

Code of Etic and Conduct



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APRESENTATION

The Code of Conduct of LOGIN ADUANA and its subsidiaries reflects the commitments assumed by it and that must also be assumed by its employees before the different audiences with which they or they interact. Ethical principles guide LOGIN ADUANA's performance and underpin its image as a solid, honest and reliable Organization in the exercise of all the activities it carries out.

The purpose of the code is to care for the values of LOGIN ADUANA, maintaining a posture compatible with its image and rescuing the importance of valuing a good relationship with its employees, customers, partners, shareholders, suppliers, associations, public bodies, media and society in general. .

This code applies to all LOGIN ADUANA employees. People hired by suppliers while providing services to LOGIN ADUANA must also guide their behavior by the principles of this code.

Employees must conduct their attitudes based on this Code, becoming drivers of ethics and the main responsible for its dissemination and assimilation, following the mission, vision and values of LOGIN ADUANA described below:

Our mission is: “Leveraging the success of our customers, shareholders and employees”

Our vision is: “To be the reference company in integrated technology solutions for critical operations”

And we have as main values: Ethics, Flexibility, Agility, Commitment and Entrepreneurship.

RELATIONSHIP WITH STAKEHOLDERS

1. EMPLOYEES

LOGIN ADUANA treats its employees with dignity and provides a work environment with equal opportunities for professional and personal growth and respect for individual freedom.

1.1. Conflict of interests

The conflict of interest in the employee-company relationship occurs when the employee uses his influence or commits acts with the intention of benefiting private interests.

The employee may not carry out external activities, such as providing consultancy or holding any position, in organizations and especially those with conflicting interests or that do business with LOGIN ADUANA, unless previously and formally authorized by the director of his/her area of activity at **LOGIN ADUANA** .

Corporate ties, either of their own or through a spouse or family members¹, are also not accepted, especially with suppliers or competitors of **LOGIN ADUANA** if the position the employee holds gives him the power to influence transactions or allow access to privileged information.

Employees who occupy positions in external entities or have a spouse, family or affective partner who also work at **LOGIN ADUANA**, competitors, suppliers or customers must communicate the fact in writing to their immediate leadership, who will assess any conflicts of interest and your competition with working hours.

Employees who, by virtue of their position or responsibilities, have access to customer information and data, strategic or confidential business information² - about **LOGIN ADUANA**, associated companies or subsidiaries -, not yet publicly disclosed, cannot pass them on. pass them on to third parties or any other

employee who is not involved in the project/subject, nor trade securities or shares of these companies using relevant information from **LOGIN ADUANA** and its customers during and after their employment or contractual relationship with **LOGIN ADUANA** .

In this case, it is the employee's duty to prevent anyone from having access to such information, redoubling care with documents and even materials left on tables or in drawers and cabinets.

Situations that may cause a conflict of interest not explained in this Code must be reported to the immediate leaders for guidance. **Conduita fora da empresa** Como integrante do quadro funcional da **LOGIN ADUANA**, o colaborador deve ser criterioso com sua conduta em ambientes públicos, seja em circunstâncias de sua atividade profissional, seja em situações de sua vida privada, agindo com prudência e zelo, não expondo a empresa nem a própria carreira ao risco. Informações dos clientes da **LOGIN ADUANA**, informações comerciais, condições de preço, estratégias e decisões de negócio possuem conteúdo de circulação restrita não devendo ser comentados fora da **LOGIN ADUANA** seja por escrito ou verbalmente com amigos e parentes.

Quer em ambiente interno ou externo, como participação em treinamentos ou eventos, utilizando o carro da empresa ou outras situações que permitam a identificação do empregador, a conduta do colaborador em situações de trabalho deve ser compatível com os valores da **LOGIN ADUANA** contribuindo, assim, para o reconhecimento de sua boa imagem corporativa. Espera-se do colaborador comportamento coerente com as condutas descritas neste Código.

2. PREJUDICE

LOGIN ADUANA values diversity in work relationships. Therefore, everyone should be treated respectfully, cordially and fairly, regardless of their position or function.

The company does not accept discrimination or prejudice of any nature, whether of race, religion, age group, sex, political conviction, nationality, birthplace, marital status, sexual orientation, physical condition or any other, including HIV serological status.

In the recruitment, selection and promotion processes, candidates must be evaluated solely on the basis of their ability to meet and adapt to expectations and job profiles³, being the manager's responsibility to update the profiles, and the Compensation area's responsibility to publish them.

Strategic or confidential information is information not known to the market and whose disclosure may affect the company's operations. Examples of this information are: financial results, acquisitions or sales under study or execution, industrial secrets, investments and related matters.

