

## GRUPO DAYCOVAL

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**1) Message from Management**

Our activities must be based on mutual trust and credibility before the general public. Therefore, all officers, directors, employees, and other internal stakeholders of the Daycoval Group must act in accordance with the highest standards of ethical and professional conduct.

The commitment of everyone, at all levels of the organization, to disseminating and complying with ethical conduct guidelines and recommendations issued by the competent authorities is of fundamental importance, as a way to ensure the necessary care related to the health and safety of all individuals, in addition to strengthening and preserving the image of solidity and integrity of the Daycoval Group before its clients, competitors, suppliers, service providers, regulators, and society in general.

Any information related to clients, competitors, suppliers, service providers, regulators, employees, and the Daycoval Group must be treated confidentially. Everyone must ensure the integrity of such information, the protection and privacy of the personal data processed, in accordance with the Data Protection Policy, as well as the security of the respective equipment and data processing and storage systems.

Upon becoming aware of any questionable action, evidence of illegality that may involve or affect Daycoval, or any violation of this Code of Conduct, any person covered by this Code must promptly report the matter through the Whistleblowing Channel, regardless of personal judgment regarding its characterization, materiality, or relevance.

We invite everyone to read this Code carefully and, in doing so, assume or reaffirm their commitment to fully complying with its guidelines and principles.

**2) Objective**

To establish standards of conduct for all persons covered under the item "Applicabition," in order to guide and define the desired personal and professional ethics, as well as the behavioral parameters that guide the Daycoval Group, within the most respect.

### 3) Application

This Code applies to all personnel, service providers, or third parties hired by the companies of the Daycoval Group, in Brazil and abroad, regardless of hierarchical level, in the performance of their professional duties within and outside the company, that is, whenever representing or presenting themselves on behalf of Daycoval. It is important to note that the term "personnel" includes employees, apprentices, interns, service providers, and administrators of the Daycoval Group.

### 4) Implementation

Effective immediately upon publication on the Corporate Intranet - Normative Instruments Portal.

### 5) Regulatory Rule(s)

[Law No. 12,846, dated August 1, 2013 \("Anti-Corruption Law"\)](#): Provides for the administrative and civil liability of legal entities for acts committed against the public administration, whether domestic or foreign, and establishes other related provisions.

[Resolution No. 4,859 - Central Bank of Brazil, dated October 23, 2020](#): Provides for the submission of information regarding members of the controlling group and administrators of financial institutions and other institutions authorized to operate by the Central Bank of Brazil, as well as the availability of a channel for reporting indications of unlawful conduct related to the institution's activities.

[SARB No. 21, dated July 1, 2019](#): Establishes the Integrity Program for the Prevention of Corruption and Other Harmful Acts Against Domestic or Foreign Public Administration, and defines principles and rules that consolidate national and international best practices related to operational and control procedures, as well as integrity mechanisms to be observed by signatory financial institutions, in accordance with existing regulations.

### 6) Business Execution Rule(s)

The content of this document must be dynamic and continuously reviewed and updated. Comments and suggestions from personnel are always welcome.

Other internal regulations contribute to compliance with the guidelines established in this Code. Below is a list of some policies that everyone must be aware of and which are available for consultation on the PIN - Normative Instruments Portal (Intranet) and on the Institution's website, through the link (<https://ri.daycoval.com.br/pt/governanca-corporativa/politicas-institucionais>):

- Information Security Policy;
- Cyber Security Policy;
- Data Protection Policy;
- Anti-Money Laundering, Counter-Terrorism Financing and Counter-Proliferation Financing of Weapons of Mass Destruction Policy (AML/CTF);
- Social, Environmental and Climate Responsibility Policy;
- Personal Investments Policy;
- Institutional Policy for Relationships with Clients and Users of Financial Products and Services.

