

	Title:		
	Code of Ethics and Conduct		
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Person responsible for change	Person responsible for review	Person responsible for approval	
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1. OUR MISSION

We are a B2B provider with sustainable financial, social and environmental performance, providing Telecom and IT services that ensure secure connectivity and access to information, contributing to a better world through digital transformation.

2. OUR VISION

Three Visions

Technology – Be the largest national IT integrator, recognized for its innovative attitudes and sophistication of its services, for the diversity of technologies offered and for its technical competence.

Telecommunication – Be recognized by incumbent operators as the best quality service partner, leading expert in wireless telecommunications networks, and for having the highest connectivity time-to-customer efficiency.

Planet Earth – To be a company that benefits the world with large and small actions aimed at sustainable development. We assume our commitment to provide the best to individual, society and the environment.

3. OUR VALUES

Governance and Transparency – We follow the best market governance practices with structured, professional and audited processes and information. We value transparency in the recording and availability of information in order to satisfy all stakeholders and meet international certification standards that support good practice.

3.1. Governance and Transparency

We follow the best governance practices, with structured information, professional and audit process. We care for transparency in the accounting and availability of information, with the aim of satisfy all stakeholders and comply with international certification standard that support good performance practices.

3.2. Expertise

We invest in people in order to attract, retain and develop employees to provide cutting edge services in order to increase the already high prestige and recognition we have for our technical competence. We seek continuous service improvement and better global technologies.

3.3. Innovation

We update on leading emerging technologies and trends in partnership with the world's top technology developers. Our employees always engage in studying, attracting and acting on key innovations for our solution offerings.

3.4. Integrity

We act and make decisions with honesty and integrity under all circumstances. We strictly comply with laws, rules and regulations. We work ethically and in accordance with internationally recognized moral standards.

3.5. Commitment

We make a continuous effort not only to meet the solutions our customers demand, but to exceed their expectations with maximum throughput, efficiency and productivity.

4. OBJECTIVE

With the publication of this Code of Ethics and Conduct, Yssy hopes to assist all those who represent it in some way to adopt a uniform approach to in relation to issues ethical in the conduction and development of the company's business.

5. RELATIONSHIPS AND CONDUCT

5.1. With the Customers

The company's development and ability to keep its commitments depend on customer satisfaction. YSSY mobilizes the set of resources and skills so that this goal is always exceeded.

YSSY's goal is to offer its customers, both public and private, products and services that enable them to assume their own responsibilities towards their respective markets and customers.

To this end, YSSY makes available products and services designed, prepared and marketed under strict criteria of quality, safety, health, protection and respect for the environment to its customers.

YSSY protects the confidentiality of its customers and partners' data, information and techniques with the same degree of care as its own data, information and techniques, to the maximum extent required by laws and regulations.

5.2. With the Employees

YSSY's staff is free from discrimination and any form of prejudice, regardless of descent, age, gender, sexual orientation, marital status, family status, physical condition, nationality, ethnic origin, religion, language, race, education, economic status, origin or social condition, political or ideological beliefs.

YSSY prohibits moral and sexual harassment expressed by unwanted written or verbal conduct, acts and gestures creating unpleasant, hostile, repetitive and prolonged situations that cause physical and / or emotional harm to workers and the organization, as defined in (Anti-Harassment Policy, 2023)

YSSY aims to develop measures and initiatives that effectively promote the inclusion of all people.

YSSY aims to provide its employees with the means and working conditions that promote professional development.

YSSY offers its employees a training plan aimed at maintaining competence levels in all fields required for their duties.

YSSY employees are committed to compliance with the Code of Ethics and Conduct, and Policies, Processes and Systems.

All infrastructure and physical and technological resources provided by YSSY are the property of YSSY and YSSY may monitor and control its use as provided in Specific Policies.

5.3. With Third Parties

Due to specific needs within projects and contracts, YSSY may contract third parties to supplement its technical or operational capacity.

The management of third parties is carried out through a specific policy, which provides for the hiring modalities, as well as subjecting the third party to the commitment and compliance with this a Code and in (Anti-Harassment Policy, 2023).

Outsourced functions should be closely monitored. They must be truthful and comply with laws and regulations and committed to complying with this Code of Conduct and Ethics as well as the YSSY Policies.

5.4. With Concurrents

The relationship with our competitors must be based on ethics, avoiding any actions or practices that may characterize unfair competition.

5.5. With Government Agencies

Yssy maintains strict compliance with the legal, tax and labor requirements established by the law bodies, through compliance with current legislation. In addition, the relationship with the public agents belonging to it is observed in accordance with the rules set out in the (Anti-Corruption and Anti-bribery Policy, 2023)

5.6. With Occupational Safety and Health

YSSY ensures the Occupational Safety and Health of workers, having implemented the PPRA – Environmental Risk Prevention Program and PCMSO – Occupational Health Medical Control Program, identifying and providing the Personal Protective Equipment and requiring the correct use by the user, as required by specific Occupational Safety and Health Policy.

5.7. With Combating Child Labor and Slave-like Labor

YSSY repudiates child labor in its operations and expects all who interact on its behalf or for its benefit, as well as customers and suppliers, to be committed to the same principle.

YSSY ensures that the working conditions of its employees are decent and free from any situation that exposes them to working conditions analogous to slave labor and expects all parties with whom YSSY relates to be committed to the same principle.

5.8. With Inside Information

The management and staff are aware of professional secrecy issues and are notified of their duty of confidentiality towards third parties, including family members.

5.9. With Information Confidentiality and Security

Employees must ensure that company confidential data is protected from any form of infringement, theft, loss, degradation, misuse, disclosure, reproduction, forgery, and use for non-professional purposes, especially on the internet and intranet.

It is especially about protecting technical and administrative data, customer files, actual and potential suppliers, computer programs, passwords, documents, drawings, methods and techniques, industry secrets, specifications and parameters, intellectual and industrial property, budgets, contracts and agreements, unpublished sale costs and prices, strategic or business objectives.

YSSY maintains a specific information security policy applicable to internal and external audiences with objectives and measures to prevent and solve:

- YSSY's exposure to actual or potential monetary loss due to compromised data or information security or equipment loss;
- Disclosure of confidential YSSY and customer data, copyrights, negotiations, patents, or use of unauthorized corporate data;
- Use of data for unlawful purposes, which may include a violation of any law or regulation, including national and international standards in general.

5.10. With Environment

YSSY encourages environmental practices in line with the nature of its activities, such as internal recycling, conscious use of energy and water, fuel and transportation use, as well as environmental awareness initiatives.

5.11. With Communities

All employees and parties acting on behalf of or for YSSY should pay attention to compliance with protocols for access and interaction with communities.

In respect and protection of the local communities, YSSY prohibits any offense, harsh treatment, harassment, pressure or any conduct that is perceived as lacking respect and integrity by community interlocutors.

YSSY encourages the development and protection of local communities through social projects.

5.12. With the Fight against Corruption and Illicit Acts

YSSY and all its employees undertake and comply with the prohibition and zero tolerance for corrupt, fraudulent, coercive, extortion, collusive and obstructive, active or passive practices, both nationally and transnationally.

YSSY maintains an Anti-Corruption and Anti-Illegal Activity Policy applicable to board members, CEO, employees and business partners (customers, consortium, suppliers and third parties) in all its internal and external relationships.

This Policy is available on the YSSY website and intranet and is communicated to all stakeholders as per the (Anti-Harassment Policy, 2023).

5.13. Violation of Code and Policies

Violations of the YSSY Group Code of Ethics and Conduct and associated Policies must be reported immediately to the Ethics Channel and will be dealt with rigorously and with the applicable sanctions.

No employee will be exempt from disciplinary sanctions, regardless of their position in the company.

Violation by Business Partners YSSY will take the necessary and appropriate measures to terminate the relationship with the business partner in case of violation of the Code of Ethics and Conduct and (Anti-Corruption and Anti-bribery Policy, 2023) duly cleared and concluded.

5.14. Ethics Channel

YSSY provides a channel to its employees, third parties, partners, suppliers and other related parties for reporting any actual or suspected breach of the YSSY Code of Conduct and Ethics and Policies.

Reporting investigations are performed to ensure confidentiality and protection of the whistleblower.

YSSY prohibits any type of retaliation, and these acts, when identified, should be immediately reported and, upon finding the violation, shall be subjected to the appropriate disciplinary measures.

Reporting can be done through the means below, and will be handled by an independent, outsourced, specialized company that ensures the confidentiality of information and the whistleblower, including anonymity, if whistleblower so wishes:

- **Ethics Channel on Internet:** <https://aloetica.com.br/yssy>
- **Ethics Channel Phone:** 0800 838 0002
- **Ethics Channel on E-mail:** grupoyssy@aloetica.com.br

For questions and clarifications regarding the YSSY Code of Conduct and Ethics, Policies and/ or acts related to these topics, the YSSY Compliance area may be contacted in person or by email compliance@yssy.com.br.

5.15. Investigations and Disciplinary Measures

Unless the Compliance area is involved as a reporting participant, all Investigations should be performed by the Compliance area only and, when necessary, at its discretion by hiring outside agents to support it.

Reports that eventually involve the Compliance area as a participant will be automatically forwarded to Senior Management, which will take the necessary steps to conduct the investigation.

Regardless of the Compliance, Senior Management or external agent area, the Investigation Plan as per its own rules and guidelines should be followed to protect the company, the whistleblower and the parties involved.

Disciplinary measures are recommended by the Compliance area, approved by Senior Management and executed by the immediate superior with proper Human Resources follow-up.

5.16. Considerations

This document is based on the Code of Ethics and Conduct of September 10, 2019, elaborated by Júlia B. C. Kayat, Compliance Lawyer. As well as in previous publications.

The following topics have been changed:

Topic:	Changes:
N/A	N/A

5.17. References

- Yssy & CO. (2023). Communication Plan.
- Yssy & CO. (2023). Anti-Harassment Policy.
- Yssy & CO. (2023). Anti-Corruption and Anti-bribery Policy.
- Yssy & CO. (2023). Relationship Procedure with Public and Private Agents

5.18. Final Considerations

Situations not foreseen in this Code, as soon as identified, will be subject to analysis by Senior Management and Compliance Officer for possible additions and updating allowing the widest possible coverage.

YSSY & CO

- Yssy Tecnologia S.A.
- Yssy Telecomunicações S.A.
- Yssy Soluções S.A.
- Yssy Serviços LTDA.
- Veeb Ensino LTDA
- Yssy Inc.