

Code of Conduct and Ethics

6th Edition



Last updated: **September 2024**

MESSAGE FROM THE CHAIRMAN

Since its foundation, Radix has been committed to leading position in the engineering and software market. We have a team of highly qualified and dedicated professionals who work hard to meet our clients' needs through, and deliver customized, humane, and high value-added solutions.

In addition to our constant quest for excellence, we are a company that values and adopts the principles of integrity and ethics. We recognize the importance of collaboration between public and private institutions in the fight against corruption.

However, we know that the work cannot stop. We are aware that the fight against corruption must be incessant and that our Compliance Program needs to be constantly evolving. That is why we continue to invest resources appropriate to our size to improve our integrity mechanisms.

In this context, it is with great honor that I present the new edition of our Code of Conduct and Ethics. I invite all Radix employees to familiarize themselves with this document. Compliance is a responsibility shared by all of us.

We count on you to be part of this story in which success and integrity go hand in hand!



João Carlos Chachamovitz, CEO

João Carlos chachamovitz

INTRODUCTION

Radix is internationally recognized for integrating business results with the appreciation of each employee.

Since our foundation in March 2010, the creation of an environment based on diversity, ethics, integrity and respect for our employees, customers, suppliers and partners has always guided our corporate strategies. Over the years, the company has proudly won important awards and certifications that reinforce our commitment to excellence.

We have ISO 9001, 14001 and 14064 certifications, which attest to our high standards in quality and environmental management. We were recognized as one of the best companies to work for in Brazil, Rio de Janeiro, IT & Telecom, according to the "Great Place To Work" (GPTW) ranking. Radix has also been recognized as a Pro-Ethics Company by the Comptroller General of the Union (CGU), in Brazil, in 5 consecutive editions! We are proud to be a benchmark for fostering an ethical culture and fighting corruption.

However, we are always looking to improve our Integrity Program. We are proud to launch the 6th edition of our Code of Conduct and Ethics. We have also updated our policies and manuals.

We invite you to explore all these updated materials.

We count on your support to promote Radix's culture of business ethics to everyone around you!

Enjoy your reading!

Be sure to check out all these materials.

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OUR COMPANY

A RADIX

Radix hit the market in March 2010, and its name comes from Latin, meaning “root”, “origin”.

At Radix, our goal is to create and implement tailor-made technological solutions to enable each company in its segment to face the most complex market challenges.

We want to accelerate your digital transformation journey and turn your challenges into opportunities and concrete, sustainable, long-term results.

Our solutions boost business and asset performance, optimize processes and effectively drive technology - all by integrating Strategic Consulting with Engineering, Operations Technology and Software.





OUR MISSION

To transform technical and scientific knowledge into results.



VISION

To be the Top-of-Mind provider of technological solutions to complex problems.



VALUES

Long-term relationship, agility, ethics, challenge, innovation, focus on the human being and commitment.



ETHICS IN EVERYDAY LIFE

Before thinking about ethics within Radix, it is essential to reflect on how we act in our daily lives. Corruption, whether it's embezzling large amounts of money or accepting the wrong change, remains the same immoral practice. There is no greater or lesser corruption. Any conduct is reprehensible and intolerable.

Think about what you can change in your daily attitudes to become a more upright person!



ETHICS IN THE BUSINESS CONTEXT

The recent history of several countries shows the existence of several corruption scandals involving well-known companies, businesspeople and influential politicians. Facts such as the payment of bribes to politicians, the misappropriation of public funds and the overpricing of public works have been in the news in recent years.



It is crucial for everyone to always be alerted to identify and take the necessary measures in the event of suspicious situations in the business environment.

Look for integrity not only in your personal life, but also in your professional life.

An ethical environment is built on the good conduct of everyone, at all times and in all places!

DID YOU KNOW?



Brazil is currently ranked 104th in the world for perception of corruption. According to data from Transparency International, which assesses corruption in the public sector in 180 countries, in 2023 Brazil scored 36 points below the global average (43 points), the regional average for the Americas (43 points), the BRICS average (40 points) and even further behind the average for the G20 countries (53 points) and the OECD (66 points).

This index shows how much people realize the influence that bribery, abuses of power (political or economic) and secret negotiations have on and devastate society. In other words, Brazil needs to make a lot of progress. We're doing our bit!

OUR COMPLIANCE

WHAT IS COMPLIANCE?

Compliance is an English word meaning “to act in accordance with” or “to conform to”. Thus, whenever we use this term, we are referring to compliance with Anti-Corruption Legislation, which covers Brazilian and International laws, and to our own Compliance Program, notably the code, policies, procedures and manuals that govern ethical and upright behavior within Radix.

