

## **Introduction**

This Code of Business Conduct and Ethics defines the minimum standards of conduct and mandatory practices to be followed by YasNiTech's leaders and employees, and should also serve as a reference for our service providers and business partners.

It is important to note that YasNiTech's Code of Ethics and Organizational Conduct is not intended to restrict business development. On the contrary, it is designed to add value, support growth, and foster our ongoing pursuit of excellence.

At YasNiTech, we must always act with professional integrity and demonstrate our commitment to the highest ethical standards.

By adopting this Code, we reinforce our commitment to maintaining a healthy work environment and a business culture grounded in ethics, mutual respect, and moral and physical integrity.

In our work environment, YasNiTech values diversity, courtesy, impartiality, and respect for individuals, and firmly rejects any acts of discrimination, harassment, or retaliation.

Respect and order must prevail in the workplace to prevent moral, economic, and sexual harassment or any situation involving pressure, intimidation, or threats in relationships among employees, interns, service providers, and/or suppliers, regardless of their hierarchical level.

Signing the Commitment Agreement associated with this Code signifies full agreement with these principles and with the duty to uphold them through respectful conduct toward others.

If you have any questions or suggestions, we are available to assist.

**Table of Contents**

1	Definitions.....	1
2	Contacts: .....	2
3	General Provisions .....	3
4	Purpose, Vision, Mission, and Values .....	3
5	Acting with Integrity in Relationships .....	4
6	Employees.....	5
7	Clients.....	6
8	Business Partners .....	7
9	Competitors.....	8
10	Government .....	8
11	Whistleblowing Channel .....	9
12	Anti-Corruption Provision .....	10
13	Conflicts of Interest.....	10
14	Gifts and Giveaways .....	10
15	Hiring of Employees and Service Providers .....	11
16	Reimbursement of Corporate Expenses .....	11
17	Accounting Records .....	12
18	Confidentiality of Information .....	12
19	Use of Company Assets and Information Technology .....	12
20	Acceptable Conduct for YasNiTech Members:.....	13
21	Unacceptable Conduct for YasNiTech Members: .....	14
22	Compliance with the Code of Ethics.....	15
23	Disclosure .....	16
24	Final Considerations .....	17

## 1 Definitions

For the purposes of this **Code of Business Conduct and Ethics**, the following terms shall have the meanings assigned below, whether used in the singular or plural, and regardless of gender:

- i. **Company:** YasNiTech Serviços de Tecnologia LTDA.
- ii. **Members:** All individuals who work for or are part of **YasNiTech's** staff.
- iii. **Public Official:** Any agent, representative, employee, officer, director, advisor, or any person exercising, even temporarily and without compensation, a position, function, or job—whether elected or appointed—within any governmental entity, department, or agency, including branches of the Executive, Legislative, or Judiciary, direct or indirect public administration, state-owned enterprises, public foundations, domestic or foreign public international organizations, or any political party, including candidates running for public office in Brazil or abroad.
- iv. **Third Parties:** Any individual or legal entity acting on behalf of, in the interest of, or for the benefit of YasNiTech, providing services or supplying goods, as well as business partners, including but not limited to agents, consultants, suppliers, resellers, or other service providers.
- v. **Policy:** Any procedure, rule, or guideline established by **YasNiTech**.
- vi. **Anti-Corruption Law:** Law No. 12.846, dated August 1, 2013.
- vii. **Administrative Improbability Law:** Law No. 8.429, dated June 2, 1992.
- viii. **Public Procurement Law:** Law No. 8.666, dated July 21, 1993.
- ix. General Data Protection Law (Law No. 13.709/2018) – **“LGPD.”**

## 2 Contacts:

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### 3 General Provisions

- 3.1 The provisions of this Code must be observed by YasNiTech's Executives, Employees, Service Providers, Suppliers, Collaborators, Interns, all Members of the organization, as well as all Third Parties that provide any type of service to YasNiTech, whether directly or indirectly, including associations or any other entities or individuals, with whom YasNiTech interacts either occasionally or on a regular basis.
- 3.2 This Code of Ethics is based on the Integrity Program of ABES – Brazilian Association of Software Companies, of which YasNiTech Serviços de Tecnologia LTDA is an active member. It aims to establish the expected conduct of the individuals mentioned above, as well as define the main procedures adopted by YasNiTech.
- 3.3 This Code was developed based on **YasNiTech's** mission, purpose, and values, and in accordance with applicable legislation, including but not limited to the **Brazilian Anti-Corruption Law**.
- 3.4 The objective of this Code of Ethics is to promote a uniform and ethical posture among all involved, addressing matters related to:
- Compliance with behavioral rules in the work environment, regardless of hierarchy, department, or role;
  - Transparency in general operations;
  - Safety in the execution of professional activities;
  - Protection and confidentiality of sensitive information.
- 3.5 This **Code of Ethics** establishes conduct guidelines grounded in ethical and moral standards, serving as a reference for the behavior of all internal and external collaborators. Its enforcement applies to all individuals within **YasNiTech's** organizational structure.

### 4 Purpose, Vision, Mission, and Values

#### 4.1 Purpose:

To develop solutions that solve our clients' problems by leveraging the best available technologies.

#### 4.2 Mission:

To organize available technological knowledge and make it accessible and useful to organizations and individuals.

#### **4.3 Vision:**

To develop high-quality technological solutions that are easy to adopt and tailored to the needs and context of our clients.

#### **4.4 Values:**

**People are essential to our business** — passionate partners working toward mutual success.

We value and respect the goals and aspirations of our employees, clients, shareholders, and partners so that we may succeed together.

**Integrity is the foundation of all our interactions.** We communicate openly and honestly with one another in order to maintain trust and empower everyone to achieve excellence.

**Leadership with the courage to drive transformation** allows us to create value.

We strive to be experts, share knowledge openly, and collaborate fairly to foster meaningful change.

**Innovation inspired by real client problems** drives us to build tomorrow's solutions today.

We embrace the convergence of new paradigms and technologies that enable lasting transformational value.

**Results with measurable goals** are the objective evaluation of our success. We say what we will do and do what we say to meet the expectations of our employees, clients, and partners.

**Commitment taken seriously** — we dedicate our best efforts to achieving YasNiTech's mission.

**Excellence in continuous improvement** — of our services, resources, and technologies — defines us as a company committed to quality and customer satisfaction at every stage of the solution development process.

## **5 Acting with Integrity in Relationships**

5.1 **Ethics, Respect, Transparency, Commitment, Trust, and Credibility.** These are the values that define how we relate to all of our Members, Clients, Suppliers, Partners, and Competitors.

5.2 All professional relationships must be guided by respect and the promotion of an inclusive environment, where any form of discrimination or inequality based on gender, gender identity, sexual orientation, race, ethnicity, age, disability, or belief will not be tolerated.

The company encourages the equitable participation of all individuals in its decision-making processes, development opportunities, career advancement, and representation at all levels of the organization.

Behaviors or statements that contradict this principle will not be tolerated and must be reported through our **Whistleblowing Channel** or the internal person responsible for integrity and compliance.

## 6 Employees

6.1 **YasNiTech** values its employees by investing in a safe, ergonomic, and healthy work environment;

6.2 The team is our greatest asset. Be responsible and ethical with all our clients, colleagues, partners, and society. **Work collaboratively, respect others' opinions, share knowledge, and promote self-development.**

### 6.3 Employee Responsibilities:

6.3.1 Preserve a professional workplace environment based on trust, cooperation, inclusion, respect for individual differences, and civility;

6.3.2 Share your knowledge and experience, continuously seeking to improve technical skills, methods, and processes in order to achieve better company results;

6.3.3 Value people by contributing to their personal, technical, and professional development;

6.3.4 Ensure proper and efficient use of the company's material, technical, and financial resources;

6.3.5 Safeguard and respect YasNiTech's image, assets, and interests;

6.3.6 Recognize and value the company's intellectual capital and encourage the emergence of new leadership;

- 6.3.7 Promote and uphold ethical behavior, both individually and collectively;
- 6.3.8 Remain alert to situations that may represent a real or potential conflict of interest that could affect your ability to remain impartial in decisions involving **YasNiTech**;
- 6.3.9 Respect all colleagues, avoiding any prejudiced, aggressive, or inappropriate behavior that may make another employee feel offended, humiliated, intimidated, discriminated against, harassed, or excluded;
- 6.3.10 Do not use your position, access to privileged information, or the company's name, inside or outside the workplace, to gain personal benefits or advantages of any kind for yourself or others;
- 6.3.11 Do not engage in behaviors that could endanger your own health and safety or that of others, such as smoking in unauthorized areas, consuming alcohol or drugs, carrying weapons, or showing up to work intoxicated or under the influence of drugs;
- 6.3.12 Do not carry out side activities—whether paid or unpaid—that compete with or conflict with YasNiTech's business or that cause physical or emotional fatigue impacting your conduct or professional performance;
- 6.3.13 Use and care for company property responsibly to prevent losses, damage, or waste, and do **not use YasNiTech's facilities or assets (such as equipment) for personal, illegal, or unethical purposes**;
- 6.3.14 Protect and maintain the confidentiality of YasNiTech's internal and external information;
- 6.3.15 **YasNiTech rejects all forms of corruption.** Be vigilant about any behavior that may represent such acts. Engaging in corrupt practices is subject to disciplinary action and legal sanctions under applicable law;
- 6.3.16 Report any violations of this Code of Ethics through the appropriate channels, which ensure confidentiality and anonymity;
- 6.3.17** Use the company's electronic communication resources solely for professional purposes, in compliance with legal requirements and the ethical principles of this Code. Do not share defamatory comments, offensive messages or content, or materials that promote discrimination. **Do not install software or files that infringe on the intellectual property of YasNiTech or third parties on company devices.**

## 7 Clients



**7.1** Stay focused on our clients. We must understand their business in order to provide the best solutions. Clients are what drive YasNiTech's continuous development. Our goal is to consistently build trust with clients by delivering high-quality services and effective solutions to their problems:

- Exceed expectations;
- Cultivate strong relationships;
- Our clients come before our differences.

**7.2 Employee Responsibilities Toward Clients:**

- 7.2.1 Treat clients with respect, courtesy, attentiveness, efficiency, proactivity, and promptness in addressing their needs — and above all, with ethics;
- 7.2.2 Serve clients impartially and without any kind of bias, safeguarding their interests and helping solve their problems efficiently and quickly, following up whenever necessary;
- 7.2.3 Fulfill what we promise within the agreed deadline, and if changes are needed, inform the client in advance, clearly explaining the impacts and available solutions.
- 7.2.4 Protect the confidentiality of any sensitive information shared by clients;
- 7.2.5 Communicate information about our services clearly and truthfully;
- 7.2.6 Be open to feedback and contributions in the ongoing pursuit of improved service quality and efficiency;
- 7.2.7 Offer solutions that add value to our clients' businesses by continuously investing in appropriate technologies and improving **business strategies**;
- 7.2.8 Value and respect the fulfillment of agreements and contracts, as well as the rights of our clients.

## **8 Business Partners**

- 8.1 Knowing how to collaborate is essential at every stage of life — and it's no different when it comes to business partnerships. We work toward shared goals, each party fulfilling their responsibilities while always maintaining professional ethics.
- 8.2 YasNiTech has established excellent business partnerships that, over time, have only added value. These partnerships are built with highly

skilled professionals who are trustworthy and committed to the company's success.

### **8.3 Employee Responsibilities Toward Business Partners:**

- 8.3.1 Treat our partners with respect, courtesy, empathy, attentiveness, efficiency, and proactivity in their activities — and, above all, with ethics;
- 8.3.2 Continuously improve the execution of our work and processes to create a motivating, respectful, and highly collaborative environment;
- 8.3.3 Strive to achieve high standards of quality in the services we deliver.

## **9 Competitors**

- 9.1 Respect means acting ethically. YasNiTech's competitiveness will always be based on our capabilities and ethical management, guided by the company's values of conduct and respect. All market and competitor information deemed legitimate and necessary for the business must be obtained through **transparent and lawful practices**. The use of **illicit methods to acquire information is strictly prohibited**.

### **9.2 Employee Responsibilities Toward Competitors:**

- 9.2.1 Do not engage in any conduct that could harm or discredit the image of competitors. Competitors must be treated with the same respect and ethics that **YasNiTech** expects to receive.

## **10 Government**

- 10.1 Respecting public authorities means acting with seriousness and integrity. YasNiTech complies with the law and is committed to contributing to the social and economic development of the country, while upholding good governance practices;
- 10.2** All operations and business activities conducted by YasNiTech must be, and remain, supported by proper documentation, and be immediately recorded in the company's official books and records, in strict accordance with applicable accounting standards and principles;

**10.3** Public officials, properly identified by official credentials, must receive professional and respectful treatment. Upon request, any legally required information, data, or records must be made available to them;

**10.4** YasNiTech does not offer or promise, directly or through third parties, any payments, gifts, or benefits to public agents, political parties or their members, candidates for public office, or their family members or associates, with the intention of obtaining any advantage for the company.

**10.5 Employee Responsibilities Toward Government Entities:**

10.5.1 Stay informed about relevant laws, regulations, and instructions applicable to your activities;

10.5.2 Maintain positive, cooperative, and transparent relationships with government entities as required by your role, in compliance with the law — always combating corruption, favoritism, and the pursuit of unlawful advantages, and defending the company's legitimate interests;

10.5.3 Only represent YasNiTech before public authorities when formally authorized to do so, and always in accordance with the company's articles of incorporation and official power of attorney documentation;

10.5.4 Refrain from engaging in any practices that violate the country's laws, rules, or regulations, or that contradict the principles of conduct outlined in this Code.

## **11 Whistleblowing Channel**

11.1 Our individual commitment to the guidelines outlined in this Code is the foundation of YasNiTech's strength and long-term success. This means that if we become aware of, or suspect, a violation of any guideline, law, regulation, or rule, we are responsible for promptly reporting the issue through the official whistleblowing channel at: [rh.conformidade@yasnitech.com.br](mailto:rh.conformidade@yasnitech.com.br).

11.2 All reports will be subject to the following rules:

- **The confidentiality of the investigation will be strictly maintained;**
- **Anonymity will be ensured for those who request it;**
- **Investigations will be conducted with impartiality and independence;**

- Reports or accusations without credible foundation will be disregarded;
- Reports made in bad faith, with the intent to harm others, will be subject to disciplinary actions;
- Disciplinary measures will also apply to any attempt at retaliation against those who file a report.

## 12 Anti-Corruption Provision

12.1 It is strictly prohibited for YasNiTech's members, suppliers, or employees to offer, promise, make, authorize, or provide (directly or indirectly) any undue advantage, payment (including facilitation payments), gifts, or the transfer of anything of value to any individual — whether a public official or not — with the intention of influencing or rewarding any official action or decision in favor of **YasNiTech's** own interests.

## 13 Conflicts of Interest

13.1 All YasNiTech members, suppliers, and employees must perform their duties and make decisions **in the best interest of YasNiTech**, and must avoid any actual or perceived **conflict of interest** in the execution of their activities;

13.2 If personal interests have the potential to interfere with one's responsibilities or performance at YasNiTech, they **must report the situation to the Executive Board** of YasNiTech.

## 14 Gifts and Giveaways

14.1 The offering or acceptance of business giveaways is permitted as long as they are of no significant value and are distributed as a courtesy, for promotional purposes, or as part of customary practices during specific occasions, dates, or special events — provided that:

- (i) the value of the gift does not exceed half of the current national minimum wage, and

(ii) any offering or receipt of such items must respect a minimum interval of 12 (twelve) months before repetition.;

14.2 It is strictly prohibited to offer or receive gifts or giveaways with the intent of obtaining any advantage or favorable treatment in exchange for the item given or received.

## 15 Hiring of Employees and Service Providers

15.1 All new hires at YasNiTech must serve the company's best interest and be based on the candidate's technical qualifications to assume a role or perform services on behalf of **YasNiTech**;

15.2 All contracts entered into by YasNiTech must be **formalized in writing** and include an **anti-corruption clause** as well as explicit reference to this Code of Ethics;

15.3 Prior to being hired by YasNiTech, all individuals must be informed of the provisions of this Code and other company policies, and they will be encouraged to comply with them for the duration of their engagement with **YasNiTech**.

## 16 Reimbursement of Corporate Expenses

16.1 Corporate expenses incurred by any YasNiTech member in the performance of activities or in the acquisition of goods on behalf of YasNiTech will only be reimbursed upon presentation of a receipt and **approval by YasNiTech's Financial Director**;

16.2 Under no circumstances will YasNiTech reimburse:

- **Personal expenses** of its members or third parties;
- Expenses — even if not personal — that are **excessively high, not aligned with market value**, or
- Expenses that are **not properly documented** or that do not comply with the rules set forth in the **Travel and Corporate Expense Reimbursement Policy**.

16.3 For any expenses not covered in this Code of Ethics, please contact: [compras@yasnitech.com.br](mailto:compras@yasnitech.com.br)

## 17 Accounting Records

17.1 **YasNiTech** must maintain its accounting records in a precise, complete, and truthful manner, in accordance with applicable accounting legislation. The company must also ensure that all transactions and operations are fully documented in writing and properly approved by the authorized personnel.

## 18 Confidentiality of Information

18.1 All YasNiTech members, including Directors, Employees, Service Providers, Suppliers, Collaborators, and Interns, must safeguard the confidentiality of any information they may come into contact with as a result of their activities within **YasNiTech**;

18.2 The disclosure of confidential or sensitive information belonging to YasNiTech is strictly prohibited, whether verbal or written;

18.3 All members must maintain confidentiality regarding client information, as well as any information related to the company for which they provide services — even after the termination of their professional relationship, in accordance with the provisions of the applicable Non-Disclosure Agreement (NDA);

18.4 Members acknowledge awareness of the **rights, obligations, and penalties** set forth in the **General Data Protection Law (Law No. 13.709/2018 – LGPD)**: [http://www.planalto.gov.br/ccivil\\_03/\\_ato2015-2018/2018/lei/L13709.htm](http://www.planalto.gov.br/ccivil_03/_ato2015-2018/2018/lei/L13709.htm) and agree to take all reasonable measures to ensure that they — and their staff, employees, collaborators, or subcontractors — use Protected Data only to the extent authorized by the LGPD.

## 19 Use of Company Assets and Information Technology

19.1 According to the Equipment Use Responsibility Agreement, all assets, resources, equipment, and facilities owned by YasNiTech must be used **exclusively for the performance of professional duties**, and must **not be used for personal purposes** by any member of the organization;

- 19.2 Each member is responsible for protecting the resources and equipment assigned to them and must promptly report any threats or incidents that may pose a risk or actual damage to **YasNiTech**;
- 19.3 Employees must not use personal email accounts to address matters related to their duties or functions at YasNiTech, and likewise must not use company email accounts to discuss topics unrelated to **YasNiTech**;
- 19.4 Members must act diligently to avoid compromising the security of the company's IT systems. Therefore, it is prohibited to send emails or access websites containing inappropriate, offensive, or potentially harmful content to YasNiTech's networks or systems;
- 19.5 For employees who require equipment provided by YasNiTech to perform their duties, the company will provide such devices under a Loan Agreement (Contrato de Comodato), duly signed.

## **20 Acceptable Conduct for YasNiTech Members:**

- 20.1 Preserve and promote the company's positive image;
- 20.2 Market only products and services owned by or of interest to YasNiTech within company premises;
- 20.3 Foster conditions that contribute to a productive and pleasant work environment;
- 20.4 Treat individuals and their ideas with dignity and respect;
- 20.5 Act with loyalty, fairness, and honesty in all workplace relationships;
- 20.6 Safeguard collective well-being by respecting personal traits, freedom of expression, and individual privacy;
- 20.7 Defend YasNiTech's interests with clarity and loyalty;
- 20.8 Present yourself appropriately for the performance of your role and responsibilities;
- 20.9 Use YasNiTech's resources solely for purposes that serve the company's interests;

- 20.10 Contribute to the smooth operation of the entire company by refraining from actions or behaviors that hinder or disrupt service delivery;
- 20.11 Decline gifts or giveaways from individuals or companies doing business with YasNiTech, as outlined in previous sections;
- 20.12 Do not prepare or present information that misrepresents YasNiTech's actual economic, financial, operational, or logistical standing—or any other aspect that may impact company performance;
- 20.13 Always prioritize and safeguard YasNiTech's interests in dealings with clients, government entities, financial institutions, suppliers, organizations, and other business partners.

## **21 Unacceptable Conduct for YasNiTech Members:**

- 21.1 Claim personal benefits or advantages for oneself or others as a result of business or financial relationships established on behalf of YasNiTech with clients, government entities, financial institutions, suppliers, organizations, or other companies;
- 21.2 Be complicit with or omit reporting any errors or violations of this Code of Ethics or applicable laws and regulations;
- 21.3 Engage in other professional activities during working hours—whether for profit or not—or perform tasks that compete directly or indirectly with **YasNiTech's** business, regardless of schedule compatibility;
- 21.4 Practice any form of discrimination based on economic, social, political, religious, racial, ethnic, or gender grounds;
- 21.5 Allow personal biases, such as favoritism, aversion, whims, passions, or private interests to interfere in professional relationships;
- 21.6 Deliberately harm the reputation of a YasNiTech employee or any professional affiliated with the company;
- 21.7 Deliberately damage the reputation of clients, government bodies, suppliers, or other companies with which YasNiTech maintains commercial relationships;



- 21.8 Request, solicit, or accept gifts or any form of advantage for oneself or others, even by insinuation or provocation, in exchange for granting concessions or privileges of any kind within **YasNiTech**;
- 21.9 Prioritize or protect personal interests—or those of clients, government agencies, financial institutions, suppliers, or partner companies—over the interests of YasNiTech;
- 21.10 Gain advantages for oneself or others from access to privileged YasNiTech information, even if no direct harm is caused to the company;
- 21.11 Use for personal gain—or share with third parties—any documents, work, methodologies, products, tools, services, or information owned by YasNiTech, its clients, or suppliers, unless legally or judicially mandated;
- 21.12 Speak or act on behalf of the company through any public channel without proper authorization or designation;
- 21.13 Misuse or waste YasNiTech’s material, technical, or financial resources;
- 21.14 Obstruct or interfere with the investigation of irregularities within the company;
- 21.15 Alter or distort the content of any document, data, or information under the responsibility of YasNiTech or third parties;
- 21.16 Enable third parties to carry out actions that result in loss or damage to the company;
- 21.17 Create confusion between personal and company assets, even if no financial gain is involved;
- 21.18 Remain in a position of trust when there is a clear misalignment with YasNiTech’s strategic directives and orientations.

## **22 Compliance with the Code of Ethics**

- 22.1 If there are any doubts about the correct conduct to adopt, the employee must seek guidance honestly and transparently;

- 22.2 Any situation that may constitute a conflict of interest or could harm the company or violate the principles of this Code must be reported immediately and formally to the Legal Representative of the Company;
- 22.3 The company guarantees confidentiality in the handling of such matters and is committed to investigating all reported cases;
- 22.4 Situations not explicitly addressed in this Code will be treated as exceptions and referred to the Company's Legal Representative, who will analyze and decide in accordance with the principles of this Code;
- 22.5 This Code of Ethics reflects the values and culture of YasNiTech, and compliance with it demonstrates our commitment to professionalism and transparency in all work-related actions;
- 22.6 **Violation of this Code of Ethics may subject members to disciplinary actions, including warnings, termination of contracts, or even dismissal for cause and legal proceedings;**
- 22.7 Everyone who has a direct or indirect relationship with YasNiTech must be familiar with and ensure compliance with this Code, and must share the same ethical commitments, regardless of their position;
- 22.8 Failure to observe any of the practices and/or procedures described herein may compromise YasNiTech's institutional credibility before clients, the market, regulatory bodies, government entities, and society at large;
- 22.9 This Code enters into force on the date of its official release.

## 23 Disclosure

- 23.1 This Code of Ethics is available online through the link: [Código de Ética e Conduta | YasNiTech](#) for consultation by all members at any time.

It is the responsibility of the Human Resources Department to:

- (i) ensure compliance with this Code of Ethics;
- (ii) inform new employees about the Code and keep a record of their acknowledgment and agreement;

(iii) promote broad dissemination of the Code and its updates to employees, clients, service providers, and suppliers;

(iv) provide clarification and verify understanding regarding its content and application.

## **24 Final Considerations**

24.1 All **YasNiTech** employees must confirm that they have read and fully understood this document and any future updates by signing a specific Acknowledgment and Adherence Agreement;

24.2 For any questions or clarification regarding the contents of this Code or its application to specific matters, the **Executive Board or Human Resources Department** must be consulted.