



Code of Conduct and Corporate Ethics.

7COMm

People and tech to transform





Summary

	Presentation	5
	Objectives	5
1	Scope	6
2	Values	7
3	Primary Aspects of Conduct	7
3.1	Conflict of interest	7
3.2	Harassment, discrimination, and prejudice.	8
3.3	Combatting child pornography	8
3.4	Contributions to political parties	9
3.5	Corruption and cartel formation.	9
3.6	Money laundering	9
3.7	Gifts, favors, and services	9
3.8	Security and Information Preservation	10
3.9	Slavery, forced, compulsory and/or child labor	11
3.10	Use of 7COMm Group resources	11
3.11	Associations and Professional Bodies	12
3.12	Customers	12
3.13	Administrators, Employees, Interns, Apprentices, and Collaborators	12
3.14	Expected Behavior by Stakeholders	13
3.15	Communities, Society, and Environment	13
3.16	Competitors	14
3.17	Suppliers	14
3.18	Government	15
3.19	Press	15
3.20	Investors	16
4	Users of its Products and Services	16
5	Amendments to the Code of Conduct and Corporate Ethics of 7COMm Group	17

Code of Conduct and Corporate Ethics

The 7COMm Group believes that ethical commitment is the sum of the conduct of each of its administrators, employees, interns, apprentices, and collaborators. Therefore, we recommend that you carefully read the information contained in this document, as it will help you in your initiatives and decisions.

In the following pages, you will find directions that reflect our way of being and our position towards the stakeholders involved in our business. This is an excellent tool that further enhances the integrity of our values.

We are committed to carrying this flag and invite you to engage in this cause. This is how we will build a company capable of making a difference and contributing to the sustainable development of our country.



Presentation

This is a Code of Conduct and Corporate Ethics. It seeks to introduce the essential elements that must be considered in the relationships established by the 7COMm Group with its different stakeholders. With this Code, the 7COMm Group aims to contribute to the creation of relationships, seeking differentiated results for society.

This Code is a reference document not only for the 7COMm Group, administrators, employees, interns, apprentices, and its collaborators but also for other stakeholders with whom the company interacts. It is these different stakeholders involved in the business who, by making their daily choices and acting in accordance with them, ratify the ethical conduct expected by the 7COMm Group, capable of ensuring meaningful, sustainable, and compatible relationships with the interests and most legitimate aspirations of those involved and society.



Objectives:

- a) Strengthen the company's ethical culture, raising the level of trust, respect, and solidarity in all its internal and external relationships;
- b) Guide the conduct of administrators, employees, interns, apprentices, and collaborators by promoting the adoption of the highest standards of integrity;
- c) Prevent and manage conflicts of interest.

d) To serve as a reference in the management of situations that may occur in everyday life, being a guide for evaluation and decision-making, not limited to the presented content; and

e) Preserve the reputation and image of the Company.

1 **Scope**

It is not expected that this document covers all possible situations of ethical conflicts that may arise. It defines basic principles that should guide the conduct of all directors, administrators, employees, interns, apprentices, and collaborators who should follow the principles established in this Code, as well as the policies, rules, and procedures available and published in the company.

This document is organized into the following segments:

- Corporate values of the 7COMm Group.
- Primary aspects of conduct.
- Relevant aspects of conduct by audience.
- Company Rules and Procedures.

The Code of Corporate Conduct and Ethics of the 7COMm Group considers the following audiences:

- Associations and Class Entities
- Customers
- Administrators, Employees, Interns, and Apprentices
- Collaborators
- Community and Society
- Competitors
- Suppliers
- Government
- Press
- Investors

Finally, it should be mentioned that a Code of this nature, which deals with ethics in relationships, can only be legitimized in the relationships themselves. We anticipate that the constant and non-exceptional application of what the Code of Corporate Conduct and Ethics

of the 7COMm Group advocates will be an opportunity for the subject to remain present in everyday life, improving the company's relationships with all audiences considered by the Code.