2.1. Slave labor or minors

LOGIN ADUANA does not admit, including its suppliers and partners with whom it maintains a commercial relationship, the use of workers under the legal minimum age, including without limitation the work of children under 16, except by means of special contracting under the terms of current legislation. . Also, **LOGIN ADUANA** does not allow the exploitation of slave labor, forced in any capacity and/or unpaid, as well as violating legal rules on minimum wage, working hours, among other conditions provided for in labor legislation.

2.2. Management posture

The demonstration of an employee's interest in participating in an internal recruitment process, after occupying a minimum of eighteen months in his current role, must be understood by his leadership as a natural alternative for the evolution of the employee's career, not being able to give rise to any type of retaliation.

Any mistakes made by employees must be pointed out by the leaders, and such events are accompanied by the information and guidelines necessary to avoid their recurrence. The repetition of errors resulting from carelessness, negligence or lack of interest must be rigorously corrected.

It is expected behavior of everyone to listen and consider new ideas, different opinions, questions and arguments that represent a way of learning and improving processes.

LOGIN ADUANA values the synergy between the areas, cooperation between employees from all units and the sharing of knowledge as a way of learning and disseminating best practices, safeguarding the confidentiality criteria set out in the Privileged Information item.

Employees, including those in leadership positions including managers, directors and statutory directors, must maintain balance in their personal accounts and financial obligations so as not to interfere with the smooth conduct of their responsibilities and impartiality in dealing with partners, suppliers and other business situations while representing **LOGIN ADUANA**.

2.3. Harassment and abuse of Power

LOGIN ADUANA does not tolerate harassment⁴, such as sexual, economic, moral or of any other nature, nor situations that constitute disrespect, intimidation or threat in the relationship between employees, at all levels and regardless of their hierarchical level.

The employee who considers himself discriminated, humiliated or the target of prejudice, pressure, abusive practices or in a situation of disrespect and who feels embarrassed to discuss the matter with his superior must report the fact to the Ethics Channel made available to him according to item 13 of the code of conduct.

2.4 Use of alcohol, drugs, possession of weapons and commercialization of goods

The consumption of alcoholic beverages during working hours, as well as the exercise of professional function in a state of intoxication, is prohibited. The use and possession of drugs and remaining in the work environment in a state altered by the use of these substances are also prohibited, which could affect the safety and performance of both the employee and their co-workers.

Weapons of any kind are allowed on company premises, except for professionals expressly authorized to do so.

The sale and exchange by employees of goods, such as food and other objects of particular interest on the company's premises, so as not to jeopardize the professional performance for which the employee is assigned are prohibited.

2.5. Political participation

Employees are prohibited from making, on behalf of **LOGIN ADUANA**, any contribution in value, goods or services to campaigns or political causes, except by resolution of the Board of Directors. This contribution will be made in accordance with current legislation.

LOGIN ADUANA respects the individual right of the employee to be involved in civic affairs and participate in the political process. However, such participation must occur in their free time at their own expense and without prejudice to the performance of their professional duties. In this situation, the employee must make it clear that the manifestations are his/her own, and not the company's, and not mention the name of **LOGIN ADUANA** in any situation.

Material resources such as computers, printers, copiers, office supplies, space and image of **LOGIN ADUANA** cannot be used to serve personal or partisan political interests.

LOGIN ADUANA respects and encourages the political participation of its employees and does not tolerate any discrimination against its employees on account of preference for party, line of political thought or candidate within the electoral process..

2.6. Syndicate

LOGIN ADUANA respects free association, recognizes unions as legal representatives of employees and seeks constant dialogue with employers' and labor unions.

Negotiations and dialogue with these partners on behalf of **LOGIN ADUANA** must only be carried out by employees or formally authorized representatives.

2.7. Company equity

The company's goods, equipment and installations are intended exclusively for use in its operations and cannot be used for private purposes, except in specific situations defined by the company.

It is the employee's responsibility to make good use, ensure the conservation and maintain the organization of the company's assets made available to the employee.

Questions relating to the donation, sale and assignment of use of any movable or immovable property must be submitted to the Legal Department for evaluation. All commercial transactions of assets owned by **LOGIN ADUANA** must be conducted by the Financial Department, previously approved by the Chief Financial Officer of **LOGIN ADUANA** and supported by the company's technical areas such as the Infrastructure, Operations or IT Areas.

LOGIN ADUANA is entitled to pass on the costs of maintenance, repair or replacement of assets to the employee, if misuse, malpractice, negligence or recklessness in the assets made available to the employee is proven.

2.8. Information security

The Information Security area is responsible for establishing the Information Security Policy, defining, implementing, disseminating and controlling guidelines for the protection of information assets owned by **LOGIN ADUANA**, or under its custody, against internal or external threats, deliberate or accidental.

It is the responsibility of every **LOGIN ADUANA** employee to know the Information Security Policy and other policies related to it, in order to protect information assets, mandatorily reporting to their immediate superior and to the Cyber Security team any situation that represents or may represent security deviation or breach, such as, but not limited to, receiving suspicious emails (phishing), attempting unauthorized access, exposing a user (logins) or password, among others.

