

Code of
**Ethics and
Conduct**

V·tal



August 2022.

Letter from the President

V.tal was created to make the connection with the digital world possible, transforming people's lives.

We know that our purpose is ambitious, inspiring and capable of bringing about change. We believe in it and the potential of our team to achieve it. After all, in the world we live in, being connected is essential to have access to opportunities, work, study, have fun, expand horizons, and conquer dreams.

We have the largest fiber optic network in Brazil, shared with operators, providers and partners of all sizes and regions. Therefore, the relationship with the market and with our customers must have neutrality as a basic and non-negotiable principle. As employees of V.tal and ambassadors of our brand, we have the responsibility to take care of this image constantly in all our attitudes, however simple they may seem.

The future passes through here and it is with you that we will build it! In this Code of Ethics and Conduct are some guidelines that will guide the activities and conduct of all of us, with the aim of strengthening our Culture and reaffirming our commitment to ethics and integrity and preserving our reputation.

Read the entire document very carefully, because all the information here is extremely important for the continuity of our business and will be demanded in your attitudes on a daily basis.

We are vital to a future that is already present!

Amos Genish
President



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1. Presentation

This **Code of Ethics and Conduct** exists to bring together, in a simple and direct way, what we expect from all our employees, in all environments where we are present and in the relationships established as a result of our activities. The guidelines presented here will guide our daily decisions, strengthening our identity as a Team, directing us to achieve our purpose.

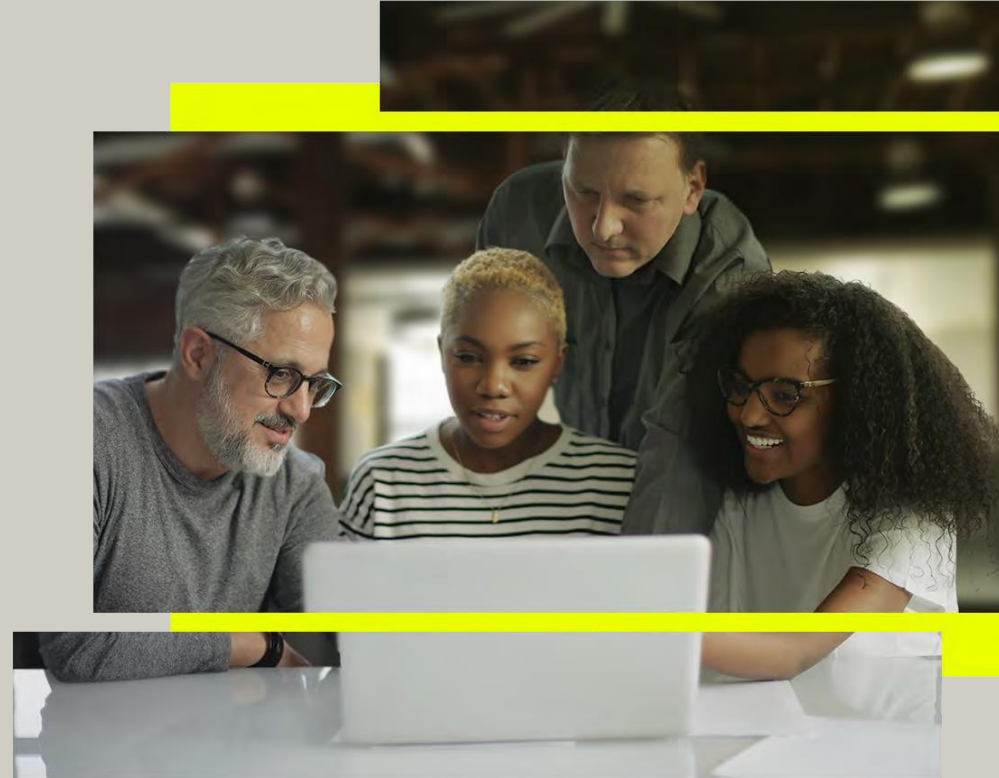
We define our governance based on four pillars, which are fundamental to our business model and our reputation:

Neutrality. The basis of our business dictates that we cannot offer any privileges to companies that use our infrastructure. Our trade relations must be unbiased. Only in this way will it be possible to monetize the infrastructure in an appropriate and sustainable way, transmitting the confidence necessary for our customers to continue with us, and new ones to be conquered.

Confidentiality: It is necessary to ensure the security of data, business information, people and companies to protect V.tal's strategy and preserve the credibility of our image in the market. The General Data Protection Law (LGPD) must be followed by everyone, in their different areas of activity.