2

Values

They are responsible for defining the identity, way of being and acting of the company. By expressing them in everyday initiatives and relationships, administrators, employees, interns, apprentices, and collaborators are contributing to the creation of value in relationships.

- **Simplicity:** We believe that simplicity minimizes complications and increases efficiency.
- **Ethics and Commitment:** We conduct the company in an ethical manner with full commitment from our professionals.
- **Relationship, Quality, and Service:** We cultivate a long-lasting relationship based on relationship, quality, and service.
- **Creativity and Innovation:** We are always looking for creative and innovative solutions to challenges.
- **Human Capital:** We respect the singularities and dreams of each one, as it is the people who materialize ideas and thoughts.
- **Sustainability:** Good business only has a future when everyone wins: shareholders, managers, employees, interns, apprentices, collaborators, suppliers, customers, partners, and the environment.

3

Primary Aspects of Conduct

These aspects are fundamental to the business and must be observed by all administrators, employees, interns, apprentices, and collaborators of 7COMm Group.

3.1 Conflict of interest

It is essential that personal interests do not conflict with the interests of 7COMm Group. Some, but not all, situations where these conflicts may be present are:

- i. Development of activities outside the company that interfere or may interfere with 7COMm Group business.

ii. Personal relationships with customers, suppliers, or competitors that compromise impartiality in business.

iii. The existence of kinship or personal relationships, internally or externally to the company, that may bring undue benefits, harm to the company, or compromise the impartiality in the evaluation of the performance of those involved.

The hiring of services, agreements, partners, or suppliers must occur impartially and transparently, with the adoption of objective and fair criteria, without discrimination of any kind, always in compliance with applicable policies, norms, and legislation.

In the event of any conflict of interest, the conflicted administrator, employee, intern, apprentice, or collaborator must promptly inform their hierarchical superior and their peer(s) involved and physically withdraw from discussions and deliberations on the specific topic.

If the conflicted person does not speak up, another person may do so if they have knowledge of the conflict.

3.2 Harassment, discrimination, and prejudice.

Group 7COMm is against any kind of discrimination - based on sex, color, race, ethnicity, disability, sexual orientation, religion, origin, marital status, age, or any other personal characteristic. The company encourages the appreciation of diversity with the goal of including all segments of society.

The company is also against any form of sexual, moral, religious, political or organizational harassment or intimidation. Therefore, it encourages work environments that promote personal fulfillment and offer prospects for human and professional development.

3.3 Combatting child pornography

The 7COMm Group is against any form of discrimination, violence, or violation of the fundamental rights of children and adolescents. It is also against anyone who produces, reproduces, or records, by any means, scenes of explicit sex or pornography involving a child or adolescent. The same applies to those who facilitate, recruit, coerce, or mediate the participation of a child or adolescent in such scenes.

3.4 Contributions to political parties

The 7COMm Group does not make contributions to politicians and political parties, nor does it oppose the exercise, by administrators, employees, interns, apprentices, and collaborators, provided that it is strictly personal and does not interfere with their responsibilities with the 7COMm Group.

3.5 Corruption and cartel formation.

The 7COMm Group is against and does not condone any form of corruption or formation of cartels.

Therefore, the expected conduct is to not engage in or allow, under any circumstances, conduct that constitutes an attempt or practice of bribery or corruption, such as: accepting, obtaining, financing, funding, granting, paying, promising, sponsoring or authorizing, directly or indirectly, any benefit, monetary or otherwise, for oneself or anyone else, including also the concealment or disguise of the occurrence of such acts or the hindrance of investigation or inspection of these facts.

3.6 Money laundering

Money laundering is understood as economic and financial practices that aim to conceal the illicit origin of certain assets, so that they appear to have a lawful origin.

The 7COMm Group does not condone such practices and if identified, they will be properly reported to the competent authorities. Therefore, constant care is expected to be taken:

- i. In complying with the laws and regulations applicable to the activities carried out by the 7COMm Group, as well as the self-regulations to which we formally adhere;
- ii. In complying with our policies, rules, and controls for the prevention and combating of money laundering, terrorism financing, corruption, bribery, and any other illegal acts.