With the exception of information classified as public, no information from **LOGIN ADUANA** and/or its customers may be disclosed or published externally, such as on social networking sites. **LOGIN ADUANA** makes information storage resources available through Microsoft services with Office365. ADUANA LOGIN and customer data must be stored on these media (OneDrive, Sharepoint and Teams) with the correct distribution information classification. This ensures data encryption on these services. Professionals are not allowed to use other forms of cloud storage such as Dropbox, Box, iCloud, among others.

To exchange internal, sectorial or confidential information with customers, partners and suppliers, it is necessary to formalize it through the Confidentiality Agreement or contractual clause, always respecting the controls provided for in the General Data Protection Law - LGPD. It is important to emphasize that in exchange for information and technical discussions in the **LOGIN ADUANA** environments or external environments, customers may be present, so employees must be aware of the information that is being addressed in certain places such as restaurants, elevators, corridors and informal meetings.

Failure to observe and adhere to the safety rules defined in this document as well as in the safety policy may generate sanctions provided for in this Code of Ethics, ranging from warnings to dismissal for just cause of the employee.

Corporate security policies are available on MOGIT-Online. If the employee does not have access to this system, he must contact his immediate leader and request more information.

2.9. Acceptable use of computing assets

Computing assets are an increasingly important part of a company's strategy to increase productivity, collaboration and access to critical information, but all of this must be done with security and common sense.

The equipment provided by **LOGIN ADUANA** must not be tampered with, nor must it undergo component replacement made by the employee. In case of need for maintenance, upgrade or replacement, the employee must contact the Help Desk team to carry out this maintenance.

It is important to note that the following are prohibited: exchange, rescue, storage or use of obscene, pornographic, violent, discriminatory, racist, defamatory content, which disrespects any individual or entity and/or is contrary to the policies and interests of **LOGIN ADUANA**.

This rule covers information written or stored in an electronic system and any other associated means. It also includes technically developed information, acquired by association, acquisition, license, purchase or entrusted to the company.

LOGIN ADUANA may, at its discretion, use and monitor any information transmitted or residing in these media, so employees in general should not expect privacy when using these systems and resources.

All files and information related to the professional activity created, received or stored in the electronic systems are the property of **LOGIN ADUANA** and constitute commercial and legal assets. Thus, in the event of a change or dismissal of an employee, this information kept by him/her must be forwarded to the immediate leadership for safekeeping or disposal.

Every employee must manage the use of computer assets made available by the company and their duly authorized use of any page of the electronic address, areas, services or content constitutes acceptance of the conditions established in this document:

1. **LOGIN ADUANA** has software and systems in place that can monitor and record all uses of the assets provided by it, such as telephone, internet, email, Teams, Zoom, Google Meeting, Skype, etc.;
2. **LOGIN ADUANA** reserves the right to inspect, without prior notice, the workstations and any stored files;
3. It is prohibited to carry out any type of file download, whose content is not known to the person who sent it and its reliability;
4. No employee may use **LOGIN ADUANA's** resources to download or distribute software or data without proper licensing or "pirate", as well as use the network to try to perform unauthorized access to communication devices;
5. The dissemination of advertising or announcements of particular products and services through the company's e-mail is prohibited;
6. Only employees who are duly authorized to speak on behalf of the company to the media can write on behalf of the company on chat sites, chat rooms or public discussion groups;
7. As it is in the interest of **LOGIN ADUANA** that its employees are well informed, the use of news sites or services is acceptable as long as their use does not compromise the use of network bandwidth and does not impair their productivity;
8. Employees with internet access can download programs only directly linked to the activities of **LOGIN ADUANA** and must provide whatever is necessary to regularize the license and register these programs;
9. The download of entertainment programs or games cannot be carried out through **LOGIN ADUANA's** internet connections.
10. The contents of the network and intranet are for professional and exclusive use and require the use of a login and password for access;
11. The use of login and password are personal and confidential, therefore, sharing them or lending them to anyone is not allowed;
12. Any and all support or maintenance activities for **LOGIN ADUANA's** assets (Servers, telecommunication equipment, networks, etc.) must be carried out via Connection Gateways officially made available by **LOGIN ADUANA** for this purpose, managed by the password vault. Any access made directly to the respective assets must be previously notified and with due justification.

13. The creation or configuration of additional access Gateways, different from those officially made available by **LOGIN ADUANA**, will be considered a serious infraction;

14. The use of any company resources for illegal activities may lead to disciplinary sanctions and immediate termination of contracts and the company will actively cooperate with the authorities in such cases;

15. As it is in the interest of **LOGIN ADUANA** that its employees make a remote connection (eg home-office) to their systems, network and intranet resources, in situations such as a pandemic, emergency or other business-related, the **LOGIN ADUANA** employee may be authorized to do so when using equipment with approved safety conditions.