### 7) Areas Involved and Responsibilities

|                                   |                                                                                                                                                                                                                                                                                                                                                                                                                       |
|-----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Board of Directors</b>         | <ul style="list-style-type: none"> <li>• Approve the Code of Conduct and its updates, ensuring alignment with the strategic and regulatory guidelines of the Daycoval Group.</li> <li>• Reinforce the dissemination of the ethical culture and principles established in this Code at all levels of the organization.</li> <li>□ Encourage continuous commitment to ethics and integrity in the workplace.</li> </ul> |
| <b>Executive Ethics Committee</b> | <ul style="list-style-type: none"> <li>• Evaluate compliance with the ethical principles and conduct guidelines established in this Code.</li> <li>• Identify improvement opportunities and propose recommendations to enhance ethical conduct within the Daycoval Group.</li> <li>□</li> </ul>                                                                                                                       |

|                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|--------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                              | <ul style="list-style-type: none"> <li>• Act as a support instance in providing guidance and resolving questions, interpretation conflicts, and situations involving potential violations.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Executive Board</b>                                       | <ul style="list-style-type: none"> <li>• Promote ethical and honest conduct among subordinates, evaluating and promoting employees based on technical and professional criteria.</li> <li>• Ensure compliance with the guidelines established in the Code of Ethics within their areas of responsibility.</li> <li>• Ensure proper assistance to regulatory bodies (Central Bank, Federal Revenue Service, CVM, etc.), self-regulatory entities, and auditors by providing complete, transparent, and consistent information.</li> </ul>                                                                                                                                                           |
| <b>Governance, Risks and Compliance</b>                      | <ul style="list-style-type: none"> <li>• Ensure the maintenance, update, and proper application of this Code of Conduct, proposing revisions based on regulatory changes, best practices, and identified needs.</li> <li>• Provide guidance to employees, officers, third parties, and other contractors regarding the interpretation and compliance with the Code guidelines.</li> <li>• Receive and analyze questions, conflicts of interest, or potential violations, monitoring compliance and reporting relevant matters to the Executive Ethics Committee.</li> <li>• Develop, implement, and disseminate knowledge regarding the Code of Conduct among Daycoval Group employees.</li> </ul> |
| <b>Employees and Other Contractors of the Daycoval Group</b> | <ul style="list-style-type: none"> <li>• Inform the Governance, Risks and Compliance area of any relationship or situation that may constitute a potential conflict of interest or violation of this Code of Conduct.</li> <li>• Sign a specific statement declaring awareness and acceptance of this Code, ensuring full compliance so that the standards established herein and the integrity of the Daycoval Group are maintained.</li> </ul>                                                                                                                                                                                                                                                   |

## 8) General Guidelines

### 8.1) Daycoval Group Mission

To offer financial solutions with excellence, security, and agility, contributing to the development of its clients and partners, following principles of economic sustainability and social responsibility.

### 8.2) Daycoval Group Vision

To be among the leading players in the financial market, operating with solidity, sustainability, diversification, ethics, modernity, liquidity, and agility.

### 8.3) Daycoval Group Values

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

**Agility** - Promptness in offering quality products and services through efficient and technological solutions for clients.

**Security** - Conservatism and prudence in managing in various risks, such as Market, Credit, Capital, and Operational risk. Always seeking a long-term growth strategy while maintaining high liquidity and low leverage.

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

**Austerity** - Rigor and seriousness in spending and in managing our companies and clients assets.

**Relationship** - Commitment to quality and diligence in relationships established with clients and partners, treating everyone equally and without any distinction, respecting human beings and individuality.

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

## 9) Conduct in the Internal Relationships

### 9.1) Valuing of People

The guidelines for internal relationship conduct are based on valuing and respecting people, reflected in behaviors that are part of our culture, such as:

- Ensuring equity by promoting fair treatment for everyone and professional growth opportunities based on merit, with respect for diversity, dignity, and people's privacy;
- Providing a safe and healthy environment, with freedom of expression and respect for integrity, dignity, diversity, and the protection of people's privacy;
- Reinforcing awareness regarding the responsibility associated with the position held, which must not be used, directly or indirectly, for personal advantage or for the benefit of third parties;
- Preventing any acts of inappropriate conduct, moral or sexual harassment, not tolerating such practices in the workplace or in any relationship with internal or external stakeholders;
- Acting in good faith, with professional ethics and absolute respect for human dignity in all relationships.