Transparency. We leave open the path of dialogue with different stakeholders.

Independence. Decision making from the perspective of processes, systems, procedures and people must be based on the interests of the business.



"This Code applies to all persons and companies that make up the V.tal Group, without distinction of position or role (employees, members of Boards and Committees, directors, interns and apprentices) and our business partners (stakeholders, third parties, representatives), pursuant to article 57, II and III, of Decree No. 11,129/2022. Attention, it is valid even during periods of vacation, leave or absence, as well as during the period of six (6) months from dismissal, resignation or retirement, except in cases expressly and specifically authorized by the Integrity Committee or by law. Failure to comply with the guidelines described in this Code, applicable legislation and other internal rules and regulations will be considered a serious infraction, especially if it results in personal benefits or to third parties to the detriment of V.tal, and the violator is subject to the application of the punishments provided for by law, which may even lead to the termination of the employment contract."

2. V.tal Way

OUR PURPOSE:

To enable the connection to the digital world by transforming people's lives.

Therefore, it is essential to have the same identity, follow the same guideline and carry out our actions with consistency.

The V.tal Way is composed of four fundamental principles that will help us achieve our goals:

Check out the principles that should be the basis of our daily decisions:

RELATIONSHIP

We play fair, we trust each other.



INNOVATION & LEARNING

Innovation and constant learning is our mantra.



RESULT

We are obsessed with excellence and high performance.



ENVIRONMENT

Work hard, play hard!



2. Vital Way



WE PLAY FAIR, WE TRUST EACH OTHER

Our relationship is sustained by the following behaviors:

- We are honest, neutral and transparent between ourselves and our customers. We do what we say, we walk the talk.
- We listen carefully and treat everyone with respect.
- We bring to the table any and all problems.
- We give feedback and ask for help.
- We empower and give people credit.
- We don't tolerate toxic people.

2. Vital Way



EVOLUTION AND CONSTANT LEARNING IS OUR MANTRA

Without learning, there is no evolution, so:

- We understand our business.
- We never stop studying and learning.
- We seek to improve and simplify our solutions.
- We encourage ideas and allow ourselves to be wrong.
- We make no excuses, we look for a solution.
- We are nonconformists, we deepen our knowledge.

2. Vital Way



WE ARE OBSESSED WITH EXCELLENCE AND HIGH PERFORMANCE

The search for results happens daily in every decision:

- We are agile and risk-takers.
- We hire people who are better than us and we don't tolerate poor performance.
- Our mindset is to go beyond what is expected.
- We are driven by results, not effort.
- We are structured and oriented to facts and data.
- We do what has to be done, we don't care about status.
- We don't do the possible, we do the best.

2. V.ital Way



WORK HARD, PLAY HARD!

We are focused and have a healthy environment:

- Here we have fun and celebrate achievements.
- Our mood is light. Cooperation prevails.
- We are enthusiastic, optimistic and kind.
- We work in open spaces, we are not hierarchical.
- We do not tolerate discriminatory behavior.

3. Commitment to Compliance

**No matter where we're doing business,
we do what we say, we walk the talk.**

- We must respect laws, internal and external, seeking to act with ethics and integrity in everything we do. We practice Compliance on a daily basis. Thus, we encourage building trusting relationships with investors, government, customers, partners and suppliers.
- We must do our part for a more just society, together or individually.
- If it is necessary to know the rules in order to do the right thing, we strive to know them and, above all, to apply them.
- To expand our knowledge, we dedicate ourselves to doing the training that V.tal offers.
- Before making a decision, we always evaluate whether it is in accordance with ethical guidelines and business rules.



3.1 Working environment

3.1.1 We contribute to a respectful and harassment-free environment

We listen carefully and treat everyone with respect.

At V.tal, we value respect as a basic principle of our relationships with everyone, whether colleagues, managers, customers, suppliers, etc.

Five recommendations to be followed in line with the principles of V.tal:

- Maintain a healthy climate of mutual trust, listen to and respect everyone.
- Solve problems that may appear professionally, without abusive conduct or overstepping boundaries.
- Encourage good relationships and be patient with the different profiles of each professional.
- Set an example with the right behaviors and attitudes at the right time.
- Report any misconduct with the Compliance or People and Culture Teams to correct any observed misconduct.



3.1 Working environment

3.1.1 We contribute to a respectful and harassment-free environment

What characterizes abusive conduct:

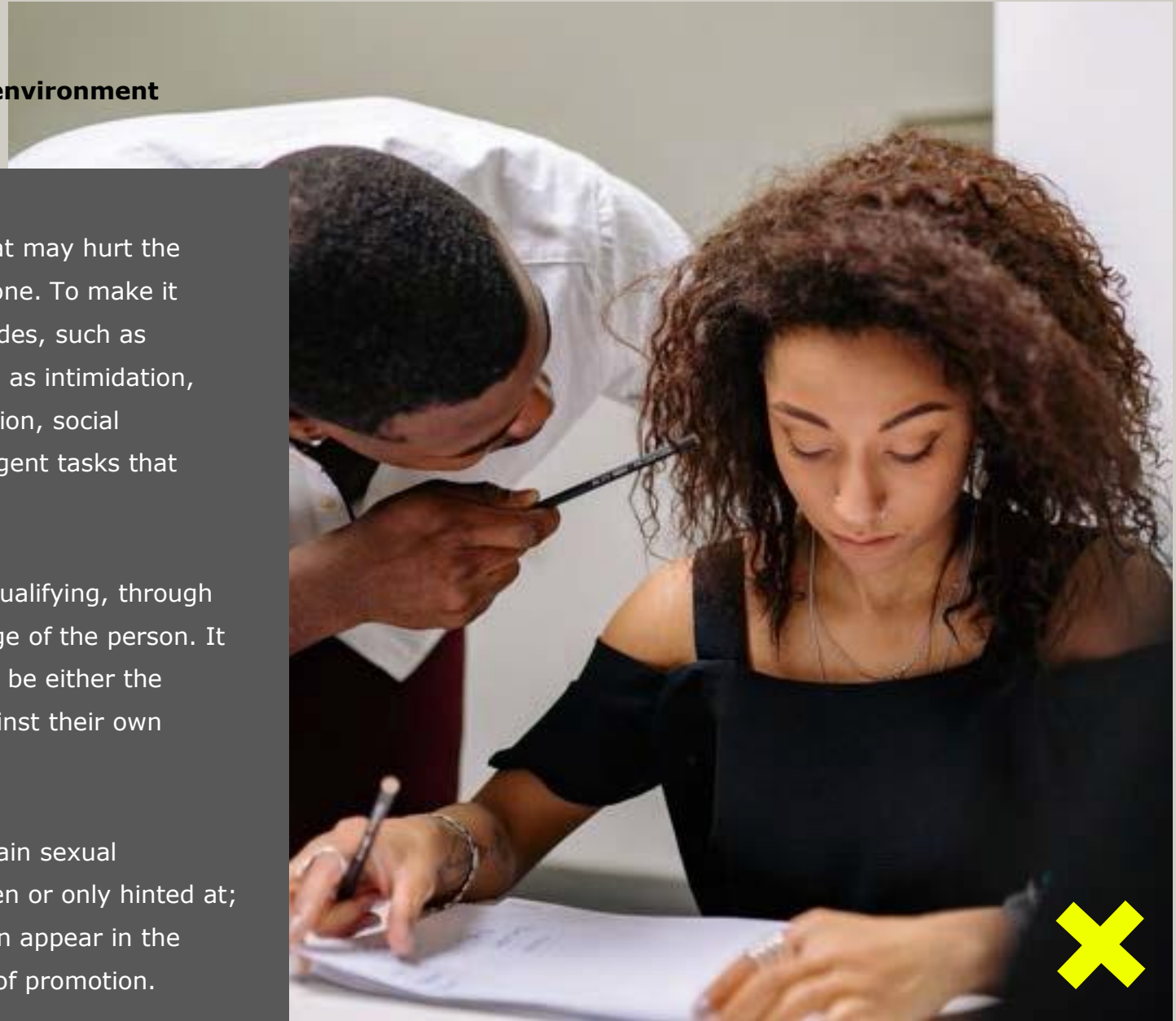
They are behaviors, words, acts, gestures or even writings that may hurt the dignity and physical, moral or psychological integrity of someone. To make it easier to understand, we can think of a list of unwanted attitudes, such as accusations, threats, insults, shouting and humiliation, as well as intimidation, spreading rumors and gossip. Don't forget to also frame isolation, social exclusion, and even the imposition of unattainable goals or urgent tasks that become permanent, among others.

What characterizes bullying:

The repetitive and prolonged practice of abusive conduct, disqualifying, through words, gestures or attitudes, the self-esteem, security or image of the person. It happens regardless of hierarchical relationships, that is, it can be either the manager against the employee, or the Team or employee against their own manager. It can also happen between peers.

