

MÉLIUZ S.A. CODE OF ETHICS AND CONDUCT

CHAPTER I - DEFINITIONS

1.1. When not defined in other provisions of this Code, the terms beginning with a capital letter, whether in the singular or plural, shall have the following meanings:

“Directors” means the members of the Board of Directors, Statutory and Non-Statutory Officers and members of the Company’s Statutory and Non-Statutory Advisory Committees and their respective alternates, as applicable.

“Whistleblower Channel”: means the main means of communication about deviations in behavior and conduct 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 Méliuz S.A.

“Subsidiaries”: means the companies controlled by the Company.

“General Data Protection Act”: means Law 13.709 of August 14, 2018, as amended.

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

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

CHAPTER II - APPLICABILITY AND OBJECTIVE

2.1. This Code is a formal declaration by the Company on the ethical principles and standards of professional conduct, based on our internal policies and regulations available at ri.meliuz.com.br, which should guide the activities of all Collaborators, regardless of position, in their relations with other Collaborators, shareholders, members, clients, suppliers, partners, the community, and with public bodies in general.

2.2. Self-employed professionals, consultants, agents, and commercial representatives acting on behalf of the Company must apply the same high ethical principles and standards of conduct when performing their activities on the Company’s behalf.

2.3. We also require that suppliers, customers and partners, in their relationships with the Company, comply with all the ethical principles and standards of conduct and integrity set forth in this Code.

2.4. This Code applies to the Company and its Subsidiaries, and any references made in this Code to the Company shall be interpreted as a reference to the Company and its Subsidiaries, as applicable.

CHAPTER III - VALUES

3.1. The Company's values are:

CUSTOMERS FOR LIFE: We are passionate about our customers - partners and users - and therefore we want to offer products and services that make them love Méliuz. We believe that in order to build a long-term relationship, we are all responsible for taking care of our customers the way we'd like to be treated when we're on the other side. We will, always, work to exceed our customers' expectations, delivering more and more value and enjoyment in the experience with Méliuz.

WIN-WIN: We believe it is possible to build win-win products, services and partnerships. We also want to build Méliuz in this way, making employees, customers and partners win as the company grows. Win-win is the only way to build strong, long-term relationships.

EXEMPLARY TEAM: Our team is made up of bold people, who spares no effort to accomplish the company's objectives and have a sense of urgency. No slacking off: we like to work! Our team is intelligent and self-taught, and is always studying, learning new things. People who stand out always share knowledge with other people at Méliuz. We love working with great people, and that's why we always want to hire and develop people better than us.

ENTREPRENEURIAL SPIRIT: We behave like owners in all situations and never outsource problems to "Méliuz" or other areas. We take risks to do great things, and sometimes we fail, but we never give up. We personally acknowledge our mistakes and successes. Everyone must have autonomy to work. Initiative is the primary virtue of an entrepreneur. If Méliuz has a problem, instead of just pointing the finger and distancing ourselves, we are part of the solution. We get nervous, but not "edgy".

BIG FAMILY: We don't hire boring people and we like humorous people. Respect comes before freedom. Here we feel as comfortable as if we were at home. Monday is awesome. Family also has discussions, but there is no gossip. We solve our problems with each other in a transparent way. We support diversity and seek to ensure that all people feel respected and equitably represented here.

PRIORITIZE AND SIMPLIFY: Simple is always better. Deliver fast and always. Make mistakes quickly. Don't try to solve everything at once. Focus!

NOTHING IS IMPOSSIBLE: We can be the best company in the world. We are convinced that everything can be changed, improved, and conquered. Phrases like "it has always been this way" and "it's impossible" are not part of our vocabulary. We like optimistic, persistent people who leave a legacy wherever they go.

CHAPTER IV - CONDUCT COMMITMENTS

Section I - Corporate Governance

4.1. We conduct ourselves with integrity and transparency in relation to our business, always observing good corporate governance practices in our activities and in the relationships between employees, customers, suppliers, shareholders, communities where the Company does business and operates, among other market participants.