### 9.2) Duties

The duties of personnel include:

- a) Acting with mutual respect, courtesy, team spirit, loyalty, and trust in workplace relationships;
- b) Maintain balanced and impartial conduct, refraining from participating in transactions and activities that may compromise their professional dignity or damage their image, as well as the image of the Daycoval Group;
- c) Perform their work in accordance with the Daycoval Group's values, refraining from acting against its interests;
- d) Comply with internal guidelines, legislation, regulations, and internal rules applicable to the performance of their duties and professional activities;
- e) Protect the assets, intellectual property rights, and image of the Daycoval Group, preserving its materials, work tools, aesthetics and safety of buildings, furniture, equipment, and vehicles;
- f) Maintain a proper work environment for the performance of their duties, helping to prevent workplace accidents;
- g) Maintain personal finances compatible with their income, avoiding situations that may adversely affect their personal and professional image or that of the Daycoval Group, including compliance with the Personal Investments Policy, especially regarding related persons;
- h) Formally and immediately inform the Governance, Risks and Compliance area, through the e-mail [compliance.corporativo@grupodaycoval.com.br](mailto:compliance.corporativo@grupodaycoval.com.br), of the existence of an affective, romantic, or sexual relationship with another employee of the Daycoval Group, as well as inform their direct manager.

### 9.3) Prohibitions

Employees are prohibited from:

- a) Admitting, under any form or circumstance, any type of discrimination based on race, religion, political opinion, origin, nationality, social class, gender, sexual orientation, color, age group, disability, or any other personal or social condition, or making decisions affecting employees' professional careers based exclusively on personal relationships. No type of discrimination or inappropriate behavior, including offensive comments or attitudes that may harm the work environment, shall be tolerated;
- b) Subjecting co-workers to any type of harassment, intimidation, or embarrassment of any nature;
- c) Adopting inappropriate behavior in the workplace, including accessing, displaying, or sharing improper content or content incompatible with the corporate environment, including through personal devices;
- d) Using privileged information, that is, information obtained by virtue of a position, role, or otherwise, to carry out any market operation by themselves or through others under their instruction, seeking personal or third-party advantage, or using any document, whether physical or digital, for personal purposes or purposes not related to the interests of the Daycoval Group;
- e) Using for personal purposes or disclosing to third parties technologies, methodologies, know-how, and other information owned, developed, or obtained by the Daycoval Group;

- f) Using the assets, systems, tools, databases, facilities, or human resources of the Daycoval Group for personal and/or improper purposes;
- g) Browsing internet websites with inappropriate content while using Daycoval Group equipment, it being understood that internet and e-mail usage must be exclusively for matters related to Daycoval's interests;
- h) Accumulating conflicting activities or conducting private activities or businesses that compete with the Daycoval Group or interfere with working hours dedicated to it, including, but not limited to, providing services, consulting, advisory services, or negotiations with clients, suppliers, and service providers, as well as selling personal products or services to co-workers within the institution's premises, among others;
- i) Expressing opinions or statements, including in public or digital environments, that may harm the image of the Daycoval Group, other institutions, or third parties;
- j) Hiring relatives who do not comply with the Recruitment and Selection Policy rules, without prior evaluation and approval by Human Resources and the Governance, Risks and Compliance area, and, when necessary, by the Executive Ethics Committee;
- k) Offering or receiving, among Daycoval Group personnel, gifts, assets, gratuities, or any benefits of significant value, whether on a recurring basis or otherwise, that may influence or appear to influence decisions or generate undue favoritism, except for low-value courtesies and strictly social gifts, such as commemorative souvenirs, provided that they do not compromise integrity and impartiality in professional relationships; and
- l) Participating, at any hierarchical level, actively or passively, in any possible favoritism.

#### 9.4) Conflicts of Interest

A conflict of interest occurs when an personnel, due to personal interests, acts against the organization's principles, influenced by personal or family situations or activities that place personal interests above the organization's interests, leading to inappropriate decisions.

