

elumini[e]
Outdoing IT



Code of Conduct and Ethics

1 - INTRODUCTION

Elumini's over 20 years of operation in the IT market have brought about some significant achievements. When it comes to ethics, two deserve special mention:

- The DUN&BRADSTREET certification, a testament to our credibility, authenticity, and trustworthiness in conducting business in both the national and global markets.*
- The Great Place To Work certification, evidence that we prioritize a pleasant and healthy work environment.*

Our success in the market stems from a work methodology based on two fundamental pillars:

- Understand who our employees are, identifying their skills and characteristics, and thereby accurately meeting the needs of the customer.*
- Respect the culture and work environment of each client, thereby building a harmonious and productive relationship for both parties.*

But before the methodology, it is necessary for our employees and clients to understand and endorse the values and principles proposed in our Code of Conduct and Ethics.

By reading this document, employees, clients, and partners become aware of the commitment to conduct their activities in line with the proposed attitudes and behaviors.

Eduardo Farias

CEO Elumini

| 2 - CODE OF CONDUCT AND ETHICS

This Code of Conduct and Ethics aims to establish guidelines and conduct standards that should guide the behavior of our employees in their internal activities and in relationships with public agents and third parties.

The Code applies to all Elumini employees, at any hierarchical level, including temporary employees, apprentices, interns, trainees, directors, CEOs, and shareholders, in the performance of their duties.

All employees are responsible for complying with Brazilian legislation, foreign laws when applicable to their areas of operation, the rules contained in Elumini's internal policies and norms, the regulations outlined in this Code, and the Anti-Corruption Policy.

RESPECT

For us, respect is the core value for a healthy work environment. Empathy should always be part of our daily routine. We do not tolerate any form of intolerance (racial, social, religious, age-related, sexual orientation, or otherwise). We also strongly condemn all forms of harassment, whether moral or sexual.

COLLABORATION

We should all embrace a collaborative spirit, as we understand that only a focused and supportive team can achieve extraordinary results. Therefore, we encourage mutual knowledge exchange, regardless of hierarchy, because each person always has something to teach, and everyone should always strive to learn.

TRANSPARENCY

All our actions and intentions are guided by strict compliance with laws, regulations, and internal procedures. We inspire our employees and clients to always act with integrity, honesty, and transparency.

CONFLICT OF INTEREST

We consider any fact that compromises the interests and objectives of Elumini and/or its clients as conflicting. Therefore, everyone should prioritize ethics and common sense, observing and communicating to other employees if there is a possible situation that jeopardizes the good relationship between the company and its clients.

Employees should never use their position at Elumini for their own or third-party benefit.

HOSPITALITY

We have established a limit of \$50.00 (fifty dollars) for the giving and receiving of gifts, giveaways, and invitations to events, of any nature, provided they do not represent potential advantages and do not compromise the integrity of relationships, whether among employees themselves or primarily with our clients.

RELATIONSHIP WITH CLIENTS AND SUPPLIERS

We are constantly committed to building and maintaining a relationship of true partnership with our clients and suppliers. It is expected that our relationship is conducted with transparency, ethics, and respect for laws and people.

Therefore, we are always available to listen to everyone, avoiding any communication noise so that the commitment established between the parties can be fulfilled.

FIGHTING CORRUPTION

Elumini and its employees are wholeheartedly committed to combating any form of corruption and favoritism.

We have an Anti-Corruption Policy with rules and guidelines to be followed, adopting good practices of corporate governance and ethical conduct in conducting our business.

IDEOLOGICAL FALSEHOOD

Altering documents, records, or omitting the truth in order to obtain some form of benefit, especially financial, is considered a crime of ideological falsehood and is not tolerated by Elumini under any circumstances.

INTELLECTUAL PROPERTY

All products, technical information, business data, strategies, planning, and actions created and improved by Elumini are the company's intellectual property and cannot be disclosed, published, or shared with any partners, competitors, or third parties. Our employees have the duty to maintain the confidentiality of information and do not have the right to use it for their own benefit or that of third parties, even when they are no longer part of our workforce.

CONFIDENTIALITY OF INFORMATION

All information obtained by our employees from our clients is protected by the confidentiality clause and must therefore be kept strictly between the agreed parties. We do not tolerate exceptions.

SUSTAINABILITY

Elumini, within the business environment, it operates, executes, supports, and promotes to its employees, clients, and suppliers the best practices of sustainable development, aiming for responsible consumption and environmental preservation.

DISCLOSURE

Elumini disseminates the Code of Conduct and Ethics, as well as the Anti-Corruption Policy, to all its employees and relevant stakeholders.

ETHICS COMMITTEE

Elumini has established an ethics committee composed of three company directors and two employees, who meet periodically to deliberate on any complaints, investigate the facts, and determine consequences for acts that violate the Code of Conduct and Ethics and/or the Anti-Corruption Policy.

If one of the directors is involved in the eventual complaint, the other two members of the committee will be responsible for deliberating on the matter.

| 3 - REPORTING CHANNEL

With the aim of promoting an environment of integrity and free from irregularities, we have a reporting channel open for expressions of criticism, suggestions, and reports regarding violations of this Code.

The reports will be received by an independent company and forwarded to Elumini's Ethics Committee, being handled anonymously and confidentially. Retaliations or punishments are not tolerated.

Email address for the reporting channel: ouvidoriaelumini@qualityrhrio.com.br

| 4 - SANCTIONS AND CONSEQUENCES

The Ethics Committee is responsible for deliberating on possible sanctions and consequences for acts that violate the Code of Conduct and Ethics and the Anti-Corruption Policy.

[Click here to access Elumini's Anti-Corruption Policy.](#)