Note: Workplace Management users – do not have the same permissions or access levels as other areas. This use is restricted due to the nature of the service, which implies a loss of productivity.

For those eligible employees, daily clocking is a legal obligation and determined by the policy of **LOGIN ADUANA** and must be complied with by the employee.

LOGIN ADUANA's governance process will report on a monthly basis to Directors, Executives and the HR area the report of deviations of each employee who misuses the assets.

2.10. Privacy and Protection of Personal Data

LOGIN ADUANA is committed to protecting the rights and freedoms of natural persons (customers, employees, collaborators and other third parties involved). In this context, and in order to affirm its commitment and respect for the rules of privacy and protection of personal data collected and processed, it is governed by strict respect and compliance with the legislation applicable in the countries in which it operates.

Therefore, it is the responsibility of every employee and service provider of **LOGIN ADUANA** to know the Privacy and Governance Policy of Personal Data, processing and protecting the personal data that they have access to in accordance with data privacy laws, using the information and data responsibly, as well as new technologies that include and are not limited to artificial intelligence.

Our customers and business partners entrust the processing of their data to us, including the data of their employees and customers, and each employee must assume the role of guardians of this data, using them to enhance our operations, in favor of **LOGIN ADUANA**, of our customers and partners, without ever disrespecting or exceeding limits to the freedoms and rights of Data Subjects.

For all personal data, where **LOGIN ADUANA** acts as Controller, it is up to the employees in their processes, to know or question:

1. What personal data may be collected for its purposes;
2. How they should be used, stored and when they need to be deleted;
3. What notifications should be provided in order to demonstrate transparency;
4. When and what types of consents must be obtained;
5. Whether there are other legal grounds for the treatment, other than consent;

6. When they may be disclosed or shared with third parties;
7. When they can be transferred outside a country's borders;
8. What protective measures are adopted;
9. How the rights of individuals related to their personal data are ensured, including the rights of access, correction and elimination, when applicable; and
10. Keep the appropriate Personal Data Risk Analysis (DPIA) records up to date.

In case of contracting Data Operators or Sub-Operators, they must be bound by contract to process the data only in the indicated way and to maintain data protection security plans. These must maintain security procedures equivalent to those of **LOGIN ADUANA** and its Controlling customers, dealing with suspected violations of personal data, unauthorized access or disclosure or loss of personal data, being liable to be jointly and severally liable for possible cases of personal data breach. , and must be accountable to the relevant regulatory authorities.

2.11. Relationship with business partners and competitors

LOGIN ADUANA is guided by the principle of free competition. All market and competitor information, legitimate and necessary for the business, must be obtained through transparent and reputable practices, and its obtaining through illegal means is not allowed.

Employees are prohibited from adopting any attitude that denigrates the image of competitors or business partners of the company.

LOGIN ADUANA's business must be guided by the observance of laws, the values of **LOGIN ADUANA** and the Code of Conduct, and it is up to all employees to ensure compliance. 8 Illicit means are illegal and morally unacceptable ways of accessing confidential information.

Agreements for the purpose of abuse of economic power or arbitrary commercial practices such as price negotiations to be practiced in the market together with competitors, negotiation of bids (RFP – Request for proposal) and public notices, among others, must not be promoted with competitors. others.

2.12. Sale of company products to employees

The sale of company products to employees must be carried out within the rules provided for in a specific policy such as cars, personal computers, cell phones or other goods that are made available. Any sale or donation of assets, even if fully depreciated, requires the formal and prior approval of the Chief Financial Officer of **LOGIN ADUANA**.

3. SHAREHOLDERS

3.1. BUSINESS RELATIONS BETWEEN SHAREHOLDERS AND FAMILY

Shareholders and their family members must follow the same rules valid for employees in the purchase or sale of products or services with **LOGIN ADUANA**.

Commercial relations are allowed between **LOGIN ADUANA**, shareholders and their families, whether as an individual or through companies of which they are directly or indirectly a part.

The aforementioned businesses must always strictly respect the principles of price coherence and commercial conditions in line with what is practiced in the market, exemption and transparency, ethics, competitiveness and the absence of conflicts of interest, which is why shareholders and their families do not must develop businesses or activities whose feasibility depends exclusively on **LOGIN ADUANA**.

LOGIN ADUANA adopts the same rules for family members of shareholders and controllers (disclosure, price, payment method, contractual terms, quality, etc.) that they adopt in dealing with third parties (Customers/Suppliers).

It is up to people or companies interested in developing a commercial relationship with **LOGIN ADUANA** to inform, when such an occurrence occurs, the existence of the family ties mentioned above.

All transactions provided for in this chapter will require the prior approval of **LOGIN ADUANA**. These proposals must be informed by the main executive of the area, presenting their considerations, when the premises contained in the above paragraphs are met.

