

## Assunto: Conduct Code

- [1\) Objective](#)
- [2\) Application](#)
- [3\) Implementation](#)
- [4\) Regulatory Rule\(s\)](#)
- [5\) Business Execution Rule\(s\)](#)
- [6\) Areas Involved and Responsibilities](#)
- [7\) General Guidelines](#)
  - [7.1\) Daycoval Group Mission](#)
  - [7.2\) Daycoval Group Vision](#)
  - [7.3\) Daycoval Group Values](#)
  - [7.4\) Message from Management](#)
  - [7.5\) Conduct in the Internal Relationships](#)
    - [7.5.1\) Valuing of People](#)
    - [7.5.2\) Duties](#)
    - [7.5.3\) Prohibitions](#)
    - [7.5.4\) Conflicts of Interest](#)
  - [7.6\) Conduct in the External Relationships](#)
    - [7.6.1\) Relationship with Customers and Users](#)
    - [7.6.2\) Relationship with Suppliers and Service Providers](#)
    - [7.6.3\) Relationship with the Market and Competitors](#)
    - [7.6.4\) Relationship with the Government](#)
    - [7.6.5\) Relationship with the Media](#)
    - [7.6.6\) Relationship with Associations and Class Entities](#)
    - [7.6.7\) Social and Environmental Relationship](#)
    - [7.6.8\) Relationship with the Labor Market](#)
    - [7.6.9\) Social Media](#)
  - [7.7\) Anti-Corruption Law](#)
  - [7.8\) Consequences](#)
  - [7.9\) Decisions](#)
  - [7.10\) Communication Channels - Reporting](#)
    - [7.10.1\) Reporting](#)
    - [7.10.2\) Executive Ethics Committee](#)
    - [7.10.3\) Audit Committee](#)
  - [7.11\) Code of Conduct Management](#)

### 1) Objective

Establish standards of conduct for all persons covered in the item "Application", in order to guide and define the desired personal and professional ethics, as well as the parameters behavior, which guide the Daycoval Conglomerate, within the strictest respect.

### 2) Application

The code applies to all employees, service providers or third parties hired by the companies of the Daycoval Prudential Conglomerate ("Conglomerate") in Brazil and abroad, without distinction of hierarchical level, in the performance of their professional duties and in the internal and external scope of the company, that is, at any time representing or presenting Daycoval. It is worth highlighting that the term "collaborators" includes employees, underage apprentices, interns, service providers and administrators of the Conglomerate.

### 3) Implementation

Immediately, as of publication on the Corporate Intranet - Normative Instruments Portal.

### 4) Regulatory Rule(s)

[Law 12.846, of August 1, 2013 \("Anti-Corruption Law"\)](#): Sets out provisions for the administrative and civil liability of companies for the practice of acts against the public administration, national or foreign, and other provisions.

[Resolution 4.859 - Central Bank of Brazil, of October 23, 2020](#): Addresses the submission of information regarding the members of the control group and the managers of financial institutions and other institutions authorized to operate by the Central Bank of Brazil and on the provision of a channel for communicating evidence of illegality related to the institution's activities.

## 5) Business Execution Rule(s)

The content of this document must be dynamic, being constantly reviewed and updated. Comments and suggestions from collaborators should always be welcome.

The internal audit code of conduct, available for consultation on the PIN - Normative Instruments Portal (Intranet), must be respected and followed by all administrators, employees or service providers who carry out the activity and does not overlap with this code.

Other internal regulations contribute to complying with the guidelines established in this code, below is a list of some policies that everyone should know and that are available for consultation on the PIN - Normative Instruments Portal (Intranet) and on the institution's website, via the link (<https://ri.daycoval.com.br/pt/governanca-corporate/politicasinstitucionais>):

- Information Security Policy;
- Cyber Security Policy;
- Data Protection Policy;
- AML\_FT Policy;
- Social, Environmental and Climate Responsibility Policy;
- Personal Investment Policy;
- Institutional Policy for Relationship with Customers and Users of Financial Products and Services.