It is also characterized when any situation may compromise impartiality or independence in the performance of duties.

Therefore, all officers, employees, and other contractors are obligated to avoid conflicts between their personal interests and those of the Daycoval Group or its clients and must formally disclose any existing business relationships or participations that may constitute a potential conflict of interest or compromise their independence.

All officers and employees of the Daycoval Group must not abuse their positions, improperly use confidential information for their own benefit or for the benefit third, or have any direct involvement in business activities that conflict with the commercial interests of the Daycoval Group or that may compromise their independence and impartiality in any manner.

Accordingly, they must also refrain from engaging in any business, transaction, or contract negotiation representing the Daycoval Group before a client or any entity in which they, or their relatives, have a direct or indirect interest, or that represents any conflict of interest with the Daycoval Group, unless:

- (I) A declaration of the facts has been provided;
- (II) The facts have been formally communicated to the Governance, Risks and Compliance area;
- (III) Prior written approval has been obtained from their direct manager, the Executive Ethics Committee, and/or at least two Executive Directors of the Daycoval Group.

Employees working in the commercial area must not, under any circumstances, act as account managers for relatives or relatives' companies up to the second degree of kinship. Referrals of such clients must be directed to another commercial representative. The immediate manager is responsible for ensuring compliance with this guideline and must act to prevent, identify, and correct possible conflict situations and may be held accountable in case of omission.

#### 10) Conduct in the External Relationships

Conduct in external relationships is based on building professional relationships and mutual respect with external parties, grounded on maintaining confidentiality of information, whether written, oral, or digital, regarding Daycoval Group clients, businesses, transactions, results, or any other information not publicly available. Appropriate measures must be adopted to ensure that only authorized persons have access to such information, aiming at its preservation. Confidentiality obligations must also extend to family members, friends, professional colleagues, and institutions, except when there is express authorization or legal obligation.

Banking secrecy is a duty and obligation of financial institutions to keep client data protected. Breach of banking secrecy without judicial authorization is considered a crime and may result in legal sanctions, including criminal penalties. The confidentiality obligation applies not only during the period in which the individual is employed by the Daycoval Group, but also permanently after termination.

**Additionally, employees are prohibited from:**

- Offering or receiving financial compensation, assets, gratuities, commissions, donations, or advantages of any kind, whether occasional or not, for the purpose of influencing decisions, obtaining undue favoritism, or generating personal or third-party benefits in business dealings with the Daycoval Group.

### 10.1) Relationship with Customers and Users

The established rules and guidelines determine how employees involved in processes and activities directly related to clients must act, reflecting the ethics, diligence, transparency, and responsibility of the Daycoval Group, in line with its values, vision, and mission.

Employees or service providers involved must maintain an ethical posture, ensuring permanent respect and preserving civility, courtesy, and empathy, while guaranteeing fair and equitable treatment.

To ensure compliance with the guiding principles in client relationships, commercial and administrative strategies and guidelines must promote an organizational culture that encourages cooperative, transparent, and balanced relationships with clients and users, ensuring regulatory compliance and the legitimacy of products and services from their conception.

Providing clients and users with fast, personalized, and high-quality service must constitute a differentiating factor for the Daycoval Group in relation to the market.

Accordingly, it is prohibited to use false, misleading, or incomplete information to attract clients, to the detriment of others, by offering advantages incompatible with the conditions and activities performed by the Daycoval Group.

In direct or indirect relationships with clients, Daycoval Group employees or service providers must:

- Know their client, business, and economic activities in order to properly identify their needs and offer compatible products and services;
- Serve clients efficiently, respectfully, and courteously, providing clear and accurate information. Clients must receive proper responses to their requests within regulatory deadlines, even when such responses are negative, avoiding practices that may mislead them;
- Maintain confidentiality regarding information received through client relationships, adopting appropriate measures for such purpose;
- Follow Daycoval Group guidelines regarding the application of procedures to detect indications of money laundering and terrorist financing, which, when identified, must be reported through the Whistleblowing Channel.

