



CODE OF CONDUCT AND ETHICS



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CEO'S WORD

Dear all,

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

I would like to introduce you to our Code of Conduct and Ethics, a document that supports and reflects the interpretation of Dynamox's Values. This document establishes the guidelines and orientations that help us promote an open and transparent dialogue inside and outside our organization, considering that omission is not part of our choices.

The purpose of this code is to guide us in our day-to-day activities in the organization, in decision-making, in our interactions and behavior. That is why it's important that everyone follows the instructions in this code.

Thank you for being part of this team, defending 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 working environment.

The Dynamox Code of Conduct and Ethics is a document that brings together the fundamental principles that underpin the purpose of our business. Understanding and following these values and principles means always learning and practicing the main behaviors expected daily, such as **adaptability, audacity, collaboration, excellence** and **innovation**, *na busca constante por resultados*.

MISSION

Making your industry safer and more productive than yesterday!

VISION

To be a world reference in efficient and effective solutions for asset monitoring, maintenance, and performance.

VALUES

ADAPTABILITY

AUDACITY

COLLABORATION

EXCELLENCE

INNOVATION

ADAPTABILITY

Our ability to adapt allows us to thrive in constantly changing environments. We adapt to new scenarios and transformations, which strengthens us, brings operational agility, a culture of innovation and continuous learning, essential for long-term success.

AUDACITY

We are an audacious company. We constantly seek out new challenges and challenging opportunities to tread unexplored paths, driving us to face them with determination and pursue ambitious goals. With courage and confidence, we embrace the future, aware that audacity is one of the driving forces behind our excellence.

COLLABORATION

We foster a collaborative working environment, promoting excellence through the exchange of ideas, diversity of thought and constructive collaboration between teams. This approach not only increases our operational efficiency, but also stimulates innovation and creative problem-solving, thereby strengthening the company's competitive position and value.

EXCELLENCE

The pursuit of excellence is a fundamental value in our company. We are committed to achieving the highest standards of quality, innovation, and performance in everything we do. We value continuous improvement, constantly refining our processes and looking for ways to exceed expectations. Excellence is more than a goal, it is a mindset that permeates our team, driving us to achieve more exceptional results every day.

INNOVATION

Innovation is the fuel that drives our company's growth, which is why we encourage a culture of creativity and develop pioneering solutions in the market.

Our ability to innovate not only generates added value for our products and services, but also strengthens our connection with customers and partners, boosting our brand differentiation.

OUR COMMITMENTS TO ETHICAL CONDUCT

Our commitment to ethical conduct is paramount. We maintain an organizational culture that promotes the highest standards of integrity and transparency in every action and decision, always prioritizing respect and responsibility in all our operations.

These fundamental principles guide our decisions and strengthen our credibility with our stakeholders.

We are committed to:

- Compliance with legislation and standards;
- Respect for people's health and safety;
- Respect for the environment;
- Respect for transparency.

COMPLIANCE WITH LEGISLATION AND STANDARDS

We guarantee compliance with all the laws and regulations applicable to our business and segment, as well as strictly following the internal rules that influence our daily responsibilities at work.

Managers' responsibility

We comply with and promote this Code by means of management and monitoring devices, disseminating it permanently and remaining available to clarify doubts and receive suggestions.

Managers do not use their position or function to influence or exert any kind of pressure or coercion in the contracting of services from which they obtain direct or indirect benefits.

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

Data Privacy

Dynamox, in line with the privacy and personal data protection laws applicable to its business, in particular Law No. 13,709/18 - General Data Protection Law (LGPD), maintains appropriate measures to ensure that the personal data of customers, employees, suppliers and partners is accessed and/or processed only by people who need this information. We also ensure that only data that is strictly necessary to conduct activities is collected.

RESPECT FOR PEOPLE'S HEALTH AND SAFETY

People's health and safety

Dynamox takes care of the health and safety of its employees and therefore provides a healthy and safe working environment.

No activity should be conducted if there is any doubt about the possibility of a risk to safety or life. The integrity of people is Dynamox's priority.

Conflict of interest

The employee must undertake to declare situations or relationships that could constitute a conflict of personal or economic interests, including the participation of politically exposed persons or representatives of political parties. Any degree of family relationship between employees, former employees or suppliers must be reported before the employment relationship begins.

The organization does not allow family members and/or relatives to be kept or hired in positions between which there is a direct hierarchical relationship, in an interdependent or correlated function. For this purpose, family members or relatives include parents, children, spouses or partners, grandchildren, great-grandchildren, siblings, brothers-in-law, uncles, nephews, parents-in-law, stepchildren, sons-in-law, and daughters-in-law.

The expected behaviors include:

If this happens, the employee must inform their superior of the situation in which they are or will be under direct subordination. The superior must immediately notify the Board of Directors, which in turn must assess whether to terminate or maintain direct subordination. If it is decided to maintain the subordination, the Board of Directors must formally forward it to the CEO and the People Management area for their knowledge and approval.

Diversity, Discrimination and Prejudice

We vehemently repudiate any kind of 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 aesthetic, 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, and decisions based on prejudice, favoritism or even privileges of any kind are not accepted.

Harassment

We maintain a respectful, healthy, and productive working environment, free from intimidation and harassment of any kind.

Alcohol, Weapons and Drugs

We do not allow gambling, carrying weapons in the workplace and/or using narcotic substances of any kind under any circumstances. Furthermore, it is not permitted to enter or remain on company premises intoxicated, except for company-sponsored events.

Human Rights

Dynamox respects the free expression of thought at all levels.

We do not accept the exploitation of 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 or adolescents, and is committed to guaranteeing respect for human rights.

Therefore, we prioritize 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 of minors should be penalized under the law and that any situation in this regard should be referred to the competent authorities.

Work environment

The means of electronic communication provided by the organization are for exclusive use in professional activities. Dynamox reserves the right to control and monitor Internet access for all equipment connected to its information system, always with the aim of safeguarding its security and privacy. No software that does not comply with the company's policies or applicable licensing and copyright agreements may be added to the company's electronic communication system. The transmission of files, images, interactive games, or messages that are not of interest to the organization is not permitted. The use of social media inside or outside the company must comply with specific policies.

RESPECT FOR THE ENVIRONMENT

Everyone who is part of the Dynamox team must be aware of the company's Health, Safety and Environment System Policy, as well as promoting the correct disposal of waste.

We implement work standards to ensure that processes, products, and services comply with environmental legislation. We therefore act consciously, seeking to minimize and mitigate any environmental impacts of the activities we conduct.

RESPECT FOR TRANSPARENCY

Open and transparent dialog

Dynamox encourages its employees to interact clearly and transparently in their internal communications, and to act with integrity, honesty, and professionalism.

In this way, it is possible to add value to actions and communications, providing agility, efficiency, and productivity to processes.

Donations and Sponsorship

Dynamox supports positive change in society through donations and sponsorships. Sponsorships are guided by the company's guidelines and analyzed by management. However, it is forbidden to make any donation or sponsorship in Dynamox's name that deviates from current legislation

Courtesies, gifts and presents

Gifts, presents and institutional invitations can be practices of kindness and cordiality accepted within a business relationship, but they require care. When offering or receiving them, 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, applicable local laws and frequency. Observe the maximum value when offering gifts, which is up to 10% of the current national minimum wage.

Partnerships with educational institutions

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

Intellectual Property

The intellectual property rights created, directly or indirectly, by Dynamox 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 registrations 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 non-material activity conducted by the company or contracted by it.

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 a public official or government representative with 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, independents, 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, transparency and in compliance with applicable laws, and 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.

Shareholders

We observe and promote the organization's compliance system, based on the following premises: recording reports and balance sheets correctly and consistently, as well as making its books available with complete transparency to audits (internal and external) and to the competent public bodies when necessary.

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 does business with reputable partners who conduct 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, sales conditions 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. The choice is careful, based on the best cost/benefit ratio and respecting the company's operating standards. All negotiations must take place through dialog based on 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 dialog. In inspections and audits of any kind, the employees responsible for the service must cooperate with public agents. The attention paid 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 trade 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.

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. Accounting records are kept in accordance with current legislation and in such a way that they reflect 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, the transmission of any company information to competitors is prohibited. In dealings with competitors, all anti-corruption laws and other laws protecting 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 allows us to have a view 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.

Consequences of Misconduct

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. Disciplinary action includes:

- Training;
- Warning;
- Suspension;
- Resignation;
- Dismissal for cause.

In addition, individuals who violate the law will be subject to civil and criminal liability, in accordance with applicable legislation.

COMPLAINTS AND DENUNCIATIONS CHANNEL

Reporting channels and forms

Our company's Communication and Whistleblowing Channel, accessible via the link [BeCompliance - Ethics Channel](#), is a tool for this purpose, structured to guarantee absolute confidentiality, protecting the anonymity of the whistleblower 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, requests for revisions, modifications and deletions can be made by data subjects via e-mail to dpo@dynamox.net.

Ethics and Conduct Committee

We treat complaints impartially and seriously. When you decide to make a report, 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 whistleblower.

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 confidential company information;
- 2.** Taking a photo of the computer screen with confidential documentation;
- 3.** Use the capture tool to reproduce confidential information;
- 4.** Using cell phones in the workplace for distractions or filming which violates our Information Security and Privacy policy;
- 5.** Negligent or careless behavior in relation to activities;
- 6.** Bad-mouthing the company;
- 7.** Watching videos or accessing social networks during working hours;
- 8.** Causing discord in the workplace;
- 9.** Using someone else's password or any other type of access;
- 10.** Inappropriate treatment from coworkers;
- 11.** Removing equipment from the company without formal authorization from the immediate manager;
- 12.** Omit any relevant information;
- 13.** Bad manners/behavior after feedback;
- 14.** Treating people with disrespect;
- 15.** Others that fall within this scope and/or hinder the progress of activities.