3.2. RELATIONS WITH COMPANIES IN WHICH LOGIN ADUANA IS PARTICIPATED

In companies in which **LOGIN ADUANA** participates in the control block, the relationship with the other partners must be conducted only by the legal representatives appointed by **LOGIN ADUANA**. Confidentiality on the topics covered must always be observed.

Contact with external investors of **LOGIN ADUANA** companies must only be made by the area defined as responsible for the function and according to specific rules assigned to it.

4. CUSTOMERS

LOGIN ADUANA is committed to contributing to the process of creating value for its customers, by meeting their expectations and developing innovative solutions.

Customer requirements and expectations must be taken into account, and all those agreed in the contract must be strictly adhered to.

LOGIN ADUANA does not discriminate customers, either by origin, economic size or location. However, it reserves the right to terminate any commercial relationship whenever its interests are not being met or, even, when the relationship represents a legal, social or environmental risk.

Information about our products and services must always be clear and truthful. Technical data, in particular safety, health and environmental requirements, must be communicated to customers.

Each product must strictly follow the legal requirements of the market for which it is intended.

It is prohibited to make improper payments or grant favors to anyone in order to facilitate the sale of our products or services, even at the cost of losing business opportunities.

It is our responsibility to ensure the absolute confidentiality of confidential information passed on to us by our customers and partners.

5. COMMUNITIES

LOGIN ADUANA is committed to the economic and social development of the communities in which it operates.

It is the commitment of all employees to act in accordance with the values of **LOGIN ADUANA** and to keep channels of dialogue permanently open with all the communities in which we are present.

Investment in social, cultural and environmental projects must be guided by the real demands of the communities, in addition to being aligned with the guidelines of **LOGIN ADUANA**, in order to meet projects effectively committed to promoting social transformation.

LOGIN ADUANA encourages the participation of its employees in volunteer programs.

6. SUPPLIERS

The relationship with our suppliers must be guided by respect and by the permanent search for the development of products and services that add value to **LOGIN ADUANA** and strengthen the competitive position of suppliers.

LOGIN ADUANA suppliers must be evaluated using clear criteria and without discrimination. Every decision must have technical and economic support, and favoritism of any nature is not allowed.

LOGIN ADUANA's suppliers must know the company's values and act in accordance with the principles of this Code of Conduct and the Information Security policies.

To be accepted as a **LOGIN ADUANA** supplier, the company must declare that it does not use child labor and respect compliance with the requirements set out in the Consolidation of Labor Laws.

The hiring of companies owned or managed by former employees must be treated with the necessary care not to expose **LOGIN ADUANA** to labor risks, respecting the minimum period of 6 (six) from the last day of work of the former employee to such contracting with a supplier through a legal entity.

LOGIN ADUANA expects from its suppliers clarity in the characterization of products and services, as well as in the care to be taken in relation to the confidentiality of information, health, safety and the environment.

LOGIN ADUANA may terminate a business relationship with a supplier whenever its interests are harmed or confidentiality, legal, tax, environmental and occupational health and safety issues are disregarded.

It is our responsibility to keep confidential information passed on to us by our suppliers confidential.

The contracting of suppliers worth more than R\$20,000.00 (twenty thousand reais) must be accompanied by competition with at least three suppliers with minimum qualification to perform the services. Exceptions must be previously approved by the Chief Executive Officer or Chief Financial Officer of **LOGIN ADUANA**.

7. COMPLIANCE

LOGIN ADUANA is committed to maintaining the highest standards of integrity, ethics and governance in the conduct of its business and establishes, through this Policy and other policies currently in force, the guidelines to combat corruption, bribery, money laundering, terrorism and the proliferation of weapons of mass destruction, both in relation to its relationship with public institutions and private companies.

7.1 ANTI-CORRUPTION

LOGIN ADUANA is committed to fighting corruption in all its forms. Illegal conduct will not be admitted, especially those that may result in theft, fraud, bribery, subtraction or diversion of assets from **LOGIN ADUANA**, DOCUMENT Code Revision DO-DOC-000-002 41 CODE OF CONDUCT Classification of Information Page PUBLICO 14 of 21 governmental authorities, competent authorities, customers, suppliers or third parties, in accordance with anti-corruption laws, including Law No. "). Failure by the **LOGIN ADUANA** employee or third party with whom **LOGIN ADUANA** has a business relationship to comply with the applicable Anti-Corruption Laws may be considered a violation of this Code of Conduct and may constitute serious misconduct that may be subject to just cause or termination contractual, depending on the case, always observing the other normative and contractual conditions in force and without prejudice to the relevant civil and criminal liabilities.

7.2 ANTI-BRIBERY

LOGIN ADUANA prohibits the payment of bribes of any kind, including facilitation payments. A facilitation payment is a small payment to secure or expedite routine government action by a Government Official. Customer will not retaliate against anyone who has, in good faith, reported a possible violation of this subsection or refused to participate in activities that violate this subsection. If the Customer violates this subsection, **LOGIN ADUANA** may report the Customer to the competent authorities for criminal proceedings or other enforcement actions or file lawsuits for damages.

