

SYSTECH CONDUCT AND ETHICS MANUAL

1. INTRODUCTION

1.1 Applicability of the Manual

This ethics and conduct manual applies to all partners, as well as to all employees, directors and interns (“Employees”). Everyone must ensure a perfect understanding of the laws and regulations applicable to the Company, as well as the complete content of this Manual and other routines and procedures established internally. In case of doubts or need for advice, it is essential to seek immediate assistance from the Board.

1.2 Term of Commitment

Non-compliance, suspicion or evidence of non-compliance with any of the rules established in this Manual or applicable to the activities of the Company must be brought to the appreciation of the Executive Board. Through this document, the Employee recognizes and confirms his knowledge and agreement with the terms of this Manual and the compliance rules and principles contained herein and applicable to the operation of the Company.

This Manual is an integral part of the rules that govern the corporate, work or service provision of Employees who, by signing it, are expressly adhering to the principles established therein.

2. ETHICS

2.1 Purpose

As a general rule, Systech will seek to perform its activities always in the interest of its customers and suppliers, always respecting the laws and other regulations applicable to those activities.

No Employee must accept any kind of bonus, gifts or benefits from third parties that may generate a conflict of interest with the company's activities;

Employees can accept invitations to seminars, congresses, conferences or any other events related to the company's activity.

2.2 Relationship with Customers

The information provided to customers must have a legal, normative and ethical basis under the terms of this Manual.

Every Employee must seek to align their own and the Company's interests with those of customers. No customer should be given preferential treatment for any personal interest or feeling of any Employee.

2.3 Relationship with Competitors

It is absolutely forbidden to disclose any relevant information of interest to the Company to its competitors, except in exceptional cases, with the express authorization of the Executive Board.

2.4 Relationship with Suppliers

The Employees responsible for the selection process will maintain a permanently updated register of suppliers, eliminating those about whom there are any doubts about ethical behavior or who have a bad reputation in the market.

2.5 Relationships in the Work Environment

The Director and Managers must represent examples of conduct for other employees. The use of the position to enjoy illicit benefits or to obtain favors from subordinates, inside or outside the company, will not be tolerated.

2.6 Relationship with the Media

It is incumbent upon the Director or professional authorized by him, to maintain any contact with the Press and other means of communication. Employees authorized participating in interviews and the like must restrict themselves to making strictly technical comments, avoiding the use of unnecessary value judgments, and must base their statements on caution.

It is forbidden, under any circumstances, to grant a statement to the press that may appear or have discriminatory content due to race, religion, color, origin, age, sex, physical and mental incapacity or in any other way not expressly authorized by law, as well as the use of bad expressions or not consistent with the best education.

It is forbidden, under any circumstances, to grant a statement to the Press that may appear or have political-party orientation. In addition, notwithstanding the foregoing, Employees must not criticize customers, competitors, suppliers or public, regulatory and government bodies in public.

2.7 Ethical Standard of Conduct

All employees of the Company must guide their conduct in accordance with the values of good faith, loyalty, transparency, diligence and truthfulness.

Employees must refrain from taking any action or omission in situations that may cause conflicts, or even appear such conflicts, between their personal interests, those of third parties and portfolios under their management, when dealing with suppliers, customers, service providers and any natural or legal person who does or will do business with Systech. Even if there is only the suspicion of a potential conflict situation or the occurrence of an action that will affect the interests of the Company, the Employee must follow this same orientation.

Employees must be aware that transparent, accurate and timely information constitutes the main instrument available to the client so that they are guaranteed the necessary equitable treatment.

2.8 Sanctions

Non-compliance, suspicion or evidence of non-compliance with any of the rules established in this Manual or applicable to the company's activities must be taken to the Board of Executive Officers. The eventual application of sanctions resulting from non-compliance with the principles established in this Manual will be defined by the board, in its sole discretion, guaranteed to the Employee, however, with a broad right of defense.

Among other things, punishment of warning, suspension, termination or exclusion for just cause may be applied, in the latter case, under the terms of article 482 of the Consolidation of Brazilian Labor Laws — CLT, without prejudice to the company's right to claim compensation for eventual losses incurred, losses and damages and / or loss of profits, through the applicable legal measures.

Systech does not assume the responsibility of Employees who violate the law or commit violations in the performance of their duties. If you become liable or suffer losses of any kind

due to the actions of your Employees, you can still exercise the right of return to the face of those responsible.

3. CONFIDENTIALITY POLICY

3.1. Term of confidentiality

Information of a confidential nature is considered to be all information that Employees may have access to as a result of the performance of their duties, including through the systems and files made available by the company for that purpose, which are not notoriously and proven to be in the public domain.

Any disclosure, personal or professional, that is not in accordance with the company's legal and compliance rules is prohibited.

Any information about the Company, its know-how, techniques, copies, diagrams, models, samples, technical, financial or information related to commercial strategies, as well as strategic, marketing or any information related to the activities of the company and its partners and customers and suppliers, eventually obtained as a result of the performance of the Employee's activities, can only be provided to the public, if authorized by the Executive Board. Privileged information must be kept confidential by everyone who has access to it, whether as a result of the exercise of professional activity or personal relationship.

Any doubts should always be referred to the Board.