## 6) Areas Involved and Responsibilities

Executive Ethics Committee	<ul style="list-style-type: none"> <li>• Evaluate compliance with the ethical principles and conduct guidelines established in the Code that must be followed by all employees, suppliers and partners, aiming at promoting respect and compliance with the established guidelines.</li> <li>• Propose any updates, when observing new concepts and new practices that must be applied with employees, suppliers, customers and society.</li> <li>• Exercise a support role in the arbitration of doubts, conflicts of interpretation or transgressions committed.</li> </ul>
Managers of the Daycoval Conglomerate	<ul style="list-style-type: none"> <li>• Promote ethical and honest conduct with subordinates, evaluating and promoting them exclusively based on technical and professional criteria.</li> <li>• Communicate any relationship or transaction that constitutes a conflict of interest or a violation of this Code of Conduct to the Executive Ethics Committee.</li> <li>• Ensure prompt service to regulatory bodies (Central Bank of Brazil, Brazilian Federal Revenue Service, Brazilian Securities and Exchange Commission-CVM, etc.), self-regulators and audits with complete, transparent and understandable information.</li> </ul>
Employees of the Daycoval Conglomerate	<ul style="list-style-type: none"> <li>• Sign a specific term declaring your knowledge and acceptance of this Policy and ensure, within their areas of responsibility, full compliance so that the standards set forth herein and the integrity of the Daycoval Group are maintained.</li> </ul>

## 7) General Guidelines

### 7.1) Daycoval Group Mission

Offer financial solutions with excellence, security and agility, contributing to the development of its customers and partners, always following the precepts of economic sustainability and social responsibility.

### 7.2) Daycoval Group Vision

To be among the main players in the financial market, acting with soundness, sustainability, diversification, ethics, modernity, liquidity and agility.

### 7.3) Daycoval Group Values

Our corporate values are our identity and are reflected in all our activities daily.

**Agility** - Quickness to offer quality products and services with efficient and technological solutions for the customer.

**Security** - Conservatism and prudence in the management of different risks (Market, Credit, Capital and Operating). Always seeking a long-term growth strategy, maintaining high liquidity and low leverage.

**Integrity** - Integrated, responsible and transparent conduct, based on ethical, moral and legal principles.

**Austerity** - Rigor and seriousness in spending and managing the assets of our companies and customers.

**Relationship** - Strives for quality and diligence in the relationships established with its customers and partners, treating everyone with equal rights and without any distinction, with respect for human beings and individuality.

**Sustainability** - Interaction with society to act respecting [economical](#), [social](#), [energy](#) and [environmental](#) issues.

### 7.4) Message from Management

Our activity must be based on the existence of mutual trust and the confidence of the general public. Thus, every employee of the Conglomerate (Daycoval Group) must follow the highest and most appropriate standards of conduct.

The commitment of all employees to disseminate and comply with ethical conduct guidelines and recommendations from the authorities is extremely important, as a way of guaranteeing the necessary care related to the health and safety of other employees, in addition to valuing and reinforcing the image of solidity and honesty of Daycoval Group towards its customers, competitors, suppliers, service providers, regulators and the society in general.

Any information relating to customers, competitors, suppliers, service providers, regulators, employees and the Daycoval Group must be confidential, and all employees must ensure the integrity of this information, the privacy of the personal data processed, in accordance with the Data Protection Policy and, in their respective processing and storage equipment.

When faced with any questionable action, evidence of illegality that may involve or affect the Institution, or even with a violation of this Code of Conduct, the employee has the institutional duty to promptly communicate the [Executive Ethics Committee](#), regardless of any individual judgment on the qualification, materiality or relevance of the matter.

We invite you to read this code very carefully and, in this way, assume or reiterate the commitment assumed to follow the guidelines contained therein.

### 7.5) Conduct in the Internal Relationships

#### 7.5.1) Valuing of Pople

The guideline for conduct in internal relationships is based on valuing and respecting people, translated into attitudes that we value in our culture, such as:

- Ensure equality and provide opportunities for professional growth, with merit as the main evaluation factor for the organization's employees;
- Provide a safe and healthy environment, providing freedom of expression and respect for integrity, dignity, diversity and protection of people's privacy;
- Reinforce awareness regarding the responsibility of the function performed, which must not be used in a way that is advantageous, whether directly or indirectly, for oneself or for third parties; and
- Repress any kind of harassment, including moral or sexual harassment, not admitting its practice in the work environment and in any relations with the internal and external public.