3.7 Gifts, favors, and services

Gifts, favors, and services should be accepted based on the usual market practices,

and one should avoid anything that may or may appear to compromise 7COMm Group or any individuals involved.

To preserve impartiality in 7COMm Group's business dealings:

i. One should not accept, nor offer, directly or indirectly, favors, money, or gifts that may affect decisions, facilitate business, or benefit third parties. In order to resolve any doubts about the application of this principle, it is recommended to observe the value limit of R\$ 100.00 (one hundred Brazilian reais). Any item accepted that exceeds this value should be duly reported and delivered to the direct hierarchical superior and/or to the Board of Directors so that its donation can be arranged.

ii. Promotional gifts with no commercial value are not considered improper relationships and do not conflict with the principles of this code.

iii. Expenses may be incurred to strengthen the relationship between the 7COMm Group and its clients, such as meals, meetings, entertainment, lodging, and travel, respecting reasonable limits that do not imply any discomfort for the guests or eventual retribution on their part.

3.8 Security and Information Preservation

The commitment to information goes beyond legal and statutory obligations, serving as a pillar in creating and maintaining a reliable image. Therefore, special care must be taken with the business's strategic information. To this end, it is recommended that:

i. Do not expose or discuss information, plans, and/or relevant facts with people whose job assignments do not require them, according to competent approvals and in accordance with corporate rules;

ii. Take special care when exposing or discussing this information in public places such as elevators, buses, restaurants, bars, airports, airplanes, etc;

iii. Ensure the truthfulness and transparency of the information contained in all disclosed material, and only authorized individuals speak institutionally on behalf of the 7COMm Group, according to the corporate vision;

iv. Cooperate with regulatory authorities, not withholding or hindering the delivery of necessary information for the evaluation of internal control activities, audits, and regulatory and supervisory bodies;

v. Do not comment on rumors;

vi. Always maintain confidentiality, not disclosing client information, such as active and passive operations and services provided by the 7COMm Group, except in legal cases. For example, actions such as copying documents to private clouds, sending emails to the external network, and not limited to this, constitute violations of information security and preservation, subject to applicable sanctions;

vii. All administrators, employees, interns, apprentices, and collaborators of the 7COMm Group must sign the Confidentiality Agreement and/or Responsibility Agreement when requested by 7COMm Group clients.

3.9 Slavery, forced, compulsory and/or child labor

7COMm Group is against slavery, forced, compulsory, and/or child labor, as well as situations that potentially involve coercion, punishments under any pretext, degrading disciplinary measures, and punishment for exercising any fundamental right. If such situations are identified, they will be properly reported to the competent authorities.

i. Irregular work by adolescents under 16 years of age;

ii. Inadequate conditions for the work and development of adolescents aged 16 to 18.

iii. Characterization of any form of discrimination, violence, or attack on the fundamental rights of children and adolescents.

3.10 Use of 7COMm Group resources

The tangible resources (furniture, facilities, equipment, notebooks, etc.) and intangible resources (image, brand, technology, codes, plans, manuals, etc.) made available to 7COMm Group administrators, employees, interns, apprentices, and collaborators must be used in the interest of 7COMm Group, according to published procedures. 7COMm Group may monitor the use of these resources to identify practices that do not comply with these procedures.

All information, data files, programs, etc., stored on the resources made available by 7COMm Group are considered the property of 7COMm Group, and it is not allowed to develop personal or unauthorized work for other companies. Therefore, 7COMm Group also expects its administrators, employees, interns, apprentices, and collaborators to have a sense of ethical standards when using resources. For example, if the service is completed earlier than agreed with 7COMm Group, availability should be reported so that other services can be initiated, instead of using idle time for personal or unauthorized tasks using 7COMm Group resources.

3.11 Associations and Professional Bodies

The commitment of 7COMm Group is to contribute to the associations and professional bodies that represent the public involved in the business, valuing ethics, sustainable relationships, and maintaining confidentiality in information.

7COMm Group also recognizes the right to collective bargaining and full freedom of association to professional bodies that do not act contrary to the provisions of this code.

