

CODE OF ETHICS
Brisanet Serviços de Telecomunicações S.A. 2024

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1 Message from the President

Brisanet Serviços de Telecomunicações S.A. ("**Company**"), as well as its entire group and subsidiary and controlled companies ("**Brisanet Group**"), has always distinguished itself by being a company that believes in people and their capacity for development. When we evaluate our history, we see how much we have grown: from a small radio provider in the semi-arid region of Ceará to a telecommunications company that has brought connectivity to thousands of people throughout the Northeast. Without ethics guiding our steps, we wouldn't have come so far, taking us to the level of one of the most important companies in the national telecommunications market.

The credibility of our institution is a reflection of the effective practice of our values, integrity, honesty, transparency, the quality and efficiency of our services and respect for our clients. Ethical conduct is essential and the responsibility of each and every one of us when carrying out our duties with the internal and external public, so the standards contained in this document represent a basic premise for the Brisanet Group.

The Code of Ethics ("**Code**") is an instrument that summarizes our corporate culture, vision, mission and values. By complying with these guidelines on a daily basis, we will contribute to a work environment that fosters productive quality, compliance with the law, consumer satisfaction and, consequently, the achievement of the purposes of the entire organization.

2 Introduction

The purpose of this Code is to set out the rules and guidelines for ethical behavior that should guide all employees (regardless of the position held or function performed, including trainees, permanent and temporary employees, members of the Board of Directors and the Executive Board) of the Brisanet Group ("**Employees**"), as well as all third-party service providers, franchisees, suppliers and other business partners ("**Third Parties**"), in the various forms of their interaction with the environment that surrounds them in their work and their relationships.

3 Who is this Code for?

It's extremely important that all employees and Third Parties adopt and comply with these principles and values.

The company's success depends on compliance with the standards established in this document. This Code applies to all employees, regardless of position and rank, as well as all Third Parties (Stakeholders, Communities where we operate, Financial Institutions, suppliers of goods and services; Public Sector Agencies in all spheres - Municipal, State and Federal-, Granting Authority - Federal Government, State Governments and Regulatory Agencies-, and Non-Governmental Organizations; Companies associated through joint ventures and consortiums; Shareholders and investors; Competitors and Media) related to the Brisanet Group.

The Brisanet Group encourages all employees and Third Parties to immediately report, through its ethics channel ("**Ethics Channel**"), any violations or suspected violations of this Code of Ethics, other Brisanet Group policies, or the Law.

You are an important member of this community and your support is fundamental to our success.

4 Our Principles and Values

4.1 Pillars



BELIEF - A better future is achieved through dreams, dedication, passion and connection with people.



MISSION - To have a positive impact on humankind, disseminating knowledge that promotes social and technological inclusion.



VISION - Become the most desired brand and the one with the largest number of people connected in the Northeast.

4.2 Values



Innovation:
Motivate yourself by bringing the future into the present.



Perception:
Get to know, understand, and serve customers.



People:
Care and believe in people, in their capacity for development and accomplishment.



Commitment:
Be responsible for providing the best service.



Cooperation:
Develop team spirit in order to achieve our goals.



Simplicity:
Be accessible and clear in our relationships.



Trust:
Have both good character and competence.



Perseverance:
Focus on our mission.



Work:
Believe in work as a philosophy of life.

5 What does the Brisagnet Group expect from you?

An ethical environment exists when all parties are committed to this standard. Therefore, everyone who is part of the Brisagnet Group, regardless of hierarchical level, should be aware of and abide by this Code, in all relationships, professional activities, and situations involving our Company.

Furthermore, the leaders are responsible for fostering ethical behavior, encouraging open communications that convey commitment to this document. In order to promote awareness of and compliance with the guidelines contained in this Code, everyone must sign the Receipt and Liability Notice at the end of this document.

5.1 Compliance with laws, regulations and internal rules

The Brisagnet Group is committed to conducting business with ethics, transparency, integrity, and in full compliance with all applicable laws, rules, and regulations.

All employees and Third Parties must know and comply with the laws, rules and regulations applicable to the sectors in which they operate, including general rules and those which may imply responsibility for the acts of its subordinates or Third Parties.

5.2 Respect for all individuals

The Brisagnet Group has a DNA of inclusion and appreciation of diversity, recognizing the unique side of each individual. The Brisagnet Group believes that diversity is the sum of differences in culture, origin, ideas, ethnicity, religion, sexual orientation, economic class, gender and educational background.

Under this belief, the Company forbids all sorts of discrimination and disrespect, as well as repudiates the exploitation of labor, whether slave, slave-like, or child labor, and ensures that all individuals who interact with us respect human rights.

The following practices are not tolerated in the workplace environment, and in case any of them happen, everyone is encouraged to report such behaviors to the Ethics Channel for due investigation and accountability of its practitioners:

- Moral and Sexual Harassment:

What is Moral and Sexual Harassment? Moral harassment is characterized by exposure to repetitive humiliating and embarrassing situations. Sexual harassment means embarrassing someone with the aim of obtaining sexual favor through requests, insinuations or any manifestation to that effect.

- Physical or verbal aggression:

Employees and Third Parties must not address colleagues, superiors or subordinates with foul language or prejudiced acts of any kind. Positive examples of conduct expected of Employees and Third Parties are: (i) treating all employees politely and courteously; and (ii) considering their performance, deliveries and performance, rather than personal characteristics, for the purposes of promoting employees.

5.3 Occupational Health and safety

Safety is a priority for the Brisagnet Group. All employees and Third Parties must respect the legislation, policies and internal programs of the Brisagnet Group about health and safety at all times.

Therefore, this document establishes, both for the Brisagnet Group, its employees and Third Parties, the following commitments:

- To ensure a safe working environment by providing training, protective equipment, both individual and collective, and other tools necessary to maintain health and safety and to take all necessary measures to prevent or minimize occupational risks.
- Do not drink alcoholic beverages while working. It is also strictly forbidden to come to work under the influence of alcohol or any other type of narcotic or stimulant drug, as well as to possess, transport or sell these substances during working hours or use company valuables to carry out such activities.
- Comply with all civil security regulations and instruct employees on how to respond to emergency situations.
- Undertake all health and safety training provided by the Company, whether legal/mandatory or refresher training.

5.4 Proper use of the Company's resources

We are responsible for preserving and caring for the resources and work tools entrusted to us. We must therefore be as careful as possible with these assets, which can be financial, material, intellectual, furniture, equipment or infrastructure. You should also always ensure that the workplace is clean and organized, avoiding waste and unnecessary expenses.

Your corporate e-mail account is also an asset of the Brisamet Group and must be used exclusively for work purposes and is subject to inspection and auditing.

It is not permitted to use the Brisamet Group's resources to access pornographic, obscene or offensive content or content that disrespects the privacy or intimacy of third parties.

Examples of assets and resources that are property of the Brisamet Group, which are the responsibility and usage of all who use them:

- stationery, office supplies (paper, pens, tables, cabinets);
- landline phones, cell phones, computers, notebooks, printers;
- e-mails;
- access to the internet;
- vehicles (cars, minibuses);
- intellectual Property, such as the Company's name and trademark.

5.5 Proper use of Social Media

Social networks are a reality in today's world. However, we must use these communication channels in an ethical and responsible way.

The disclosure of official information on behalf of the Brisamet Group and its relationship with external communication agencies are exclusively the responsibility of the Communication Management, being forbidden for any employee to express an opinion, make contact, or send verbal and/or written information to the media on behalf of the Company.

Employees must always speak on their own behalf, and not on behalf of the Brisamet Group. Moreover, although they are expressing themselves in their own name, possible references to the company in the profiles could be interpreted as the opinion of the Brisamet Group, affecting the Company's image and reputation.

For this reason, one must always be attentive to the guidelines of this Code, even in the external environment, and any kind of discrimination, prejudice or unethical conduct will not be tolerated.

Nor is it necessary to respond to comments to the detriment of the Brisagnet Group or made by competitors on social networks. Whenever there are doubts, one should contact the Marketing Management for further clarification on how to act in the social networks and consult the Policy for Social Media Use.

If you do not know how to proceed, or if you notice any inappropriate behavior on social networks that may harm the company's image, communicate it immediately through the Ethics Channel or to the Compliance Area.

5.6 Innovation and Intellectual Property

The Company stimulates the development of new ideas and the contribution of employees to the improvement of internal processes. When developed in the performance of their duties, this information and content become the property of the Brisagnet Group.

Intellectual property refers to intellectual creations, such as patents, trademarks, trade secrets, inventions or processes.

It is the responsibility of everyone involved to protect and enforce the intellectual property rights of the Brisagnet Group.

6 How to handle information

6.1 Confidential Information and Secrecy Duty

The employees come into contact on a daily basis with a variety of confidential information, be it commercial, strategic, financial, personal or of any other nature, due to the position they hold or the activity they perform.

Because they are important to the success of our business, this information should not be shared with external audiences, such as family members, competitors, third parties, and often not even with other employees of the Brisagnet Group.

That's the reason you must be responsible for the use and safekeeping of the information entrusted to you by the Company.

6.2 Data Protection and Information Security

The Brisagnet Group believes that it is essential to implement measures to safeguard its operations related to Information Security, as well as the protection of fundamental rights of freedom and privacy of each user. Therefore, in accordance with Law No. 13,709/2018 - General Data Protection Law ("**LGPD**") - Employees must take the appropriate measures to ensure that personal data is accessed and/or processed only by people who need this information in the performance of their tasks, and that only data strictly necessary for the performance of their activities is collected, especially in relation to data classified as sensitive by the LGPD.

6.3 What are personal data?

It is information that allows identifying, directly or indirectly, an individual who is alive, so they are considered personal data: name, ID, CPF, gender, date and place of birth, phone number, home address, location via GPS, photograph, health records, bank card, income, payment history, consumption habits, leisure preferences; Internet Protocol (IP) address and cookies, among others.

6.4 What are sensitive personal data?

Within the set of personal data, there are still those that require a little more attention: these are those about children and adolescents; and the "sensitive" ones, which are those revealing racial or ethnic origin, religious or philosophical convictions, political opinions, union membership, genetic issues, biometrics, and about a person's health or sex life.

6.5 Books, Records and Reports

All books, records and accounts must reflect transactions and events in accordance with generally accepted accounting principles, applicable internal methodologies and the internal control structure. It is forbidden to coerce, manipulate or deceive any internal or external party involved in auditing, inspection or any other form of administrative, regulatory or judicial inspection.

7 Conflicts of interest

It is the duty of all employees and Third Parties to act with integrity and avoid potential, real or apparent conflicts of interest in their personal and professional relationships in the conduct of their activities inside and outside the Brisagnet Group. If you feel you are facing a situation of conflict of interest, the ideal is to communicate directly to your manager, report to the Compliance Area or through the Ethics Channel any situations of conflict of interest, whether evident or suspicious, so that they can be verified.

7.1 What are conflicts of interest?

Conflicts of interest can occur when a particular interest of one of the Collaborators interferes in some way, or appears to interfere, with the interests of the Brisagnet Group, making it difficult or preventing the Collaborator from carrying out their work in the best interests of the Company as a whole.

Conflicts of interest can also arise when an Employee or a member of their family or friend receives undue personal advantages as a result of their position as an Employee of the Brisagnet Group.

Examples of behavior that may represent a conflict of interest: *

- work for the Brisagnet Group and for any of its competitors, clients or Third Parties at the same time;
- take advantage of any form of business opportunity by means of information obtained through or by reason of one's office or position, or engage in activities or invest in companies that compete with the Brisagnet Group in any way;
- a report or personal judgement intended to harm other employees or partners;
- grant or favor business opportunities for personal or third-party gains;
- receive or offer goods, property, money or any other benefits with financial gains to suppliers or companies that have any involvement with the Brisagnet Group;
- hold business relationships, as representatives of the company, with companies in which you or people of your personal relation have interest or participation, directly or indirectly.

7.2 Family and Affective Relationships

*For further information, consult the Policy on Transactions with Related Parties and other situations involving Conflict of Interest and the Policy on Disclosure of Material Act or Fact.

The Brisagnet Group allows first-degree relatives and spouses to work for the Company, but it is not allowed to hire or keep first-degree relatives, who are father, mother and children, as well as spouses (husband and wife) or partners in positions where there is a direct hierarchical relationship.

When indicating a relative, regardless of the degree of kinship, spouse or partner to work for the Brisagnet Group, you must inform this relationship to your manager or the Attraction and Selection area of this relationship.

In case a situation of close relationship is established between employees who have, among themselves, direct hierarchical subordination, the situation must be communicated to the immediate superior or to the Personnel Management Department, so that the conflict situation can be eliminated through internal transfer.

7.3 Gifts, Souvenirs, Entertainment and Travel Invitations

One must abstain from situations that may interfere in decisions or cause discredit due to the receipt of courtesies, gifts, gratifications, and discounts.

One should not accept or offer favors, money or personal gifts which may influence decisions, facilitate business deals or benefit Third Parties.

It is prohibited to suggest or accept participations, commissions or any other form of remuneration or cash payment related to any transaction or business involving the Company.

The employees are strictly forbidden to take trips, commercial or leisure, paid or sponsored by Third Parties.

It is allowed to accept gifts that have no commercial value and are distributed as a courtesy, advertising, on special events or commemorative dates.

Example of allowed gifts: Agendas, Pens, Calendars, Samples, Items with the company logo.

Presents and gifts received more than R\$ 200, 00 (two hundred reais) must be immediately returned to the sender, along with the standard letter of thanks and return available in the Compliance Area. If the gift or present cannot be returned or is refused, the company will donate it to charity. Presents in cash must not be accepted under any circumstances.

7.4 Acceptance of equipment for testing

Equipment for testing, such as cell phones, technology inputs, among others, can only be received if there is relevant interest on the part of the Brisagnet Group, with the authorization and approval of the Board of Directors responsible for the project.

After the end of the test and demo period, the equipment should be forwarded to the Compliance Area for final destination.

7.5 Events sponsored by Third Parties

In case an employee is invited to participate in an event with professional purposes sponsored by Third Parties (clients, suppliers, partners, etc.), the following rules must be followed:

- whenever possible, the costs will be fully covered by the Brisagnet Group, in which case it will bear the expenses of its employee;
- when the invitation is not intended for a specific person, the manager of the area that received the invitation will decide which employee will participate in the event, submitting this approval to the respective Director, always considering the advantages of such participation for the business;
- when the invitation is intended for a specific person, the manager of the area that received the invitation will decide whether the Employee can attend the event, submitting this approval to the respective Board of Directors with the support of the Human and Organizational Development team - DHO, which will also verify the relevance of such attendance for the development of the Employee

and the Brisagnet Group.

7.6 Business Meals

Business meals can be held, as long as they are properly accounted for to the manager with justification for the expenses. In addition, it is important to note that these expenses must take place in such a way that they do not generate any kind of undue favor, direct or indirect.

Business meals with public servants, people who hold public positions, or who have direct or indirect relationship with public administration bodies, autarchies, parastatal entities, should be preferably avoided, but, in case they occur, it is recommended that each party should pay for its own expenses.

If any of the hypotheses above cannot be fulfilled, for any reason whatsoever, the employee must immediately report the fact to the Compliance Area, which will analyze the case in question and address any necessary measures in order to avoid any conflict of interest.

8 Relationships

8.1 Internal Public

The Brisagnet Group values ethics in all its relationships, so it will always ensure respect between the parties and honesty in the interactions carried out.

It is our value to take care of people, so the initial and most important link is made with the internal public, composed of all employees who are part of the Brisagnet Group.

The Brisagnet Group is committed to ensuring the health, welfare, and safety of people in their working environment, always seeking to promote quality of life.

Likewise, it is the commitment of everyone who is part of the Brisagnet Group to act ethically and in compliance with this Code, laws and internal regulations, always acting with courtesy and making our workplace a pleasant environment for growth.

8.2 Clients

The purpose of the Brisagnet Group is the relentless pursuit of customer satisfaction. The Brisagnet Group focuses on offering quality services and products, always trying to provide the consumer with offers tailored to their needs, seeking their loyalty through clear information about the products, for the safety of all those who seek its services.

8.3 Suppliers*

The Brisagnet Group bases its relationship with its suppliers on mutual respect, absence of conflicts of interest, transparency and honesty in its operations.

It is also expected that suppliers behave ethically in all spheres and that they honor all their obligations, especially those related to legal, tax, labor, social and environmental issues, health and safety at work, respect for human rights (such as not performing slave or child labor practices), nor take advantage of acts of corruption and fraud.

*For further information, consult the Anticorruption Policy and the Policy on Transactions with Related Parties and other situations involving Conflict of Interests.

You should only hire suppliers that share the same values as those of the Brisagnet Group.

8.4 Franchisees

The relations between the Brisagnet Group and its franchisees must be ethical, transparent and respectful in order to avoid conflicts.

The franchisees are guaranteed an isonomic and fair treatment, as well as a clear and objective communication of the information transmitted.

The franchisees must:

- respect and comply with this Code and the conditions of the franchising agreements;
- conduct business with integrity and comply with its obligations, mainly related to legal, tax, labor, social-environmental, occupational health and safety issues, respect for human rights (such as not engaging in slave or child labor practices), and refrain from acts of corruption and fraud.
- keep confidentiality and secrecy about the data they receive about the Brisagnet Group.

8.5 Competitors

The Group values fair and loyal competition, respecting the products and services of the competitors.

Thus, offensive comments about competitors, in any media, and unduly affecting a competitor's brand reputation are not allowed.

Likewise, discussions or sharing of internal and confidential matters and information with our competitors or obtaining information from competitors through suspicious or unfair methods, are not allowed in the Brisagnet Group.

8.6 Public Entities*

Relationships with public entities are based on compliance with the applicable laws in each area in which the Brisagnet Group operates.

The Brisagnet Group is committed to being collaborative in inspections and other administrative and regulatory acts, submitting the documents requested by public authorities.

As best practices, the Brisagnet Group will not allow the granting of privileges to public agents by means of gifts, promises, privileges or personal advantages, even if they are intended to benefit the company, whether to speed up procedures or to exempt them from legal obligations.

8.7 Shareholders

The relationship with shareholders is based on the best corporate governance practices, with equal treatment, regardless of the amount of shares they possess.

The Brisagnet Group is committed to providing the necessary information to allow the monitoring of its performance with agility, veracity and promptness, as well as ensuring the confidentiality of information that is not of public knowledge or that may influence market movements or investment decisions.

* For further information, consult the Anticorruption Policy.

8.8 Natural environment

The Brisagnet Group is committed to environmental preservation and socio- cultural appreciation, contributing directly to the sustainable development of the region.

Thus, in addition to seeking compliance with environmental legislation, the Brisagnet Group acts to identify, eliminate, control or mitigate the risks of its business associated with the environment, as well as promoting actions to prevent environmental pollution.

8.9 Communities

The Brisagnet Group is present in several communities with strong regional and cultural values, some of them distant from large urban centers. By means of its line of business, it always acts in a way to contribute to the improvement of the living conditions, digital inclusion and sustainable development of these communities.

The Brisagnet Group engages in promoting actions associated with transformation strategies and social development, respecting the welfare of the population in the places where it operates.

9 Prohibition of corruption and fraud practices

The Brisagnet Group seeks to be in compliance with the anti-corruption legislation where we operate, as well as with other legislations from countries where we do business. We prohibit any and all forms of corruption, fraud, bribery, favoritism, extortion, reward or kickback in all our relationships or during any of our negotiations.

Attention!

Corruption is not necessarily related to money! Job requests or offers, gifts, privileged information, or any advantage can also be considered corruption practices.

In other words, the employee cannot offer, give or promise, either directly or indirectly, any undue advantage to public servants or even representatives of the private sector in exchange for benefits to the Company or to any other person.

Likewise, the Brisagnet Group cannot receive any improper advantage, accept any promise of payment or reward from any public servant or representative of the private sector, as well as from any Third Party with whom it has a relationship. *

10 Prohibition of money laundering

The Brisagnet Group is committed to the efforts of preventing and combating the crimes of money laundering and financing of terrorism, complying with the legal requirements and those provided for in the regulations of the supervisory and regulatory authorities.

10.1 What is Money Laundering?

Money laundering is the practice of disguising or concealing the ownership or source of illegally obtained funds through transactions to "clean" these funds to make them appear to be coming from legal activities.

The Brisagnet Group is also committed to checking its potential clients, customers, and Third Parties to ensure that their products and services cannot be used to facilitate money laundering or terrorist activity.

* For further information, consult the Anticorruption Policy.

11 Donations and sponsorships

Brisanet Group allows and supports charitable donations when they are not made with the aim of obtaining or retaining any inappropriate advantage or favor, and are made to reputable charitable institutions, after prior analysis and review of the public information of the institution and related persons.

Sponsorships are monetary contributions to an action organized by a third party with the aim of advertising or publicizing the Brisanet brand.

Employees responsible for contributions that are of a sponsorship nature must ensure that such activities are transparent, conducted by means of a written contract, for legitimate business purposes.

The donations or sponsorships must always observe the internal flows and policies for approval, payments and accounting, and must be previously approved by the Executive Directors of the Brisanet Group.

11.1 Prohibition of political donations

Employees are prohibited from making donations to political parties or candidates running for public office on behalf of the Brisanet Group.

12 Managing ethics

12.1 Code Enforcement and Training

All Employees must take part in periodic training courses on the need to comply with the provisions of this Code and other Brisanet Group policies, to be organized and applied by the Company's Compliance area, subject to the guidelines of the Executive Board.

The role of managers is essential to ensure the enforcement of the values, principles and rules established in this Code, both inside and outside the workplace, because leaders should be examples of ethical conduct and good practices to be followed by their teams.

12.2 Ethics Channel

Any violation or suspected violation of this Code, of any of Brisanet Group's policies and rules, or of the current legislation, committed by an employee or third party must be promptly reported through the Ethics Channel.

The Brisanet Group will take all reasonable and justified measures to protect the confidentiality of complainants and will not retaliate in any way for you reporting a complaint.

Access to the Ethics Channel is independent, confidential, impartial and free of charge. The complaints will ensure the anonymity and non-retaliation of the complainant, and can be made through the following means:

- phone: 0800 517 1051
- website: <https://www.contatoseguro.com.br/grupobrisanet>

12.3 Ethics Committee

The Ethics Committee will be formed by the Brisanet Group's People Committee, Legal Management and the Presidency and is directly subordinated to the Board of Directors. Its principles are to act impartially to ensure compliance and updating of this document. It is also the committee's responsibility to welcome and clarify doubts, analyze and deal with complaints in the last instance, as well as to deal with critical cases that directly impact the Company's future.

12.4 Violations and Penalties

Employees who violate any provisions of this Code, other Brisanet Group policies, or the Brazilian legislation, depending on the severity of the offense committed, may be subject to the following sanctions (in addition to any consequences arising from reporting to the competent authorities if the act in question constitutes a crime under applicable law):

- warning (oral or written);
- suspension, or
- dismissal with or without due cause.

Any questions or complaints about ethical violations of laws, rules, regulations, policies or of this Code by any employee, regardless of his or her hierarchical position, must be reported to the Ethics Channel.

Anonymous complaints will be received through the Ethics Channel and handled by the Compliance Area, which is independent and reports directly to the Board of Directors.

13 Effective date

This edition is effective as of this date and revokes any and all provisions to the contrary. All employees must confirm knowledge and understanding of the Code of Ethics and its revisions via the "Letter of Receipt and Commitment".

14 Letter of commitment

I hereby declare that I have received, read and understood the Brisanet Group's Code of Ethics and am aware of the established conduct and sanctions and their importance for me and for the company.

I agree to comply with it in full, being subject to the applicable sanctions, including disciplinary punishments and termination measures, in the employment contract and in the applicable legislation.

Name: _____

Date: ____ / ____ / ____

Signature: _____