7.3. FIGHTING MONEY LAUNDERING

Money laundering is the process by which resources from gains from illegal activities are transformed into assets with an apparently legal origin. **LOGIN ADUANA** is committed to transparency and legality in financial transactions, therefore, Employees or third parties who have evidence or suspicion of money laundering practices should immediately seek the Confidential Ethics Channel of **LOGIN ADUANA**.

7.4. FINANCING TERRORISM AND THE PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

Financing of terrorism and proliferation of weapons of mass destruction can be defined as the financial support, by any means, of terrorism and proliferation of weapons of mass destruction, or to those who encourage, plan or commit such acts. Thus, the financing of terrorism and the proliferation of weapons of mass destruction is intended to provide funds or capital for terrorist activities and other similar and related practices. This collection can happen in different ways, even through legal means, such as associative contributions, donations or profits from various commercial activities, as well as from criminal sources, such as drug trafficking. In this sense, Employees, Customers, Suppliers and other third parties are invited to exercise greater vigilance and have an attitude of repudiation, and must combat the practice of illegal acts, whether in the relationship with **LOGIN ADUANA** or within its own structure.

8. GOVERNANCE

Periodically, Internal Audits take place that can initiate the internal investigation, that is, investigative and inspection actions, with the purpose of verifying if the internal procedures adopted are adequate and if the legislation is being applied properly.

Internal and External Audits are important risk control and management tools, ensuring transparency and effectiveness in the Organization's business and its positioning in the light of the directives of the Board and its shareholders. The Organization's Compliance and CSIRT programs also meet these premises through

diligent mechanisms to comply with legislation and offer security in the face of fraud, direct administrative actions to apply the penalties provided for in this code and provide subsidies for due lawsuits provided for in current legislation. **LOGIN ADUANA's** Legal department guides and supports the areas responsible for compliance and audits, contributing to the updating of internal policies and audit criteria.

LOGIN ADUANA, through its Employees, always values transparency and ethics in its business relationships, individual and legal entity responsibilities, values confidentiality and agreements signed with its customers, suppliers, government and regulatory bodies, following the legislation and business guidelines. The Organization cooperates and collaborates effectively with internal or external investigations, mainly in the application of legislation.

The "Computer Security Incident Response Team (CSIRT)", or Security Incident Response Group, is responsible for receiving, analyzing and responding to notifications and activities related to computer security incidents.

9. PRESS, ADVERTISING, IMAGE AND REPUTATION

LOGIN ADUANA adopts an objective and clear position in the dissemination of information and seeks to satisfy the interests of the parties involved.

9.1. PUBLICITY

All advertising of **LOGIN ADUANA** must be truthful and avoid exaggeration; arrogance, arrogance and prejudice are not tolerated. **LOGIN ADUANA's** institutional advertising must be appropriate to the company's positioning and follow the guidelines of the Communication area. The company condemns misleading advertising. **LOGIN ADUANA's** product marketing and communication initiatives are characterized by respecting current legislation, ethics and local and international reference standards.

9.2. PRESS

Contacts with the press will be promoted exclusively by spokespersons designated by the company, with guidance from the Communication area. It is therefore prohibited for unauthorized persons to contact the press on behalf of **LOGIN ADUANA**. The employee must not promote the disclosure of confidential or untrue information in the press or through social media, even if they are in their private accounts. Contact with media professionals should not be treated, under any circumstances, as a business relationship. Thus, it does not involve favors or payments of any kind. The relationship with the press should privilege the dissemination of relevant facts and the promotion of the company's business. The highlight should be, whenever possible, directed to the activities of **LOGIN ADUANA**. The Press Communication Manual establishes guidelines for the correct contact of our spokespersons with the press.

9.3. IMAGE AND REPUTATION

The construction and strengthening of **LOGIN ADUANA's** image and reputation also takes place through our dialogue and behavior towards the public with whom we interact. Therefore, our actions, inside and outside the company, must always be in line with the principles and values of **LOGIN ADUANA**.

LOGIN ADUANA's image and reputation management must follow the positioning defined and detailed in the Brand Guide, under the guidance of the Communication area.

It is important to know what company information cannot be shared on social media. Confidential documents, internal matters and criticisms of the company's structure or processes must be discussed and resolved internally. **LOGIN ADUANA** employees must respect and comply with all provisions of the Manual of Conduct on Social Networks (MKT-MPR-011-001).