What characterizes sexual harassment:

Harassing colleagues with constant teasing and innuendo to gain sexual advantage or favor. This attitude can be clear or subtle; spoken or only hinted at; written or made explicit in gestures or physical contacts. It can appear in the form of coercion or blackmail and also when there is promise of promotion.



3.1 Working environment

3.1.2 We value diversity and promote inclusion.

Diversity is part of our essence. Personal differences, plurality of experiences, knowledge and different points of view broaden our perspectives and multiply the potential of all of us and of V.tal.

We do not tolerate discriminatory behavior.

- We are open to diversity and do not discriminate against people on account of their race, origin, gender identity or expression, sexual orientation, age, religion, physical and mental disability, social class, family, marital status, medical leave (including pregnancy), political affiliation, physical appearance, lifestyle, among others.
- We become aware of and act to strengthen an environment in which people feel valued and included.
- We do not allow jokes, social media posts or comments of a discriminatory or prejudiced nature in our internal and external interactions.
- We advocate for equal opportunity for candidates and employees.



3.1 Working environment

3.1.3 We guarantee a safe and healthy environment.

Our employees are our greatest asset, so we have a non-negotiable commitment to life. At V.tal we are focused and have a healthy environment, we promote clarity, understanding and self-development so that our Team seeks its best version.

Health and Safety Requirements: know and comply with legal requirements, policies, good practices and health and safety procedures at work.

Hazards and Risks: assume its central role in building and maintaining a safe environment, analyzing hazards and risks before starting its activities. Good recommendations include carrying out the necessary examinations for their functions and actively participating in training actions and health and safety programs.

Accidents and Emergencies: If an accident occurs, it is essential to act quickly, seek medical attention to ensure the well-being of those involved. Within 24 hours after the accident, register the Work Incident Report (COT) through Vic (Service Channel).



3.1 Working environment

3.1.3 We guarantee a safe and healthy environment.

Training and awareness: Carry out all training legally required for their duties and following the recommended frequency. Activities should only be carried out with the employee properly equipped and in favorable physical and mental health conditions.

Alcohol and Drugs: It is strictly forbidden to carry, encourage, sell, distribute and consume alcohol and other drugs on the Company's premises or when at the service of V.tal. In addition, it is worth remembering that, in compliance with the legislation, smoking is also not allowed in any building of the Company.

Working hours: respect the working hours of employees, avoiding calls or messages outside working hours. It is essential to respect the breaks and lunch time. Addressing demands during established work hours through good time management is an essential role.



3.2 Conflict of interest

Conflicts of interest occur when an individual's particular interest interferes with, or appears to interfere with, his or her ability to act, judge, or make impartial decisions. That is: when an employee's professional decisions are made based not only on professional criteria, but also on personal criteria, and are not necessarily the best for V.tal.



We follow ethical principles when our decisions minimize risks, protect V.tal and:

- They do not allow personal interests to affect our choices or professional performance.
- They eliminate conflicts of interest.
- They seek the most appropriate and lowest risk solution for V.tal.
- They are transparent in situations where there is a potential conflict of interest.
- The guidelines related to transactions with Related Parties are as follows.

3.2 Conflict of interest

3.2.1 In the work environment.

We do not allow:

- Competing and/or conflicting professional activity with those performed by V.tal.
- Use of inside information.
- Use of V.tal resources, for its own benefit or that of third parties.
- Use of the position held at V.tal, for its own benefit or that of third parties.



3.2 Conflict of interest

3.2.2 In the contracting of family members and relatives.

The indication made by employees of family members and relatives* to V.tal is a common and acceptable practice, but it is important that the existing kinship condition is clearly informed to the People and Culture area at the beginning of the recruitment process. The omission of this information constitutes a violation of the Code. In addition, the responsible areas must decide on the selection and contracting and examine candidates nominated on equal terms with candidates who are seeking placement at V.tal by other means.

Affective relationships between employees are allowed when those involved do not occupy any level of hierarchical or administrative subordination within the same Board, as well as any type of management decision influence, processes, evaluations, promotions and other conflicting conditions not specified in this Code. Even in cases where there is no subordination, but there may be some type of influence on career decisions, behavior or activity of one over another, the employee may not participate in decisions that may benefit or harm the other.

During the employment contract, internal movements such as transfers or promotions can lead to a conflict situation. If this happens, inform your immediate superior, the area of People and Culture, and the Compliance area. In rare situations where exceptional circumstances are unclear to constitute non-compliance with the guidelines established by this Code of Ethics and Conduct, the Integrity Committee shall be involved to arbitrate.



