

CÓDIGO DE ÉTICA

INTRODUCTION

Dear Collaborator and Partner,

SOMAP Soluções is committed to the continuous improvement of its corporate governance practices. As a result, the company was the first in its segment in Brazil to receive ISO certifications, attesting to the proper functioning of its compliance system and anti-bribery mechanisms. It is a company that prioritizes transparency and full compliance with the laws and regulations applicable to its activities.

Our compliance program is guided by international best practices. It

It follows established norms such as the United States FCPA, the United Nations Global Compact, the Universal Declaration of Human Rights, the Anti-Corruption Convention of the Organisation for Economic Co-operation and Development, and the Bribery Act of the United Kingdom.

This Code of Ethics is one of the pillars of this program. Its purpose is to clarify and guide our employees and partners on the expected conduct in any and all relationships established with the company.

Everyone has an obligation to know it, follow it, and disseminate it whenever necessary, contributing to the maintenance of a good working environment and respect among all employees and business partners.

We ask that you read carefully and, whenever you have any doubts regarding a procedure or behavior, refer back to these pages for clarification. If you do not feel properly guided, contact your manager or the company's compliance department.

Remember: everyone's commitment to observing the rules will make the company a better place for everyone. We believe that correct attitudes and a good professional environment contribute not only to the success of companies, but also to a better country.

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1. OBJECTIVE

Ethics is the ideal of human conduct that guides each individual on what is good and right, aiming for the common good. In the workplace, it should guide not only the content of decisions (what I should do) but also the decision-making process (how I should do it).

SOMAP Soluções bases its practices on transparency and honesty. fair negotiation and full compliance with all applicable laws and regulations, principles that They guide all of their activities. Their objective is to value their professionals and they seek... To disseminate, in a well-founded manner, the importance of ethics and morality.

The creation and dissemination of this Code of Ethics ("Code") makes clear this commitment to its daily responsibilities, seeking to improve its products and services, guaranteeing total quality to its users.

Therefore, the purpose of this Code is to clarify and guide employees, suppliers, customers, and partners on the expected and desired behaviors in any and all relationships established with the Company. These are:

- To safeguard the company's image, operating in the market in an honest, fair, transparent, and ethical manner;
- Comply with applicable legislation;
- To practice fair and honest competition;
- Respect human relationships, based on principles of equality and respect for individuality and dignity, with relationships free from prejudice of any kind, whether based on origin or social condition, religion, gender, color, ethnicity, age, sexual orientation, political preferences, physical conditions, or any other form of discrimination.

A good relationship between employees, managers, clients, and suppliers is what SOMAP Soluções continuously strives for, so that the company's reputation remains one of its most important assets.

2. MISSION, VISION, PRINCIPLES AND VALUES

MISSION:

To provide the best and most efficient resources and solutions to support management and our customers' operation.

VISION:

To be the benchmark in services for our clients and partners.

PRINCIPLES:

Valuing people and their individual rights.

Support for personal development.

Respect and support for community life.

Support for freedom of initiative.

VALUES:

Doing it right the first time – Our actions aim to guarantee maximum efficiency in delivery to our clients, contributing to adding value to their businesses.

Safety First – Our group faces challenges with the certainty that it is

It is possible to overcome them with determination, dedication, and our ability to achieve.

Customer focus – This is a value that is expressed not only in how we relate to our customers, but also to the communities in all the locations where we operate.

Respect for society – We carry out our mission by serving our clients with dedication and respect for the people and companies with whom we interact.

Open and direct dialogue – We encourage our employees to maintain a proactive stance.

High ethics and total transparency in their relationships, expressing themselves with complete freedom.

3. APLICAÇÃO

This Code applies to everyone. This includes senior management and employees, regardless of their hierarchical level at SOMAP Soluções. For our purposes, all these individuals will be referred to as "Employees".

SOMAP Soluções has a strong commitment to ethical conduct and attitudes that reinforce the company's principles and values.

Remember: you are part of this company!

4. EMPLOYEE CONDUCT

4.1 IN THE RELATIONSHIP BETWEEN COLLABORATORS

SOMAP Soluções values a dignified, responsible, and fair work environment, understanding that this is fundamental for its employees to perform their activities properly and achieve professional and personal development.

To that end, we seek to foster relationships based on:

- Mutual respect among employees through fair, equal and non-discriminatory treatment;
- Healthy leadership that provides opportunities for development and dignified treatment for all team members;
- Employees who perform their duties professionally and with the necessary skills to properly carry out their functions;
- Equal opportunities in selection processes for internal promotions and Hiring new employees;

Furthermore, we have as a principle:

a) To ensure that all employees receive the rights stipulated in Brazilian labor law (CLT), as well as those resulting from collective agreements and/or conventions.

b) Respect the Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, the United Nations Convention on the Elimination of All Forms of Discrimination against Women, and the Statute of Children and Adolescents.

c) Meet social requirements based on the International Standard of Responsibility Social (SA 8000), such as:

- Do not use or support the use of child labor (labor of children under sixteen) years of age, except in the condition of apprentice, from the age of fourteen), including in suppliers and subcontractors.
- Do not use or support the use of forced or compulsory labor, nor the withholding of any type of identification document, deposits, salary or any part thereof, benefits or any other property of the professional, as a condition for him or her to become or remain an Employee of the Company.
- Provide regular training on occupational health and safety, including on-site training where work activities are performed, for new employees and those who have been transferred to a different location.
- Provide PPE (personal protective equipment) appropriate to the employee's work activities, as well as training on its correct use.
- Respect the right of its employees to join the union, as well as to

to collectively negotiate their demands, respecting the limitations imposed by Brazilian law, that is, the employee may join the union of their professional category, or the union of the category to which the company is associated.

- We do not support any type of discrimination related to ethnicity, nationality, social class, birth, religion, disability, sex, family responsibilities, marital status, trade union membership, political opinion, age, or any other condition, whether in hiring, remuneration, promotion, access to training, contract termination, or retirement.

- We do not support any type of sexual or moral harassment or physical punishment, nor do we allow any threatening, abusive, exploitative, or sexually coercive behavior.

d) Maintain an environment conducive to the flow of ideas and innovations among employees, with a focus on continuous improvement.

e) Ensure that, in the event of environmental risks in the workplace that place one or more employees in a situation of serious and imminent danger, they can immediately interrupt their activities, reporting the fact to their direct supervisor for appropriate action (NR-9 – item 9.6.3)

SOMAP Soluções values employees who possess a personal and professional attitude guided by the company's principles and values, and encourages its employees to:

- To admit mistakes honestly and transparently;
 - Notify the manager about errors and mistakes as quickly as possible, so that problems can be resolved.
- Don't get worse;
- Question guidelines that are contrary to the company's principles and values.

SOMAP Soluções understands that privacy is a right for everyone, and that it is necessary and fundamental for a healthy existence. Therefore, it ensures respect for the individuality of its employees and recommends that they conduct their lives in a correct, fair, and honest manner, seeking to avoid situations that could negatively affect their reputation or the company's image.

SOMAP Soluções seeks and values diversity among its employees, recognizing that the diversity of people enriches the company and is essential for creativity and business growth. As a company, we are committed to the concept and practice of equal employment opportunities and the unbiased treatment of all individuals.

It is the Company's responsibility to provide a work environment free from intimidation, hostility, or abuse against employees, whether perpetrated by supervisors, colleagues, or individuals outside the Company. Abusive behaviors include those considered offensive to individuals or groups, such as sexual innuendo, malicious, sexist, or racist comments, ethnic jokes, or religious insults.

Such behavior may interfere with an employee's performance or create an intimidating, hostile, or offensive work environment.

Any discriminatory or abusive treatment of employees, suppliers, or customers that violates our company's values or applicable law will be subject to disciplinary action.

4.2. IN RELATIONSHIP WITH CUSTOMERS

SOMAP Soluções always seeks a respectful and ethical relationship with its clients, in order to achieve the best results for both parties in a responsible and fair manner.

We base our relationships on a commitment to delivering what is contracted with excellence, demonstrating quality daily, from customer service to the execution of services, meeting the expectations of our clients.

These are the attitudes of SOMAP Soluções towards its clients:

- Courtesy and efficiency in problem-solving;
- Excellence in service, clarity and objectivity in relationships;
- Maintain a relationship of loyalty and respect with the company's target audience;
- Respect for the Code of Conduct and/or Ethics and other client policies.

We consider the confidentiality of strategic and confidential information to be extremely important. Customer information must be protected. SOMAP Soluções employees.

They may not make unauthorized use of the information provided by the client, especially strategic and confidential information.

If you have access to customer information:

- Use only as authorized by the client.
- Protect all confidential client records, documents, and electronic items.
- Do not share information with third parties without the client's prior written permission.
- All information requested by third parties, even for legal purposes, must have the client's prior written permission.

Remember: We do everything we can to help our clients do their best!

4.3. IN RELATION TO THIRD PARTIES

The contracting of third parties by SOMAP Soluções must be based on technical, commercial, and objective criteria, according to the company's internal regulations. For our purposes, third parties include suppliers, sales representatives, distributors, customs brokers, consultants, law firms, service providers, and other commercial partners of SOMAP Soluções.

All third parties must undergo an evaluation process which includes the mandatory completion of the Preliminary Analysis Questionnaire. After completing the questionnaire, the need for an Integrity Due Diligence procedure will be assessed and conducted by the Compliance Department. The purpose of the *Integrity Due Diligence* is to identify and mitigate any potential risks involving relationships with third parties.

More details and specific rules can be found in the Third-Party Relationship Policy.

4.4 IN RELATION TO COMPETITORS

SOMAP Soluções' principles in its relationships with competitors are based on loyalty, respecting and encouraging free competition and market laws. According to our Code of Conduct, A competitor is any company that operates in the same line of business as the companies in question. SOMAP Solutions.

All employees must comply with competition law (Law 12.529/2011). SOMAP Soluções does not tolerate anti-competitive practices, such as price fixing, market division among competitors, or any other practice that prevents a free and fair market.

Employees should never share or discuss competitively sensitive information, such as prices, proposals, bids, clients, and market prospects, with competitors.

Further details and specific rules can be found in the Competition Policy.

4.5. IN RELATION TO TRADE UNIONS AND PROFESSIONAL ASSOCIATIONS

SOMAP Soluções respects freedom of association, recognizes trade unions as the legal representatives of employees, and seeks constant dialogue to resolve issues. Disputes of a labor or union nature.

Only individuals formally designated by the Board of Directors are authorized to represent the Company before Unions and Associations.

Participation in meetings organized by unions and associations depends on a clear and legitimate agenda.

Also within the context of Unions and Associations, employees should never share or discuss competitively sensitive information, such as prices, proposals, bids, clients, and market prospects with competitors.

4.6 In relation to the community and the environment

In addition to complying with legislation, SOMAP Soluções promotes the rational use of natural resources, environmental preservation, reduction of waste generated and recycling, and encourages the participation of its employees in social activities, volunteer work, solidarity actions and all those that aim to improve the quality of life and protect human dignity.

We value maintaining a harmonious relationship with the community, always being receptive to complaints and suggestions that are beneficial to the well-being of everyone and the environment.

More details and specific rules can be found in the Social Responsibility Policy.

4.7 IN RELATION TO PUBLIC AUTHORITIES

All employees must act in accordance with the highest ethical standards in all interactions with the Public Sector. For the purposes of our Code, the Public Sector is any public entity or body that exercises legislative, executive, or judicial functions.

Therefore, all employees must comply with the rules related to corruption, specifically, crimes against the Brazilian and foreign Public Administration as set forth in the Penal Code (Decree-Law No. 2,848/1940), corruption crimes provided for in the Bidding Law (Law No. 8666/93), and offenses provided for in the Anti-Corruption Law (Law No. 12,846/2013).

It is strictly forbidden to give, offer, or promise, directly or through third parties, any undue advantage to any public official or person related to them. According to our Code, undue advantage should be interpreted as any benefit, even if not monetary, offered, given, or promised to a Public Official so that they perform, delay, or omit an official act.

It is prohibited to obtain any undue advantage or benefit fraudulently within bidding processes or during the execution of contracts entered into with the public authorities. Facilitation payments and the offering of undue advantages in obtaining licenses and in inspection and regulation are also prohibited.

or enforcement actions by regulatory bodies and agencies.

More details and specific rules can be found in the Public Sector Relations Policy.

4.8. REGARDING THE USE OF COMPANY RESOURCES

It is the duty of all employees and third parties to protect and use company assets responsibly. Using company assets for personal gain, for personal interests, or for any illegal or unethical purpose will constitute conduct contrary to this Code.

SOMAP Soluções' assets and resources include: facilities, equipment, vehicles, software, systems, telephony, printers, and office supplies, whether owned, rented, or leased. Raw materials, semi-finished and finished products are also considered company resources.

Working hours are dedicated to fulfilling professional activities, according to the professional responsibilities of each employee and service provider of SOMAP Soluções.

Therefore, it must be used consciously and responsibly.

SOMAP Soluções' assets must be used exclusively for the proper conduct of its business, always considering the well-being of all. Furthermore, the use of company equipment, including computers, for illegal or unethical activities such as gambling, pornography, and other related matters is prohibited.

Do not use company assets, property in your possession, or privileged information for any opportunity for financial gain that may arise due to your actions.

position.

Theft, robbery, or fraud involving tangible or intangible company assets must be reported immediately. If committed by an employee, supplier, or business partner, the responsible individual will be subject to both disciplinary measures and penalties provided by law.

All employees must observe the rules defined in the Corporate Information Security Policy.

The materials provided by SOMAP Soluções for the performance of activities must be returned upon the employee's termination, in suitable condition.
conservation and use.

4.9. REGARDING THE CONFIDENTIALITY AND SECURITY OF INFORMATION

It is essential to guarantee the confidentiality of internal information and not disclose it without prior authorization.

It is the duty of employees to observe the following conduct to maintain confidentiality:

- Maintain the confidentiality of passwords for computers, email, systems, and electronic devices;
- Do not share or lend your system logins and passwords;
- Do not disclose information that could negatively impact the image and results of SOMAP Soluções.
- Do not transmit strategic and confidential information from SOMAP Soluções to Employees and third parties who do not use them in the performance of their tasks;
- Be discreet when discussing company matters in public places, especially if They involve confidential information. Analyze whether the location and timing are appropriate;

Both public and restricted information about the Company and its business contribute to its reputation and must be protected by all employees and partners.

In the case of non-public information, it generally has strategic value and must be used strictly within the rules and standards of disclosure established internally. This information, not yet disclosed to the general public, must be protected by everyone, even outside the workplace and working hours; this includes

their relatives, family, and friends. This conduct should be observed even in the event of termination of the employment relationship.

Company documents and records must be stored or disposed of according to confidentiality classification and document retention guidelines.

All employees must observe the rules defined in the Information Security Policy.

4.10. IN RELATION TO THE PRESS AND SOCIAL MEDIA

SOMAP Soluções recognizes the value of freedom of expression and maintains relationships with media outlets based on respect and truth.

To avoid the dissemination of inappropriate or incorrect information, only individuals formally designated by the Board of Directors are authorized to speak on behalf of SOMAP Soluções.

We understand the importance of social media as a means of socialization and expression of the political, sporting, and cultural positions of its users. Therefore, it is understood that the employee must behave in accordance with the principles and values of SOMAP Soluções, both in the real and virtual worlds.

Since the employee is responsible for the content posted on their own social media profiles or those of third parties, it is important to be aware of a few things:

- Do not express value judgments or opinions about the Company, other Employees, partners, customers or competitors;
- Do not post text or images that are internal to the work environment;
- Do not disclose information that is not in the public domain, that is, information that has not yet been publicly disclosed by the Company itself.

4.11. REGARDING POLITICAL AND RELIGIOUS ACTIVITIES

SOMAP Soluções respects the political and religious activities practiced by its members. Employees, observing the following restrictions:

- Do not use the image or resources of SOMAP Soluções to conduct political campaigns or religious activities;
- The position held by the employee cannot be used to support a candidate or neither political party nor religious institution;
- Political and religious activities should not be carried out on the premises of Company and/or its employees, such as leaflet distribution;
- Engaging in political and religious activities should not cause any advantage or disadvantage to the employee's performance.

5. Conflict of Interests

A conflict of interest may arise when the individual interests of any employee conflict with the interests of the company. Employees may not use the power of their position, company assets, assets in their possession, or strategic or confidential information belonging to the company or clients for any opportunity to gain financially for themselves or for third parties.

5.1. FAMILY MEMBERS OF EMPLOYEES

The hiring of family members of employees must adhere to the following criteria:

- They may only operate independently, without direct subordination, and with the approval of the general management of SOMAP Soluções;
- Business relationships with suppliers, partners, and clients who have a family relationship with a SOMAP Soluções employee must be reported to management;
- The hiring of family members of employees as suppliers, clients, and partners may only be carried out with the prior approval of the General Director and the Director of Finance and Planning;
- Contract management for suppliers, clients, and partners who have family members in the Company cannot be performed by an employee who is a family member of the other party.

According to our Code, family members include the spouse, partner, or relative in a direct or collateral line, by consanguinity or affinity, up to the third degree.

5.2 AFFECTIONATE RELATIONSHIP BETWEEN EMPLOYEES

Romantic relationships are not permitted between employees who are directly subordinate to each other and belong to the same department/reporting line.

5.3 Parallel Activities

When performing parallel activities, whether paid or unpaid, outside of their working hours, the employee must exercise caution to ensure that these activities do not negatively impact their performance or the company's image, and that they do not constitute an act of competition.

For the performance of these activities, the following aspects must be observed:

- It is not permitted to carry out parallel activities during working hours or on company premises;
- The use of Company assets for such activities is prohibited;
- Employees are not permitted to participate in the management or boards of directors of competing companies, nor to engage in external activities that may constitute any type of conflict of interest with the Company's business;
- The use of internal information in lectures, workshops, or classes must be authorized by the Board of Directors;

- Invitations to give lectures as a representative of SOMAP Soluções should be validated beforehand with the respective Director.

In order to ensure transparency in our business dealings, we recommend that invitations to assume advisory roles in any company or organization be communicated to and validated with the respective Director.

6. GIFTS, PRESENTS and HOSPITALITY

Offering gifts, presents, and hospitality to initiate or strengthen business relationships is a common practice in the corporate world. SOMAP Soluções

This practice is permitted provided it has a legitimate commercial purpose and is not tied to... to any type of compensation or consideration.

For our Code:

A promotional gift is any object, usually without commercial value, distributed as a courtesy, advertising, routine promotional action, or on the occasion of events or commemorative dates (e.g., pen, diary, mug with the company logo, etc.);

A gift is any object or service for personal use or consumption that has commercial value (e.g., drinks, electronic devices, clothing, game tickets, etc.);

Hospitality includes expenses such as travel, food, lodging, transportation, and other costs (e.g., invitations to participate in events promoted, supported, or sponsored by a company; invitations to present products and services or company facilities, etc.).

Gifts, Presents and Hospitality in the Private Sphere:

- Gifts and presents may be offered and received provided that their value does not exceed the limit of R\$ 200.00 (two hundred reais).
- Hospitality for legitimate commercial purposes may be offered and received provided that expenses for food, lodging, and transportation are modest and reasonable, and have been approved by the immediate supervisor.

Gifts, Presents and Hospitality for Public Officials:

- Gifts may be offered provided that their value does not exceed the limit of R\$ 100.00 (one hundred reais);

- Hospitality for legitimate commercial purposes may be offered provided that expenses for food, lodging, and transportation have been previously approved by the Compliance department and are of modest and reasonable value.

After prior approval from the Compliance department, the request for accommodation and transportation must be made in accordance with the rules of PO002 – Travel, Accommodation and Transportation Request, and Value Limits.

SOMAP Soluções employees should never offer or receive money in exchange of favors or privileges, or to engage in corrupt practices or bribery.

- The Code of Ethics and/or Conduct of the company to which the gift, present, or hospitality will be offered must be respected, provided it is compatible with this Code and properly disclosed.

If the other company does not provide any guidance in this regard, the offer should be discussed with the immediate supervisor at SOMAP Soluções, respecting the established rules defined in this Code.

It is important that the offering or receiving of gifts, presents, or hospitality does not involve an obligation or expectation of reciprocation or consideration. In other words, when receiving or offering any of these items, a SOMAP Soluções employee, for example, does not... must reciprocate or be reciprocated with favors, money, privileges, confidential information, or any other form of compensation.

Meals

Business meals should always have a legitimate business purpose and should never create an obligation or expectation of remuneration or compensation, being limited to the criteria established in the company's internal regulations.

- Only individuals authorized by the Board of Directors may hold/participate in business meals, always observing the Travel Expense Reimbursement Policy;
- Meals must respect the limit of R\$ 200.00 (two hundred reais) per person;
- The employee must pay for the meal and request reimbursement according to the Policy. Travel Expense Reimbursement;
- In the case of meals provided by suppliers or potential suppliers, each party will be responsible for their own expenses.

More details and specific rules can be found in the Gifts, Presents and Hospitality Policy.

7. DOAÇÕES E PATROCÍNIOS

SOMAP Soluções will seek to support the community in which it operates through social projects and socio-cultural actions. This support may occur through donations or sponsorships, financial or otherwise, always in strict compliance with applicable laws and regulations.

Donations and sponsorships should never be made with the intention of obtaining any undue advantage for SOMAP Soluções companies.

Following approval from Senior Management for donations and sponsorships, it will be mandatory to complete the Donation/ Sponsorship Form for the purpose of evaluating its purpose and the beneficiary entity. This evaluation will also aim to identify any history of involvement of the beneficiary entity.

in cases of corruption or fraud, as well as relationships with public officials.

SOMAP Soluções does not support or make donations to political parties or political campaigns.

More details and specific rules can be found in the Donation and Sponsorship Policy.

8. QUALITY, SAFETY, ENVIRONMENT AND HEALTH (QSMS)

Adopting best practices in relation to Quality, Safety, Environment and Health allows SOMAP Soluções' processes to be more efficient. Actions that reduce workplace accidents and incidents and environmental impacts lead to greater satisfaction for both workers and consumers.

Therefore, all individuals who use the Company's facilities or materials, whether employees or visitors, play an important role in reducing environmental damage, accidents, and workplace incidents, and contribute to improving quality through an active attitude, adoption of good health practices, and the use of appropriate Personal Protective Equipment (PPE) for their roles.

SOMAP Soluções employees and visitors should:

- Report any accidents and work-related incidents that may occur on the premises of Company or its employees, including collaborators, outsourced workers, partners, or service providers;
- Maintain cleanliness, organization, and safety in the workplace;

- Use the necessary PPE (Personal Protective Equipment) for the performance of activities and ensure that others do the same. Colleagues should do it too;
- Inform your supervisor whenever you identify hazardous situations in the workplace;
- Do not store, consume, or remain under the influence of any type of narcotics and/or alcoholic beverages on Company premises or while on duty;
- Always inform your manager if you are undergoing medical treatment or taking medications that interfere with your reflexes and that could compromise your safety or the safety of other employees.

The carrying of firearms will only be permitted to authorized and qualified professionals, during the performance of their duties, in accordance with current legislation.

SOMAP Soluções works to ensure that your Occupational Health, Safety and Environment Management System is maintained in compliance with OHSAS 18001:2007 standards and NBR ISO 14001:2004.

9. COMPLIANCE WITH THE CODE

It is the responsibility of each Employee to ensure full compliance with all terms of this Code. "Making the right decision" and acting according to the highest ethical standards is the personal responsibility of each Employee, and this responsibility cannot be delegated. In case of doubt, Employees should always seek guidance from their supervisors.

principles and values established in the introduction to this Code.

SOMAP Soluções reserves the right to control and monitor means of communication, as well as having free access to files stored on its equipment. The company also has the right to control and monitor internet access.

and all the equipment connected to its information technology system (are Examples, but not limited to: computers, tablets, smartphones, telephones, etc.).

Corporate email is a work tool owned by SOMAP Soluções and, therefore, may be monitored. Therefore, use it responsibly and do not send...

Inappropriate, offensive, or obscene messages, as well as chain letters or pyramid schemes, are prohibited.

10. DISCIPLINARY MEASURES

Any failure to comply with the terms of this Code will result in the application of disciplinary measures including warnings, disciplinary suspension, termination for cause, as provided for in the Company's Disciplinary Measures Procedure, in addition to any potential legal implications.

11. COMMUNICATION CHANNEL – ETHICS CHANNEL

In case of doubt, employees may contact the Compliance Department. Furthermore, employees and third parties must report, through the Ethics Hotline, any conduct that violates this Code and/or applicable legislation. This is a confidential channel that can be accessed via email at contato@somapsolucoes.com.br. Any violation or suspected violation of the rules of this Policy should be reported through the Ethics Channel.

The Ethics Hotline is managed by a specialized and independent company.

Employees are assured that under no circumstances will the authorship of the communication be revealed, and they are guaranteed total confidentiality and secrecy, both regarding their identity and the content of the communication formalized through the Ethics Channel. If you do not wish to identify yourself, we guarantee your anonymity.

12. TIPS FOR REFLECTION

When in doubt about an action or decision, answer the following questions:

Does this action bother me or make me uncomfortable?

- Does it align with SOMAP Soluções' values?
- What does the SOMAP Soluções Code of Ethics say?
- Are there any rules related to the situation in question in the Company's Policies, Standards and Procedures?

- Will this action impact the company's reputation?

- Will it harm other people?

Is this something I would proudly tell my children about?

Is this something that could keep me up at night?

Would I like to receive such treatment?

If the company were mine, would I want my employee to have this attitude?

- If I were to comment on this action, practice, or activity, the people in my circle would
Would (personal, family, community, etc.) consider the situation acceptable?

If you still have questions, consult your manager or the HR department at SOMAP Soluções.

A tip for you, our leader:

You need to be an example of ethical behavior for all SOMAP Soluções employees!

Recognize the merits of each person and provide equal opportunities for professional development based on the value and contribution of each employee. We do not allow decisions concerning employees' professional careers to be based solely on personal relationships. Ensure that your team receives continuous and appropriate training, as well as up-to-date information on SOMAP Soluções policies.

STATEMENT OF AWARENESS AND COMMITMENT

This Acknowledgment and Commitment Form is an integral part of the Employee's Employment Contract with SOMAP Soluções and consists of two copies. One copy

One copy remains with the employee, and the other copy remains with the company.

I declare that I have received, read and understood the SOMAP Soluções Code of Ethics and I am aware of and fully agree with the terms and guidelines established and their relevance to me and to the Company.

I commit to fully complying with this agreement, under penalty of being subject to disciplinary measures, in accordance with the company's internal regulations and applicable legislation.

Full Name:

Area:

Corporate email:

Personal email:

Telephone Contact:

Signature:

Date:

Are there any situations you would like to comment on regarding potential conflicts of interest for information and/or validation by the Ethics Committee?

Yes. Complete the Clarification and Validation Form.

No.

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Full Name:

Area:

Corporate email:

Personal email:

Telephone Contact:

Signature:

Date:

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This document consists of two copies. One copy is for the employee and the other copy is for SOMAP.

CLARIFICATION AND VALIDATION TERMS

This term refers to employees who have any situation that may suggest a conflict of interest with SOMAP Soluções' business, as well as situations that... require validation from the Company, in accordance with the rules set forth in this Code.

1. List the supplier companies, service providers, clients, or partners of SOMAP Solutions, of which you are a partner, administrator, executive, negotiator, sales representative, or hold a position with decision-making power:

2. List individuals with whom you have a close relationship (family, romantic, friendship, etc.) who are partners, administrators, executives, negotiators, sales representatives, or hold decision-making positions in a supplier company, service provider, partner, client, or competitor of SOMAP Soluções:

3. Situation(s) requiring validation:

I declare that the information I have provided in this document is true, and that no information has been omitted that could influence decisions that SOMAP Soluções may need to make regarding this Agreement.

Full Name:

Area:

Signature:

Date:

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