4.2. Among the best corporate governance practices adopted by the Company, the following stand out:

- (i) The Company's Articles of Incorporation are in accordance with applicable laws and regulations, including the rules of the Brazilian Securities and Exchange Commission and B3 S.A. - Brasil, Bolsa, Balcão, as well as the New Market Listing Rules;
- (ii) The Company and its Subsidiaries are managed with integrity and transparency, encouraging

good relationships with the stakeholders involved in the business. The Company's management bodies and their advisory committees are active in monitoring the implementation of our culture of integrity and other Company policies and rules;

(iii) The Company makes available and publishes information, data and reports in an effective and transparent manner to the appropriate stakeholders;

(iv) The Company has the practice of performing constant external audits that assist the management bodies and advisory committees; and

(v) The resolution of conflicts that may arise between the Company and/or its Subsidiaries, our shareholders, and our Directors, will be conducted by means of arbitration, according to the arbitration clause provided for in the Articles of Incorporation.

Section II - Collaborators

4.3. We expect all Collaborators to strictly follow this Code, which should be understood as a guideline for positioning themselves on the most frequent issues, without pretending to contemplate all the practices and principles of conduct and integrity expected by the Company.

4.4. We believe that relationships in the workplace should be guided by honesty, respect, collaboration, and teamwork among all Collaborators.

4.5. We always seek to contribute to the creation and maintenance of a good work environment among employees, observing the following terms:

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

(ii) We seek to ensure safety and health at work by developing practices and policies that minimize occupational risks;

(iii) We comply with the labor legislation in force; and

(iv) We believe and invest in valuing and developing our Collaborators.

Section III - Use of Assets

4.6. We seek to create and maintain inspiring and comfortable work environments for our employees, and for this reason we invest in furniture, electronic equipment, decoration, and amenities so that everyone feels comfortable in our spaces.

4.7. The goods available in our space must be used exclusively for Company-related activities, subject to the other provisions set out in specific policies. Collaborators must care for the conservation of the Company's assets, avoiding unnecessary expenses and ensuring their durability.

4.8. The use of all Company resources assigned to Collaborators will be monitored.

Right Choices:

- *Use the assets made available by the Company to perform their work properly and efficiently, provided that the norms for cession and conservation of the ceded assets are respected.*
- *Moderate use of the internet provided by the Company for personal purposes, as long as this does not interfere with the progress of your work and does not violate the internal rules.*

- *Use the Company's resources under your responsibility correctly and moderately, paying attention to possible waste arising from misuse.*

Wrong choices:

- *Requesting a Company asset (equipment or space) for exclusively personal use. All requests for acquisition or assignment of a Company asset must be made for professional purposes.*
- *Misappropriating assets belonging to the Company or to other Collaborators.*
- *Using electronic means provided by the Company for exchanging or storing pornographic, violent, discriminatory, racist and/or defamatory content.*

4.9. All physical spaces, materials, furniture, and equipment owned or rented by the Company are considered Company assets. The Company invests in providing the best physical spaces, furniture, materials, and equipment for the day-to-day activities of its Collaborators (tables, chairs, videoconference equipment, air conditioning, microwaves, refrigerators, ovens, stoves, computers, TVs, video games, sound equipment, and other electronic devices, furniture, materials, and accessories). Therefore, it is important that everyone takes care of the conservation of our assets.

Right Choices:

- *When leaving a meeting room, remember to turn off the lights, turn off the monitors and air conditioners, clean the boards and tables, and leave the door open.*
- *If the Collaborator notices that any electronic equipment or any Company asset is broken, damaged, or malfunctioning, he/she should immediately notify those responsible.*
- *Whenever you need any material, equipment or accessory, ask those responsible.*

Wrong choices:

- *Noticing that the microwave oven has stopped working and not notifying those responsible immediately.*
- *Leaving the meeting room and leaving the lights and TVs on.*
- *Opening bottles on the edge of the table, damaging the paint.*

CHAPTER V - CONFLICT OF INTERESTS

5.1. Collaborators must always act in the best interests of the Company and its customers. Conflict occurs when a Collaborator finds himself/herself in a situation that may lead him/her to make decisions in his/her professional activities motivated by interests other than those of the Company.