3.12 Customers

7COMm Group, together with its administrators, employees, interns, apprentices, and collaborators, understands that they must effectively contribute to the success of their customers, adding value and proposing improvements in the products and services provided, as it is the shortest way to make its Mission a reality.

All must ensure the confidentiality of customer information, in compliance with the principles of banking secrecy when applicable; build and preserve a relationship of trust and harmony; dedicate special attention to matters of interest to customers, whether internal or external; strictly comply with what was contracted and constantly seek excellence in service provision.

3.13 Administrators, Employees, Interns, Apprentices, and Collaborators

It is a characteristic of 7COMm Group administrators, employees, interns, apprentices, and collaborators to have passion in everything they do. 7COMm Group understands that respect for differences is in its DNA, and this is reflected in its attitudes and positions.

7COMm Group values meritocracy, transparency, open dialogue, and recognition of best practices. The company wants inspired teams that make a difference and have the courage to express their ideas and perceptions, always aligned with their planning and contributing to results.

7COMm Group encourages its administrators, employees, interns, apprentices, and collaborators to establish an appropriate balance between work, family, and society in general, in a way that maintains their professional, social, and personal well-being.

3.14 EXPECTED BEHAVIOR BY STAKEHOLDERS

The Group 7COMm considers the unique characteristics of its relationships with each stakeholder group.

The company aims to create the best possible workplace by fostering an environment of personal, social, and professional growth that is healthy and promotes physical, psychological, and emotional well-being.

In addition, it is the responsibility of each administrator, employee, intern, apprentice, and collaborator to safeguard the assets of the Group 7COMm and uphold its image. The actions of all administrators, employees, interns, apprentices, and collaborators must reflect their commitment to the longevity of the Group 7COMm and its values.

3.15 Communities, Society, and Environment

Sustainability in business, relationships, and the environment is one of the core values of the 7COMm Group, demonstrating its concern for the well-being and development of communities and society.

It is the duty of all administrators, employees, interns, apprentices, and collaborators to identify opportunities to improve processes in order to minimize the socio-environmental impacts caused by the company's operations.

The 7COMm Group understands that it should contribute to public policies aimed at improving Brazilian society and is firmly committed to practicing, encouraging, and valuing environmental preservation, striving to align business objectives with the aspirations and interests of the community in which we operate, always in line with sustainable development.

Note: we have voluntarily joined the Global Compact.

3.16 Competitors

Competition, conducted without abuse of power and fairly, is beneficial for consumers and essential for the proper functioning of the market.

- i.** In performing our duties, we participate in class associations aligned with the interests of the Group 7COMm, the market, our customers, and our competitors, respecting them and repelling any and all forms of illegality.
- ii.** Respect the reputation of competitors;
- iii.** Transparently and lawfully send and/or receive information from competitors in accordance with the confidentiality principles of 7COMm Group;
- iv.** Respect the intellectual property of competitors and not use it without proper authorization;
- v.** Reject any comment that may harm the image and reputation or contribute to spreading rumors about our competitors;
- vi.** Not allow any type of retaliation resulting from the loss of customers to the competition, as well as not offer undue advantage to a competing bidder;
- vii.** Not contribute to the exchange of competitively sensitive information that may compromise free competition, such as business strategy, competitive advantages, pricing policies, contract terms, market research, geographic location, services or technology.

3.17 Suppliers

The relationship with suppliers will be characterized by adherence to the precepts of the Code of Conduct and Corporate Ethics of 7COMm Group. Transparency in processes (especially those involving competition), impartiality, independence, and adherence to contracts will be observed without exception. Encouragement of good practices, valuing sustainability issues, should be constantly sought.

The supplier must comply with the current legislation, through a rigorous selection and due diligence process, adopting commercial, tax, or labor practices compatible with the provisions of this Code of Conduct and Corporate Ethics.

The practices of the supplier related to issues such as the environment, conscious consumption, slave, forced, compulsory and/or child labor, inclusion, security, and preservation of information, quality in service delivery, unfair competition, conflict of interest, among others, will be specially observed.