For the purposes of our Compliance Program, Anti-Corruption Legislation refers to all laws and other normative acts related to the prevention and sanctioning of corrupt practices and other related irregularities, such as bribery, fraud and money laundering, including, but not limited to: (i) Brazilian Anti-Corruption Law (Law No. 12.846/2013); (ii) Foreign Corrupt Practices Act (FCPA); (iii) UK Bribery Act (UKBA); (iv) the Brazilian Penal Code (Decree- Law No. 2.848/1940); (v) Brazilian Administrative Improbity Law (Law No. 8.429/1992); (vi) Brazilian Money Laundering Law (Law No. 9.613/1998); (vii) Decree No. 5.687/06, which enacted the United Nations Convention against Corruption; (viii) Brazilian Anti-Corruption Decree (Decree No. 11.129/22); (ix) Brazilian Bidding Law (Law No. 14.133/2021); (x) Brazilian Antitrust Law (Law No. 12.529/2011); (xi) Brazilian Conflict of Interest Law (Law No. 12.813/2013); (xii) all normative acts exhausted under the terms of the aforementioned laws and decrees by the Federal Comptroller General and the Brazilian Public Administration; (xiii) all laws or normative acts exhausted by authorities with applicable jurisdiction, related to this matter; etc.

WHAT IS A COMPLIANCE PROGRAM?

The compliance program is the set of measures taken to ensure a culture of integrity in Radix’s internal and external environment. This Code, our policies and manuals are all part of a large system that is constantly improving.

FOUR PILLARS

Our compliance program is based on four fundamental pillars:

INSTRUÇÃO E CAPACITAÇÃO

Radix values the production of materials with clear, objective and accessible language, and the continuous training and awareness of its employees. Communication and marketing strategies are essential for ideas to be propagated efficiently and for compliance training to be widely adopted.

PREVENTION

Acting preventively is very important. Senior management plays an essential role in adopting, implementing and disseminating ethical conduct, which must be observed by all Radix employees and third parties who have dealings with Radix.

Training, our policies that punish offenders and the Integrity Channels are all tools used to prevent irregularities. Prevention is always better than cure.

MONITORING AND DETECTION

Radix is concerned with constantly monitoring its activities and detecting illegal or unethical conduct practiced in its business context.

REACTION

There is no tolerance for conduct that does not comply with our compliance program. Radix will deal with deviations and, if necessary, apply the appropriate disciplinary measures to employees and may terminate the contract with the respective business partner.

PROTAGONISTS

SENIOR MANAGEMENT

Directors, members of the Board of Directors and other Radix managers are key players in the company's compliance. It is up to them, whenever possible, to show support for compliance and engage the people in their team. They must influence their leaders by example.

We value a track record of commitment and integrity from our managers.

ETHICS COMMITTEE

Our Ethics Committee will be made up of at least three members, consisting of the CEO, a company employee with knowledge of compliance, human resources and law, and an independent member, who may be internal or external, with the Board of Directors making the choice. The number of members, however, may be increased by decision of the Board of Directors.

RESPONSABILITIES

The duties of the Ethics Board include:

- » Updating and disseminate the guidelines of the Code of Conduct and Ethics;
- » Interpreting the text, clarifying any doubts and taking a position on any conduct not provided for in the Code;

- » Analyzing suspicions of ethical deviations forwarded by employees and determining whether to start investigating the facts;
- » Assessing and deciding on any violations, applying the respective disciplinary measures;

PREROGATIVES

Radix guarantees the members of the Ethics Committee and the Compliance Officer that no punishment, direct or indirect (such as unjustified transfer of departments or cities), will be directed as a form of reprisal for investigations and denunciations of illicit or unethical acts, including those carried out by Directors, members of the Board or the CEO himself.

COMPLIANCE OFFICER

This is the Radix employee chosen to be responsible for coordinating the main actions of the Compliance Program.

RESPONSABILITIES:

The Compliance Officer's duties include:

- » Building and disseminating a culture of integrity and ethics in all Radix sectors;
- » Coordinating actions relating to the procedures for implementing, monitoring and improving the Compliance Program;
- » Updating and approving the Codes, Policies and Manuals related to the Radix Integrity Program;
- » Managing the Integrity Channels;
- » Coordinating non-compliance investigations and submitting the conclusions to the Ethics Committee for consideration.

CHAMPIONS

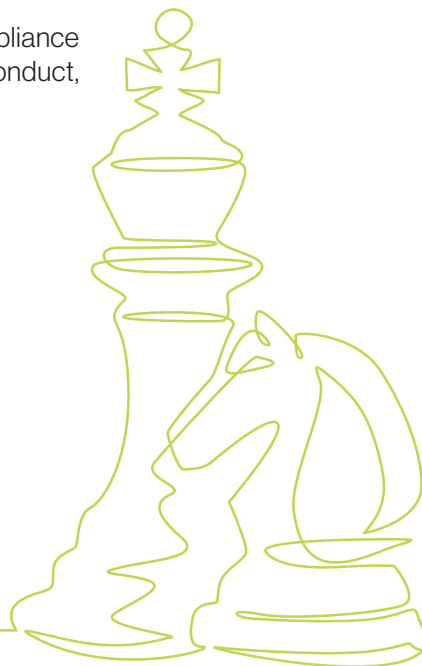
To assist the Ethics Committee and the Compliance Officer in disseminating the ethical culture and applying the Integrity Program, Radix appoints employees to act as local compliance representatives and multipliers of the Integrity standards.