#### 7.5.2) Duties

The employees have the following duties:

- Be guided by mutual respect, courtesy, team spirit, loyalty and trust in relationships in the work environment;
- Have a balanced and unbiased conduct, not participating in transactions and activities that could compromise their professional dignity or discredit their image, as well as that of the Daycoval Group;
- Carry out their work in line with the values of the conglomerate, refraining from doing so against the interests of the Daycoval;
- Comply with the legislation, regulations and internal regulations applicable to the performance of their duties and the exercise of their professional activities;
- Care for the Group's assets, intellectual property rights and image, preserving materials, work instruments, the aesthetics and safety of the Daycoval Group's buildings, furniture, equipment and vehicles;
- Maintain an adequate work environment for the performance of their duties, helping to prevent occupational accidents;
- Keep their personal finances compatible with their income, avoiding situations that may adversely affect their personal and professional image, or that of the Daycoval Group, also following the provisions of the Personal Investment Policy, especially as it applies to related parties;
- Immediately notify the Executive Ethics Committee of the existence of a confidential affective, romantic or sexual relationship with another employee of the Daycoval Group through their immediate superior or directly to the respective Committee.

### 7.5.3) Prohibitions

Employees must refrain from:

- Allowing, under any form or circumstance, any type of discrimination based on race, religion, origin, nationality, social class, gender, sexual orientation, color, age group or disability, or even making any decision that affects the professional career of employees based solely on personal relationships. No type of discrimination should be tolerated;
- Submitting their co-workers to any type of harassment, intimidation or embarrassment of any kind;
- Using privileged information, that is, information obtained by virtue of occupying a position, exercise of function or otherwise, to carry out any market operation, by themselves or by another person under their instruction, aiming to obtain an advantage for themselves or for others, or using any document, whether physical or digital, for private use or that is not in the interest of the Daycoval Group;
- Using for private purposes or transmitting technologies, methodologies, know-how and other information owned by the Daycoval Group or developed or obtained by it to third parties;
- Using the assets and facilities of the Daycoval Group or their human resources for private and/or unlawful purposes;
- Browse internet websites with inappropriate content when using Daycoval Group equipment, it being clear that the use of the Internet and email must be for the exclusive use of matters of interest to Daycoval;
- Accumulating conflicting activities or developing private activities or businesses that compete with the Daycoval Group or that interfere with the working time dedicated to it, including, but not limited to, the provision of services, advice or business with customers, suppliers and service providers, the sale of private products/services to co-workers, on the institution's premises, among others;
- Expressing an opinion that may harm the image of the Daycoval Group, another financial institution or any other entity, or even an individual;
- The hiring of relatives, who do not comply with the rules of the Recruitment and Selection Policy, without prior evaluation and deliberation of the Executive Ethics Committee; and
- The participation, at any hierarchical level, actively or passively, of possible favoritism.

### 7.5.4) Conflicts of Interest

The conflict of interest occurs when an employee, due to his own interest, starts to act against the principles of the organization, influenced by personal or family situations or activities, which place his interests above the interests of the organization, leading him to make decisions inappropriate.

Thus, all managers and employees must avoid conflicts between their personal interests and those of the Daycoval Group or its customers and must not promote and/or disclose any existing business relationships or interests that may have the potential for conflict or compromise.

managers and employees of the Daycoval Group must not abuse their positions, unduly use confidential information for personal gain or information of third parties, nor have any direct involvement in business that is in conflict with the commercial interests of the Daycoval Group or that, in any way, compromise its independence and impartiality.

Thus, they must also refrain from getting involved in any business, operation, contract negotiation representing the Daycoval Group before a customer or any entity in which they have, or a relative of theirs has, a direct or indirect interest, or that represents any conflict of interest with the Daycoval Group, without:

(I) Having a statement of facts.

(II) Submitting authorization, in writing, from their hierarchical superior, the Executive Ethics Committee and/or at least two Executive Officers of the Daycoval Group.

Employees who work in the commercial area must not, under any circumstances, act as responsible parties for accounts of their family members or family businesses, up to the 2<sup>nd</sup> degree of kinship. The indication of these customers must be directed to another commercial professional.

## **7.6) Conduct in the External Relationships**

Conduct in the external relationships is based on building professional relationships and mutual respect with the several external agents, based on maintaining confidentiality in relation to any information, either written, oral or digital, about Daycoval Group's customers, regarding business, operations and results, or any other issues that are not subject to public knowledge, adopting adequate measures so that only authorized persons have access, aiming at the preservation of confidential information. Confidentiality should be extended to family members, friends, professional colleagues, financial institutions and others, unless expressly authorized.