5.2. All Collaborators must avoid situations that involve a conflict of interest, even if only apparent.

5.3. When faced with a potential conflict of interest situation, Collaborators must evaluate whether:

- (i) The situation creates (or appears to create) some incentive/benefit for the Collaborator or someone related to his or her family at the expense of the Company;
- (ii) The situation affects the reputation of the Collaborator or of the Company, or may even hinder the activities developed by the Collaborator for the Company; and
- (iii) The situation could damage the image of the Collaborator or the Company if published on any news portal or social network.

5.4. Should the Collaborator believe that any of the situations above apply to the situation in which he/she finds him/herself, it is likely that he/she is facing a conflict of interests, which must be avoided.

CHAPTER VI - COMMERCIAL RELATIONSHIPS AND PARTNERSHIPS

Section I - Contracting with Suppliers/Service Providers

6.1. Contracting with the Company's suppliers and business partners should always be negotiated and closed by the purchasing team who will ensure that the agreement is made in the most advantageous way for the Company.

6.2. The Company's relations with its suppliers and service providers must contemplate the legitimate interests of those involved, always based on technical parameters, not admitting undue advantages, obtained through the manipulation of information, or through intimidation, coercion, embarrassment, or any artificial creation of situations of dependence of the other party involved, whether these are unfair competition practices or situations characterized as conflict of interest with the Company's business.

6.3. Our suppliers must mainly: (i) be reputable; (ii) comply unequivocally with the applicable legislations and standards, as well as with the Company's hiring rules, codes, policies and procedures; (iii) not use child or slave labor; (iv) observe the constant confidentiality of our own information, as well as that of our customers, partners and Collaborators.

6.4. The supplier or service provider agrees that supplying goods and/or providing services to the Company constitutes its acknowledgment that it understands the requirements set forth in this Code, is in compliance with all of the requirements of this Code, and will continue to comply with those requirements during the time it is our active supplier or service provider.

Right Choices:

Request purchase of a service or product from the procurement team by recommending certain suppliers with whom you have a relationship, provided that you do not participate or exercise influence in the decision-making process and that you formalize the situation of conflict before your leadership and your area.

Wrong choices:

- *Influencing or attempting to influence in any way the procurement team's decision on hiring a business partner with whom you have a family relationship or friendship, or from whom you expect to receive some personal benefit.*
- *Making a decision to purchase a certain service or product without the involvement of the procurement team, which in turn finds out about it only when payment is collected.*

Section II - Business Partnership

6.5. The Collaborator must ensure that the terms of the partnership are evaluated and reviewed by the legal team prior to any hiring or exchange of information.

Right Choices:

- *A Collaborator sends a confidentiality agreement to be reviewed and only exchanges information with the partner after signing the document.*
- *After the legal team validates the documents to be signed, the Collaborator provides the data of the people responsible for the signature so that the administrative team can proceed with the contractual signing process.*

Wrong choices:

- *A Collaborator exchanges data with a potential partner, without having evaluated and signed a confidentiality agreement to do so.*
- *A Collaborator starts integration with a partner, without having signed a partnership agreement.*
- *A Collaborator accepts the contractual terms without going through the legal team's review.*
- *A Collaborator signs a partnership document without the power to do so.*

Section III - Presents, Gifts, and Hospitality

6.6. All gifts, meals, trips, or entertainment packages that may be offered by suppliers, business partners, or any third party to Collaborators, purchased by Collaborators at events/courses funded by the Company, or that are offered by the Company to any third party, regardless of the amount involved, are considered presents, gifts, and hospitality.

6.7. Collaborators must refuse gifts, meals, presents, or any service provided by any third party, regardless of the value. If they have already been received, or if returning the gift would cause embarrassment, the gift must be forwarded to the immediate superiors for an internal drawing among all Collaborators.