These local representatives are called Champions and represent Radix in the respective location where the Company operates, both in Brazil and abroad.

ATTRIBUTIONS:

The Champions' duties include:

- » Encourage employees to comply with the rules of the Radix Integrity Program;
- » Assisting the Ethics Committee and the Compliance Officer in publicizing the actions of the Integrity Program; and
- » Reporting to the Ethics Committee and Compliance Officer on the identification of possible misconduct, irregularities or unethical acts.



OUR COMMITMENT TO ETHICS AND INTEGRITY

The Program is led by the Ethics Committee, a collegiate body responsible for disseminating the Program's guidelines and assessing possible ethical violations, and by the Compliance Officer, responsible for managing its main actions. We also count on the work of the Compliance Champions, who act as multipliers of Integrity and Ethics within Radix. In addition, the Program has the continuous and unrestricted support of the company's Senior Management and Management.

But our compliance is not just for the members of the Ethics Committee, the Compliance Officer, the Champions or those who hold the highest positions within the company. All Radix employees need to be involved, without exception. Regardless of their role or sector within Radix, everyone can contribute!

The effectiveness of compliance depends on your collaboration!



For this reason, you are invited to learn about the main rules set out in this Code and, if necessary, use our Integrity Channels.

INTEGRITY CHANNELS

WHAT ARE THEY?

Integrity channels are Radix's internal and external means of communication for the Compliance area. You can either report a situation that you consider suspicious, and thus make a complaint, or ask questions and request clarification on the rules of our Integrity Program.

WHAT ARE RADIX'S INTEGRITY CHANNELS?

Radix has two integrity channels:

- » Inquiry Channel (canaldeduvida@radixeng.com.br); and
- » The Whistleblowing Channel (canaldedenuncia@radixeng.com.br).

Radix treats these channels extremely seriously and recommends using them whenever necessary!



IS IT SAFE TO USE THEM?

The Integrity Channels are completely safe and reliable. The Channels have guarantees that ensure professionalism, confidentiality, secrecy, protection of the whistleblower and the prohibition of retaliation. Always feel free to use them. Radix will take all necessary measures to protect the whistleblower in good faith.

HOW DOES THE INQUIRY CHANNEL WORK?

The Inquiry Channel serves as your Compliance teacher. Any questions you may have about this Code, our policies or our Compliance procedures will be answered through the Channel.

DON'T BE SHY TO ASK!



HOW DOES THE REPORTING CHANNEL WORK?

The Whistleblower Channel will be how you can report to Radix any possible irregularities detected, notably the practice of acts harmful to the Public Administration as provided for in all Anti-Corruption Legislation, particularly Law No. 12.846/2013 (Brazilian Anti-Corruption Law). Following your complaint, investigations will be launched to determine the facts.

CAN I MAKE AN ANONYMOUS COMPLAINT?

Yes, Radix accepts anonymous reports and ensures that the whistleblower is protected in good faith throughout the investigation.

AM I REQUIRED TO REPORT AN ILLEGAL OR UNETHICAL ACT?

If you become aware of an illegal act and do not report it, Radix will consider your conduct to be unacceptable. Remember: ethics cannot be measured. You either act with integrity or you don't. There is no middle ground!

More than an option, it is an obligation to report illicit practices of which you are aware. Failure to do so can lead to disciplinary action being taken against the employee.

GUIDELINES APPLICABLE TO OUR BUSINESS RELATIONSHIPS

CORRUPTION

WHAT IS CORRUPTION AND HOW IS IT DEFINED?

For legal purposes, corruption can be defined as offering or promising an undue advantage to a public official, in order to get them to perform, omit or delay an official act.

Here in this Code, we will adopt a broader concept, understanding corruption as illegal conduct practiced in the context of a relationship with the public sector, which amounts to a violation of Anti-Corruption Legislation, notably Law No. 12.846/2013 (Brazilian Anti-Corruption Law), the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act (UKBA).

In the corporate environment, corruption can take many forms, such as:

- » The payment of a bribe to a public official to “facilitate” the obtaining of an administrative license or the release of goods through customs;
- » Paying a bribe to a public official to improperly obtain confidential information about a public administration project; or
- » The creation of obstacles to inspection by public bodies and institutions of any kind.

Radix strongly prohibits the practice of these and any other corrupt and fraudulent acts by its employees and third parties who acting on behalf of Radix. Regardless of whether the conduct was carried out with the best intentions of benefiting the Company, Radix does not tolerate such behavior and, if it is carried out, will adopt the appropriate disciplinary measures.

BIDS AND ADMINISTRATIVE CONTRACTS

IS THERE CORRUPTION IN THE CONTEXT OF BIDS AND ADMINISTRATIVE CONTRACTS?