Banking secrecy is a duty and obligation that Financial Institutions have to keep their customers' data safe. Violating banking secrecy without the authorization of the Justice is considered a crime that can lead to imprisonment for the offender. The obligation of secrecy is not only valid during the period in which you are an employee of the Daycoval Group, but also on an ongoing basis, after leaving the company.

Moreover, employees must refrain from:

- Offering or receiving financial remuneration, goods, bonuses, commissions, donations or advantages, in any capacity, occasionally or otherwise, to influence decisions or obtain advantages for themselves or third parties when doing business with the Daycoval Group.

Note: Receiving gifts is allowed, including those related to entertainment, with, individually, a financial value of less than 4% of the monthly remuneration received by the employee, up to twice a year. Any item received outside the allowed parameters must be reported by the employee to the email: [compliance@grupodaycoval.com.br](mailto:compliance@grupodaycoval.com.br), to be forwarded to partner charitable entities.

### **7.6.1) Relationship with Customers and Users**

The rules and guidelines established provide for how employees and those persons involved in processes and activities directly related to customers must act, reflecting the ethics, diligence, transparency and responsibility of the Conglomerate, demonstrating efforts to put its values, vision and mission into practice.

Employees or service providers involved must have an ethical attitude, ensuring ongoing permanent respect and the preservation of civility, courtesy and empathy, providing a fair and equitable treatment.

To certify the compliance with the guiding principles of customer relations, the Bank must ensure that the strategies and guidelines in the commercial and administrative scope are oriented towards promoting an organizational culture that encourages a cooperative and balanced relationship with customers and users, ensuring compliance and legitimacy of products and services from their design.

Fast, customized and high-quality customer and user service must be the Daycoval Group's main differential in relation to the market.

To this end, the Bank undertakes not to use false or misleading advertising to attract customers, to the detriment of others, offering them advantages incompatible with the conditions and activities carried out by the Daycoval Group.

When dealing with direct or indirect relationships with customers, employees or service providers of the Daycoval Group must:

- Know their customer, business and economic activities, aiming to better identify their needs and be able to offer the right services and products;
- Serve customers with efficiency, respect and courtesy, providing clear and accurate information. The customer must receive answers to their requests in an appropriate manner and within the regulatory period, even if these replies are negative; avoiding any practice capable of inducing them to error;
- Maintain confidentiality of information received as a result of the relationship with customers, adopting appropriate measures for this purpose;
- Follow the Daycoval Group's guidelines regarding the application of procedures to detect indications of Money Laundering and Financing of Terrorism; if so, inform the hierarchical superior or the Ethics Executive Committee.

### **7.6.2) Relationship with Suppliers and Service Providers**

The relationship with suppliers and partners must be guided by technical and professional criteria, following the guidelines of the Policy for Contracting Suppliers and Service Providers, always aiming to satisfy the needs of the Daycoval Group in the best cost/benefit ratio. To this end, it is essential that the Daycoval Group's suppliers maintain ethical standards compatible with the practices described in this Code and fight corruption and bribery. Therefore:

- Daycoval Group employees must ensure that any contracting of services and suppliers is based on technical, unbiased, transparent and ethical criteria, ensuring the efficiency, quality and economic feasibility of the products and services provided;
- Contracted professionals must guide their behavior by the ethical conduct guidelines contained in this Code;
- Business with the following suppliers must not be carried out: (i) of questionable reputation and (ii) that do not comply with anti-corruption law, environmental legislation or labor standards;
- The acquisition of products and the provision of services from any company in which employees or relatives have any type of participation or interest, directly or indirectly, must be submitted for approval by the Ethics Executive Committee.
- No employee should ask a supplier or contracted third party to engage in any conduct that the employee is prohibited from engaging in under this Code. Furthermore, all employees undertake to report any suspected or actual involvement of a supplier or contracted third party in undue or unlawful conduct to the Ethics Executive Committee;
- Prior to hiring any supplier and/or third-party service provider, it is mandatory to carry out a prior and careful analysis, in accordance with the guidelines of the Policy for Contracting Suppliers and Service Providers, to determine:
  - whether the individual offering the service in exchange for payment is a public official;
  - if the legal entity employs a public agent or authority or if it is a company in which a public agent or body has an ownership interest or on whose board of directors he or she has a seat;
  - whether the services that the individual or legal entity is volunteering to provide are necessary to further an existing business initiative or contract;
  - whether the individual or legal entity has the expertise, experience and other qualifications to legitimately perform the required services; and
  - whether the individual or legal entity is likely to engage in practices that may expose the Daycoval Group to any liability.