10. CONTRACTS AND ACCOUNTING RECORDS

All financial and commercial transactions will be promptly and correctly transcribed in the books and records of **LOGIN ADUANA**. The employee must not make irregular financial arrangements with customers or suppliers, such as overcoming under-invoicing. The contracts in which **LOGIN ADUANA** takes part must be written as precisely as possible, leaving no room for dubious interpretations. Documents not attached to the main text can only be accepted or provided with the assistance of **LOGIN ADUANA**'s legal department. All payments and commitments assumed must be authorized by the competent hierarchical level and supported by legal documentation.

11. INTELLECTUAL PROPERTY

Intellectual property is a strategic asset for **LOGIN ADUANA**. It includes patents, registered or not yet registered trademarks, know-how⁹, technical data and process and market information, among other items that would benefit a competitor if they were known.

The result of the work of an intellectual nature and strategic information generated in the company is the exclusive property of **LOGIN ADUANA**.

Employees are responsible for treating information on intellectual property to which they have access as a result of their work confidentially, using them carefully. The disclosure of this information is not permitted without the express authorization of the company's management.

Confidential information in response to legitimate requests from government authorities may only be provided after consideration, whether it will be treated confidentially, and after appropriate steps have been taken to protect its confidentiality, with the help of the Company's Legal Department.

12. HEALTH, SAFETY AND ENVIRONMENT

The health, physical integrity of employees and protection of the environment are priorities for **LOGIN ADUANA**. **LOGIN ADUANA** complies with and enforces occupational safety and medicine standards, especially through continuous training for its employees and contracted service providers.

For the efficient fulfillment of routines and responsibilities, it is the practice of **LOGIN ADUANA** to communicate to all those involved in a transparent manner the preventive and/or corrective information related to health, safety and the environment that may have an impact on its employees, the community or in the environment. The health, safety and environment policies, procedures and practices are available in the media and duly published on the MOGIT-OnLine, in order to strictly safeguard proper compliance in the practice of their daily activities.

Taking care of the work environment is the responsibility of all **LOGIN ADUANA** employees and whenever they identify possible risk situations, they must report to the SESMT area of **LOGIN ADUANA**, as well as their immediate leadership. It will be up to the **LOGIN ADUANA** team, with the support of SESMT, to adopt

all necessary measures to exclude and/or mitigate situations that expose the work environment to risk or possible irregularity.

In emergency situations, such as environmental¹⁰ or work accidents, those involved must follow the procedures provided for the situation and quickly report the facts to the local SESMT. Only officially appointed spokespersons will be able to give interviews or make announcements to authorities and the community.

13. GIFTS AND INVITATIONS

Gifts and institutional invitations are practices of kindness and cordiality accepted within a reasonable and not excessive value and product of a commercial relationship. Institutional gifts that represent a practice of kindness and cordiality between the parties in a business relationship and that do not characterize the obtaining of benefits in any negotiations may be accepted by employees.

Invitations to events with expenses paid for by customers, suppliers, government agencies and other stakeholders can only be accepted when there is a real opportunity to develop commercial contact, when they have also been extended to professionals from other companies and with authorization from the leadership.

Environmental accidents are unexpected and unwanted events that can cause damage, directly or indirectly, to the environment, health and life.

Objects received as an award that represent distinction or tribute to **LOGIN ADUANA** and its companies must be forwarded to the communication area. Employees cannot accept, on their behalf or that of their family, gifts or advantages that lead to their commitment.

In such cases, the gifts must be returned to the sending company. Everyone should be aware of the context of receiving gifts, and not just their value; in case of doubt, they should consult their immediate leadership. Receiving cash offers for any reason is prohibited. The employee must inform the entities with which he maintains relations on behalf of **LOGIN ADUANA** what the company's conduct is regarding gifts or presents.

The same principles must be applied when **LOGIN ADUANA** offers gifts and invitations to its partners.

14. EXTERNAL LECTURES AND PRESENTATIONS

In lectures and participation in seminars and other public events, the protection of confidential information about the company, its customers, suppliers and its businesses must be strictly respected. Both participation as an exhibitor in events and the topics to be exposed must be previously approved by the leadership of the employee involved and by the Communication area. For presentations on CUSTOM LOGIN, the Institutional Presentation document available on the intranet must be used.

15. 15. CLARIFICATIONS AND COMPLAINTS

Doubts of interpretation, unforeseen cases and complaints of non-compliance with this Code must be registered in the **LOGIN ADUANA** Ethics Channel, available to Employees, Customers and External Providers, from Brazil and LATAM. Complaints of fraud, misuse of computer assets, misappropriation, bribery in commercial acts or transactions, as well as non-compliance with any item of this Code of Conduct

involving employees, suppliers, contractors and business partners must be accompanied, whenever possible, by concrete facts and data.

Every complaint received by **LOGIN ADUANA** will be treated with confidentiality. No retaliation against the employee will be accepted for reporting in good faith. If the employee suffers retaliation of any nature, he must immediately inform the **LOGIN ADUANA** Ethics Channel.