4. TRAINING AND RECYCLING POLICY

4.1. Integration

Systech has a process of integration and initial training of its Employees and a program of continuous recycling of the knowledge of such Employees in relation to the general principles and standards of conduct of the company described in this Manual and in the other policies and procedures established internally, as well as to the main laws and regulations applicable to its activities.

Each hired employee, before the effective start of their activities, will participate in an integration and training process, where they will acquire knowledge about the activities, internal rules, especially about this Manual and Declaration of Compliance and Commitment

to Ethics, in addition to information about the main laws and regulations that govern such documents.

4.2. Continuous Training

Systech adopts an annual continuous training program for its Employees, through online training of its Manufacturers, with the objective of ensuring that employees are always up to date on the terms and responsibilities described here, as well as on the laws and other applicable regulations. To our activities, with all Employees being obliged to participate in such recycling programs.

5. INFORMATION SECURITY POLICY AND USE OF ASSETS AND EQUIPMENT

It is strictly prohibited for Employees to make copies (physical or electronic) or print files used, generated or available on the network and circulate outside the Company with these files, since such files contain information that is considered confidential information.

The aforementioned prohibition does not apply when the copies (physical or electronic) or the printing of the files are for the benefit of the execution and development of the business and the interests of the company. In these cases, the Employee who is in possession and custody of the copy or printing of the file containing the confidential information will be directly responsible for its good conservation, integrity and maintenance of its confidentiality. Each Employee is responsible for maintaining control over the security of information stored or made available on the equipment under his responsibility.

The use of assets and systems, including computers, telephones, internet, e-mail and other devices is intended for professional purposes. The indiscriminate use of them for personal purposes should be avoided and should never be a priority over any professional use.

The password and login to access the data contained on all computers, as well as e-mails that can also be accessed via webmail, must be known by the respective computer user and are personal and non-transferable, and should not be disclosed to any third parties.

6. ANTI-CORRUPTION POLICY

It is strictly forbidden for Employees, acting by themselves or through third parties, to perform harmful acts against the public administration, national or foreign, that violate the national or foreign public patrimony, the principles of public administration or the international commitments assumed by Brazil, defined as follows:

I — promise, offer or give, directly or indirectly, undue advantage to a public agent, or the third person related to it;

II — demonstrably, finance, fund, sponsor or in any way subsidize the practice of illegal acts provided for in the legislation and regulations that deal with administrative and civil liability of legal entities for the practice of acts against the public administration (“Anti corruption Rules”);

III — provenly, to use a natural or legal person to conceal or hide their real interests or the identity of the beneficiaries of the acts performed;

IV — with respect to tenders and contracts:

a) frustrate or defraud, by means of adjustment, combination or any other expedient, the competitive nature of a public bidding procedure;

b) prevent, disturb or defraud the performance of any act of public bidding procedure;

c) remove or seek to remove a bidder, by means of fraud or offering an advantage of any kind;

d) defrauding public bidding or contract resulting from it;

e) create, in a fraudulent or irregular manner, a legal entity to participate in public bidding or enter into an administrative contract;

f) obtaining an improper advantage or benefit, in a fraudulent manner, from modifications or extensions of contracts entered into with the public administration, without authorization by law, in the call for tenders or in the respective contractual instruments; or

g) manipulating or defrauding the economic and financial balance of contracts entered into with the public administration.

V — hinder the investigation or inspection activity of public bodies, entities or agents, or intervene in its performance, including within the scope of the regulatory agencies and inspection bodies of the Brazilian Financial System.

“Public agent” means: (i) any individual who, even if temporarily and without compensation, is in the service, employed or holding a public function in a governmental entity, an entity controlled by the government, or an entity owned by the government, national or foreign, or

in international public organizations (United Nations); (ii) any individual who is a candidate or is in public office; (iii) any political party or political party representative.

Representatives of public pension funds should also be considered “public agents” for the purposes of the Brazilian Anti-Corruption Standards.

The same requirements and restrictions also apply to family members of civil servants up to high school (spouses, children and stepchildren, parents, grandparents, brothers, uncles and nephews).

Foreign public administration is considered to be public entities and state entities or diplomatic representations of a foreign country, of any level or sphere of government, as well as legal entities controlled, directly or indirectly, by the public authority of a foreign country. International public organizations are equated with foreign public administration.

It is strictly forbidden for the Employee to give or offer values or gifts to public agents.

The Employee must also be aware that any amount offered to public agents, however small and regardless of acceptance by the public agent, may give rise to the application of the penalties provided for in the Anti-Corruption Rules to Society, in which case the Employee will be subject to indemnity. The Company, through the applicable legal measures.

Employees must question the legitimacy of any payments requested by public authorities or agents that are not subject to legal or regulatory provisions.

No Employee may be penalized for delay or loss of business resulting from his refusal to pay or offer a bribe to public officials.

The Company and its Employees must also constantly check whether third party service providers and business partners are being prosecuted or have already been convicted of corrupt practices and must refrain from maintaining relationships or hiring third parties if there is serious evidence or condemnation in cases of active corruption or passive. This provision applies especially to counterparties that have been recommended to the Company by any authorities, public servants, employees or executives of companies or public bodies. The Laws governing the DECLARATION OF COMPLIANCE AND COMMITMENT TO ETHICS, delivered with this manual, must also be observed and known.

Any suspicion or evidence of corrupt practices by the Company's Employees must be reported immediately to the Executive Board, or through the direct channels **ouvidoria@systechtecnologia.com.br and +55 0800.642-3781.**