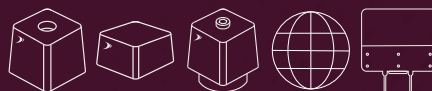




# CODE OF CONDUCT AND ETHICS





## LETTER FROM OUR CEO

Once again, we are united and facing challenging times, and considering the new perspectives, we are building the foundations of our organizational culture as a team.

I present to you our Code of Conduct and Ethics, a document that supports and reflects the interpretation and outlining of Dynamox's Values, establishing guidelines and orientations to help us promote an open and transparent dialogue inside and outside our organization, since omission is not one of our choices.

The purpose of this code is to guide Dynamox's workforce in their day-to-day activities, in decision-making, in their interactions and behaviors. That is why it is important that everyone follows the instructions in this code.

Thank you for being part of this team and for upholding our values and commitments.

Guillaume Barrault  
CEO - Dynamox



## CODE OF CONDUCT AND ETHICS

### INTRODUCTION

Originating from the Greek “ethos”, the word “ethics” means “way of being, character”. It also gives its name to the set of rules of conduct, essential in any work environment.

Dynamox’s Code of Conduct and Ethics is a document that brings together the fundamental principles that support the purpose of our business. Understanding and following these values and principles means always learning and practicing the expected behaviors on a daily basis, such as commitment, respect, empathy, simplicity, creativity and the search for results.

### MISSION

Make our technologies accessible to all business sizes.

### VISION

To be a global reference in user-friendly sensing and data analysis solutions, that support our customers’ digital transformation.

### VALUES

Dynamox seeks excellence in its processes through:

- **C**OMMITMENT to meeting stakeholders’ expectations.
- **R**ESPECT for people in all their interactions.
- **E**MPATHY when managing social and environmental issues.
- **S**IMPLICITY in the way we act and do things.
- **C**REATIVITY in proposing innovative solutions.
- **E**THICS in the positioning and obedience to the laws in the various relations.
- **R**ESULTS achieved in a solid and consistent manner.

# COMMITMENT

## Compliance with Standards and Laws

Comply with all the laws that apply to the business and the segment in which it operates, as well as the internal rules that affect daily work responsibility.

## Use and Protection of Assets

We are all responsible for the safeguarding and proper use of Dynamox's assets and property, such as machinery, equipment, facilities, vehicles, licenses, information, the Company's brand and reputation.

We must make proper use of tangible and intangible assets, serving their legitimate purpose and not using them to gain any kind of personal advantage.

## Managers' Responsibility

To comply with and promote compliance with this Code by means of management and monitoring devices, permanently disclosing it, with a willingness to clarify doubts and receive suggestions.

Not to use their position or role to infer, influence or exert any kind of pressure or coercion in the contracting of services from which they derive direct or indirect benefit.

Promote a healthy working environment, free from embarrassment, innuendo or any kind of prejudice or discrimination. This approach must also be applied to the people with whom we interact externally.

## Data Privacy

Maintain absolute confidentiality of personal and institutional information in accordance with current legislation and as described in internal regulations and standards and may not be used for personal gain.

Dynamox, in accordance with Law No. 13,709/18 - General Data Protection Law (Lei Geral de Proteção de Dados (LGPD)), maintains appropriate measures to ensure that the personal data of clients, employees, suppliers and partners is accessed and/or processed only by people who need this information to perform their tasks, and that only data strictly necessary to perform the activities is collected, especially in relation to data classified as sensitive by the LGPD.

## Confidentiality

Dynamox declares that it is the legitimate holder and owner of information that it considers confidential, which is essential and confidential in the working relationship, as well as in relations with other clients.

Employees and contractors, aware of the obligation of confidentiality of information, irrevocably and irreversibly undertake to maintain complete and absolute confidentiality with regard to any and all confidential information related to Dynamox's activities for themselves or for their clients, as well as their affiliates, direct or indirect controlling companies and related parties of which they may have knowledge or access by virtue of the development of their activities, and may not, under any pretext, use, disclose, reveal, testify in or out of court, reproduce or otherwise make known to third parties.

Dynamox may use electronic or other means to verify compliance with confidentiality, including filming in controlled access locations and monitoring of electronic correspondence (e-mails) generated as a result of the work.

### **Shareholders**

Record reports and balance sheets correctly and consistently and make its books available with complete transparency to internal and external audits and to the competent public agencies when necessary. Observe and promote the organization's compliance system.

# RESPECT

## People's Health and Safety

Dynamox is concerned about employee health and safety and wants a safe work environment. Every employee is expected to:

- Report unsafe situations they have identified.
- Care and worry about their safety and that of their colleagues.
- Comply with rules and procedures.

No activity should be carried out if there is any doubt that the safety, life and integrity of people is Dynamox's priority.

## Conflict of interest

The employee must commit to declaring situations that could constitute a conflict of personal or economic interests in their relationship, including the participation of politically exposed people or representatives of political parties. Any kind of family relationship between employees and former employees and suppliers needs to be communicated before the business relationship begins.

The organization does not allow family members and/or relatives to be retained or hired in positions where there is a direct hierarchical relationship between them, in interdependent or correlated positions.

## Diversity, Discrimination and Prejudice

No employee or potential employee will receive discriminatory treatment because of their race, skin color, ethnic origin, nationality, social position, age, religion, gender, sexual orientation, personal aesthetics, physical, mental or psychological condition, marital status, opinion, political conviction, or any other factor of individual differentiation. In the recruitment, selection and promotion processes, candidates are assessed solely based on their skills and ability to meet and adapt to the expectations of the position; decisions based on prejudice, favoritism or even privileges of any kind will not be accepted.

## Image

We are all responsible for promoting and maintaining the company's reputation in all forms of communication.

Any external communication, through social media, identifying oneself as an employee to report issues that jeopardize the company's image and/or reputation, clients and suppliers is not allowed. This includes fake news, political positioning, illegalities, defamation, disrespectful, prejudiced messages or those contrary to human rights.

## **Harassment**

Maintain a respectful, healthy, and productive work environment, free from intimidation and harassment of any kind.

## **Alcohol, Weapons and Drugs**

We do not allow gambling, the use of narcotic substances of any kind, carrying weapons in the workplace or entering or remaining on company premises under the influence of alcohol.

# EMPATHY

## Environment

Understand Dynamox's Health, Safety and Environment System Policy.

Promote the correct disposal of garbage and waste. Execute the work standards to guarantee products and services that comply with environmental legislation.

Act conscientiously, seeking to minimize and mitigate the activities performed.

## Human Rights

Dynamox respects the free expression of thought at all levels.

We do not accept forced or compulsory labor, child labor or any other form of exploitation that violates human dignity.

Dynamox repudiates any form of sexual exploitation and trafficking of children and adolescents and is committed to ensuring respect for human rights by prioritizing relationships with partners and suppliers who share the same principles and policies. Dynamox believes that anyone who facilitates or acts as an intermediary in cases of sexual exploitation and/or trafficking in minors should be penalized under the law and that any situation in this regard should be referred to the competent authorities.

## Work Environment

Make moderate use of electronic systems for personal purposes, as long as such use does not contravene internal rules and guidelines or hinder the progress of work, ensuring an organized and safe working environment.

## Open and transparent dialogue

Dynamox encourages its employees to interact clearly and transparently in their interpersonal relationships, as well as to act with integrity, honesty, and professionalism.

We focus on what adds value. As a result, we are more agile and gain efficiency and productivity.



# SIMPLICITY

## **Donations and Sponsorship**

Dynamox supports positive change in society by encouraging donations among its employees. Sponsorships are guided by their guidelines and analyzed by the company's directors. It is forbidden to sponsor or make any donation on behalf of Dynamox that deviates from current legislation.

## **Treats and Gifts**

Gifts and institutional invitations may be accepted practices of kindness and cordiality within a business relationship, but they require cautious consideration. When giving or receiving a gift, anywhere in the world, a rigorous analysis of each situation is essential, considering issues such as the nature of the courtesy, the values involved, the context, the applicable local laws, and the frequency. Keep in mind that the maximum value of gifts is up to 10% of the current national minimum wage.

# CRIATIVITY

## **Partnership with Educational Institutions**

Dynamox values and encourages partnerships with educational institutions and believes that sharing information and experiences expands the frontiers of knowledge.

## **Intellectual Property**

Intellectual property rights created, directly or indirectly, by Dynamox's employees, trainees and third parties are the exclusive property of Dynamox, which may use them in whole or in part, with or without modifications, and may demand their registration both in Brazil and abroad.

Intellectual property includes trademarks, designs, domain names, copyright, innovations, inventions, processes, products, projects, prototypes, ideas, financial, commercial and market information or any other activity of non-material nature carried out by the company or contracted by it.

# ETHICS

## **Fraudulent Behavior**

All persons acting on behalf of Dynamox are subject to this Code and are prohibited from offering, paying, promising or authorizing any bribe or kickback to public officials or government representatives for the purpose of securing a contract, advantage or other favorable treatment for the company.

Third parties representing the company (consultants, agents, sales representatives, brokers, distributors, resellers, contractors, independent contractors and subcontractors) who may have any interaction with public officials or government representatives must follow the provisions of this Code.

## **Anti-corruption**

Dynamox is committed to conducting business ethically, with integrity and transparency, and in compliance with applicable laws. Dynamox does not tolerate any form of bribery or corruption. It is the company's practice to conduct its operations in compliance with applicable Anti-Corruption laws and prohibits employees or third parties from engaging in corruption in any form or context.

## **Money Laundering**

Money laundering and its facilitation are prohibited in any form or context. Any unusual financial transactions that could give rise to corrupt practices or in any way harm national or foreign public assets are not tolerated.

Dynamox conducts business with respectable partners who perform legitimate activities with resources of lawful origin.

## **Competition Defense**

Dynamox is committed to complying with all applicable antitrust and competition laws. No employee or third party shall enter into any agreement or scheme, express or implied, formal or informal, with competitors regarding prices, bids, production, distribution, terms of sales or customers.

Employees or third parties are prohibited from exchanging ideas or discussing with a competitor about Dynamox's profit margin, costs, business and investment plans, warranty terms or any other competitive information.

## **Partnerships with third parties and suppliers**

The selection and approval of suppliers is based on technical, ethical, professional and competitive criteria, it is judicious, with the best cost/benefit ratio, and in accordance with the Company's operating standards. All negotiations must be conducted through dialogue sustained by trust and transparency. Dynamox has a Supplier Code of Conduct to promote a climate of professionalism, impartiality and mutual respect in the relationship.

## **Government Relations**

Dynamox complies with all laws in force in Brazil and in the countries where it operates, supporting open and constructive dialogue. In inspections and audits of any kind, the employees acting as audit liaisons must cooperate with public agents. The attention devoted to this issue is also manifested by a firm ethical stance, prohibiting the granting of any advantage or privilege.

## **International Trade**

Laws regulating trade and business with certain countries, companies and individuals must be complied with. In addition to these, we enforce compliance with commercial regulations in the markets in which we do business, complying with all import and export laws governing the transfer of products, information, technologies, services, licensing, and customs.

# RESULTS

## Accounting Records

The relationship with shareholders is based on accurate and transparent communication of information that allows them to monitor the company's activities and performance. The accounting records are made based on current legislation and in a way that reflects the reality of the company's operations. It is everyone's responsibility to protect information that has not yet been made public and that could influence market movements and investment decisions.

## Relationship with Competitors

All market and competitor information must be obtained through transparent and reputable practices. Dynamox professionals must not obtain or use competitors' confidential information that has not been made available in the public domain. Likewise, it is forbidden to pass on any company information to competitors. Regarding relations with competitors, all anti-corruption laws and other laws that protect free competition will be observed.

## Risk Management and Internal Controls

We maintain a formal structure to prevent risks and have a clear definition of roles and responsibilities, as well as periodic monitoring that gives us an overview of the main risks and the effectiveness of our critical controls.

## Responsible and Sustainable Results

We seek results that are always in line with our values. We work to be recognized as a socially just, economically viable and environmentally sustainable company. We rely on people and have a management model that establishes autonomy with responsibility. We need to think before we act, and we must always report any faults or errors that occur.

In addition, those who violate the provisions of this code, or who allow a member of their team to do so, or know of any violation and do not report it, are subject to appropriate disciplinary action, which will be applied in accordance with local laws and the seriousness of the violation:

- Training.
- Warning.
- Suspension.
- Dismissal.
- Other legal measures.

# COMPLAINTS AND DENUNCIATIONS

## Reporting channels and forms

Our company's Communication and Complaints Channel, via the **BeCompliance - Canal da Ética**, link, is a tool for this purpose, structured to guarantee absolute confidentiality, protecting the anonymity of the complainant and preserving the information so that a fair investigation can take place, this being an independent environment managed by Be Compliance, a company specializing in compliance, external to our own company.

## Personal Data

For personal data, data subjects can request revisions, modifications, and deletions by e-mail at **dpo@dynamox.net**.

## Ethics and Conduct Committee

We treat complaints impartially and seriously. When you decide to report one, provide as much information as possible to back it up, enabling a fair and balanced investigation. When a report is made, an entire corporate structure is mobilized to conduct the investigation and, if necessary, hold those involved accountable. Under no circumstances will there be any breach of confidentiality, intimidation, or retaliation against the complainant.

## CONSEQUENCES/PENALTIES

Failure to comply with this Code of Conduct and Ethics, applicable laws, or any internal policies or instructions may result in consequences for employees and contractors of civil and/or criminal liability, fines, or other sanctions. Non-compliance activities may include:

1. Sharing company information (confidential) via social networks.
2. Taking a photo of the computer screen.
3. Using the screenshot tool.
4. Using cell phones in the workplace for distractions.
5. Those working from home must pay attention to their activities, without neglecting them.
6. Speaking ill of the company.
7. Causing discord in the workplace.
8. Hiding relevant information.
9. Rude behavior after feedback sessions.
10. Using someone else's password.
11. On-site filming (cameras).
12. Treating people disrespectfully.
13. Other.

## TERM OF COMMITMENT

I have received Dynamox's Code of Conduct and Ethics and, after reading and understanding its contents, I agree with the principles and guidelines contained therein and undertake to follow these principles and guidelines in my professional activities.

Any updates deemed necessary by the Conduct Committee will be automatically incorporated into the Dynamox Code of Conduct and followed by me.

### Employee Signature

Name: \_\_\_\_\_

Company: \_\_\_\_\_

Area: \_\_\_\_\_

Note: If I do not accept the current content or the updates, I will express my disagreement in writing to the Conduct Committee.