The Ethics Channel guarantees the uniformity of the criteria used in the resolution of similar cases, verifies the validity of the question raised, takes action when applicable and responds to the requester, when identified. The analyzes and recommendations are conducted by an independent company.

The purpose of this channel is to ensure the maintenance and compliance with the **LOGIN ADUANA** Code of Conduct, which aims to:

- Clarify doubts related to what is contained in the Code;
- Correct misconduct;
- Investigate the veracity of possible complaints;
- Recommend the application of disciplinary actions when applicable;
- Evaluate improvement opportunities related to the code of conduct and suggested.

The whistleblower may or may not identify himself. In cases where the complainant identifies himself/herself, the identity will be treated confidentially. The forwarded messages will be previously analyzed by an independent company and dealt with by a restricted team of Operational Excellence, as detailed in QP-PRO-008 – **LOGIN ADUANA** Ethics Channel.

LOGIN ADUANA ensures that all cases will receive a return resulting from the investigative analysis when necessary.

16. ETHICS COMMITTEE

It is up to the Committee to analyze and judge the issues related to the Code of Conduct sent to the Ethics Channel with impartiality and seriousness, seeking solutions to the situations that are presented to them.

The Ethics Committee¹¹ is formed by members of the Executive Committee of **LOGIN ADUANA**. The committee is responsible for handling the cases addressed to it, ensuring the uniformity of the criteria used in the resolution of similar cases through the incidence report or not provided for in the Code and for the proper functioning.

17. DISCIPLINARY MEASURES

The existence of rules, policies and procedures is an essential condition for a successful company. It is up to the leadership to ensure that they are followed for the harmonious and efficient functioning of the organization.

Deviations or non-compliance can lead to disciplinary measures that, when applied, should serve as an educational and culture-forming element. It is up to the leadership to inform, guide and prepare its team for the correct application of the organization's policies and norms, being an example to be followed. Non-

compliance with **LOGIN ADUANA**'s norms and rules cannot be tolerated and is subject to punishment, including the termination of the employee's employment contract. Repeat offenses, after proper guidance, are also subject to disciplinary action.

The Ethics Committee is responsible for receiving manifestations such as: complaints, denunciations, criticisms and regarding non-compliance with the company's code of conduct.

The ORGANIZATIONAL DEVELOPMENT framework determines the application of each punishment together with the Legal Department. The possible penalties to be applied are:

1. Verbal warning
2. Written notice
3. Suspension
4. Unjustified dismissal
5. Dismissal with just cause

The application of penalties must be made, as much as possible, immediately after the fault committed, under penalty of characterizing tacit forgiveness.

A longer period of time is allowed for the application of penalty when the fault requires verification of facts and the due responsibilities. Sanctions must be fair, reasonable and proportionate to the offense committed. Similar fouls shall receive similar sanctions.

When an employee deems that there is a dysfunction in a particular standard, he or she must turn to his or her leadership and request a review of that standard. It will be reassessed by the competent department and may be revised. In cases in which, due to lack of infrastructure or adequate resources, the employee is unable to comply with the standard, he/she must request guidance from his/her immediate manager. In turn, this should take the case to an appropriate level of the organization for the search for a definitive solution.

The employee's immediate manager who fails to comply with a Company standard or procedure will be notified by the Ethics Committee. If another infraction occurs in the same area, the mediate manager will be notified and the immediate manager and the employees involved will be warned in writing. If non-compliance with the same rule occurs again in the same area, the director will be notified and must decide, based on the information from the Ethics Committee, what action will be taken, and the first action is to warn the immediate manager in writing.

ORGANIZATIONAL DEVELOPMENT should always be consulted on what disciplinary action is to be taken and, when necessary, should consult with the Legal Department for guidance. Positive results, due to compliance with the rules, must be dealt with by the **LOGIN ADUANA** recognition systems, which, accompanied by communication actions, contribute to the formation of a culture of respect and discipline.

Likewise, the disclosure of disciplinary measures applied has a positive effect, as it demonstrates the seriousness with which **LOGIN ADUANA** treats such issues.

In any of these situations, respect for the individual must be the guiding element in the conduct of leaders.

Tacit Forgiveness - if there is no IMMEDIATE punishment for the employee who commits a fault and proof of immediacy between the knowledge of the fact and the punishment, tacit forgiveness is configured (delay in punishment).

18. MANAGEMENT OF THE CODE OF CONDUCT

The approval of this Code and its updates are the responsibility of **LOGIN ADUANA**. It is up to leaders, at all levels, to ensure that their employees and contractors know and apply the precepts of this Code, which must be an example of conduct to be followed by all employees.

The Organizational Development area is responsible for publishing and updating the Code of Conduct. The term of acceptance that references the code is under the responsibility of the Management of the internal ombudsman channel.

19. AVAILABILITY OF THE CODE OF CONDUCT

The code of conduct is available on the Denunciation Channel and, for employees, with its immediate management.