Yes. The following are examples of acts harmful to the Public Administration practiced in bids and administrative contracts:

- » Frustrating or defrauding, by means of an arrangement, combination or any other expedient, the competitive nature of a public bidding procedure;
- » Fraudulently or irregularly creating a legal entity to participate in a public bidding process or enter an administrative contract (“front company”); and
- » Manipulating or defrauding the economic and financial balance of contracts entered with the public administration.

It is the duty of all Radix employees and third parties who in any way act on behalf of the Company to comply with the rules applicable relating to public bids and administrative contracts.

Radix is against any attempt to interfere with or gain unfair advantage in public bids or contracts. Offering improper benefits to public or private officials is not allowed. Any violations will be punished with appropriate disciplinary actions.

GIFTS, PRESENTS AND HOSPITALITIES

WHAT ARE THEY?

Gifts: in general, these are objects offered as a courtesy, advertisement or to commemorate certain events and dates. They have no significant commercial value.

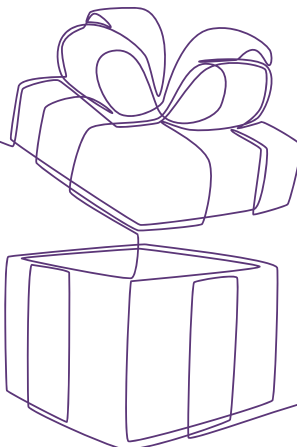
Examples: pens, bottles, key rings, notebooks.

Presents: these are goods that have a higher marketing value, without having a promotional nature like gifts. They are usually souvenirs offered in more established business relationships, as a form of appreciation.

Examples: bottles of alcoholic drinks, sweets, fine stationery.

Hospitalities: payment of certain expenses in the context of meetings, trips or work events.

Examples: airline tickets, meals (lunch or dinner), accommodation, entertainment tickets (sporting or musical event).



RULES FOR THE PUBLIC SECTOR

AS A RADIX EMPLOYEE, WHEN CAN I RECEIVE GIFTS AND PRESENTS?

It is strictly forbidden to offer or receive gifts, presents and hospitality when dealing with a Public Official or a third party related to them, regardless of the value of the corporate courtesy. The exceptions, if any, are described in the appropriate regulations.

AS A RADIX EMPLOYEE, CAN I GIVE HOSPITALITYS:

TO PUBLIC OFFICIALS?

Regardless of the negotiation or event, Radix does not allow travel, accommodation, transportation or other hospitality expenses to be offered or paid to public officials or third parties related to them.

EVEN IF IT'S JUST LUNCH OR DINNER?

It is also expressly forbidden to pay for meals for a public official or a related third party.

WHAT ABOUT PROMOTIONAL GIFTS AND PRESENTS?

Radix also prohibits the granting of gifts, presents or prizes to a public official or related third party. In this case, unlike relationships in the private sector, the value of the item offered or the context of the negotiation is irrelevant.

CAN I TAKE CASH?

Under no circumstances may you receive and/or offer cash, even if it is called a gift, prize, advantage or any other denomination.

RULES FOR THE PRIVATE SECTOR

AS A RADIX EMPLOYEE, WHEN CAN I RECEIVE GIFTS AND PRESENTS?

In the private sector, you may only receive promotional gifts that have no commercial value and bear the logo of the supplying company, the client or their representative. Gifts should only be received on special occasions. In both cases, the courtesy may not exceed the limit of \$50 (fifty dollars).

AS A RADIX EMPLOYEE, WHEN CAN I GIVE THEM?

In the private sector, gifts may only be offered to clients, partners and suppliers when they form part of the Company's marketing policies. In addition, the value must not exceed \$50 (fifty dollars).

CAN I RECEIVE OR OFFER MEALS, HOTELS AND AIRLINE TICKETS?

It is possible to receive or offer meals, preferably during business hours.

In the private sector, the limit for offering or paying for meals is \$50 (fifty dollars) per person.

Radix does not agree with extravagant or abnormal expenses. The purpose of business lunches is not to impress third parties, but to make them feel comfortable with the occasion. Let's leave it to our technique and ethics to surprise and impress our clients.

As for other hospitality, such as airline tickets, hotels and event tickets, these must be analyzed on a case-by-case basis by the Compliance Officer.

For more details on this, see the Corporate Courtesies Policy.



WHAT HAPPENS IF I DON'T COMPLY WITH THESE RECOMMENDATIONS?