Right Choices:

- *Offer gifts with low value, as long as you have previously obtained the proper internal approvals.*
- *Accept invitations for training sessions or seminars, with no restrictions as to value, as long as they are approved by your immediate leadership. In case the invitation includes the payment of costs related to air tickets and accommodation, the Collaborator must inform these details to his/her immediate superior and obtain previous authorization.*

Wrong choices:

- *Requesting gifts, sponsorships, discounts, gratuities or other personal advantages for business partners or putting them in a situation where they feel obliged to grant such benefits, even if of low value.*
- *To give, offer or promise any gift that has commercial value or hospitality to any public official or related persons.*
- *Accepting gifts or hospitalities that have been offered in exchange for any advantage.*

Section IV - Affectionate Relationships and Family Relationships

6.8. At the Company, family relationships or affectionate relationships among Collaborators are allowed, provided that this does not impair the work activities of any party.

6.9. The following are considered relatives: children, grandchildren, and great-grandchildren; spouses/partners; parents-in-law, brothers-in-law, sons-in-law, and daughters-in-law; parents, siblings, nephews, nieces, and great-nephews; uncles and cousins; grandparents, great-grandparents, and great-uncles.

Right Choices:

- *Having an affectionate relationship with another Collaborator, as long as it does not impair the work activities of any party.*

Wrong choices:

- *Intervening or attempting to intervene in the hiring or evaluation process of someone who is your relative or your spouse/partner.*

Section V - Relationships with Competitors

6.10. Competition for the services and products offered by the Company should be exercised on the basis of fair competition.

6.11. Comments that could affect the image of competitors or contribute to the spreading of rumors should not be made.

6.12. It is expressly forbidden to supply strategic, confidential, or in any way harmful information to

the Company's business to any third parties, including, but not limited to competitors, even after the Collaborator's relationship with the Company has ended.

6.13. We do not admit, under any hypothesis, the use of illegal (theft, robbery, bribery, espionage by electronic means, and others) or unethical means to obtain information about competitors.

6.14. We do not practice agreements with competitors that aim at or cause impediments or restrictions to free competition, such as price agreements, supply agreements, customer distribution and sales conditions, and others.

Section VI - Relations with Shareholders

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

6.16. The relationship with shareholders and investors must be based on the accurate, transparent, and timely communication of information that will enable them to follow up on the Company's activities and performance, pursuant to the applicable legislation and rules.

6.17. The treatment given to shareholders is independent of the number of shares they hold, observing the legal limitations and wording, and all information is provided with equal treatment.

6.18. The reports and documents registered or submitted to CVM, B3 or the public in general, as well as the other public communications, must include complete, fair, accurate, timely, and understandable information.

Section VII - Relations with Public Authorities and Regulatory Bodies

6.19. We comply with legislation that regulates the participation of companies in political affairs and in relationships with public authorities and regulatory agencies, including with regard to contributions to election campaigns.

6.20. We also maintain, with the government and regulatory agencies, a position of independence, collaboration, and respect for the laws and regulations.

6.21. The Company's relationship with the public authorities must always be transparent and exempt, and favors and donations, whether direct or indirect, to civil servants are expressly forbidden.

Section VIII - Relationship with Social Media

6.22. Collaborators are responsible for registering on social media or means of communication with their own names and personal e-mails, without adding names or logos related to the Company, avoiding the generation of bonds.

6.23. It is not allowed to publish or share the Company's confidential information on social media. Information may only be shared or published once it becomes public, i.e., once it has been previously published in official communication vehicles authorized by the Company.

6.24. When expressing any personal opinion in communication media, social media, or communication apps, Collaborators are expected to take into consideration that these environments are public and that the content of their messages may damage the Company's reputation and harm the image of other Collaborators, customers, suppliers, and shareholders.

6.25. It is not allowed to share with the press or publish in the media, social media or

communication apps content and comments that are not compatible with our principles, values and culture, as well as sharing confidential information.