### 10.2) Relationship with Suppliers and Service Providers

Relationships with suppliers and partners must be based on technical and professional criteria, following the guidelines of the Supplier and Service Provider Hiring Policy, always aiming to meet the needs of the Daycoval Group through the best cost-benefit relationship. Therefore, it is essential that Daycoval Group suppliers maintain ethical standards compatible with the practices described in this Code and adopt anti-corruption and anti-bribery measures.

Therefore:

- Daycoval Group personnel must ensure that any hiring of suppliers and services is based on technical, impartial, transparent, and ethical criteria, ensuring efficiency, quality, and economic feasibility of the products and services provided;
- Contracted professionals must conduct themselves in accordance with the ethical conduct guidelines contained in this Code;
- No business shall be conducted with suppliers: (i) of questionable reputation, or (ii) that fail to comply with applicable legislation, including anti-corruption, environmental, and labor regulations;
- The hiring of companies in which employees or their relatives have a direct or indirect participation or interest must be submitted to the Governance, Risks and Compliance area for assessment and approval by the Executive Ethics Committee;
- No employee shall request a supplier or contracted third party to engage in conduct that the employee himself/herself is prohibited from performing under this Code. Furthermore, all employees are obligated to report to the Governance, Risks and Compliance area any suspicion or actual involvement of suppliers or contracted third parties in improper or unlawful conduct;
- Prior to hiring any supplier and/or third-party service provider, it is mandatory and careful prior assessment must be conducted in accordance with the Supplier and Service Provider Hiring Policy guidelines, in order to determine:
  - whether the individual proposing to provide services in exchange for payment is a public official;
  - whether the legal entity employs a public official or authority, or whether it is a company in which a public official or public body has an ownership interest or a seat on the board of directors;
  - whether the services proposed by the individual or legal entity are necessary to support an existing business initiative or contract;
  - whether the individual or legal entity has the expertise, experience, and qualifications necessary to legitimately perform the required services; and
  - whether the individual or legal entity demonstrates a likelihood of engaging in practices that may expose the Daycoval Group to liability.

The Daycoval Group requires written agreements signed by its legal representatives for all permanent supplier and business partner engagements, and the hiring of products and services in disagreement with the rules and determinations established in policies is expressly prohibited and considered invalid..

### 10.3) Relationship with the Market and Competitors

The treatment of competing entities must be based on ethical standards, observing the principles of free competition and market integrity, avoiding any actions or practices that may characterize unfair competition or improperly harm the image or reputation of competitors. Therefore:

- Comments that may damage or harm competitors' image must not be made; and
- Employees must not contribute to the dissemination of unverified information, rumors, or speculation regarding competitors.

### 10.4) Relationship with the Government

Any information requested by Public Authorities and their respective agencies or representative entities must be responded to in a timely, complete, and transparent manner, and such responsibility shall lie with the areas responsible for maintaining relationships with such entities, which must:

- Respond to information requests with transparency, accuracy, and promptness;
- Allow access to other employees when additional information is required, observing authorization levels and information confidentiality;
- Ensure compliance with applicable legislation and regulations;
- Avoid publicly expressing opinions regarding administrative acts of public officials;
- Avoid making political comments while performing their duties or on behalf of the Daycoval Group; and
- Not promise, offer, or grant, directly or indirectly, undue advantages or privileges to public officials or related third parties, in accordance with the provisions of the item "Anti-Corruption Rules."

### 10.5) Relationship with the Media

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

Personnel are prohibited from speaking on behalf of the Daycoval Group unless duly authorized to do so. Therefore, no Daycoval Group personnel should comment on any external inquiry without proper authorization, also observing item 9.3) Prohibitions, established in this Code.

### 10.6) Relationship with Associations and Trade Entities

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

Personnel participating in committees of trade associations must possess an adequate level of seniority to represent Daycoval and are responsible for attendance and for the proper exchange of information regarding discussed matters, both internally and externally.

### 10.7) Social, Environmental and Climate Relationship

The Daycoval Group, through its employees and officers, must continuously seek to contribute to the country's social development, acting responsibly and aligned with sustainability best practices and applicable legislation. For this purpose, in addition to investing in employee development, investments must also be made in social and cultural projects that may generate benefits for the community.

The responsible use of natural resources or resources derived therefrom shall be encouraged as a means of contributing to society's quality of life and public health, considering social, environmental, and climate impacts in Daycoval's activities and decisions.

### 10.8) Relationship with the Labor Market

The Daycoval Group is committed to offering equal employment opportunities to employees and candidates, ensuring equity in labor relations, as well as maintaining a diverse workforce by promoting an inclusive, fair, and respectful environment free from any type of discrimination, harassment, intimidation, and retaliation, in accordance with applicable legislation.

Recruitment, hiring, training, and promotion of candidates and employees occur regardless of age, color, ethnicity, marital status, nationality, race, religion, gender, sexual orientation, or any other

characteristic unrelated to the requirements necessary for the role.

All hiring and promotion decisions must be based on candidates qualifications and objective merit and competency criteria, also observing the principles of equity and equal opportunity regarding a given opportunity.

#### 10.9) Social Media

Daycoval respects the rights and privacy of its employees; however, it is important to emphasize that personal profiles and statements on social media may be associated with the institution. Therefore, special care must be taken to ensure that shared content and opinions are not confused with the institution's official position and do not compromise the image of the Daycoval Group.

Additionally, personnel must observe and comply with the provisions established in the Information Security Policy, item "Use of Social Media."

Accordingly, below are some examples of permitted and prohibited behaviors for employees on social media:

##### Permitted:

- Expressing personal opinions, following ethical and good-faith principles, including respect for different opinions and expressing oneself in a healthy manner within legal limits;
- Identifying oneself as a Daycoval Group employee, including one's position, while observing the rules of use and content applicable to each social media platform, as well as the guidelines established in the Institution's internal rules, provided there is no undue association with Daycoval's official positions.

##### Prohibited:

- Disclosing confidential information and processed personal data, as established in the Data Protection Policy, including through private messages;
- Sharing through media or social networks (including text, image, and audio transmission) confidential matters or information known due to the nature of the work performed;
- Posting on social media any statement or content regarding Daycoval that has not been previously authorized;
- Publishing images or recordings within internal facilities that may compromise the institution's image and/or contain confidential information;
- Speaking on behalf of the Daycoval Group, even implicitly, without proper authorization.

#### 10.10) Receipt of Gifts, Promotional Items and Institutional Invitations

The receipt of gifts, promotional items, and institutional invitations is permitted, provided they do not involve any type of monetary value and comply with the criteria below.

##### 10.10.1) Gifts, Promotional Items and Entertainment Events

Promotional items without significant commercial value, such as pens, agendas, and keychains, are considered acceptable.

Other gifts must have accessible, reasonable values compatible with market practices and may under no circumstances characterize a potential conflict of interest or undue advantage.

The individual value of received items must be equal to or less than BRL 500.00 (five hundred reais) per year. Exceptional situations exceeding this limit must be previously assessed and justified in accordance with internal guidelines.

##### 10.10.2) Invitations and Corporate Events

Invitations to corporate events, social gatherings, business travel, external training programs, entertainment events, and similar activities must serve a legitimate business purpose, be related to the employee's professional duties, and be consistent with market practices.

In such cases, the assessment should not be limited solely to the financial value involved, but should also take into account the context, purpose, frequency, reasonableness, and any potential impact on reputation, independence, or objectivity.

Invitations that may create an appearance of undue influence, preferential treatment, or impairment of impartiality must be declined or submitted for prior review and approval.

##### 10.10.3) Communication and Exceptions

Items or invitations received outside the established parameters must be communicated to the immediate manager and submitted for analysis by the Governance, Risks and Compliance area through

the e-mail [compliance.corporativo@grupodaycoval.com.br](mailto:compliance.corporativo@grupodaycoval.com.br) and may, when applicable, be forwarded to the Executive Ethics Committee for deliberation.

It is expressly prohibited to offer or accept any type of undue advantage for the purpose of obtaining personal or third-party benefits.

## 11) Integrity and Anti-Corruption

The Daycoval Group has the obligation to act 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 officers. Therefore, it is essential for the Daycoval Group that everyone is aware of and complies with all national and international anti-corruption and anti-bribery laws.

With the purpose of maintaining the Daycoval Group's reputation and complying with the Anti-Corruption Law, the Daycoval Group prohibits and combats the practice of any of the following actions by its employees, officers, suppliers, and contractors:

- a) practicing any harmful act against the Daycoval Group, public administration, whether domestic or foreign, or against public or private assets;
- b) promising, offering, or giving, directly or indirectly, money or any advantage to a public official, or to a related third party, or to any individual or legal entity for the purpose of obtaining an unlawful and/or undue advantage in conducting business and/or transactions with the Daycoval Group;
- c) financing, funding, sponsoring, or in any way subsidizing the practice of unlawful acts provided for in the Anti-Corruption Law or the Brazilian Penal Code;
- d) frustrating, defrauding, or preventing public bidding procedures or contracts arising therefrom;
- e) creating or using a legal entity fraudulently for the purpose of obtaining an undue advantage;
- f) requesting, inducing, suggesting, or receiving financial compensation, money, assets, gifts, gratuities, awards, commissions, donations, or advantages of any kind, whether occasional or not, from public officials, clients, or third parties interested in obtaining advantages for themselves or others in business dealings with the Daycoval Group, including during festive and/or commemorative occasions, with the intention of obtaining undue advantage or improperly influencing an action; or
- g) engaging in any corrupt activity or, directly or indirectly, offering, promising, providing, or authorizing any person to provide money or undue advantage to public officials, clients, and/or suppliers, especially for the purpose of obtaining credit, financing, guarantees, or contracts; and
- h) making any facilitation payment to a public agent/official, that is, payments intended to accelerate, facilitate, or guarantee the performance of routine public actions, such as permits, licenses, bidding procedures, police protection, mail collection, inspections, authorizations, or contracts.

Failure to comply with these guidelines may subject those involved to administrative, civil, and criminal sanctions, in addition to applicable internal disciplinary measures.

## 12) Consequences

Failure to comply with the guidelines established in this Code, other internal policies, and/or applicable legislation may subject third parties and personnel, regardless of their position, to legal sanctions, as well as applicable disciplinary and administrative measures.

The Executive Ethics Committee is responsible for assessing and deliberating on the consequences, when applicable, in situations presenting sufficient evidence or reasonable doubt regarding their validity. At the end of the assessment, any of the measures below may be imposed, in accordance with the principles of proportionality, internal rules, and applicable legislation:

1. Verbal warning;
2. Written warning, formally documented and recorded in the employee's personnel file;
3. Suspension from work activities for 3 (three) days;
4. Termination of the Employment Agreement, with or without cause, in accordance with applicable legislation.

## 13) Decisions

If an personnel is faced with a situation involving doubt regarding the appropriate conduct, he or she should ask the following questions:

- Could this affect the reputation of the Daycoval Group?
- Is this legal and correct?
- How would this be perceived if it appeared in newspapers or the media?

- Would I feel ashamed to tell someone about it?
- How would my friends, family, community, or shareholders view this?
- Is this in accordance with the values, policies, and guidelines of the Daycoval Group?

The answers should guide the decision-making process.

If doubts or uncertainty still remain, guidance should be sought from the Governance, Risks and Compliance area through the e-mail [compliance.corporativo@grupodaycoval.com.br](mailto:compliance.corporativo@grupodaycoval.com.br).

#### 14) Whistleblowing Channel

The Daycoval Group provides all employees, clients, partners, suppliers, and the general public with a Whistleblowing Channel intended for reporting acts or suspicions of illegality, inappropriate conduct, or situations that may affect Daycoval's image and reputation.

The Whistleblowing Channel is intended to receive, direct, and address situations involving violations of the Code of Conduct or any law or regulation applicable to the Daycoval Group, including, but not limited to: inappropriate conduct, moral or sexual harassment, discrimination, non-compliance with guidelines, policies, internal rules and procedures, conflicts of interest, violations of laws (labor, environmental, tax, or others), corruption and bribery, risks to physical integrity, destruction or improper appropriation of Daycoval assets, favoritism toward suppliers or clients, or any other situation involving improper or unethical conduct.

The Whistleblowing Channel is a secure, impartial, and confidential channel and uses a third-party platform to receive reports. Access may occur through different means: through the website <https://contatoseguro.com.br/pt/daycoval>, by telephone (0800 881 3690), via WhatsApp through QR Code, or through a mobile application.

Reports must be submitted to the Whistleblowing Channel, which acts as the responsible instance for receiving, processing, and forwarding information. The handling process is conducted with impartiality, independence, and confidentiality by the Channel's team, which also supports the Executive Ethics Committee. The Channel forwards recommendations to the Committee, which assesses and deliberates, when applicable, on the actions and consequences to be adopted, always maintaining secrecy and confidentiality throughout the process.

Instructions for use, as well as detailed information regarding the operation of the channel, are available in the Whistleblowing Channel Regulation.

Reports may be submitted anonymously or identified. When the whistleblower identifies himself/herself, their identity shall be kept under absolute confidentiality, and they shall be protected against any type of retaliation, ensuring the confidentiality of all reported information.

The Daycoval Group guarantees the traceability and documentation used to support future analyses, reviews, and decision-making related to compliance with internal and legal requirements.

To ensure that reports are investigated in an agile and complete manner, it is recommended that detailed information be provided regarding the facts, persons or companies involved, dates, times, and evidence supporting the report. Reports that do not contain minimum information or are based solely on opinions may be archived, with the justification properly recorded, without prejudice to any future investigation should new relevant information arise.

Upon identification of any information that may affect the reputation of controlling shareholders, qualified shareholders, and/or members of statutory and contractual bodies, the Daycoval Group, through the Governance, Risks and Compliance area, must report the matter to the Central Bank of Brazil within 10 (ten) business days from becoming aware of or obtaining access to such information, in accordance with the requirements established in CMN Resolution No. 4,859/2020.

##### 14.1) Executive Ethics Committee

The Executive Ethics Committee acts as the final instance for the analysis and deliberation of submitted cases, evaluating recommendations and defining the necessary disciplinary or corrective measures. Its decisions are made with independence, impartiality, and absolute confidentiality, always aiming to ensure compliance with the Code of Conduct and the Group's ethical principles.

##### 14.2) Audit Committee

The following channel may be used to contact the Audit Committee in order to provide information regarding possible non-compliance with laws, regulations, internal rules, or codes applicable to the Daycoval Group.

For anonymous communications to the Audit Committee, it is recommended to send correspondence to:

**Post Office Box No. 78.475**  
**ZIP Code 01401-970**

**15) Management of the Code of Conduct**

The management of the Code of Conduct is the responsibility of the Executive Ethics Committee, which shall oversee its communication, updating, interpretation, and application.

All employees, upon joining the Daycoval Group, sign a statement acknowledging and agreeing to this Code of Conduct.

The guidelines presented herein are intended to guide the conduct of all Daycoval Group personnel and, although they address the most common and routine situations, they are neither exhaustive nor intended to limit the diversity of situations that may arise during the performance of activities.

To clarify doubts or report situations that may constitute a conflict of interest, contradict the interests of the Daycoval Group, or violate the guidelines established in this Code, the Governance, Risks and Compliance area must be formally informed through the following e-mail address: [compliance.corporativo@grupodaycoval.com.br](mailto:compliance.corporativo@grupodaycoval.com.br). Whenever necessary, the Executive Ethics Committee shall be engaged to adopt the appropriate measures.

Conduct Code  
Propriedade do Grupo Daycoval  
*Acesso interno. Proibida a divulgação para o público externo, sem autorização prévia.*