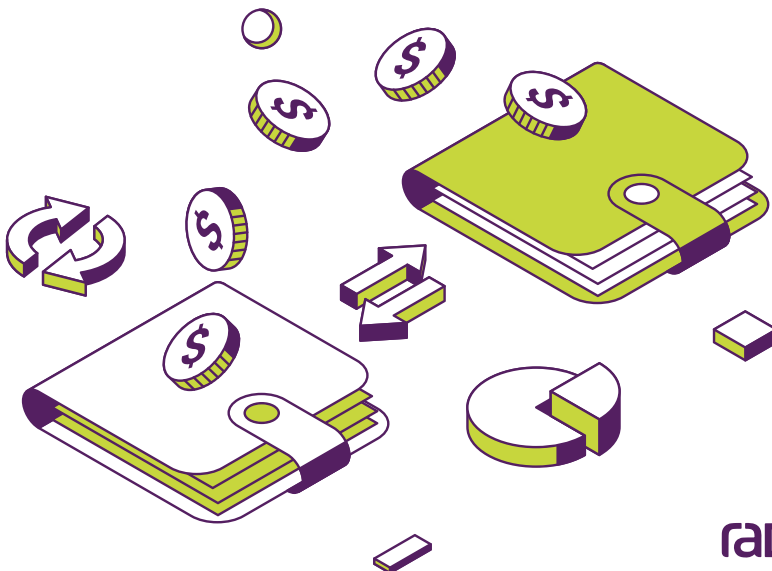
Failure to comply with the rules on gifts, presents and hospitality will subject the person responsible to the appropriate disciplinary measures.

DONATIONS AND SPONSORSHIPS

DOES RADIX MAKE DONATIONS AND GRANT SPONSORSHIPS?

Yes. As a general rule, Radix allows donations to philanthropic organizations and sponsorships to athletes, research organizations and other partners. However, these transactions require special care. There are a number of specific rules for making them, in accordance with Radix's own policy on the subject. Be sure to consult them.

Contributions of this kind must comply with the rules laid down in accounting, tax and fiscal legislation. In other words, donations cannot be used for shady purposes, such as embezzlement, illegal payments or any form of circumvention of national or foreign legislation.



WHY SHOULD WE BE CAREFUL WITH DONATIONS AND SPONSORSHIPS?

Because most acts of corruption are often masked by donations and sponsorships. That's why it's important that employees are always alert to this issue within Radix.

POLITICAL PARTIES

CAN I MAKE CONTRIBUTIONS TO POLITICAL PARTIES ON BEHALF OF RADIX?

It is strictly forbidden to make any contributions on behalf of Radix to candidates for political office, politicians, political parties or other political organizations.

If such contributions are made, they must be reported immediately to the Compliance Officer or the Ethics Committee. Any employee who does anything described above will be punished accordingly.



CONFLICT OF INTERESTS

WHAT IS IT?

A conflict of interest is the situation in which an employee's personal interests come into conflict with Radix's interests and may influence the decisions to be made by the professional.

CONFLICT OF INTEREST IN THE PUBLIC SECTOR

WHAT CONSTITUTES A CONFLICT OF INTEREST IN THE PUBLIC SECTOR?

When we think about the issue of conflicts of interest, we must be especially careful when dealing with public officials.

There are certain situations and attitudes which, according to the law, constitute a conflict of interest for public officials:

- » Disclosing and use of privileged information obtained because of the public office held;
- » Doing an act for the benefit of a legal entity;
- » Receiving gifts as a form of bribe;
- » Providing services to companies linked to the public office held.

Therefore, Radix employees who have a close friendship or family relationship of up to the third degree with Public Officials must inform the Compliance Officer and the People and Management department, who will assess the risks arising from this relationship.

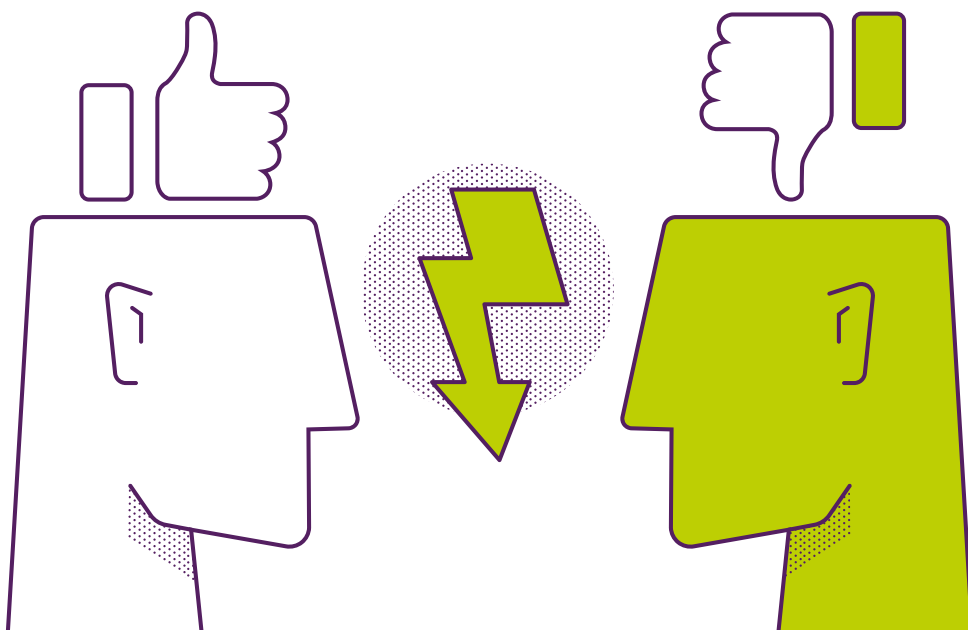
EXAMPLES OF HYPOTHETICAL SITUATIONS:

In the public sector:

- » The brother of a Radix employee is the authority that approves or authorizes an amendment to a public contract;
- » The spouse of a Radix employee works in the procurement department of the organization with which Radix is interested in bidding.

In the private sector:

- » A Radix employee uses office equipment (ream, printer, scanner, telephone, etc.) for personal purposes;
- » A Radix employee fails to deliver a certain piece of work because he is favoring, on the company's premises, the activities of his second job.



CONFLICT OF INTEREST IN THE PRIVATE SECTOR

CAN I PURSUE ANOTHER PROFESSIONAL ACTIVITY BESIDES RADIX?

Yes. It is permissible to engage in another professional activity, provided that:

- » it does not constitute a new employment relationship;
- » it takes place during hours other than Radix working hours;
- » it does not affect the activities carried out at the company;
- » it does not constitute a conflict of interest; and
- » Radix believes it is compatible, and activities similar to those carried out by the company cannot be carried out.

But pay attention! Employees are prohibited from carrying out any type of professional activity linked to people and/or companies that are Radix customers, partners, competitors or suppliers.



SHOULD I INFORM RADIX OF ANY OTHER PROFESSIONAL ACTIVITY?

Yes. The immediate supervisor and the People and Management department must be notified immediately. In turn, the Compliance Officer is responsible for analyzing the compatibility and existence of a potential conflict of interest in the professional activity. When communicating, the employee should use the Inquiry Channel.

In addition, as long as the employee has a relationship with Radix, he or she must inform Radix of any changes to this professional activity.

SHOULD I INFORM RADIX OF MY RELATIONSHIP WITH EMPLOYEES FROM COMPETING COMPANIES?

Yes. Employees who have relatives of up to the third degree working or providing services, even temporarily, in competing companies must follow the same reporting procedure as above.

Radix takes these precautions to avoid the exchange of strategic commercial information and the risk of cartel formation. For example, the mere discussion of pricing can give rise to an antitrust investigation with criminal repercussions!

Violation of the conflict-of-interest rules subjects the offender to the appropriate disciplinary measures, as defined in a specific policy.

SHOULD I INFORM RADIX OF ANY RELATIVES OF EMPLOYEES OF THE COMPANY ITSELF (RADIX)?

Yes. All hiring of relatives up to the third degree of current Company Employees must be approved by the Compliance Officer, regardless of the type of hiring and hierarchical level.

To this end, the hiring process must be subjected to a careful assessment. Hiring approval can only take place if:

- » It has the analysis and approval of the People and Management Board and the Compliance Officer;
- » The candidate is not assigned to the same sector as the Employee who is their relative, either in the same unit or in the same Corporate Area in another location;
- » There is no management of the parties involved; etc.

Other criteria may be assessed at the discretion of the People and Management Board and the Compliance Officer, depending on the specific case, always with a view to Radix's best interests and avoiding situations of Conflict of Interest.

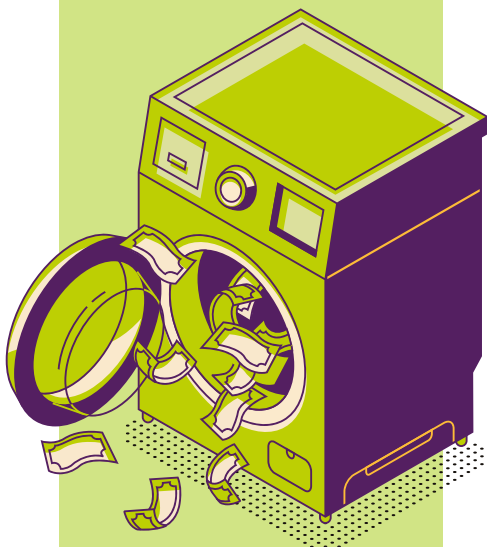
COLLABORATION WITH A GOVERNMENT INVESTIGATIONS

All conduct with public officials must be guided by respect, transparency and ethics. As a rule, it is the duty of all employees and third parties acting on behalf of Radix to cooperate with investigations or inspections carried out by public bodies.

MONEY LAUNDERING PREVENTION

Anti-corruption legislation in general, and particularly Law No. 9.613/1998 (Brazilian Money Laundering Law) and the Money Laundering Control Act, stipulates that suspicious financial activities must be reported to the public authorities to prevent crimes involving the concealment of assets, rights and values.

Therefore, Radix employees must report any conduct they suspect of money laundering to the Compliance Officer or the Ethics Committee. The Ethics Committee, the Board and Radix's legal department will take appropriate action, as the Company does not condone such illegalities.



INTERNATIONAL CORRUPTION

International corruption occurs when an undue advantage is offered to a foreign public so that he or she acts (or fails to act) in favor of a company.

Radix operates abroad and expressly prohibits the practice of any conduct related to international corruption.

Therefore, Radix will severely punish any employee who commits acts of international corruption, regardless of the country in which they occurred.

Remember: any act of corruption, national or international, causes serious damage to the credibility and image of our company!



RELATIONS WITH COMPETITION

Radix, like any competitive company in a capitalist market, seeks to increase its profits. However, Radix is aware of the importance of adopting practices that comply with the economic order, antitrust legislation and anti-corruption legislation as a whole, notably Law No. 12.529/2011 in Brazil and the Sherman Antitrust Act and the Clayton Act in the United States.

In view of this, Radix publicly declares that it is against conduct that is intended to limit or harm free enterprise and free competition, whether in private business relationships or in the context of public contracts.

In the case of business partnerships, any evidence of infringement of the economic order or the competitive nature of tenders will be grounds for terminating the partnership.

We highlight the following practices of violations of the economic order provided for in the Anti-Corruption Legislation, notably in Law No. 12.529/2011 (Brazilian Antitrust Law) consisting of agreeing, combining, manipulating or adjusting with a competitor:

- » the prices of goods or services offered individually;
- » the production or marketing of a restricted or limited quantity of goods or the provision of a restricted or limited number, volume or frequency of services;
- » the division of parts or segments of a current or potential market for goods or services, through, among other things, the distribution of customers, suppliers, regions or periods;
- » prices, conditions, advantages or abstention from public tenders.

Employees who engage in anti-competitive conduct within Radix will be subject to the respective disciplinary measures.

RELATIONS WITH BUSINESS PARTNERS AND SUPPLIERS

It is important to note that the provisions of this Code of Conduct and Ethics also apply to Radix's business partners and suppliers.

Bearing in mind the rules of the Anti-Corruption Legislation, Radix is concerned with forming corporate relationships based on ethics, trust and transparency. This is precisely why we make sure that we choose business partners, suppliers and third parties who share the same values and principles as the company.

As a good practice, before formalizing a deal, Radix carries out a series of integrity due diligences, specified in our policies. On the other hand, if any unethical, illegal or corrupt conduct is found on behalf of the company, Radix will immediately terminate the partnership and/or contract.

CONSEQUENCE MANAGEMENT

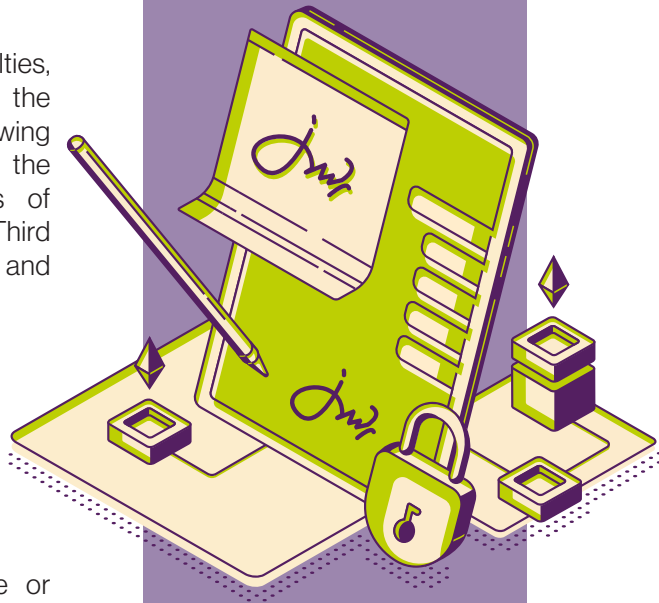
Any Employee or Third Party who deviates from the values of ethics and integrity, current legislation or the provisions of this Code or any Integrity Program regulation will be subject to measures or sanctions aimed at correcting the inappropriate attitude.

In addition to legal penalties, misconduct may result in the application of the following disciplinary measures to the Employee, including members of Senior Management, or to the Third Party, depending on the nature and seriousness of the infraction:

- » Verbal warning;
- » Written warning;
- » Suspension; and
- » Dismissal of the employee or termination of the contract with the Third Party.

In all cases, the facts will be investigated through a formal procedure, detailed in a specific policy.

Disciplinary measures will be applied following a decision by the Ethics Committee.



CONDUCT AT GENERAL

HUMAN RIGHTS

Radix is against any form of violation of human rights, including torture, psychological, physical or moral violence, hate speech, prejudice against minorities, among other acts that offend human dignity in the broadest sense. We do not allow or accept any such practice!

SLAVE, FORCED AND CHILD LABOR

Regardless of the partner, public or private, Radix will never engage, support or conceal practices that promote, facilitate, allow or perpetuate slave or forced labor, or child labor.

We will not accept business relationships with companies that have such practices in their history.



MORAL AND SEXUAL HARASSMENT

Bullying in the workplace is any conduct intended to humiliate, embarrass, disqualify and psychologically diminish a person. It is not always done through words. Gestures and actions can also constitute bullying. Examples: abusive orders, threats, blackmail, verbal offenses.

Sexual harassment is also a form of embarrassment, with the aim of obtaining favors of a sexual nature, either through words or attitudes.

Radix values and promotes a safe environment and does not tolerate harassment (moral and sexual) or other discriminatory, prejudiced, violent, offensive and/or intimidating conduct.

INFORMATION SECURITY

Radix is aware of the importance of keeping its corporate information protected and of the impacts of security incidents. In this sense, it is committed to adopting the pillars of information security in its activities, namely:

- » **Confidentiality:** protection of information considered confidential against leaks and unauthorized access;
- » **Integrity:** preserving the reliability, accuracy, updating and consistency of information, avoiding undue modification of documents;
- » **Availability:** adequate accessibility to the information needed to carry out its activities.

To guarantee the total security of information of interest to Radix, certain practices must be adopted. Some examples are:

- » Not sharing Radix passwords and access credentials, which are unique and non-transferable;
- » Properly storing all documentation and information in a secure location on the network or in the cloud;
- » Ensure that their equipment, operating systems, applications and systems are up to date; and
- » Be careful when entering unknown links and downloading attachments from suspicious emails.

SENSITIVE AND CONFIDENTIAL INFORMATION

Some Radix employees invariably handle information that is considered secret or confidential when carrying out their activities. These are examples of the legal hypotheses of secrecy:

- » Commercial and industrial secrets;
- » Bank and tax secrecy;
- » Legal secrecy.

Therefore, all data relating to commercial proposals, contracts, projects, specifications and technical drawings, budgets, accounting and finance, cost spreadsheets, agreements, investments, among others, must be duly protected and classified in proportion to their degree of secrecy and strategic importance. This is data whose disclosure could lead to liability or strategic damage for Radix.

If there is any doubt about the secrecy of the information, as well as the possibility of disclosure, the immediate supervisor and, if applicable, the Integrity Channels should be consulted.

In the event of an official request for information from any government authority, the data may be provided in accordance with the terms of the request, after Radix's legal department has given its opinion and has been duly monitored (jointly).



Besides these cases of confidentiality, it's important to highlight the need to protect personal data—especially after laws like Brazil's LGPD and the EU's GDPR. Check out the topic below!

INTELLECTUAL PROPERTY

Intellectual property is a strategic and intangible asset of Radix, covering materials created by Employees throughout their work at the Company. If there is a transfer of ownership agreement in this regard, Radix also considers creations by Third Parties or Partners of the Company to be an intellectual property asset.

In this regard, Radix establishes the following guidelines:

- » Employees and Third Parties acting on behalf of Radix must undertake to protect patents, trademarks, copyrights, trade secrets and other confidential information;
- » Information classified as Radix intellectual property must only be used for legitimate business purposes. Unauthorized persons are not permitted to have access to this information, which must be stored exclusively on approved and secure devices.
- » Before sharing internal Company, customer or third-party information, it is necessary to ensure that all internal protocols are followed and that proper authorization is in place, to preserve the competitive advantage provided by Radix's intellectual property.

PROTECTION OF PERSONAL DATA

Radix undertakes to process personal data in accordance with the principles and rules set out in Brazil's General Personal Data Protection Law (LGPD - Law 13.709/2018), the EU's GDPR, and other relevant standards and national and international best practices.

All operations to be carried out with personal data include

- collection, storage, reproduction, deletion, among others - must respect the principles of processing and be supported by some legal basis provided by law. In addition, Radix, as a processing agent, must respect all the rights of data subjects.

Be sure to check out Radix's specific policies and procedures on the processing and privacy of personal data.

COLLECTIVE COMMITMENT TO ETHICS AND INTEGRITY

Despite Radix efforts to modernize and adopt a Compliance program, we depend on the commitment of everyone - employees, partners, directors, executives and third parties, whether linked to Radix or not - for the goal to be achieved and for us to have an effectively ethical and upright environment.

In this way, Radix will be recognized as a benchmark both for the quality of its products and services and for its anti-corruption actions,

fraud and other illicit practices.

We count on your help, dear reader, to ensure that the measures adopted here are fully complied with.



INDEX OF REVISIONS					
Code of Conduct and Ethics					
REV.	DATE	DESCRIPTION	BY	CHECK	APPROVED
1	07/20/2015	Initial Issue	ABittar	FLopes	LRubião
2	06/20/2016	Update	ABittar	FLopes	LRubião
3	10/25/2018	Update	ABittar	FLopes	LRubião
1	07/17/2020	Update	ABittar	FLopes	JChachamovitz
2	08/18/2022	Update	ABittar	FLopes	JChachamovitz
3	09/30/2024	Update	ABittar	FLopes	JChachamovitz



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