6.26. If any situation of risk to the image and reputation of the Company or other Collaborators is identified in the media, social media, or communication apps, the Collaborator must report the occurrence to the respective responsible persons or Company Advisory Committees, in accordance with the Risk Management Policy.

6.27. Any contact or communication between Collaborators and the press or any means of communication must comply with the provisions of item 9.4 below.

CHAPTER VII - PROFESSIONAL BEHAVIOR

7.1. It is the duty of every Collaborator to ensure that their attitudes and professional behavior (a) are in line with the Company's development and growth; and (b) fully comply with the Company values described in item 3.1 above. Every Collaborator must avoid harming the

activities of other Collaborators with noise, interruptions, matters not related to the Company, or any other action that may disturb the concentration and development of the activities for which each person was hired. If a coworker harms the development of his/her professional activities, or if a Collaborator witnesses any such attitude, he/she must report it to the management through the applicable channels.

7.2. All Collaborators must respect their own working hours and those of their colleagues. Cases of time clock fraud or suspected fraud must be immediately reported to the direct leadership.

Section I - Working Hours

7.3. The Collaborators must observe the rules of the Company's Telework Booklet, as applicable.

CHAPTER VIII - DIVERSITY AND RESPECT

8.1. The Company respects differences and does not admit discrimination or prejudice of any nature, whether it be of race, gender, age, religion, physical condition, marital status, nationality, political conviction, sexual orientation, or social condition. The Company's respect to diversity is also in the freedom of thought and expression among its Collaborators and in the practices of recruitment, internal/external selection, and promotion. Disrespectful and/or discriminatory attitudes will not be tolerated, whether they are practiced by people in hierarchical superiority, by peers, or by subordinates. Should the Collaborator witness or experience any situation of disrespect and/or discrimination, he/she must communicate it to the leadership through the applicable channels.

Section I - Moral or Sexual Harassment

8.2. Moral harassment is any and all behavior practiced in a premeditated and systematic way with the purpose of constraining someone in the workplace. A common example of subjecting a person to moral harassment is, in the workplace, subjecting them to words and attitudes that violate their dignity.

8.3. Sexual harassment is any situation of embarrassing someone through an act of harassment and harassment with a sexual connotation. This type of harassment occurs even if it is committed only once and even if the intention of obtaining sexual advantage or favor is unrequited. It is enough to act in an inopportune, unpleasant, offensive and impertinent manner through sexual behavior.

8.4. It can be practiced by people in a hierarchical superiority condition, by peers or subordinates. Situations of sexual embarrassment are not tolerated in the work environment, on trips or in any moments of relaxation (ex: happy hour or parties) held and/or funded by the Company.

8.5. Any situations involving humiliation, intimidation, exposure to ridicule, hostility or embarrassment are considered discrimination or harassment, whether related to color, gender, sexual orientation, age, competence, medical condition, religion, political ideology, nationality or social condition.

Right Choices:

- *Respect each person's place of speech within the Company.*
- *Hiring diverse people.*
- *Making decisions in a way that considers the different needs and realities of people inside and outside the Company.*

Wrong choices:

- *"Hit on someone", approach in an inappropriate manner or without the consent of colleagues in the work environment, on trips or in any relaxation moment (e.g. happy hour or parties) held and/or*

funded by the Company.

- *To use expressions or make jokes that offend a certain group of people;*
- *To favor people or situations based on similarities of thought, position or orientation;*
- *Making comments that reinforce stereotypes and generalize people;*

Section II - Other Non-Tolerated Actions

8.6. The Company also does not tolerate that the Collaborators get involved or allow themselves to be involved, or even involve the Company, in transactions and operations that characterize, either actively or passively:

- (i) corrupt practices (public or private), fraud or bribery that are carried out in any way, with the use of financial resources, material goods, exchange of information or corporate or political influence, among others;
- (ii) unauthorized exchange of confidential or strategic information relative to the Company's business with any market agent or institution;
- (iii) actions considered extortionate or of mutual or individual favoritism between employees or Collaborators and any market agents or institution; and
- (iv) Violation of any nature of the Company's intellectual or industrial property rights and copyrights.