* The following persons will be considered relatives, under the terms of the Brazilian Civil Code: children, grandchildren and great-grandchildren; spouses/partners, in-laws, brothers-in-law, sons-in-law and daughters-in-law; parents, siblings, nephews and great-nephews; grandparents, uncles/aunts, cousins, second cousins and nephews; great-grandparents, great uncles/aunts and second uncles/aunts.

3.2 Conflict of interest

3.2.2 In the contracting of family members and relatives.

We do not allow:

- Family relationship and/or affective relationship between employees with hierarchical or administrative subordination within the same Board.
- Admission of relatives of employees classified as managers to open positions on the same Board, even if there is no direct relationship of subordination or hierarchy.
- Family relationships and/or affective relationship between employees with direct influence on the performance of the tasks performed.
- That employees who have family and/or affectionate relationships evaluate themselves in the annual 360 or similar evaluation processes.



3.2 Conflict of interest

3.2.3 In the relationship with suppliers and business partners.

Relationships with suppliers and business partners must be based only on the practice of mechanisms in accordance with V.tal and complying with the procedures with regard to the selection, negotiation and contracting of third parties. We will always negotiate transparently and smoothly in business relationships.

All potential suppliers and business partners of V.tal will be evaluated and selected through clear, honest and non-discriminatory criteria.

V.tal discloses its principles and rules of conduct of its suppliers, which must act in a manner compatible with these principles and rules described in the Ethics and Expected Conduct for Third Parties Manual.

The relationship with suppliers and business partners will be immediately terminated whenever losses or risks to the image of V.tal or its interests are observed due to non-compliance with legal, tax, labor, social security, environmental and occupational health and safety issues.

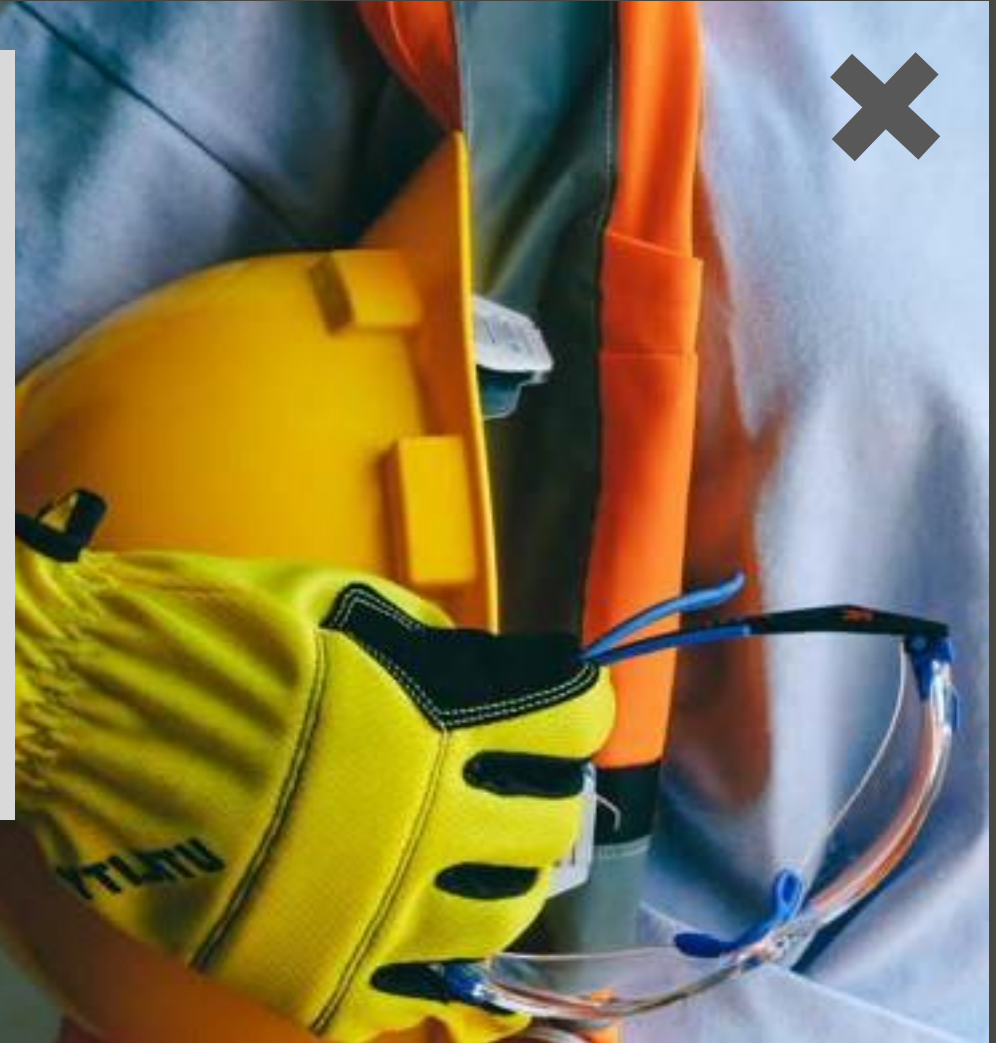


3.2 Conflict of interest

3.2.3 In the relationship with suppliers and business partners.

We do not allow:

- The contracting of companies owned, managed or directed by V.tal employees or their direct or indirect family members.
- Contracting suppliers for reasons other than technical, economic and commercial ability.
- Favors or privileges of any nature in the selection and contracting of suppliers.
- The contracting of companies that use slave or child labor, and it is the obligation of each employee to report this type of practice.



3.2 Conflict of interest

3.2.4 In the relationship with competitors.

Exercising our commitment to free competition and a competitive market includes never taking actions prohibited by law and contrary to V.tal's ethical principles.

We do not allow:

- Establish an agreement, formal or informal, with competitors to fix, increase or stabilize prices or profit margins, including track agreements, initiatives or price recommendations.
- Fix minimum price of products and services for distributors and resellers.
- Divide the market or avoid competition for certain customers or accounts, or in geographical areas.
- Participate or defraud free competition in bids or bidding processes.
- Combine prices in bids, competition or other terms and conditions of the offer.
- Restrict or eliminate the production or supply of products and services.
- Restrict the performance of competitors.



3.3 Relations with Government and Public Sector

In our business we can relate to the public sector. Due to the greater exposure to the risk of corruption, interactions with public agents are a source of risks for V.tal. Therefore, all our relations with the segment are guided by care, respect, integrity, ethics, and transparency, and there are specially trained areas to be called upon when necessary.

We are aligned with V.tal's ethical principles when:

- Interactions with public officials happen for legitimate reasons. That is, with a legitimate, relevant, ethical reason and with interlocutors with appropriate competence and function for such representation.
- We use impersonal dialogue and more formal, clear and concise language.
- We are transparent and record all meetings in a corporate agenda or in the internal controls created by the area.
- We strictly follow V.tal and public sector policies when offering or accepting hospitality and other courtesies.



3.3 Relations with Government and Public Sector

Important:

- V.tal does not sponsor, fund or make donations to political campaigns, candidates or political parties. In addition, any individual campaign or distribution of material involving politics or religion must not be carried out in our workplace or through our resources.
- In case of receipt of court orders or demands, send immediately to the Legal & Regulatory Board, through the email ld-contencioso@vtal.com.



3.4 Promotional gifts, presents, hospitality and other benefits

We know that giving or receiving courtesies is a common practice of companies. But we must pay attention to the risks involved. And that goes for freebies, low-value gifts, and even invitations to events or meals. For this reason, we are very cautious and transparent, worrying about following the best rules established for this practice.

Know each item:

- **Promotional Gifts:** They are objects with no commercial resale value used as advertising, publicity or small courtesy.
- **Presents:** They are items or services for personal use and that have commercial value.
- **Hospitality:** It includes meals, travel and entertainment, among others.



3.4 Promotional gifts, presents, hospitality and other benefits

What you need to know and do:

- Understand the risks of courtesy actions and act transparently and according to the internal policies.
- To avoid apparent inappropriate influence, no employee or closest member of your family should accept any promotional gift, present, or perk that is equivalent to an amount greater than \$100 (one hundred U.S. dollars).
- Refuse any promotional gifts, presents, invitations, trips, and other courtesy actions outside of policies and over the limit. Especially if you notice a potential attempt at influence, expectation of retribution, condition for effectiveness or promise of a business or any of the conditions prohibited in the policy.
- Before offering courtesies, be sure to comply with the guidelines of the Promotional Gifts, Presents, Hospitalities and Other Benefits Policy, as well as the policy of the third parties who will receive it.
- Pay special attention when dealing with public agents, respecting V.tal's policy and public sector rules.
- Courtesy may not be in cash, check or security, or set up customarily.



3.5 Combating corruption, preventing money laundering and financing terrorism

In line with our commitments, the Integrity Program and applicable national and international laws, it is non-negotiable that any employee of the group – or third parties acting on their behalf or in partnership – commits illegal acts.

It is expressly forbidden:

- **Accept or receive any type of bribe** – insinuate, promise, offer or give, directly or indirectly, undue advantage to a public agent, national or foreign - or the person related to him. Bribery is also unacceptable in relationships between private companies and the most common forms include facilitation payment, kickbacks, rebates, donations and sponsorships, political contributions and gifts, among others.
- **Obstruction to investigation or inspection processes** - establish any type of obstruction, intervention or difficulty to the action of public agencies, entities or agents in their performance, investigations or inspections. Even within the scope of regulatory agencies and supervisory bodies of the national financial system.
- **Money laundering and financing terrorism and the proliferation of weapons of mass destruction** - camouflaging the illicit origin of financial resources using V.tal's legal operations or its resources in order to give the money a lawful appearance.
- **Fraud in bidding processes** - committing fraud in bids and contracts with the government, national or foreign, or offering undue advantage to a bidding competitor.



3.5 Combating corruption, preventing money laundering and financing terrorism

When establishing commercial relations outside Brazil, we are subject to anti-corruption legislation from other countries.

V.tal requires compliance with all applicable national and international laws and regulations against bribery and corruption, including, without limitation, the laws of Brazil (Brazilian Anti-Corruption Law No. 12,846/13), and the United States Foreign Corrupt Practices Act (FCPA).



3.6 Use of social media

We must communicate with all audiences (internal or external) in a light, simple and clear way, seeking to ensure the quality of the content, after all, we are responsible for what we disclose.

- Do not speak on behalf of V.tal on social media. There are official profiles for this.
- If you identify anything that needs evaluation, or that exposes V.tal, send the evidence to marketing@vtal.com. We are talking about both the logo and any other institutional symbol applied on unofficial websites, blogs or social profiles.
- Do not use social networks to express a dissatisfaction that can be resolved internally, nor to express offensive content that damages the image of V.tal or the dignity of its members.
- When using images in official V.tal profiles, choose neutral positions and without undue content, exaggerated or related to politics, religion, soccer, brand of any V.tal customer, among others. This also applies to our professional profiles on the intranet, Teams, email, among others.



3.7 Use of resources, assets, information and systems

3.7.1 We protect V.tal's resources.

Protecting the Company's assets and resources is one of our basic obligations. This means using them sensibly, correctly, responsibly, avoiding waste and misuse.

- Be sensible when using financial resources, always with prior authorization and in line with powers and policies of V.tal.
- Ask for your refunds exactly according to the expenses you made.
- Make use of V.tal vehicles only for the Company's activities and complying with traffic legislation.
- V.tal's computers and electronic systems are for the execution of its professional activities.
- Only use the V.tal brand in permitted activities and after authorization from the responsible areas. And don't forget to always follow the standard and rules of the Brand Manual.

Attention: V.tal reserves the right to monitor the use of its assets and resources whenever necessary, including computers, devices, email and systems.



3.7 Use of resources, assets, information and systems

3.7.2 Information Security.

V.tal's information must be used exclusively for professional purposes, in its activities at the Company. We have an important role to protect business, avoiding misuse and unauthorized access. Increased attention to information classified as confidential, including that protected by law or privileged.

Six recommendations to protect information:

- Credentials (ID, passwords and badges) are personal and non-transferable.
- Take care that sensitive information is not shared or posted on social networks, exposed on workstations or forgotten in meeting rooms.
- If you print something, be careful not to leave the material on the printer. Securely archiving documents is also applicable to the home office.
- Do not share information about the business and strategies you have access to due to the activities you carry out at V.tal.
- Avoid conversations with sensitive or competitive information in virtual environments, home office or public places such as elevators, restaurants, taxis, airports or airplanes. If you want to share files with sensitive information, prefer to use official V.tal services like Teams or corporate email.
- Do not use confidential or legally protected information for your benefit or that of a third party. Suggesting investments to family, friends or others, based on this information, fits this requirement and is not allowed. Pay attention not to share sensitive information with competitors of V.tal. Speak with caution in meetings with associations, unions and benchmark work.



Remember that what we produce in our daily work is intellectual property of V.tal. That is, we must not delete, destroy or take this information when we eventually terminate our employment contract. Our commitment to the protection of the Company's information must be maintained even after the interruption of professional relations.

3.8 Privacy and Data Protection

Based on the General Data Protection Law - LGPD, we are committed to guaranteeing privacy and protecting the personal data of our customers, business partners and employees. Thus, we further strengthen the trust of our stakeholders.

- Seek to learn and apply the laws and regulations on the protection of personal data.
- Seek to continuously improve security measures.
- In your daily life, evaluate the effect of decisions in relation to people's privacy, seeking the most appropriate solutions.
- Do not collect, store, retain, share, transfer, delete or otherwise process personal or sensitive data without making sure it complies with the guidelines and policies.
- Share personal data only with authorized persons and retain the information only as long as it is necessary in accordance with laws and regulations.
- Respect people's choices regarding privacy and the use of their personal data.
- When using collaborative video call tools, be careful not to record meetings without authorization or share with unauthorized persons.
- In case of incident or misuse of personal data, report the occurrence immediately to the Privacy Team, through PP-IncidentesdePrivacidadeVtal@vtal.com.



Whenever you have questions on the subject or are developing any project or product that involves the processing of personal data, please contact the V.tal Privacy Team and our Data Officer, Baptista Luz Advogados, through PP-PrivacidadeVtal@vtal.com.

3.9 Risk management

Risks are part of any business and each employee is fundamental in its prevention. We encourage our employees to be agents of identification of possible problems and to promote the discussion of solutions.

At V.tal, we understand that everyone is an integral part of risk management, and that prevention is the smartest way to help us achieve our goals and ensure business continuity. Thus, what you have to do is identify where the risks are, assess how much they can harm our strategy and/or impact the business, and act to overcome their negative effects.

▪ What you can do:

- Protect V.tal and people, reporting problems with potential risks so that the best solution is evaluated.
- Correctly identify and assess risks, seeking and anticipating the best response strategies before making a decision.
- Contribute openly and collaboratively to the corporate process of risk management and business continuity for the protection and benefits of V.tal.



4 Integrity Committee

It is the higher body responsible for assessing issues related to responsibility, behavior and ethics at V.tal. The Integrity Committee deliberates on disciplinary measures and ensures the management and review of this Code.

Its composition includes three directors of the Company: the Vice President of Legal, the Vice President of People and Culture and the Vice President of Governance, Risks and Compliance. The disciplinary measures decided by the Committee will follow the internal Disciplinary Regime procedure and may be applied in the form of verbal, written warning, suspension or termination of the employment contract, regardless of any opening of legal proceedings.



5 Reporting of illegal or unethical behavior

The V.tal Way guides us to maintain a relationship based on respect, honesty, neutrality and transparency.

V.tal encourages its employees, as well as any third parties, to report any violation of V.tal's internal laws, regulations and policies. To this end, we offer a direct, secure and confidential channel for reporting these occurrences - the [Confidential Channel](#).

- Always opt for dialog to clarify questions about whether a situation is in accordance with the precepts of our Code. Talk to your manager, the People and Culture Team or Compliance Team. However, if you identify situations of deviation that could harm you, employees, or third parties, make a report.
- When opening a report in the Channel, try to present evidence, facts, data, date and details of what happened. The more information, the more assertive the investigation will be.
- Be as transparent and collaborative as possible with investigations.
- Use the channel to report cases of good faith related to: harassment, fraud, misconduct, discrimination, among other topics. However, do not use the Channel for: complaints or clarifications about V.tal processes and procedures, outbursts, gossip, reports without sufficient data for investigation or reports of bad faith or demonstrations with conspiratorial or revenge purposes.



GET TO KNOW THE CHANNEL:

- Web: <https://canalconfidencial.com/vtal/>
- Phone: 0800 721 0783

6 Final considerations

When necessary, we should be guided by the most restrictive rule. To enter V.tal, every employee must seek to understand and know all the guidelines of this Code and other internal policies (mandatory knowledge or not) to guide their behavior.

Formal awareness of this Code and specific policies, as well as proper training, are mandatory and applicable to everyone. This act represents the formalization of the knowledge and commitment of each employee to comply with them. Ignorance or non-awareness of the Code and Policies does not exempt the responsibility to act in accordance with V.tal's guidelines.

Policies, standards and internal procedures by V.tal

complement this Code and should also be observed.

7 Questions, criticisms and suggestions

This code doesn't end here. Your participation is important for the improvement of V.tal. Collaborate and present your questions, criticisms or suggestions about this Code to the Board of Governance, Risks and Compliance (PP-ComplianceVtal@vtal.com). To get more information, access the intranet. We're counting on you!

**Suppliers, third parties,
representatives and
business partners **must**
also be guided by
this Code**

**through the
Conduct Expected
of Our Third Parties
Manual in all their
activities with V.tal.**

The Code of Ethics and Conduct

Governance, Risks and Compliance Board

PP-ComplianceVtal@vtal.com

shall enter into force from its publication and will be reviewed every two years. At each review, all employees must formalize "Awareness" in the HR Portal.

v·tal