



CODE OF ETHICS, CONDUCT AND INTEGRITY

2025 – 2026



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PRESIDENT'S MESSAGE

Dear employee and collaborator, we present the 2025/2026 version of the BB Tecnologia e Serviços (BBTS) Code of Ethics, Conduct and Integrity.

BBTS's sustainability and continued growth are the result of everyone's commitment to comply with the standards of conduct and principles established in our Policies, the Corporate Governance Code, the Compliance Program, as well as internal rules and regulations.

The engagement of each and every one of us is essential to achieving BBTS' Purpose and strengthening the pillars that underpin our Corporate Strategy.

This Code of Ethics reflects what BBTS expects of its staff, consolidating guidelines that promote upright behavior in relationships with colleagues, customers, suppliers and other publics, whether private or governmental.

Periodic reviews aim to reinforce values and provide clear guidelines for ethical conduct in our lives.

It is important to remember that the Code of Ethics is not just a formal document. It is a practical guide for our actions and decisions. Adopting ethical principles adds value BBTS, strengthens its reputation and contributes to a positive impact on society.

We therefore stress the importance of reading and acknowledging the Code of Ethics, Conduct and Integrity. Knowing and applying corporate ethics strengthens our commitment to integrity and the trust that clients and partners place in BBTS.

If you have any questions, ask your manager or contact the Ethics Committee in your region. We are here to support and guide you.

Let's work together to build an even more honest and reliable BBTS.

Sincerely,



Gustavo Pacheco Lustosa

1. INTRODUCTION

11 - The Code of Ethics, Conduct and Integrity represents the company's moral commitment and aims to guide the actions of Senior Management, Employees, Collaborators and all individuals who are acting or providing services on behalf of BBTS.

12 - BBTS's business must be guided by honesty, responsibility, transparency, respect and observing social and environmental impacts when carrying out its activities.

13 - It is of the utmost importance that its content guides the internal and external relations of all Employees and Collaborators, regardless of their duties and responsibilities, and finds support in Senior Management.

14 - The directors and managers must lead by example, always acting in accordance with the highest standards of integrity and ethical conduct. They have the additional commitment of ensuring that the principles and values of BBTS are permanent.

15 - No rule, document or manual is capable of covering all the behaviors and standards of conduct required on a basis. To ensure that the actions of Employees and Collaborators are consistent with the levels of ethics and integrity expected by BBTS, before making a decision, ask yourself the questions below:

1

Is my action in compliance with the law and BBTS's internal rules?

2

Does my action protect the reputation and image of BBTS?

3

Would I be reassured if my decision was made public?

4

Can my performance be thoroughly investigated without any problems?

5

Does my conduct set an example for my coworkers?

6

Have I evaluated all the information available decision-making?

7

Have I assessed the risks and whether the decision to be made would be the best for BBTS?

16 - If you answer positively to all of the above questions, there is a strong indication that your attitude is in line with the precepts of our Integrity Program. If you answer no to at least one of the questions, it's worth stopping and rethinking your actions. If you have any questions, talk to your manager or contact the Ethics Committee in your region by email: Southeast and Northeast: eticasene@bbts.com.br, Central West North: eticaconorte@bbts.com.br and São Paulo South: eticaspsul@bbts.com.br

17 - The Code of Ethics, Conduct and Integrity is available on the internal network (<https://intranet.bbts.com.br/>) and the external network (<https://www.bbts.com.br/>), allowing all employees, collaborators and other interested parties to access it.

18 - The Code of Ethics, Conduct and Integrity must be reviewed every two years or extraordinarily at any time when it undergoes relevant changes. BBTS's Board of Directors, Audit Committee, Board of Executive Officers, Employees, Interns and Junior Apprentices must register their awareness of an agreement with the documents guiding BBTS's corporate ethics.

19 - Access to the Code of Ethics, Conduct and Integrity is mandatory and available via the Service Center.



2. CODE OF ETHICS, CONDUCT AND INTEGRITY

This document is designed to provide the reader with a complete and objective experience of ethics, conduct and integrity.

Throughout the document, the guidelines for relations with BBTS's main stakeholders and the conduct expected of each of us in these relations will be presented.



The following chapters also demonstrate our concern for human rights, how to proceed when there are signs of conflicts of interest, the conduct to be adopted in relation to receiving and offering gifts, participation in events and the rules for institutional donations.

The document concludes with a discussion of issues relating to the use social media and the procedures in the event of complaints or non-compliance.

This Code has therefore been structured follows:

- 21** - Principles of the Code of Ethics, Conduct and Integrity
- 22** - Relationship with BBTS Stakeholders
- 23** - Rights Humans
- 24** - Conflict of Interests
- 25** - Gifts, Hospitality, Sponsorship, Events and Donations
- 26** - Responsible use of social media
- 27** - Complaints and non-compliance

21 PRINCIPLES OF THE CODE OF ETHICS, CONDUCT AND INTEGRITY

21.1 - Each of us has the challenge transforming ethical principles into an essential part of our responsibilities.

These are principles that dictate the direction we should take, especially when we experience ethical dilemmas and need to make decisions that adhere to the expectations of the BBTS, even if they have not been laid down in specific rules.



Honesty: BBTS expects its Employees' conduct to be based on honesty. We must do only what is right, we must act in good faith, with integrity and sincerity in matters that affect BBTS's duties and interests.



Responsibility: Each member of BBTS is responsible for their actions and decisions. Regardless of the position we hold, we must be responsible for creating a transparent, respectful and safe environment, so that business is ethical and sustainable. It is also our responsibility to ensure that irregular acts do not occur at BBTS.



Transparency: BBTS strives for transparency in its actions. Information must be complete, accurate and clear. The trust of our partners is linked to the free access that BBTS gives to the information in its reports and decision-making. The secrecy and confidentiality of information permeates and is required in our actions at BBTS. In the meantime, actions carried out deliberately on the sly are unethical.



Respect: BBTS does not accept disrespect for people's dignity, equality, diversity or privacy. The work environment must be a place of professionalism, where different cultures and understandings of the world are respected and where respect for the laws and regulations in force is a priority.

22 RELATIONSHIP WITH BBTS STAKEHOLDERS

RELATIONSHIP WITH SHAREHOLDERS



22.1 - Needs and expectations: to obtain a return on their investments by expanding the business, in accordance with ethical principles and complying with governance principles in line with the organization's structure.

22.1.1 - BBTS management is guided by the principles of honesty, responsibility, transparency and respect.

22.1.2 - We take action to maintain, improve and expand the business.

22.1.3 - We disclose information on management's actions to shareholders in order to guarantee transparency in the conduct of business.

22.1.4 - We maintain a system of Corporate Governance consistent with our size, providing the necessary transparency to the market about the actions of the Company and its senior management.

22.1.5 - We defend the interests of BBTS, always observing the highest ethical principles and respecting the laws and regulations in force.

22.1.6 - We have prepared financial statements in accordance with the law, accounting principles and standards in order to adequately represent the results of operations, cash flows and the equity and financial position of BBTS.

2.2. RELATIONSHIP WITH BBTS STAKEHOLDERS

EMPLOYEE RELATIONS AND COLLABORATORS



222 - Needs and expectations: gaining knowledge of their skills, working in a respectful, healthy and harassment-free environment under the guidance of an inspiring leadership aligned with the organization's strategy.

2221 - We strive to establish a dignified and healthy working environment, with relationships based on respect and cordiality between superiors, subordinates, peers and employees.

2222 - We repudiate conduct that could characterize harassment or prejudice of any kind.

2223 - We guarantee each employee access to relevant information, their privacy, and the confidentiality of this information, except in cases provided for by law.

2224 - We respect the diversity of the people who make up the work environment and who maintain relationships with BBTS.

2225 - We encourage the internal dissemination of the Code of Ethics, Conduct and Integrity and the internal rules that regulate the behavioral aspects of the organization.

2226 - We repudiate illicit practices such as fraud, bribery, extortion, corruption, discrimination of any kind, kickbacks, loan sharking, money laundering, currency evasion, terrorist financing and the financing of the proliferation of weapons of mass destruction.

2227 - We value dialogue, maintaining channels capable of receiving doubts, suggestions, complaints, denunciations, requests and compliments, such as the Ombudsman Channel, preserving appropriate confidentiality when requested or by force of law.

2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

2228 - ARE THE DUTIES OF EMPLOYEES AND COLLABORATORS:

22281 - Perform their duties with quality and efficiency, avoiding delaying actions.

22282 - Fully perform the duties of the job.

22283 - Be assiduous and punctual at work.

22284 - Immediately report any fact contrary to the interests of BBTS, registering any suspicions of unlawful conduct identified via the Ombudsman Channel.

22285 - Facilitate the inspection of its acts or services by the competent bodies.

22286 - To relate to clients and employees in a professional manner, preserving the impartiality necessary for the performance of their duties.

22287 - Keep confidential strategic information and/or information relating to facts or acts that have not yet been made public about BBTS, its Employees, clients, service providers and suppliers.

22288 - Keeping the workplace in order, following appropriate methods for its organization and maintenance.

22289 - Taking care of the Company's assets and not using them for personal or private activities.

222810 - Guide relationships by respecting differences, whether they be physical, racial, cultural, religious, sexual orientation, social, regional linguistic, age, ideas, origin, ability, appearance, class, marital status or gender identity.

222811 - Refrain from making or disseminating, in any medium (internal or external), offensive criticism or slander that exposes the image or reputation of BBTS, the board of directors, hierarchical superiors or colleagues.

222812 - Maintain respect, cordiality and truthfulness when posting comments associated with content published on official BBTS channels, such as articles published on the intranet.

222813 - To commit to a good working environment, guiding our conduct by respect and tolerance.

222814 - Develop activities with responsibility, autonomy and commitment.

222815 - Carry out the activities entrusted to them, taking responsibility for the task.

222816 - We repudiate conduct that could be characterized as discrimination or its inducement, coercion, persecution or embarrassment, disrespect for functional attributions, public disqualification, offense or threat.

2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

222817 - Refrain from dealing with confidential matters and internal use, not authorized by BBTS, in chat rooms, social networks and applications with internet access.

2.2.2.9 TO THE LEADERS:

22291 - We expect our leaders to promote development and inspire their teams, stimulating engagement and seeking to train successors for current and future challenges.

22292 - We expect our leaders to act with vision and purpose, presenting the BBTS strategy from an assertive perspective to gain the support and commitment of those they lead.

22293 - We require our leaders to be ethical, to be the benchmark for appropriate behavior and to encourage teamwork as a practice of collaboration and the sharing of knowledge and experience.

22294 - We expect our leaders to promote dialog with respect, good manners and assertiveness, putting Nonviolent Communication and active listening into practice.

22295 - We expect our leaders to contribute to the development of those they lead, encouraging autonomy, innovation and cultural transformation.

22296 - It's up to leaders to be transparent when leading their team, informing them of the organization's objectives, motivating them and contributing to their growth and evolution, as well as training successors, receiving suggestions and ideas with wisdom. Giving and receiving feedback and working hard to resolve their team members' doubts, in the pursuit of greater learning and the improvement of internal processes.

2.2.2.10 - TO THOSE THEY LEAD:

222101 - Show respect, tolerance, emotional control and maturity by applying Nonviolent Communication and active listening.

222102 - Take the lead in their own careers and promote self-development, showing initiative, commitment and the ability to adapt to changing circumstances.

222103 - Develop strategic thinking, digital dexterity, the ability read a scenario, creativity and innovation.

2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

RELATIONS WITH SUPPLIERS AND PARTNERS



223 - Needs and expectations: to obtain impartiality and transparency in competitive processes, as well as to receive payments for services or products within the deadlines established in the contract.

223.1 - We maintain a harmonious and transparent relationship with suppliers and partners in order to guarantee the quality and reliability of the services and products contracted.

223.2 - We adopt impartial and transparent selection, contracting and evaluation criteria that allow competition between suppliers, under the terms of current legislation and regulations.

223.3 - We carry out bidding processes, contracting and formalizing agreements, covenants and partnerships based on technical criteria that ensure BBTS the best cost-benefit ratio.

223.4 - We are committed to combating fraud and illicit bidding processes and any act against the public administration, whether by our employees or collaborators.

223.5 - We investigated the practice of a harmful act that qualifies as corruption, classified in article 5 of Law 12.846/2013, by a legal entity against BBTS, through the initiation of an Administrative Accountability Process (PAR).

223.6 - We periodically review processes to ensure that all services provided or contracted by the company are duly backed up by formal contracts.

223.7 - It is essential that all Employees understand that any work carried out on behalf of BBTS must be documented and authorized by formal contracts or agreements. This helps protect the company from legal and financial risks and ensures transparency and accountability in all our operations.

2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

2238 - We do not make purchases or contracts with individuals or companies whose director or partner holding more than 5% (five percent) of the share capital is a director or employee of BBTS.

2.2.3.9 - WE DEMAND FROM SUPPLIERS AND PARTNERS:

22391 - Compliance with labor, social security and tax legislation.

22392 - Compliance with legislation and regulations on preventing and combating corruption, money laundering, the financing of terrorism and the financing of the proliferation of weapons of mass destruction.

22393 - No use of child, slave or analogous labor.

22394 - The adoption of good environmental preservation practices.

22395 - No acts of corruption against governments, public administration, Brazilian or foreign, in any of its spheres.

22396 - Respect for the guidelines of this Code of Ethics, Conduct and Integrity.

22397 - Not to carry out any business on behalf of BBTS in an improper manner that constitutes criminal or illicit acts, such as corruption, fraud, bribery, money laundering, financing terrorism and financing the proliferation of weapons of mass destruction.



2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

RELATIONSHIP WITH GOVERNMENT AND PUBLIC OFFICIALS



224 - Needs and expectations: to obtain cooperation and promptness in dealing with requests and inspections in a transparent manner and free from conflicts of interest.

2241 - We respond to requests from public authorities and their regulatory and supervisory agents promptly, quickly and transparently.

2242 - We collaborate with public agents in investigations related to acts harmful to the public administration arising from the activities carried out at BBTS.

2243 - We have adopted formal and documented means of expressing the company's position in relations with public authorities, regulatory bodies and the constituted authorities of the Executive, Legislative and Judicial branches.

2244 - We have adopted mechanisms that allow for the traceability of interactions with public agents, with the aim of guaranteeing the transparency of these interactions, in compliance with the applicable corporate rules.

2245 - We conduct public tenders or commercial negotiations with public entities with fairness and in line with BBTS values and the guidelines of this Code, the Policies and the Compliance Program.

2246 - Whenever possible, we schedule meetings with public and private agents in advance, defining the subject to be discussed. Face-to-face contact with agents, whether public or private, should not be carried out by one employee alone; whenever possible, these meetings should include the presence of at least one other employee to ensure transparency and avoid potential conflicts of interest.

2.2. RELATIONSHIP WITH BBTS' STAKEHOLDERS

2.2.4.7 - IS NOT ALLOWED:

22471 - Offer, promise, deliver or accept, directly or through third parties, economic benefits or undue advantages of any kind to public officials as a way of facilitating business (facilitation payment), omitting acts or obtaining benefits for BBTS, such as: obtaining authorizations, licenses, permits and certificates.

22472 - Carrying out or contributing to the carrying out of acts that could be considered harmful to the public administration.

22473 - Accepting, requesting or offering any bribe or facilitation to conduct business, request a service or information, whatever its nature.

22474 - Frustrating, defrauding, obtaining an undue advantage or benefit, preventing, disturbing or manipulating the competitive nature of a bidding procedure.



2.3. HUMAN RIGHTS

Needs and expectations: To obtain service with excellence and quality in the services provided, considering the principles of competitiveness, conformity, transparency, fairness and commutativity.

2.3. HUMAN RIGHTS

231 - BBTS is committed to respecting, raising awareness of, preventing violations of and promoting human rights in its activities, as well as making reparation for any losses or damages caused under its responsibility. In respect of rights, acts of corruption, extortion, bribery or illegality in any of their forms are also not tolerated.

232 - BBTS promotes and encourages access to continuing education for everyone as a way of offering functional improvement for the full exercise of their functions, at any hierarchical level.

233 - BBTS bases its relations on respect for differences, be they physical, racial, cultural, religious, sexual orientation, social, regional linguistic, age, ideas, origin, ability, appearance, class, marital status or gender identity.

234 - BBTS offers a health plan to maintain the well-being of each employee and their family.

235 - BBTS adopts measures to reduce the environmental impact of its activities through targets and indicators.

236 - BBTS ensures that everyone is treated fairly, equally, cordially and respectfully, regardless of their position or job title. It is everyone's duty not to:

- **2.3.6.1** - Discrimination or prejudice of any kind relating to ethnicity, gender, religion, age group, political conviction, nationality, marital status, sexual orientation or special condition.
- **2.3.6.2** - Any type of forced, child, slave or analogous labor.
- **2.3.6.3** - Harassment, moral or sexual, systematic intimidation (bullying), any other type of violence, including verbal and psychological, nor the exposure of any person to humiliating, vexatious or embarrassing situations.

237 - BBTS maintains political and religious neutrality and therefore respects the political and religious activities practiced by its Employees and Collaborators. They are also responsible for:

- **2.3.7.1** - Not to use the BBTS image for political campaigning or religious preaching.
- **2.3.7.2** - Do not use the position held by the employee or collaborator at BBTS to support a candidate, political party or religious institution.
- **2.3.7.3** - Not to carry out political or religious activities, such as leafleting, on BBTS premises and/or on its behalf.
- **2.3.7.4** - Not to cause any favoritism or prejudice to the performance of the employee or collaborator in the exercise of political and religious activities.

2.4. CONFLICT OF INTEREST



241 - Employees and Collaborators have a duty to avoid the occurrence of conflicts interest and must ensure that their professional activities are restricted to the business and interests of BBTS.

242 - Employees and Collaborators must inform their manager or the Regional Ethics Committees of any actual, potential or apparent conflict of interest.

243 - Employees and Collaborators must inform BBTS of their relationship or friendship with public officials and their families whenever this condition could jeopardize a particular transaction or the reputation of BBTS.

244 - Upon admission or at any time thereafter, Employees and Collaborators are obliged to declare any functional or employment ties that may or may not conflict with their exercise of BBTS and with Art. 37 XVI of the Federal Constitution.

245 - Employees or collaborators may engage in parallel activities, provided that there is no conflict of interest with BBTS activities and that the provisions of this Code, other regulations and legislation dealing with the subject are observed, and in particular that:

- **2.4.5.1** - Does not interfere with your activities and responsibilities, or those of others, and is compatible with your working hours at BBTS.
- **2.4.5.2** - Does not and cannot cause damage to the reputation or image of BBTS;
- **2.4.5.3** - Do not disclose or use privileged or confidential information obtained as a result of carrying out their activities that may or may not provide any kind of advantage for themselves or for third parties.
- **2.4.5.4** - The material and human resources made available to them for the performance of their activity at BBTS are not used.
- **2.4.5.5** - The physical premises of BBTS are not used to carry out commercial transactions or provide services not linked to the company.

246 - In addition to this Code, Statutory Employees must also follow the Code of Conduct for Senior Federal Management, which deals, among other things, with conflicts of interest, confidentiality and the communication of relevant information obtained as a result of the position held.

247 - It is forbidden to accumulate remunerated public positions, except in the cases provided for in the Federal Constitution (Art. 37, item XVI, CF).

- **2.4.7.1** - The accumulation of positions, even if lawful, is subject to proof of compatibility of working hours.

248 - Employees and Collaborators who have any doubts about a specific, individualized situation that concerns them and could constitute a conflict of interest should consult the Ethics Committee, via e-maletica@bbts.com.br or consult Internal Regulation 187 (Conflict of Interest).



2.5. GIFTS, HOSPITALITY, SPONSORSHIP, EVENTS AND DONATIONS

251 - We allow participation in seminars, congresses and similar events as long as the interest of institutional representation of BBTS is respected, accordance with NI 1510 - Management of Institutional Events.

252 - We authorize the acceptance of gifts valued at up to R\$ 390.00 (three hundred and ninety reais), which refers to 1% of the remuneration ceiling provided for in item XI of caput of art. 37 of the Federal Constitution, as long as it is not in kind and does not characterize manipulation of decision-making processes or obtaining undue advantages.

253 - Gifts that have no commercial value are not considered gifts.

254 - The employee or collaborator may receive prizes from promotional draws offered by external entities, provided that:

- **2.5.4.1** - There is a level playing field between all contestants competing for the prize.
- **2.5.4.2** - Clear, pre-existing rules are defined.

- 255** - We prohibit the receipt and solicitation of benefits or remuneration in return for services rendered in the performance of our activities.
- 256** - We prohibit BBTS employees from receiving any money in kind for their own benefit or for the benefit of third parties.
- 257** - We disapprove of the receipt or offer of gifts, presents, hospitality, any other advantages or favors that compromise the perception of BBTS' professionalism and impartiality, regardless of their value.
- 258** - We authorize the acceptance or offer of gifts and hospitality, provided that it is authorized within the scope of BBTS, as established by Decree No. 10,889/2021 and provided that the premises of impartiality and morality not compromised.
- 259** - Any gifts, presents or hospitality received that do not comply with the guidelines of this Code must be returned promptly by the recipient to their respective sender, accompanied by a return letter with proof of receipt, explaining that BBTS rules do not permit their receipt. All returns must be reported to the Ethics Committee(s) immediately.
- 2510** - Any gift or present that cannot be refused or returned immediately must be immediately incorporated into BBTS assets or allocated to official social programs, in accordance with current internal regulations. All incorporations or allocations must be reported to the Ethics Committee(s).
- 2511** - BBTS does not donate to candidates or political parties, as stated in the Company's Internal Regulations: "It is forbidden to donate money, including through advertising of any kind, to political parties or candidates".
- 2512** - Philanthropic donations and sponsorships may not be made to companies listed in the Register of Impeded Private Non-Profit Entities (CEPIM), the National Register of Ineligible and Suspended Companies (CEIS) and the National Register of Punished Companies (CNEP).
- 2513** - At the start of a business relationship, the other party must be made aware of the contents of this Code, the Policy for Preventing and Combating Money Laundering, Bribery, Corruption and the Financing of Terrorism and the Proliferation of Weapons of Mass Destruction.
- 2514** - The offering or receipt of gifts by BBTS Employees and Collaborators, on behalf of the Company, involving suppliers and partners must be previously authorized by the Marketing and Communication Division - Dimac (comunicacao@bbts.com.br).
- 2515** - If you have any doubts about the possibility of receiving a particular gift, please consult the specific rules on the subject or contact the Ethics Committee in your region by e-mail: Southeast and Northeast: eticasene@bbts.com.br, Central West North: eticaconorte@bbts.com.br and São Paulo South: eticaspsul@bbts.com.br or with Geric - Risk Management, Internal Controls and Compliance (integridade@bbts.com.br).

2.6. RESPONSIBLE USE OF SOCIAL MEDIA



261 - We must use digital media responsibly and apply good communication practices in line with the principles of integrity, transparency and respect.

262 - Responsibility, respect for copyright and privacy must guide the behavior of BBTS Employees and Collaborators on social media.

263 - For specific endomarketing actions, in which there may be some initiative that encourages the participation of Employees and Collaborators in social networks, guidance will be given on the content of publications on BBTS's official channels.

264 - These are considered unacceptable behaviors:

- **2.6.4.1** - Using profiles on social networks, even private ones, to publish messages that disparage the image of BBTS.
- **2.6.4.2** - Using the Internet or social media profiles, even if private, to spread or disclose, without formal authorization, information or documents that are not public, from BBTS, its customers, suppliers, Employees and Collaborators.
- **2.6.4.3** - Create social media profiles and accounts that mention BBTS in their names.

265 - Only deal with work matters on corporate communication platforms.

266 - Any statement on behalf of the Organization must be made by a previously designated representative, expressing the institutional position and never personal positions.

267 - BBTS respects the individuality and freedom of expression of its employees, but it is important to emphasize that, in the virtual environment, information is available to everyone, inside and outside the company, which requires an ethical and responsible attitude from those who use these social media.

268 - Confidentiality and information security

- **2.6.8.1** - Ensure the security and safeguard the integrity of the information in our systems and equipment, regularly backing up data and adopting appropriate mechanisms to protect the confidentiality of information, cyber-attacks, invasions and information leaks.

269 - Data protection:

- **2.6.9.1** - In order to ensure a safe environment for our data and that of our stakeholders, it is essential that all Employees act in accordance with legal requirements and the Company's internal regulations, applying to any form of processing of personal data carried out in the course of their activities, whether of an administrative nature, the development of new products or services, various projects or any other situations.

2610 - Artificial Intelligence:

- **2.6.10.1** - Technology must be applied responsibly and effectively, adopting safe practices that respect the privacy of individuals, promote transparency and guarantee data integrity. The implementation of technological solutions, such as Artificial Intelligence, must always prioritize protection of information and compliance with ethical and legal standards, guaranteeing the trust of all those involved.



2.7. COMPLAINTS AND NON-COMPLIANCE

271 - Any citizen, public official, private legal entity, association or class entity may call for the investigation of an ethical transgression imputed to the public official or which occurred in the course of their activities at BBTS.

272 - Failure to comply with the Code of Ethics, Conduct and Integrity is subject to Internal Regulation 116 (Disciplinary Regulations), which includes the following sanctions, among others: dismissal, suspension and warning.

273 - Complaints and representations against Employees and Collaborators for alleged non-compliance with ethical standards, including anonymous complaints, must be forwarded to the Fala.BR Integrated Ombudsman and Access to Information Platform (<https://falabr.cgu.gov.br>). For the complaint to be valid for forwarding and investigation by the competent bodies, it is important to provide the following minimum elements and evidence:

- **2.7.3.1** - Place, date and time of the.
- **2.7.3.2** - Name of the perpetrator(s).

- **2.7.3.3** - Position/function of the author(s), including information on their position.
- **2.7.3.4** - Witnesses who can corroborate the complaint, where possible.
- **2.7.3.5** - Evidence, such as emails, messages, photos, videos, etc. when possible.
- **2.7.3.6** - Reference to the item of the Code of Ethics, Conduct and Integrity, regulation or legislation that has been violated, if any.
- **2.7.3.7** - A detailed description of what happened, containing the information mentioned.
- **2.7.3.8** - Confidentiality is ensured in the handling of cases in order to protect the identity of whistleblowers and the accused and to guarantee a fair and safe process for all involved.

274 - Any suspicion of a harmful act, qualifying as corruption under Law 12.846/2013, committed by a legal entity against BBTS, or against the public administration, Brazilian or foreign, committed by an employee or collaborator who is acting in the interest or benefit of BBTS, must be reported through the Clean Company Reporting Channel, available on the BBTS website, and can even be done anonymously.

275 - The Fale com Comitê de Auditoria (Talk to the Audit Committee) channel is designed to collect information exclusively related to the performance of internal and external audits; non-compliance with internal controls or irregularities of an accounting nature; evidence of fraud, suspected corruption or ethical misconduct; and non-compliance with legislation, regulations and internal codes. The channel allows anonymous reports to be filed, as long as they are made up of objective facts or information that make it possible to verify and identify the specific elements being reported.

276 - Retaliation, sanctioning, harassment and/or any form of embarrassment of bona fide whistleblowers by immediate managers or areas involved in the investigation will not be permitted. Acts of retaliation and complaints made in bad faith will not be tolerated, which, if identified, will subject those responsible to the sanctions provided for in Internal Regulation 116 (Disciplinary Regulations), without prejudice to legal penalties.

277 - Geric (Executive Management of Risks, Compliance and Control), which is responsible for the Ombudsman's Office and for being BBTS's Compliance Officer, acts independently and autonomously, and must report directly to Conad - the Board of Directors in situations related to suspicions of irregular practices and misconduct by the company's Executive Board.

2.8. FINAL PROVISIONS

281 - Within the scope of the BBTS, including the decentralized units, the correspondence of the Regional Ethics Commissions and their members, including electronic correspondence, must be treated specifically, and it is forbidden for anyone to know the content or open it, or to disclose the records of senders and recipients.

282 - The public tender notices for the selection of BBTS Employees will expressly refer to this Code, so that candidates are aware of it beforehand.

283 - This Code comes into force on the date it is published in the official BBTS media, and it is the responsibility of the People Management Department (Gepes) to ensure that it is publicized and complied with.



CLOSURE LETTER

This Code of Ethics, Conduct and Integrity was developed by the People Management and approved by the Ethics and Disciplinary Committee, the Executive Board and the BBTS Board of Directors.

Ethics are intrinsic to BBTS's culture and are fundamental to our success and reputation. This document will be reviewed periodically every two years or, exceptionally, whenever necessary.

People Management is the area responsible for structuring, updating, disseminating and implementing this Code, ensuring that all employees have access its guidelines.

To facilitate understanding, the Code has been written in a clear and objective manner. It not only guides employees in their day-to-day decisions, but also describes the conduct expected by BBTS, as well as that which is expressly prohibited. The aim is to ensure that everyone, including senior management, understands their responsibilities, contributing to the credibility, integrity and longevity of BBTS.

The guidelines and orientations of this Code must be followed with rigor, dedication and a vision of leadership, as we are all responsible for its application and dissemination, ensuring that BBTS remains an ethical and trustworthy organization.

BOARD OF DIRECTORS

CHAIRMAN: Paulo André Rocha Alves.

ADVISERS: Adriana Gomes de Paula Rocha, Benilton Couto da Cunha, Iraneth Rodrigues Monteito, Luanna Sant'anna Roncaratti, Rodrigo Costa Vasconcelos and Felipe Aguiar Viana (Employee Representative).

EXECUTIVE BOARD

CHAIRMAN: Gustavo Pacheco Lustosa.

DIRECTORS: Ananias Pereira da Silva Neto, Erica Gomes dos Santos and Gustavo José Sousa da Silva.

GLOSSARY

Public Agent: Anyone who provides services to the Brazilian State, who performs a public function, even on a temporary basis, with or without remuneration, through election, appointment, designation, contracting or any form of investiture, bond, mandate, position or function associated with the Public Administration.

Foreign Public Administration: state bodies and entities or diplomatic representatives of a foreign country, at any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public authorities of a foreign country.

Senior Management: Directors, members of the Audit Committee, President and Executive Officers.

Gifts: items distributed or received by an organization of any kind as a courtesy, advertisement, regular publicity or on the occasion of events or commemorative dates of a historical nature.

Public Position: is the set attributions and responsibilities provided for in the organizational structure. Public positions, accessible to all Brazilians, are created by law, with their own name and salary paid from the public coffers, to be filled on a permanent or commission basis.

Collaborators: Managers, employees, trainees or apprentices from contracted companies.

Compliance Officer: The Compliance Officer guides the best compliance and risk management practices, according to

with the legal and regulatory standards in force.

Conflict of Interest: Conflict arises when your activities, interests or personal relationships may unduly influence your professional decision-making.

Actual Conflict of Interest: Occurs when there is a clear and direct collision between a person's interests and their obligations or responsibilities. In this case, the conflict situation is already underway, affecting the person's integrity, objectivity or judgment. For example, if an employee of an auditing firm is assigned to audit a company where a relative is an executive, there is a real conflict of interest.

Potential Conflict of Interest: This refers to a situation in which a conflict of interest may arise in the future, depending on circumstances or events. Although the conflict is not active at the moment, there is a concrete possibility that it will occur. For example, if a company employee is participating in the supplier selection process, and a close friend owns one of the competing companies, this creates a potential conflict of interest that could materialize if the friend is favored in the selection process.

Apparent Conflict of Interest: Happens when the situation creates an impression of a conflict of interest, even though there is no actual or potential conflict situation. This type of

GLOSSARY

conflict is harmful because it can affect the public perception of impartiality, ethics and transparency. For example, if a judge is a friend of one of the parties involved in a court case, even if there is no direct influence on the judgment, the mere appearance of a personal relationship can create an apparent conflict.

Donations: the act of giving one's own goods or financial resources to a private or public institution, with or without purpose of promoting one's brand.

Employees: all members of the BBTS permanent or permanent staff, bound by the CLT, including those on leave or other equivalent leave, with or without pay, as well as employees on assignment or on requisition.

Entertainment: activities or events whose main purpose is to provide leisure for their participants, such as parties, concerts, sporting events or celebratory meals.

Ethics: a word of Greek origin meaning custom or habit. It is a part of philosophy dedicated to answering how we should act.

Hospitality: the provision of services or expenses for transportation, meals, accommodation, courses, seminars, congresses, events, fairs or entertainment activities, granted by a private agent to a public agent in the institutional interest of the body or entity in which they work.

Sponsorship: The communication action that seeks to add value to the brand, consolidate positioning, generate identification and recognition,

strengthen relationships with stakeholders, increase sales of products and services, publicize programs and policies, by acquiring the right to associate the image of a private or public institution as a sponsor of third-party projects.

Facilitation payment: this is related to the payment of small amounts or promises benefiting a public official, most often at a low hierarchical level, in order to speed up certain processes. It is not equivalent to bribery, since the activity in question would be carried out anyway.

Gifts: Items that have commercial value and do not fall under the definition of gifts.

Bribe or Undue Advantage: Any asset, tangible or intangible, including money and valuables, offered, promised or delivered with the aim of unduly influencing or rewarding any act, decision or omission by a person, whether a public official or not.

This concept includes gifts, entertainment, airline tickets, accommodation, donations, sponsorships or anything else of value used for such purposes as unduly influencing or rewarding any act or decision.