CHAPTER IX - CONFIDENTIALITY AND SECURITY OF INFORMATION

9.1. The Company's intellectual property and confidential information are extremely valuable and irreplaceable assets. The Company's position as a leader in the cashback industry attracts increasing attention from the specialized media and competitors, which increases the risk of confidential information leakage.

9.2. All Collaborators must always maintain confidentiality in relation to reports, research, financial information and other elements to which they have access during the course of their work for the Company.

9.3. The Company monitors and may access at any time all records of access to the internet and e-mails of its Collaborators, as well as information and files received or stored in the Company's electronic equipment and communication systems. The Collaborator must not have any expectation of privacy regarding any activities developed on Company equipment, even if of a personal nature.

Section I - Information Integrity

9.4. Only a few previously selected Collaborators are authorized to speak on behalf of the Company to the press. Whenever they are contacted by representatives of the media, our Collaborators must forward to branding@meliuz.com.br.

Right Choices:

- *Granting interviews to the press on any subject on its behalf, as long as it is not understood that the Collaborator represents the opinion of the Company. Only previously authorized Collaborators may speak to the press on behalf of the Company.*

Wrong choices:

- *Speaking to journalists or representatives of the public administration as a Company Collaborator without authorization from the communications team (branding@meliuz.com.br).*
- *Disclosing confidential information or expressing opinions on behalf of the Company on social*

media, blogs or various comments about the Company or its related business.

Section II - Confidentiality of Information

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

9.6. Internal Company information should be assumed to be confidential whenever there is no clear indication that the Company has either publicly disclosed it or authorized its disclosure. The confidentiality commitment remains valid even after the Collaborator's dismissal.

9.7. Our activity is strongly based on the use of our clients' confidential and strategic information, which must be handled with due diligence and care. To this end, it is imperative to observe some basic principles in our work:

- (i) Information is an asset of the Company and of our clients. It is the duty of all Collaborators to protect it from unconscious leaks or malicious attempts by third parties, adopting a careful and responsible behavior.
- (ii) Since information security is strongly linked to behavior, it is necessary to adopt a responsible and ethical attitude at all times, in accordance with the Company's basic values.
- (iii) The consequences of making confidential information available can be disastrous for the Collaborator and for the Company. The negligent or fraudulent provision of information is a crime and opens the possibility of economic losses for the companies involved. For example, close attention must be paid to relationships with friends and acquaintances who work with our competitors or competitors of our customers.
- (iv) *Chinese wall policy*: confidentiality of projects and client information must be maintained even internally in the Company, especially in the case of teams assigned to competing customers (examples of competing customers: supermarket chains, e-commerces, etc.). In case of any doubt, the Collaborator must talk to his or her direct supervisor for clarification and guidance.
- (v) Improper use of confidential Company or customer information is considered grounds for just cause for dismissal, in addition to subjecting the responsible party to the penalties provided by law.

9.8. The Collaborators count on several of the Company's electronic assets for the development of their professional activities on a daily basis. All information and documents must be stored in appropriate virtual environments previously approved by the Information Security area (seguranca@meliuz.com.br).

9.9. Files created, received or stored in the electronic equipment and communication systems provided by the Company are considered Company property.

9.10. Information on business, activities, projects, and results that have not yet been disclosed to the market and that may in any way interfere in the quotation or volume of the Company's securities traded on stock exchanges or other environments, or create asymmetry of information, must be kept absolutely confidential by all Collaborators, under the terms of the applicable legislation.

9.11. Any confidential, material, or privileged information communicated, inadvertently or without

authorization, to any person or body prior to its disclosure to the market by any Collaborator must be immediately transmitted to the Investor Relations Department, so that appropriate measures can be taken.

9.12. The Company and Collaborators must always respect the information and data they receive, under the terms of the General Data Protection Act.