The Daycoval Group requires written contracts signed by its legal representatives for all contracting of permanent suppliers and other business partners, being expressly prohibited and ineffective the contracting of products and services in disagreement with the standards and provisions of the policy.

### **7.6.3) Relationship with the Market and Competitors**

The treatment of competing entities must be based on ethical standards, avoiding any actions or practices that may characterize unfair competition or, in any way, adversely affect the image of competing entities, as follows:

- Comments should not be made to denigrate the image of competitors; and
- One must not contribute to disseminate rumors about competitors.

### **7.6.4) Relationship with the Government**

Any information requested by the Government and its respective bodies or class representative entities must be answered timely and with full transparency, leaving this responsibility to the areas responsible for the relationship with such bodies, and must:

- Answer to requests for information with transparency and promptness.
- Allow access to other employees, when they need to obtain more information.
- Ensure compliance with applicable laws and regulations.
- Avoid speaking out about administrative acts of public agents.
- Not to make comments of a political nature; and
- Not to promise, offer or give, directly or indirectly, undue advantage to public agents, or a to a third party related to them, as per item "Anti-Corruption Rules".

#### **7.6.5) Relationship with the Media**

Any request made by any media vehicle (newspapers, television, radio, etc.) must be forwarded to the Marketing area - Press Office, responsible for surveying and preparing the official statement of the Group, including the necessary approvals by the Investor Relations Department, when applicable.

Employees are prohibited from expressing themselves on behalf of the Daycoval Group when not authorized to do so. Thus, no position regarding any external questioning should be given by Daycoval Group employees without proper authorization.

#### **7.6.6) Relationship with Associations and Class Entities**

Recognizing the key role of legally established Associations and Class Entities, the Daycoval Group must ensure that their representatives are not subject to discrimination and that such representatives have access to those represented in the workplace.

Employees who participate in committees in class associations must be senior enough to represent Daycoval, being responsible for attendance and the exchange of information on matters discussed internally and externally.

#### **7.6.7) Social and Environmental Relationship**

The Daycoval Group, through its employees and managers, must constantly seek to contribute to the social development of the country. For this purpose, in addition to investing in the development of its employees, investments must also be made in social and cultural projects that can be translated into benefits for the community. The responsible use of natural resources or those derived from them will be encouraged as a way of collaborating with society's quality of life and public health.

#### **7.6.8) Relationship with the Labor Market**

The Daycoval Group is committed to offering equal employment opportunities to employees and applicants, as well as maintaining a diverse workforce, free from any type of discrimination, harassment, intimidation and retaliation. The recruitment, hiring, training and promotion of candidates and employees occur regardless of their age group, color, ethnicity, marital status, nationality, race, religion, gender, sexual orientation, or any other characteristic not related to the requirements necessary for your activity.

All hiring and promotion decisions must be based on the qualifications of candidates or employees in relation to a given opportunity.

#### **7.6.9) Social Media**

Daycoval respects the rights and privacy of its employees, however, it should be noted that their profiles and manifestations on social networks can be linked to the institution, being necessary to maintain special care regarding the contents and opinions disclosed so that they do not confuse with the positioning and do not compromise the image of the Conglomerate.

Additionally, it is necessary to observe and comply with the provisions of the Information Security Policy, item "Use of Social Networks".

In this sense, we present some examples of permitted and prohibited behaviors for employees in social media:

Allowed:

- Speak up in your own name, following ethical principles and in good faith, including respect for different opinions and taking a healthy stand, within the limits of legality;
- Identify yourself as a collaborator of the Conglomerate, including your position, paying attention to the rules of use and content of each social network, as well as the guidelines provided for in the Institution's internal rules.

Prohibited:

- Disclose confidential information and processed personal data, as established by the Data Protection Policy, including via private messages;
- Publicize confidential matters or those that are known due to the nature of the work through social communication (through the transmission of texts, images and audio) and on social media;
- Write any note or content about Daycoval on social networks that has not been previously authorized;
- Publish images and footage from internal facilities that could compromise the institution's image and/or contain confidential information.

## **7.7) Anti-Corruption Law**

The Daycoval Group has an obligation to conduct its activities with integrity and honesty in its management practices and business operations, combating corruption and bribery in all its forms, especially through its employees, suppliers, contractors, agents and administrators. Thus, it is fundamental for the Daycoval Group that each one of those informed above is aware of and complies with all national and international anti-corruption and anti-bribery laws.

Aiming to maintain the reputation of the Daycoval Group and compliance with the Anti-Corruption Law, the Daycoval Group prohibits and combats the practice of any of the following actions by its employees, managers, agents, suppliers and contractors:

1. Perform any act harmful to the Daycoval Group, to the national or foreign public administration, or even against the assets of the Daycoval Group or against the assets of any national or foreign public body or entity;
2. Promise, offer or give, directly or indirectly, money or advantage to a public agent/official, or a third party related to him or her, or even to any individual or legal entity with the purpose of obtaining illicit and/or undue advantage in carrying out business and/or operations with the Daycoval Group;
3. Finance, cost, sponsor or any other way subsidize the practice of illegal acts provided for in the Anti-Corruption Law or in the Brazilian Penal Code;
4. Preclude, defraud or prevent public bidding or contract arising therefrom;
5. Participate in the creation of any legal entity in a fraudulent or irregular manner, with the purpose of obtaining undue advantage for themselves or others, or even, to defraud public bidding;
6. Solicit, provoke, suggest or receive financial remuneration, money, goods, gifts, bonuses, prizes, commissions, donations or advantages, in any capacity, occasionally or not, from a public agent, customer or third party interested in obtaining an advantage for themselves or for others in carrying out business with the Daycoval Group, even if related to festive and/or commemorative dates, with the purpose of obtaining undue advantage or even improperly influencing an action; or
7. Engage in any corrupt activity or, directly or indirectly, offer, promise, provide or authorize any person to provide money or undue advantage to public officials, customers and/or suppliers, especially for the purpose of obtaining credit, financing, guarantee or contract; and
8. Make any facilitation payment to a public agent/official, that is, to accelerate, facilitate or guarantee the performance of routine public actions, such as permits, licenses, bids, police protection, collection of correspondence, inspections, authorizations or contracts

For the purpose of complying with the obligations set forth in this Code, especially the aspects related to anti-corruption practices, any individual (other than an employee of Daycoval) or legal entity, contracted by a Daycoval Group company to provide services, supply goods or act on behalf of the Daycoval Group, regardless of the name or position of the individual or legal entity, must be considered contractors of Daycoval Group and, therefore, subject to all the rules described above.

The commercial decisions of the Daycoval Group and its employees must be taken objectively and without the influence of advantages, gifts or favors.

Regardless of the value, it is expressly forbidden to offer any gift, benefit, meal, promotional item, money or other item of value to public agents, customers or suppliers with the purpose of influencing, contracting or obtaining inappropriate or undue advantage.

All collaborators, employees, managers and contractors of the Daycoval Group must immediately report to the Executive Ethics Committee, through the communication channels described and disclosed, any evidence or actual practice of any action prohibited by this Code, especially regarding aspects related to the prevention of money laundering and terrorist financing, corruption and/or bribery. To facilitate understanding, a list of suspicious activities that must be reported to the Executive Ethics Committee is presented below:

1. Carrying out financial transactions with companies, individuals or countries that have indications of involvement in bribery or corruption;
2. Extravagant/luxurious gifts or hospitality involving a public official or body;
3. Payments or expenses without supporting documentation or carried out improperly;



4. Requests from the collaborator, customer or supplier for an operation and/or contract to be approved or structured to disguise material facts or doubtful payments;
5. The contracted supplier is not qualified or does not have the required experience or resources to provide the services or goods;
6. The supplier was established recently and does not have a record, customers, references or information that allow proving its history and capacity;
7. The customer and/or supplier has been recommended by a public official or has a personal, family or business relationship with a public official; or
8. The commission or remuneration of the supplier or contractor exceeds the usual value practiced by the market for similar services or goods.

Any employee, supplier or customer of the Daycoval Group may be investigated by regulatory bodies in Brazil and/or abroad for non-compliance with the Anti-Corruption Law, which may lead to administrative, civil and criminal proceedings. Failure to comply with Brazilian regulations related to the practice of corruption or bribery can result in severe penalties, fines, exclusions and even imprisonment.

## **7.8) Consequences**

Failure to comply with the guidelines established in this Code, other internal policies and/or current legislation may subject third parties and employees, regardless of the position held, to legal sanctions and disciplinary and administrative measures.

It is up to the Executive Ethics Committee to evaluate and deliberate on the consequences to be applied to each situation, which presents sufficient evidence or reasonable doubt as to its origin, and in the end it must apply any of the measures below, depending on the severity of the violation:

1. Verbal warning by the executive director responsible for the employee;
2. Warning in a private letter and recorded in the employee's medical record;
3. Suspension of work activities for 3 (three) days;
4. Dismissal/dismisal with or without just cause; and
5. Contract termination

## **7.9) Decisions**

If the employee is faced with a situation involving a doubt about the proper conduct, he or she should ask the questions below:

- Would this affect the Daycoval Group's reputation?
- Is this legal and is it the right thing to do?
- How would this appear in newspapers or in the media?
- Would I be ashamed to tell anyone?
- How would my friends, family, community or shareholders view this?
- Is this in line with the values, policies and guidelines of the Daycoval Group?

The answers to these questions should point the employee in the right direction.

If after answering the questions above there are still doubts or lack of security for decision making, do not hesitate! Seek guidance from your immediate manager, from the Human Resources area, from Compliance or, directly, from the Executive Ethics Committee.

## **7.10) Communication Channels - Reporting**

### **7.10.1) Reporting**

This channel is intended for communicating situations with signs of abnormality or illegality, inappropriate conduct or practices that may affect the image and reputation of the Daycoval Conglomerate.

Claims must be handled independently, impartially and unbiased, in compliance with current legislation, and may be reported anonymously. Upon completion of the process, due feedback must be given to whistleblowers who identify themselves and request feedback.

Non-retaliation is guaranteed due to anyone who, in good faith, has reported a possible violation of this code, internal policies and legislation, ensuring confidentiality the identity of the complainant.

Aiming at a quick and complete response to the complaint, we suggest, whenever possible, to indicate as much information about the fact as possible, such as the names of the people, date, time, channel, place of occurrence or companies involved and, if any, documents that corroborate the understanding.

To register a report, please access the form to fill in the form through the link: <https://www.daycoval.com.br/institucional/sobre-nos/código-conduta/denuncia> or use the complaint boxes available in the administrative buildings of the conglomerate.

When identifying any information that may affect the reputation of controlling shareholders and holders of qualifying interests and/or members of statutory and contractual bodies, it must be communicated to the Central Bank of Brazil within ten (10) business days, counted from the receipt or access to information.

In order to maintain transparency regarding the channel, semi-annual macro indicators of the complaints handled are presented to CIPA, with the aim of providing visibility and opportunities for its members to propose improvements, considering the classifications of reports and their frequency, ensuring the confidentiality of those involved.

#### **7.10.2) Executive Ethics Committee**

Communication with the Executive Ethics Committee must be treated with absolute confidentiality, based on the same guidelines as the reporting channel.

#### **7.10.3) Audit Committee**

The following channel can be used to access the Audit Committee for the purpose of providing information regarding non-compliance with legal and regulatory provisions applicable to Daycoval, in addition to information on non-compliance with regulations and internal codes.

For anonymous reporting to the Audit Committee, mail to:

Caixa Postal nº 78.475

CEP 01401-970

#### **7.11) Code of Conduct Management**

Management of the Code of Conduct is the responsibility of the Executive Ethics Committee, which must be responsible for its communication, updating, interpretation and application.

When all employees join Daycoval, they sign a declaration of acknowledgment and agreement with this Code of Conduct.

The guidelines presented in this Code are intended to guide the action of all Daycoval Group's employees and, although they allow assessing the most common and routine cases, they do not exhaustive or limit the diversity of situations in which employees may become involved in the course of their journey.

To clarify any doubts or in case of identification of situations that may characterize a conflict of interests, contradict the interests of the Daycoval Group or violate the guidelines set out in this Code, the Compliance area must be formally communicated via email: [compliance@grupodaycoval.com.br](mailto:compliance@grupodaycoval.com.br). When necessary, the Executive Ethics Committee will be contacted to adopt the measures adopted.

The reported cases, with evidence of participation and/or collaboration of employees, using the Daycoval Group, as an instrument for money laundering and financing of terrorism must be investigated by the AML area and forwarded to the AML/CFT Officer and the Officer responsible for the employee, who must analyze and take the appropriate measures.

When addressing a subject or situation related to customers, where the issues are not resolved or that do not meet expectations and needs, the Committee must include the Ombudsman area for action.