3.18 Government

The company complies with current legislation and is interested in contributing to the social and economic development of the country. The 7COMm Group understands that it has an important role to play in combating tax evasion and money laundering.

i. Ensure compliance with the laws and regulations applicable to the activities carried out by the 7COMm Group, in addition to self-regulations to which we formally adhere;

ii. Ensure compliance with our policies, norms, and controls for preventing and combating money laundering, terrorism financing, corruption, bribery, and any illegal acts, in strict compliance with applicable laws and according to the best national or international practices, wherever they are applicable;

iii. Do not promise, offer, or give, directly or indirectly, undue advantage to a public agent, national or foreign, or to a third person related to them, as well as receive any benefit, whether on behalf of the 7COMm Group or anyone else; and

iv. Do not collude in fraud in bids and contracts with national or foreign governments, federal, state, municipal, autonomous entities, public companies, and mixed economy companies.

The company agrees with the terms of Law No. 12.846 of August 1, 2013.

3.19 Press

We must ensure the reliability of the information transmitted to the media and ensure that all comments, statements, or pronouncements on behalf of the company are made only by authorized persons.

Our relationship with the media must be based on transparency and credibility, always observing ethical aspects in our marketing strategy.

We must express ourselves on behalf of the 7COMm Group only when invested with such authorization, always expressing the institutional point of view, never the personal one.

3.20 Investors

Investors play a fundamental role in the success of the business of 7COMm Group. Therefore, the company has a team committed to achieving results that ensure the best profitability rates, always valuing transparency and treating strategic information meticulously, so that the official reports of 7COMm Group reflect its reality.

4

Users of its Products and Services

It is the responsibility of 7COMm Group to offer a safe environment in transactions, making it as difficult as possible for any type of inconvenience to occur, maintaining high service availability and confidentiality of information.

All administrators, employees, interns, apprentices, and collaborators of 7COMm Group are responsible for applying the precepts of this Code in all their professional relationships. In this sense, everyone should act as its guardians, reporting, via available channels, any situation that may indicate non-compliance with the precepts contained in this document.

If there is any doubt whether a situation is a deviation from the principles established in this Code, administrators, employees, interns, apprentices, and collaborators may seek guidance from their immediate management or WeAre7 before formalizing communication of their doubt. However, the communication should be registered through the available channels by administrators, employees, interns, apprentices, and collaborators.

The Board of Directors of 7COMm Group is the final administration instance of the Code of Conduct and Corporate Ethics. Its objectives are as follows:

- i. To ensure the constant improvement of the content of the Code of Conduct and Corporate Ethics of 7COMm Group.
- ii. To ensure that the precepts of the Code are a reference for the management process of

7COMm Group and are respected in the day-to-day work of each administrator, employee, intern, apprentice, and collaborator.

iii. To deliberate, as the final instance body, on all situations that are identified as deviations from the principles contained in this Code.

iv. To deliberate on atypical situations not covered in this Code or in policies, norms, and procedures of 7COMm Group, in order to preserve ethical guidelines.

If any administrator, employee, intern, apprentice, or collaborator observes any potential deviations from this Code, they must report them anonymously or not through the channels below:

i. Email: weare7@7comm.com.br;

ii. Link: <https://forms.gle/mPTznRgULvQyYJpXA>

The information received through these channels will be kept strictly confidential and used by specially designated groups to investigate the facts. These groups, formed according to the nature and origin of the potential deviation, will prepare reports that will be submitted to the Board for deliberation.

5 Amendments to the Code of Conduct and Corporate Ethics of 7COMm Group

7COMm Group reserves the right to modify this Code of Conduct and Corporate Ethics at any time, keeping it updated and available on the website www.7comm.com.br.

Histórico			
Date	Version	Description	Responsible
31/10/2014	2	Update of content	-
08/11/2017	3	Update of content	-
16/07/2021	4	Updating content and incorporating the Procedures and Policies Manual version 6.02 from February 2014	Board of directors, Legal Department, WeAre7
09/09/2021	5	Update of content	Board of directors, Legal Department