Right Choices:

- *Being on a public network (from the airport, your home, etc.) activate the VPN configured on your computer whenever you need to access the Company's services and information.*
- *Block or put down your computer screen when you leave your desk.*
- *Close or put away your notebooks and notes when you leave your desk.*
- *Delete the information written on the board in the meeting room when you leave the room.*
- *Logging out of printers shared with others after printing any Company document and making sure that no printouts are left in the queue*

Wrong choices:

- *Uninstalling software (corporate antivirus, VPN, etc.) or other control that has been implemented by Company Information Security.*
- *Talking to an employee of a supermarket in a certain city, and in this conversation quote some information from a supermarket in another city, even if it is apparently irrelevant information.*
- *Talking to a friend about confidential information of an e-commerce client of the Company.*
- *Talking to your boyfriend or girlfriend about the Company's confidential information.*
- *Leaving sensitive information exposed on workstations, printers or in meeting rooms.*
- *Bill Gates, founder of Microsoft, sends you an e-mail asking for some information about Microsoft licenses that the Company owns, purporting to be part of the Company's piracy prevention policy, and you reply to that e-mail or click on a link in the e-mail.*

Section III - Information Security

9.13. The rules presented here do not comprise all situations that may arise. In cases of doubt, the Collaborator must resort to the principles presented in this Code, or ask the direct leadership for help.

Document management:

- Anyone who creates a document or obtains a copy of a document from a client has the ultimate responsibility for its filing and distribution.
- No information acquired through work for a client may be used in a project developed for a competitor of the client (but the methodology developed may be disseminated).
- No document must be left "forgotten". In particular, pay attention to notes on blackboards, notebooks, documents on the desk, printer or copier, both in the office and at clients.
- Personal files should be kept in order by each employee, avoiding accumulating useless materials over time. This saturates the available space and increases the risk of leaving insufficient space to store important files.
- Computer files should also be protected, for example by keeping computers in safe places, protecting access, correctly archiving files in the client or project folder, eliminating outdated versions, and, in general, storing all necessary files in Google Drive, without deleting them.
- Every Collaborator must be careful with e-mails. In general, it is advisable to check addresses and confirm receipt in case of important documents, and avoid leaving "sensitive" documents sent or received in the inbox, outbox or trash (instead, one should save the documents in Google Drive).

Clean desk policy:

- During absence from the office, the Collaborator should leave the desk "clean" (without any documents on the desk). This, in addition to allowing another Collaborator to use it, reduces the

risk of inadvertently "losing" documents.

Internet use:

- Internet browsing leaves traces and the Company can monitor its Collaborators' browsing when they use the Internet or the Company's equipment. It is therefore essential to avoid sites that are not consistent with the Company's values.

Public behavior:

- Great care should be taken in places such as airports, airplanes, etc., where it is easy for comments made about clients or documents used for work to be overheard or seen by a competitor (of the client or the Company). In particular, it is advised to work with extreme discretion on airplanes, especially when you are not sure of the identity of your neighbors.

Press and events:

- Never give information, interviews or attend events as an exhibitor without prior authorization from your direct leadership or the Communications team (branding@meliuz.com.br). Inappropriate communications may result in serious damage to the Company's image.

CHAPTER X - COMMITMENT TO SUSTAINABILITY

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

10.2. We have adopted a sustainability management model that promptly meets the demanding clauses and standards of the global market. To this end, we carry out a continuous process of engagement and strengthening the commitment of our employees, as well as of everyone in our business chain.

Section I - Environment

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

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

10.5. We seek to invest in technologies that enable the promotion of sustainable development and the preservation of the environment in all its aspects, continuously improving processes and products through awareness and the adoption of effective programs.

Section II - Social Responsibility

10.6. Our policy is to encourage our employees to:

- (i) Disseminate social practices and policies in our production chain, thus contributing to the economic and social development of Brazil;
- (ii) To form partnerships with institutions for the qualification and development of people;
- (iii) To exercise social awareness and voluntarism through social actions; and
- (iv) Stimulate social projects that contribute to the development of the regions where the Company develops its activities.

Section III - Economic Development

10.7. We have as practices and always seek to:

- (i) Form partners to encourage the economic development of the community or region where we develop our activities;
- (ii) Comply with our obligations to our stakeholders; and
- (iii) Respect the best international practices and the market standards defined by regulatory bodies in Brazil and abroad.

CHAPTER XI - ETHICS MANAGEMENT AND DENUNCIATION

11.1. All the Collaborators are committed to applying and watching over the guidelines set forth in this Code.

11.2. In the event of non-compliance with these guidelines and with other Company policies, Collaborators must report this through the Whistleblower Channel, so that the situation can be analyzed by the Ethics Committee.

11.3. Our Whistleblower Channel guarantees the confidentiality and secrecy of reports, and may be used by all Collaborators, suppliers, business partners and shareholders, as well as any other third parties, with anonymous reporting allowed at the following e-mail address: <https://ouvidordigital.com.br/meliuz/>

11.4. Anonymous reporting does not satisfy a duty to report possible involvement in a conflict of interest or unethical or illegal conduct.

11.5. Clarifying the provisions contained in this Code, as well as making reports of violations of our policies and standards and/or assisting in an investigation, is a conduct appreciated and encouraged by the Company, as follows:

- (i) Any retaliatory measure against the Collaborator who has made the report will be punished, unless the Collaborator has acted in bad faith, with fault or malice; and
- (ii) Any suspicion that someone is suffering any kind of reprisal must be immediately informed to the Ethics Committee, through the Whistleblower Channel.

CHAPTER XII – GENERAL PROVISIONS

Section I - Compliance with the Code and Penalties

12.1. It is the responsibility of all Collaborators to be aware of the content of this Code. Thus, any violation of any of its provisions may result in, among others:

(i) reprimand; (ii) suspension; (iii) termination of the Collaborator's employment; (iv) termination of the existing contractual relationship with the Company, or, further, (v) filing of lawsuits.

12.2. All Collaborators have the duty to report immediately, through the channels indicated in this Code, when expressed, to their direct superior or the Company's management, any violation of the provisions of this Code, as applicable. It is certain that the Collaborator's omission may imply in the same penalties and sanctions mentioned in item 12.1.

12.3. The Ethics Committee is responsible for proposing actions regarding the dissemination of and compliance with this Code, in order to ensure its efficacy and effectiveness. The Ethics Committee will

analyze and deliberate on the complaints received, considering their degree of criticality, always ensuring confidentiality and the importance given to the respective complaint. It is the Ethics Committee's responsibility to decide, by means of a formal process, on the penalties that will be applied to each fact that is the subject of the denunciation.

12.4. Denounced cases that have accounting and tax issues as their scope, as well as denouncements that involve members of the Company's Management (directors and officers) in addition to the Ethics Committee, the case will also be reported to the Company's Audit Committee, which will accompany and support the Ethics Committee's decisions.

Section II - Training

12.5. Periodic training will be held with Collaborators at least once a year, to remind them of the rules and principles set forth in this Code, and to clarify any questions.

Section III - Exemptions and Amendments

12.6. This Code is dated September 1st, 2020, and will be reviewed periodically, aiming at keeping it updated with the Company's policies. Suggestions are always welcome at meluz.com.br.

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

Section IV - Adhesion Term

12.8. Every Collaborator is required to sign the Adhesion Term (Exhibit I) to this Code, committing to ensure the application of the rules and principles contained herein.

EXHIBIT I TO MÉLIUZ S.A. CODE OF ETHICS AND CONDUCT

ADHESION TERM

I understand that this Code contains the Company's culture, values, and principles, reflecting a commitment to professionalism and transparency. I hereby declare that I have received it and commit to read it and to fully comply with it in all my actions at work.

Full name:

CPF [Individual Taxpayer's Registry]:

Date:

Signature: