procedures, which include an adequate and detailed assessment of the information and history of a given company or individual involved in the transaction.

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RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

13. RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

13.1. PROHIBITION OF ACTS OF CORRUPTION

We do not tolerate corruption, bribery, fraud, or facilitation payments in our business, nationally or internationally, either by Employees or by our Business Partners. The practice of conduct prohibited by Law No. 12,846/2013 "Anti-Corruption Law" or international laws applicable to the business may lead to strict civil and administrative liability of Allied, either by Employees or its Business Partners.

THEREFORE, EMPLOYEES AND OUR BUSINESS PARTNERS ARE PROHIBITED FROM:



Promising, offering, or giving, directly or indirectly, an undue advantage to a Public Agent or a third person related to him;



Financing, funding, sponsoring, or in any way subsidizing the practice of unlawful acts provided for in the Anti-Corruption Law;



Use an intermediary natural or legal person to hide or disguise their actual interests or the identity of the beneficiaries of the acts performed;

13. RELATIONSHIP WITH THE PUBLIC ADMINISTRATION



Defrauding, manipulating, preventing, or frustrating tenders and administrative contracts;



Hinder investigation or inspection activity, or intervene in the performance of public bodies, entities, or agents, including regulatory agencies.

13.2.PROHIBITION OF PRIVATE CORRUPTION

Allied also repudiates and does not tolerate private corruption, which can be understood as any action to obtain undue advantages in the intimate environment in exchange for benefits or advantages of any nature.

13.2.PROHIBITION OF PRIVATE CORRUPTION

We also do not condone the offer, promise, or delivery of facilitation payments to Public Agents. Facilitation payments are those of small value made to accelerate or guarantee the process or provision of services by a specific public body.

13. RELATIONSHIP WITH THE PUBLIC ADMINISTRATION

For this reason, we advise all Collaborators that, in the event of requests for facilitation payment or any action indicating this, interaction with the Public Agent in question must be immediately suspended and the fact communicated directly to the Compliance Department through the Channel of Compliance.

13.4. PROHIBITIONS APPLICABLE TO BUSINESS PARTNERS

Our Business Partners who act in the name, interest, or benefit of Allied before the Public Administration must observe the rules outlined in this Code of Conduct and Allied's policies to mitigate the risk of occurrence of practices that imply or may imply the course of acts of corruption and conflict of interests.

13.5. PARTICIPATION IN PUBLIC TENDERS

To participate in any public bidding process, Allied undertakes to follow applicable Brazilian legislation in force and to present fair proposals based on the merits of our products and services. We do not authorize or participate in actions, whether isolated or in collusion with competitors, which aim to prevent, disturb or defraud the transparency of the bidding process and its competitive nature or improperly obtain government contracts.

13.6. CONSEQUENCES APPLICABLE TO VIOLATION OF PROHIBITIONS

Non-compliance with our guidelines by our Collaborators and Business Partners constitutes a breach of contract and subjects the Collaborator or Business Partner to the application of penalties and the termination of the employment contract or relationship with Allied. In addition, they may be communicated to the public authorities for the appropriate measures to be taken.

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**PRACTICES
AGAINST MONEY
LAUNDERING AND
TERRORISM**

14. PRACTICES AGAINST MONEY LAUNDERING AND TERRORISM

Allied is against any and all money laundering, terrorist financing, and other criminal activities. We do not condone or collaborate with actions that have or may have the objective or consequence of disguising or concealing the illegal origin of financial resources, provision of services without issuing an invoice, overpriced, or in any way considered illegal.

Everyone's duty:

Ensure the integrity of its operations by current laws and regulations.

Immediately report suspicious practices through the Compliance Channel

**PROMOTIONAL ITEMS,
GIFTS, ENTERTAINMENT,
AND HOSPITALITY**

15. PROMOTIONAL ITEMS, GIFTS, ENTERTAINMENT, AND HOSPITALITY

Allied values the solid and ethical relationships it builds with its Business Partners. These relationships must be based on transparency and integrity, so we must be attentive. We must not offer or accept promotional items, gifts, travel, meals, and entertainment outside the conditions outlined in Allied's internal policies or any undue advantage.

#Be alert: If you have questions about whether or not offering or receiving a gift/entertainment/hospitality violates our policies. Get in touch with the Compliance Board.

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DONATIONS AND SPONSORSHIPS

16. DONATIONS AND SPONSORSHIPS

We are committed to offering charitable donations and/or sponsorships only to people or entities that act with integrity and transparency, respecting the laws, particularly the Anti-Corruption Laws and our internal policies. All charitable donations and/or sponsorships must comply with current legislation and reflect the rules established in this Code of Conduct.

Files must be kept with clear and transparent information about these donations or sponsorships, as well as a periodic rendering of accounts by the beneficiary institutions, to prove that the resources were destined for the purpose to which they were subject.

Allied will not allow the delivery or receipt of charitable donations and/or sponsorships to any person, whether a Public Agent or not, national or foreign, in exchange for a benefit or anticipation of this.

Donations to political parties and/or candidates for public office, in cash or any other type of good or activity, in the name or with resources or assets of Allied, are strictly prohibited.

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FINANCIAL AND ACCOUNTING RECORDS

17. FINANCIAL AND ACCOUNTING RECORDS

Ensuring accurate and correct accounting records is critical to uphold transparency as an Allied value and provide adequate information to our shareholders and counterparties about our financial condition.

Allied is committed to keeping accounting and financial records and statements always transparent, up-to-date, and in compliance with applicable accounting policies and standards and its internal controls. Making or allowing forms with false, misleading, incomplete, or incorrect information is strictly prohibited.

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INTERNAL AUDIT

Allied has an Internal Audit Area responsible for auditing compliance with rules, policies, and business processes. The practice follows an annual schedule previously presented and approved by the Audit Committee.

Internal Audit must report to the Audit Committee any situation of non-compliance in the business.

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INFORMATION SECURITY AND PRIVACY

19.1. PROTECTION OF PRIVATE AND CONFIDENTIAL INFORMATION

All information about Allied's business must be handled responsibly. Protecting confidential and sensitive information is fundamental to the smooth running of our business and is part of our policies. Allied information must not be stored on unapproved, unprotected Internet or cloud services and/or that may be accessed by unauthorized persons, nor on personal electronic equipment of our Employees.

Therefore, when working with tools such as notebooks, emails, applications, and databases, employees must follow Allied's information security policies, avoiding improperly sharing of relevant information.

WHAT INFORMATION IS CONFIDENTIAL TO OUR BUSINESS?

	Sales details;
	Business performance goals;
	Product Strategies;
	Disclosure of new products;



Internal surveys and results;



Any and all unpublished information about our business.

19.2. PRIVACY AND DATA PROTECTION

Allied acts responsibly and transparently to comply with the General Data Protection Law and to follow measures to protect the personal data of our shareholders, customers, Employees, and Business Partners. We value the confidentiality and privacy of personal data and are committed to only using them for legitimate purposes defined and permitted by law. Everyone must observe and comply with the guidelines of confidentiality, data protection, and information security policies.

19.3. INTELLECTUAL PROPERTY

Protecting Allied's or third parties' intellectual property used in our operations is essential to guarantee our business strategies and respect for our commercial agreements. Everyone must maintain the information's confidentiality and properly use strategic business information, trademarks, copyrights, trade secrets, and software, among others.

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**COMPLIANCE
PROGRAM
MANAGEMENT**

20. COMPLIANCE PROGRAM MANAGEMENT

Implementing the Allied Compliance Program is an initiative of the Board of Directors with the support of the Executive Board.

Its execution is the responsibility of the Compliance Board, supervised by the Compliance Committee

Compliance Committee is responsible for evaluating and monitoring Allied's compliance program and compliance with internal policies and guidelines established by this Code of Conduct. It comprises members appointed by the Board of Directors and follows the guidelines of its Internal Regulations.

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COMPLIANCE CHANNEL

21. COMPLIANCE CHANNEL

Allied investigates all reports, impartially and responsibly, that imply suspicion or violation of current legislation, this Code of Conduct, or its internal policies.

Allied's Compliance Channel is available to all Employees, Business Partners, or the external public for reports that are made ethically and transparently in good faith. It is a means of communication that guarantees the confidentiality and anonymity of the complainant.

All Collaborators must respond to requests made by the Compliance Board objectively and within the requested period.

Any person who demonstrably makes a false report or statement, who has the purpose of unduly harming the image or assets of third parties may be subject to legal or disciplinary measures.

All information provided within an investigation process will be treated confidentially and only be disclosed to those involved in the investigation process or case of a court order.

21. COMPLIANCE CHANNEL

ALL STATEMENTS MUST BE FORMALIZED THROUGH THE FOLLOWING CHANNELS:

0800 800 8030;

Intranet (Employees only);

Internet: <https://contatoseguro.com.br/allied>

COMMITMENT TO NON-RETALIATION

Retaliation of any kind against bona fide whistleblowers or witnesses is not permitted. Any attitudes that characterize retaliation are strictly prohibited and subject to the application of the applicable sanctions.

DUTY TO REPORT

Allied protects the right of all Employees and Business Partners to securely report any irregularities, questionable practices, and any events that are not in line with our values, this Code of Conduct, and our internal policies.

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DISCIPLINARY MEASURES

21. DISCIPLINARY MEASURES

All Employees and Business Partners must Respect the guidelines of this Code of Conduct. Failure to comply with our guidelines may result in penalties such as:

Oral or written warning;

Suspension;

Termination of the employment contract;

Legal measures related to data restitution;

Communicating the facts to the competent authorities, when applicable;

Terminating the contract with Business Partners and/or applying penalties and fines.

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| TRAINING COURSES

To ensure guidance on institutional values, the subjects addressed in this Code of Conduct, and the maintenance of a culture of compliance, Allied annually provides training to its Employees and Business Partners.

Participation is mandatory for all those called up, regardless of the type of bond established with Allied.

24 **TERM OF ACCEPTANCE AND COMMITMENT**

It is the responsibility of Allied's Human Resources Department to present the latest version of this Code of Conduct to Allied Employees when they are hired and collect their signatures on the Term of Adhesion and Commitment (Annex I).

Business Partners must comply with the provisions of this Code of Conduct that apply to them through a written contract to be entered into with Allied, according to the Risk Management and Business Partners Policy.

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FINAL DISPOSITIONS

No code of conduct or policy can cover every situation involving integrity and ethical behavior. Therefore, all Allied Employees and Business Partners must exercise careful vigilance and judgment during their professional activities.

ANNEX I

TERM OF ACCEPTANCE AND COMMITMENT

I hereby declare that I have received a copy of the Allied Code of Conduct, as well as that I have read and understood the document, and I am committed to complying with and respecting it in all my professional activities.

I further declare that, should situations occur that are not provided for in the Code of Conduct and that raise doubts about the correct conduct to be adopted, I will seek guidance from my direct manager or the Compliance Area through the channels indicated in the Code of Conduct.

Full name:

Branch:

Date:

Signature: