

CODE OF ETHICS AND CONDUCT - CASH3

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CODE OF ETHICS AND CONDUCT - MÉLIUZ S.A.

CHAPTER I – DEFINITIONS

1.1. When not defined in other provisions of this Code, terms beginning in capital letters, whether singular or plural, masculine or feminine, will have the following meanings:

“Directors”: means the members of the Board of Directors, Directors Statutory and Non-Statutory and members of the Company's Advisory Committees, statutory and not statutory, and their respective alternates, as applicable.

“Whistleblower Channel”: refers to the primary communication channel for reporting behavioral and conduct deviations that violate the guidelines of the Company's Ethics and Conduct Program.

“Code” or “Code of Ethics and Conduct”: means this Code of Ethics and Conduct of the Company and its Subsidiaries, approved by the Board of Directors, applicable to all Directors and Employees of the Company and its Subsidiaries.

“Company”: - means a company of the CASH3 group with which the employee maintains an employment relationship.

“Subsidiaries”: means companies controlled by Méliuz S.A. In that case, Company means Méliuz S.A.

“General Data Protection Law”: means Law No. 13,709, of August 14, 2018, as amended.

“Employees”: means every person who maintains a statutory or employment relationship with the Company and its Subsidiaries, such as: Directors, employees full-time and temporary employees, outsourced employees, interns and other employees of the Company and its Subsidiaries when carrying out any acts or transactions on behalf of the Company and/or its Subsidiaries.

“Term of Adhesion”: means the Term of Adhesion referring to this Code, according to the attached model, in the form of the Exhibit I.

CHAPTER II – APPLICABILITY AND OBJECTIVE

2.1. This Code represents the Company's formal declaration of ethical principles and professional conduct standards, based on our internal policies and regulations available at ri.meliuz.com.br. It serves as a guideline for all Employees, regardless of position, in their interactions with other Employees, shareholders, partners, clients, suppliers, partners, the community, and public authorities in general.

2.2. Independent contractors, consultants, agents, and commercial representatives acting on behalf of the Company are required to uphold the same high ethical principles and conduct standards when carrying out activities in the Company's name.

2.3. We also require that suppliers, clients, and partners adhere to all ethical principles, conduct standards, and integrity guidelines established in this Code in their dealings with the Company.

2.4. This Code applies to all companies within the CASH3 group.

CHAPTER III – VALUES

3.1. The Company's values are described in the Culture Handbook.

CHAPTER IV – CONDUCT COMMITMENTS

Section I – Corporate Governance

4.1. We uphold integrity and transparency in our business practices, consistently adhering to good corporate governance practices in our activities and in relationships with Employees, clients, suppliers, shareholders, the communities where the Company operates, and other market participants.

4.2. The Company's key corporate governance practices include:

(i) The Company's Bylaws comply with applicable legislation and regulations, including the standards of the Brazilian

Securities and Exchange Commission (CVM) and B3 S.A. – Brasil, Bolsa, Balcão, as well as the Novo Mercado Listing Rules;

(ii) The Company and its subsidiaries are managed with integrity and transparency, fostering positive relationships with stakeholders involved in the business. The Company's management bodies and advisory committees actively monitor the implementation of our culture of integrity, as well as the Company's policies and rules;

(iii) The Company provides and publishes information, data, and reports effectively and transparently to the relevant stakeholders;

(iv) The Company regularly conducts external audits to support its management bodies and advisory committees; and

(in) Any disputes that may arise between the Company and/or its subsidiaries, our shareholders, and our administrators will be resolved through arbitration, as stipulated in the arbitration clause in the Company's Bylaws.

Section II – Employees

4.3. We expect all Employees to strictly adhere to this Code, which should be understood as a guide for addressing common issues, without intending to cover all practices and principles of conduct and integrity expected by the Company.

4.4. We believe that workplace relationships should be based on honesty, respect, collaboration, and teamwork among all Employees.

4.5. We are committed to contributing to the creation and maintenance of a positive work environment for Employees, following these principles:

(i) We value relationships based on trust and transparency, recognizing the right to free association with trade entities, combating corruption, respecting diversity and the rights of children and adolescents, valuing human dignity, and opposing all forms of discrimination and prejudice;

(ii) We aim to ensure workplace safety and health by developing practices and policies that minimize occupational risks;

(iii) We comply with current labor laws; and

(iv) We believe in and invest in the appreciation and development of our Employees.

Section III – Use of Assets

4.6. The resources available in our workspace must be used exclusively for activities related to the Company, in accordance with the provisions established in specific policies. Employees must ensure the proper care of the Company's assets, avoiding unnecessary expenses and ensuring their durability

4.7. The use of all Company resources provided to Employees will be monitored.

Right Choices:

- *Use the resources provided by the Company to perform your work appropriately and efficiently, respecting the rules for asset use and maintenance.*

- *Utilize the Company's resources responsibly and moderately, avoiding waste due to improper use.*

Wrong Choices:

- *Request a Company asset (equipment or space) for exclusively personal use. All requests for acquisition or use of a Company asset must have a professional purpose.*

- *Inappropriately appropriate Company property or the property of other Employees.*

- *Use Company-provided electronic resources to exchange or store pornographic, violent, discriminatory, racist, and/or defamatory content.*

4.8. The Company's assets include all physical spaces, materials, furniture, and equipment owned or leased by the Company. The Company invests in providing the best physical spaces, furniture, materials, and equipment for Employees' daily use. Therefore, it is essential that everyone takes care of our assets.

Right Choices:

- *When leaving a meeting room, remember to turn off the lights, monitors, and air conditioning, clean the boards and tables, and leave the door open.*
- *If you notice any electronic equipment or Company asset is broken, damaged, or malfunctioning, report it immediately to the responsible team.*
- *Whenever you need any material, equipment, or accessory, request it from the appropriate personnel.*

Wrong Choices:

- *Leave a meeting room without turning off the lights and TVs.*
- *Leave dirty dishes on office tables.*

CHAPTER V – CONFLICT OF INTEREST

5.1. Employees are required to always act in the best interests of the Company and its clients. A conflict of interest arises when an Employee is in a situation that might lead them to make professional decisions motivated by interests other than those of the Company.

5.2. All Employees must avoid situations that involve, or appear to involve, a conflict of interest.

5.3. When faced with a potential conflict of interest, Employees should assess whether:

- (i) The situation creates (or appears to create) any incentive/benefit for the Employee or a family member at the expense of the Company;
- (ii) The situation impacts the reputation of the Employee or the Company, or may interfere with the Employee's professional activities for the Company; and
- (iii) The situation could damage the reputation of the Employee or the Company if disclosed on a news portal or social media.

5.4. If the Employee determines that any of the above situations applies to their case, it is likely they are facing a conflict of interest that must be avoided.

CHAPTER VI – COMMERCIAL RELATIONSHIPS AND PARTNERSHIPS**Section I – Contracting Suppliers/Service Providers**

6.1. The hiring of the Company's suppliers and business partners must always be negotiated and finalized by the Procurement team, which will ensure that the agreement is executed in the most advantageous way for the Company.

6.2. The Company's relationships with its suppliers and service providers must respect the legitimate interests of all parties involved, always based on technical criteria. Undue advantages obtained through information manipulation, intimidation, coercion, duress, or the artificial creation of dependency, as well as practices of unfair competition or conflicts of interest with the Company's business, will not be tolerated.

6.3. All of the Company's suppliers will undergo a rigorous Know Your Supplier (KYS) process to ensure integrity and compliance with the ethical and legal principles established by the Company. Our suppliers must, in particular: (i) Be reputable; (ii) Fully comply with applicable laws, regulations, and the Company's rules, codes, policies, and contracting procedures; (iii) Refrain from using child or forced labor; and (iv) Maintain the confidentiality of the Company's information, as well as that of our clients, partners, and Employees.

6.4. By supplying goods and/or providing services to the Company, the supplier or service provider acknowledges their understanding of the requirements established in this Code, confirms their compliance with all of its provisions, and agrees to maintain compliance throughout their active relationship with the Company.

Right Choices:

- Request the purchase of a service or product from the Procurement team, recommending specific suppliers with whom you have a relationship, provided you do not participate in or influence the decision-making process and formally disclose any potential conflicts of interest to your leadership and department beforehand.

Wrong Choices:

- Influence or attempt to influence the Procurement team's decision regarding the hiring of a business partner with whom you have a familial or friendly relationship, or from whom you expect to receive personal benefits.
- Make a purchase decision for a particular service or product without involving the Procurement team, notifying them only after the invoice is received.

Section II – Commercial Partnership

6.5. Employees must ensure that the terms of the partnership are reviewed and approved by the Legal team before any agreement or exchange of information takes place.

Right Choices:

- An Employee submits a confidentiality agreement for review and exchanges information with the partner only after the document is signed.
- After the Legal team validates the documents to be signed, the Employee provides the details of the authorized signatories so that the administrative team can proceed with the contractual signing process.

Wrong Choices:

- An Employee shares information with a potential partner without first having a confidentiality agreement reviewed and signed.
- An Employee begins integration with a partner without signing a partnership agreement.
- An Employee accepts contractual terms without prior review by the Legal team.
- An Employee signs a partnership document without proper authorization.

Section III – Gifts, Tokens, and Hospitality

6.6. Gifts, tokens, and hospitality include all tokens, meals, trips, or entertainment packages offered by suppliers, business partners, or any third party to Employees, acquired by Employees at events/courses funded by the Company, or offered by the Company to any third party, regardless of the value involved.

6.7. Employees must decline gifts, meals, tokens, or any service provided by any third party, regardless of value. If the item has already been received or its return could cause embarrassment, the receipt must be reported to the Company's HR team, which will consider organizing an internal raffle among all Employees.

Right Choices:

- Offer low-value tokens, provided prior internal approvals (Area Leadership, HR, and Compliance) have been obtained.
- Accept invitations to training or seminars, regardless of value, as long as they are approved by your immediate leadership. If the invitation includes travel and accommodation costs, the Employee must inform their immediate leadership and obtain prior authorization.

Wrong Choices:

- Request gifts, sponsorships, discounts, gratuities, or other personal benefits from business partners or place them in situations where they feel obligated to provide such benefits, even if of low value.

- *Provide, offer, or promise any token with commercial value or hospitality to a public official or related persons.*
- *Accept gifts or hospitality offered in exchange for any advantage.*

Section IV – Romantic Relationships and Family Ties

6.8. The Company permits family ties or romantic relationships between Employees as long as these relationships do not interfere with the work activities of any party involved.

6.9. Family members include children, grandchildren, and great-grandchildren; spouses/partners; parents-in-law, siblings-in-law, sons-in-law, and daughters-in-law; parents, siblings, nieces and nephews, and grandnieces and grandnephews; aunts and uncles, cousins, grandparents, great-grandparents, and great-aunts and uncles.

Right Choices:

- *Maintain a romantic relationship with another Employee, provided it does not interfere with the work activities of any party.*

Wrong Choices:

- *Intervene or attempt to intervene in the hiring or performance evaluation process of a family member or spouse/partner.*

Section V – Relationship with Competitors

6.10. The competitiveness of the Company's services and products must be based on fair competition.

6.11. Employees must refrain from making comments that could harm the image of competitors or contribute to the spread of rumors.

6.12. It is strictly prohibited to disclose strategic, confidential, or otherwise harmful information about the Company's business to any third party, including competitors, even after the Employee's relationship with the Company has ended.

6.13. Under no circumstances do we tolerate the use of illegal (theft, robbery, bribery, electronic espionage, etc.) or unethical means to obtain information about competitors.

6.14. We do not engage in agreements with competitors that aim to or result in restrictions or barriers to free competition, such as price fixing, supply agreements, customer allocation, sales conditions, or similar practices.

Section VI – Relationships with Shareholders

6.15. Communication with our shareholders will always be handled through the Company's Investor Relations department.

6.16. Relationships with shareholders and investors must be based on the accurate, transparent, and timely communication of information, enabling them to monitor the Company's activities and performance in accordance with applicable laws and regulations.

6.17. Shareholders are treated equally regardless of the number of shares they own, subject to legal limitations and requirements, with all receiving information on an equitable basis.

6.18. Reports and documents filed with or submitted to the CVM, B3, or the public, as well as other public

communications, must include complete, fair, accurate, timely, and understandable information.

Section VII – Relationships with Public Authorities and Regulatory Bodies

6.19. We comply with the legislation governing corporate participation in political matters and relationships with public authorities and regulatory bodies, including regulations concerning contributions to electoral campaigns.

6.20. We maintain a position of independence, collaboration, and respect for laws and regulations in our interactions with public authorities and regulatory bodies.

6.21. The Company's relationships with public authorities must always be transparent and impartial. Offering favors or donations, directly or indirectly, to public officials is strictly prohibited.

Section VIII – Social Media Relationships

6.22. Employees must register on social media or communication platforms using their personal names and email addresses, avoiding the use of names or logos related to the Company to prevent the creation of perceived affiliations.

6.23. Publishing or sharing the Company's confidential information on social media is prohibited. Information may only be shared or published after it has been made public through the Company's official and authorized communication channels.

6.24. When expressing personal opinions on communication platforms, social media, or messaging apps, Employees are expected to consider that these platforms are public, and the content of their messages could harm the Company's reputation or damage the image of fellow Employees, clients, suppliers, and shareholders.

6.25. It is forbidden to share with the press or publish on communication platforms, social media, or messaging apps any content or comments that are inconsistent with our principles, values, and culture. Sharing confidential information is also strictly prohibited.

6.26. If an Employee identifies any risk to the Company's image and reputation or that of other Employees on communication platforms, social media, or messaging apps, they must report the issue to the relevant parties or the Company's Advisory Committees, in accordance with the Risk Management Policy.

6.27. Any contact or communication between Employees and the press or media outlets must comply with the provisions of item 9.4 below.

CHAPTER VII – PROFESSIONAL BEHAVIOR

7.1. It is the duty of every Employee to ensure that their actions and professional behavior align with the Company's growth and development, fully adhering to the Company's values outlined in item 3.1 above. Employees must avoid disrupting others' activities with noise, interruptions, unrelated matters, or any other actions that could affect focus and productivity. If an Employee's activities are hindered or if they witness such behavior, they should report it to leadership using the appropriate channels.

Section I – Working Hours

7.2. Employees must adhere to the rules outlined in the Company's Telework Guide, as applicable.

CHAPTER VIII – DIVERSITY, INCLUSION AND RESPECT

8.1. The Company respects differences and does not tolerate any form of discrimination or prejudice based on race, gender, age, religion, physical condition, marital status, nationality, political beliefs, sexual orientation, or social status. The Company's commitment to diversity also extends to freedom of thought and expression among Employees and in its recruitment, internal/external selection, and promotion practices. Disrespectful or discriminatory behavior will not be tolerated, regardless of whether it is perpetrated by individuals in positions of hierarchical superiority, peers, or subordinates. If an Employee experiences or witnesses disrespectful or discriminatory behavior, they must report it to leadership using the appropriate channels.

Section I - Moral or Sexual Harassment

8.2. Moral harassment includes any deliberate and systematic behavior intended to embarrass or humiliate someone in the workplace. A common example is subjecting someone to words or actions that undermine their dignity.

8.3. Sexual harassment refers to any situation where a person is subjected to unwelcome sexual advances, whether through stalking or inappropriate sexual conduct. This type of harassment occurs even if it happens only once and regardless of whether the intention for sexual favor is reciprocated. Any inappropriate, unpleasant, offensive, or intrusive behavior of a sexual nature qualifies as sexual harassment.

8.4. Harassment can be perpetrated by individuals in positions of hierarchical superiority, peers, or subordinates. Sexual harassment is prohibited in the workplace, during business trips, or at any Company-sponsored events, such as happy hours or parties.

8.5. Any behavior involving humiliation, intimidation, ridicule, hostility, or embarrassment, whether related to race, gender, sexual orientation, age, competence, medical condition, religion, political ideology, nationality, or social status, is considered discrimination or harassment.

Right Choices:

- Hire diverse talent and promote actions to include and respect differences through equitable management.
- Foster a work environment free from harassment, prejudice, and discrimination.
- Recognize, promote, and reward Employees based on meritocracy.
- Respect each individual's voice and personal choices within the Company.
- Value the diversity of clients, partners, and suppliers.
- Encourage collaboration, diversity of ideas, and inclusion for all.
- Provide excellent service to all clients, without distinction.
- Make decisions considering the diverse needs and realities of people within and outside the Company.

Wrong Choices:

- Hire team members based on personal and discriminatory criteria that violate the Company's equitable policies.
- Humiliate, disqualify, or treat individuals or groups differently based on race, ethnicity, gender, sexual orientation, age, competence, medical condition, religion, political ideology, nationality, or social status.
- Prejudge or subject colleagues, suppliers, or clients to jokes or situations that cause embarrassment.
- Inappropriately approach, "flirt with," or harass colleagues in the workplace, on business trips, or at Company-sponsored events.
- Use expressions or jokes that offend specific groups of people.
- Favor individuals or situations based on personal affinities or opinions.
- Make comments reinforcing stereotypes or generalizing individuals.
- Relate professional achievements or promotions to physical attributes.
- Allow cultural, physical, mental, ethnic, or economic differences to limit professional growth.

8.6. The Company also prohibits Employees from engaging in or allowing involvement in, or implicating the Company in, transactions or actions that constitute:

(i) Corruption (public or private), fraud, or bribery through financial resources, material assets, information exchange, or corporate/political influence, among other means.

(ii) Unauthorized sharing of confidential or strategic Company information with market agents or institutions.

(iii) Extortion or acts of mutual or individual favoritism between Employees and market agents or institutions.

(iv) Violations of the Company's intellectual property, industrial property, or copyright rights.

CHAPTER IX – CONFIDENTIALITY AND INFORMATION SECURITY

9.1. The Company's intellectual property and confidential information are highly valuable and irreplaceable assets. The CASH3 group increasingly attracts attention from specialized media and competitors, heightening the risk of confidential information leaks.

9.2. All Employees must maintain confidentiality regarding reports, research, financial information, and other materials they have access to during their activities at the Company.

9.3. The Company monitors and may access at any time all internet access records and emails of its Employees, as well as information and files received or stored on the Company's electronic equipment and communication systems. Employees should not expect privacy regarding any activities conducted on Company-owned equipment, even if personal in nature.

Section I - Information Integrity

9.4. Only a select group of Employees is authorized to speak on behalf of the Company to the press. If contacted by media representatives, Employees must direct them to the individuals responsible for press communications within the Company.

Right Choices:

- Give interviews to the press on any subject in a personal capacity, provided it is clear that the Employee does not represent the Company's opinion. Only Employees explicitly authorized may speak to the press on behalf of the Company.

Wrong Choices:

- Speak with journalists or public administration representatives as a Company Employee without authorization from the team responsible for press or external communications.

- Disclose confidential information or express opinions on behalf of the Company via social media, blogs, or other platforms regarding the Company or its business activities.

Section II - Confidentiality of Information

9.5. Confidential information produced or stored internally is part of the Company's competitive strategy and intellectual property. Such information must be securely stored and never shared with anyone, especially investors, business partners, or competitors.

9.6. Internal Company information should always be presumed confidential unless it is clearly indicated that the Company has publicly disclosed or authorized its disclosure. The confidentiality obligation remains valid even after the Employee's departure.

9.7. The Company's operations rely heavily on the use of confidential and strategic client information, which must be handled with care and diligence. Key principles include:

(i) Information is an asset of the Company and its clients. It is the duty of all Employees to protect it from inadvertent leaks or malicious attempts by third parties through attentive and responsible behavior.

(ii) Since information security is strongly linked to behavior, Employees must always act responsibly and ethically, consistent with the Company's core values.

(iii) The negligent or fraudulent disclosure of confidential information can have disastrous consequences for both the Employee and the Company. For example, special attention must be given to relationships with friends or acquaintances working for competitors.

(iv) Chinese Wall Policy: Confidentiality of projects and client information must be maintained, even within the Company, especially when teams are working with competing clients (e.g., competing supermarkets or e-commerce businesses). Employees should consult their direct leadership for clarification if needed.

(v) The misuse of confidential Company or client information is grounds for termination for cause and may result in legal penalties.

9.8. Employees have access to various electronic assets provided by the Company for their daily work. All information and documents must be stored in appropriate virtual environments pre-approved by the Information Security team.

9.9. Files created, received, or stored on the Company's electronic equipment and communication systems are considered the property of the Company.

9.10. Information about business activities, projects, and results that have not yet been disclosed to the market, which could impact the stock price or trading volume or create an information asymmetry, must remain strictly confidential, in compliance with applicable laws.

9.11. Any confidential, material, or privileged information unintentionally or unauthorizedly disclosed to any person or entity before market disclosure must be immediately reported to the Investor Relations Department for appropriate action.

9.12. The Company and its Employees must always respect information and data received, in accordance with the General Data Protection Law (LGPD).

Right choices:

- *Use a VPN configured on your computer when accessing the Company's services and information over public networks (e.g., at the airport or home).*
- *Lock or lower your computer screen when leaving your desk.*
- *Close or store notebooks and written notes when away from your desk.*
- *Erase information written on meeting room whiteboards before leaving.*
- *Log out of shared printers after printing Company documents and ensure no documents are left in the print queue.*

Wrong Choices:

- *Uninstall software (e.g., corporate antivirus, VPN) or other controls implemented by the Company's Information Security team.*
- *Discuss information about a supermarket in one city with an employee of another supermarket in a different city, even if the information seems trivial.*
- *Share confidential information about an e-commerce client with a friend.*
- *Discuss the Company's confidential information with a romantic partner.*
- *Leave sensitive information exposed on workstations, printers, or in meeting rooms.*
- *Respond to or click on links in an email claiming to be from Bill Gates or another source requesting Company information, such as software licenses, without verification.*

Section III – Information Security

9.13. The rules outlined here do not encompass all potential situations. In case of doubt, Employees should refer to the principles presented in this Code or seek guidance from their direct leadership.

Document management:

- The individual who creates or obtains a copy of a client document is ultimately responsible for its storage and distribution.
- Information acquired through work for a client cannot be used in projects for their competitors (although developed methodologies may be shared).
- No document should be left "forgotten." Particular attention should be paid to notes on whiteboards, notebooks, and documents left on desks, printers, or copiers, whether at the office or client sites.
- Personal files must be kept organized to avoid unnecessary accumulation, which can saturate storage space and leave insufficient room for critical files.
- Computer files must also be protected by securing computers, managing access, organizing files in client or project folders, eliminating outdated versions, and storing all necessary files on Google Drive without deletion.
- Employees must exercise caution with emails, verifying addresses, confirming receipt of important documents, and saving sensitive documents on Google Drive instead of leaving them in inboxes, sent folders, or trash bins.

Clean desk policy:

- When absent from the office, Employees must keep their desks "clean" (free of documents). This ensures the desk is available for others and reduces the risk of inadvertently losing documents.

Internet Usage:

- Internet navigation leaves traces, and the Company may monitor Employee usage when using the Company's internet or equipment. It is essential to avoid websites inconsistent with the Company's values.

Public behavior:

- Exercise caution in public spaces like airports, airplanes, etc., where comments about clients or visible work documents could be overheard or seen by competitors. Discretion is particularly important on planes, especially when unsure of neighbors' identities.

Press and events:

- Never share information, give interviews, or participate in events as a speaker without prior authorization from your direct leadership or the Communications team responsible for external contacts. Improper communications can cause significant damage to the Company's reputation.

CHAPTER X - COMMITMENT TO SUSTAINABILITY

10.1. We aim to achieve economic, environmental, and social balance in all our actions, conducting our business with socio-environmental responsibility and contributing to sustainable development.

10.2. We adopt a sustainability management model that meets the demanding standards and clauses of the global market. To achieve this, we continuously engage and strengthen the commitment of our Employees and all stakeholders in our business chain.

Section I – Environment

10.3. We are committed to conducting our business while protecting the environment and ensuring the safety and health of our Employees.

10.4. It is part of our culture to comply with applicable laws and regulations and to adopt best practices in environmental, occupational health, and safety management.

10.5. We seek to invest in technologies that promote sustainable development and environmental preservation in all aspects, continuously improving processes and products through awareness and the implementation of effective programs.

Section II – Social Responsibility

10.6. Our policy encourages Employees to:

- (i)** Promote social practices and policies throughout our production chain, contributing to Brazil's economic and social development;
- (ii)** Partner with institutions to support the qualification and development of individuals;
- (iii)** Engage in social awareness and volunteerism through social initiatives; and
- (iv)** Support social projects that contribute to the development of the regions where the Company operates.

Section III – Economic Development

10.7. Our practices and goals include:

- (i)** Building partnerships to foster economic development in the communities or regions where we operate;
- (ii)** Fulfilling our obligations to stakeholders; and
- (iii)** Adhering to international best practices and market standards established by regulatory bodies in Brazil and abroad.

CHAPTER XI - ETHICS MANAGEMENT AND WHISTLEBLOWING

11.1. All Employees are committed to adhering to and upholding the guidelines set forth in this Code.

11.2. In cases of non-compliance with these guidelines or other Company policies, Employees must report such incidents through the Whistleblower Channel so that the Ethics Committee can assess the situation.

11.3. Our Whistleblower Channel ensures confidentiality and discretion for reports. It is accessible to all Employees, suppliers, business partners, shareholders, and other third parties. Anonymity is allowed via the following website: <https://canal.ouvidordigital.com.br/cash3>.

11.4. Anonymous reports do not exempt individuals from the obligation to disclose potential involvement in conflicts of interest or unethical or illegal behavior.

11.5. Seeking clarification on this Code's provisions, reporting violations of policies and regulations, and assisting in investigations are appreciated and encouraged by the Company under the following terms:

- (i)** Any retaliation against Employees who file a report will be penalized, unless the Employee acted in bad faith, with negligence, or intent to harm; and
- (ii)** Any suspicion that someone is being subjected to retaliation must be immediately reported to the Ethics Committee through the Whistleblower Channel.

CHAPTER XII – GENERAL PROVISIONS

Section I – Code Compliance and Penalties

12.1. All Employees are responsible for knowing the contents of this Code. Any violation of its provisions may result in: (i) a warning; (ii) suspension; (iii) termination of employment; (iv) termination of the contractual relationship with the Company; or (v) legal action, as applicable.

12.2. Employees have a duty to report any violations of this Code immediately through the channels specified herein, to their direct supervisor, or to the Company's management, as applicable. Failure to report such violations may result in the same penalties and sanctions mentioned in item 12.1.

12.3. The Ethics Committee is responsible for promoting and ensuring adherence to this Code to guarantee its effectiveness. The Committee will analyze and deliberate on received reports, considering their severity while maintaining confidentiality and emphasizing their importance. The Committee will decide, through a formal process, the penalties to be applied to each reported case.

12.4. Cases related to accounting and tax matters, as well as reports involving members of the Company's Management (board members and directors), will also be referred to the Company's Audit Committee, which will oversee and support the Ethics Committee's decisions.

Section II – Training

12.5. Periodic training will be conducted for Employees at least once a year to reinforce the norms and principles outlined in this Code and to clarify any questions.

Section III - Amendments and Updates

12.6. This Code was first dated September 1, 2020. To keep it aligned with the Company's policies and values, the Code was revised on July 31, 2024. Going forward, the Code will be reviewed annually, and any necessary changes will be reflected in a new version. Suggestions for improvement are always welcome.

12.7. Any changes to this Code must be approved by the Board of Directors and will be duly communicated to Employees.

Section IV - Acknowledgment Form

12.8. All Employees are required to sign the Acknowledgment Form (Annex I) as part of their onboarding process and after any updates to the Code, committing to uphold the norms and principles contained herein.

Exhibit I - ACKNOWLEDGMENT FORM

I understand that this Code outlines the Company's culture, values, and principles, reflecting a commitment to professionalism and transparency. I hereby acknowledge receipt of the Code and commit to reading and fully adhering to its provisions in all my workplace actions.

Full name:

CPF:

Date:

Signature: