

Code of
**Ethics and
Conduct**

V·tal



August, 2022.

Letter from the president

Since day one, our objective has been to speed up connections with the digital world and transform people's lives.

Our business goal is ambitious and inspiring and will produce significant impacts. We believe in it and our Team's capability to make it happen. After all, in today's connected world, the digital connection is a critical commodity for accessing opportunities, working, learning, relaxing, expanding horizons, and making our dreams come true.

We are Brazil's most extensive fiber optic network company, shared with operators, providers, and partners of different sizes and regions. In this sense, our relationships with our clients and the market must always rely on neutrality - a fundamental and non-negotiable principle. As employees of V.tal and ambassadors of our brand, we must protect the company's trade dress in all our activities, both inside and outside the company, no matter how simple it appears to be.

The future is being shaped here and now with your collaboration! This Code of Ethics and Conduct sets out specific guidelines that everyone must follow to strengthen our Culture, endorse our commitment to act with integrity and ethics in everything we do, and preserve our reputation.

You should read the entire document carefully because the information provided here is critical for our business continuity, and you'll be requested to follow these guidelines in your daily activities strictly.

The future is now, and our contribution is vital!

Amos Genish
President



Table of Content

1. Introduction _____	4	27____	3.5 Fighting corruption, prevention of money laundering and terrorist financing
2. The V.tal Way _____	5	29____	3.6 Using Social Media
3. Commitment to <i>Compliance</i> _____	10	30____	3.7 Using V.tal resources, assets, information & systems
3.1 In Our workplace _____,	11	30____	3.7.1 We protect V.tal resources
3.1.1 We contribute to a healthy and harassment-free environment _____	11	31____	3.7.2 Information Security
3.1.2 We embrace diversity and encourage inclusion _____	13	32____	3.8 Privacy & Data Protection
3.1.3 We contribute to a healthy & safe environment _____	14	33____	3.9 Risk Management
3.2 Conflicts of Interest _____	16	34____	4. Integrity Committee
3.2.1 In our workplace _____	17	35____	5. Reporting illegal and unethical behaviors
3.2.2 In hiring direct or indirect family members _____	18	36____	6. Conclusion
3.2.3 In relationships with suppliers and business partners _____	20	37____	7. Questions, comments & suggestions
3.2.4 In relationships with competitors _____	22	38____	8. Validity
3.3 In Relationships with the Government & the Public Sector _____	23		
3.4 Gifts, corporate hospitality & other benefits _____	25		

1. Introduction

This **Code of Ethics and Conduct** aims to briefly inform our employees what is expected from them regarding ethics and conduct to be followed in all the environments and relationships engaged by our business activities. These guidelines must lead our daily decisions and improve our Team's identity to meet our business goals.

Our governance is built on four pillars, which guide our business model and protect our reputation:

Neutrality. We must not offer any advantage to any company using our infrastructure. Our business relations must be impartial. This is the only way we can monetize our infrastructure in a sustainable and endured way and be trusted by our current and future clients.

Confidentiality. We must protect our data and business information, as well as the data of the people and companies, to protect our business strategy and preserve our market credibility. The applicable Data Protection Law must be followed by everyone, regardless of their role or department.

Transparency. We must have open communication channels with the different stakeholders.

Independence. Our decision-making must always consider the company's business interests regarding processes, systems, procedures, and people.



"This Code applies to all persons and companies belonging to V.tal Group, regardless of their role or position (staff, members of Boards & Committees, directors, interns & trainees) and our business partners (*stakeholders*, third parties, representatives), under applicable anticorruption laws. Attention! This Code applies even during holidays, absence or sick leave, and during the 6-month term as of dismissal or retirement, except for the cases specifically determined by the Integrity Committee or by the law.

Failure to comply with the guidelines set forth herein and in other internal rules, as well as in the applicable laws and regulations, will be considered serious infraction, especially if the result is personal benefit or to third parties to the detriment of V.tal. In this case, the individuals involved will be subject to the legal penalties and possible employment termination."

2. The V.tal Way

OUR MISSION:

Enable connections with the digital world to transform people's lives.

In this regard, we must have a common identity, follow standard guidelines, and our actions must be consistent.

The V.tal way is based on four fundamental principles that will help us meet our goals:

Premises that support our daily decisions:

RELATIONSHIPS

We play fair and trust each other.



INNOVATION & LEARNING

Our mantra is innovation and continuous learning.



RESULTS

We strive for excellence and high-performance standards.



WORKPLACE

Work hard, play hard!



2. The Vital Way



WE PLAY FAIR AND TRUST EACH OTHER

Our relationships are based on the following behaviors:

- Our relationships among our people and with our clients are honest, impartial, and transparent.
- We *walk the talk*.
- We listen carefully and treat each other with respect.
- We bring all the problems to the table.
- We give *feedbacks* and ask for help.
- We empower people and acknowledge their work.
- We don't tolerate toxic people.
- We value our clients above everything. This principle is inviolable, non-negotiable and unquestionable.

2. The Vital Way



OUR MANTRA IS: GROWTH & CONTINUOUS LEARNING

No learning, no progress. So:

- We know our business.
- We never stop studying and learning.
- We seek to improve and simplify our solutions.
- We incentivize ideas and allow ourselves to make mistakes.
- We don't justify; we find solutions.
- We are always eager to learn more.

2. The Vital Way



WE STRIVE FOR EXCELLENCE AND HIGH-PERFORMANCE STANDARDS

Results are sought every day and, in every decision made:

- 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 expectations.
- We are driven by results, not the efforts.
- We are fact & data-driven and structured.
- We do what must be done, we don't care about status.
- We don't do what we can, we do our best.

2. The V.tal Way



WORK HARD, PLAY HARD!

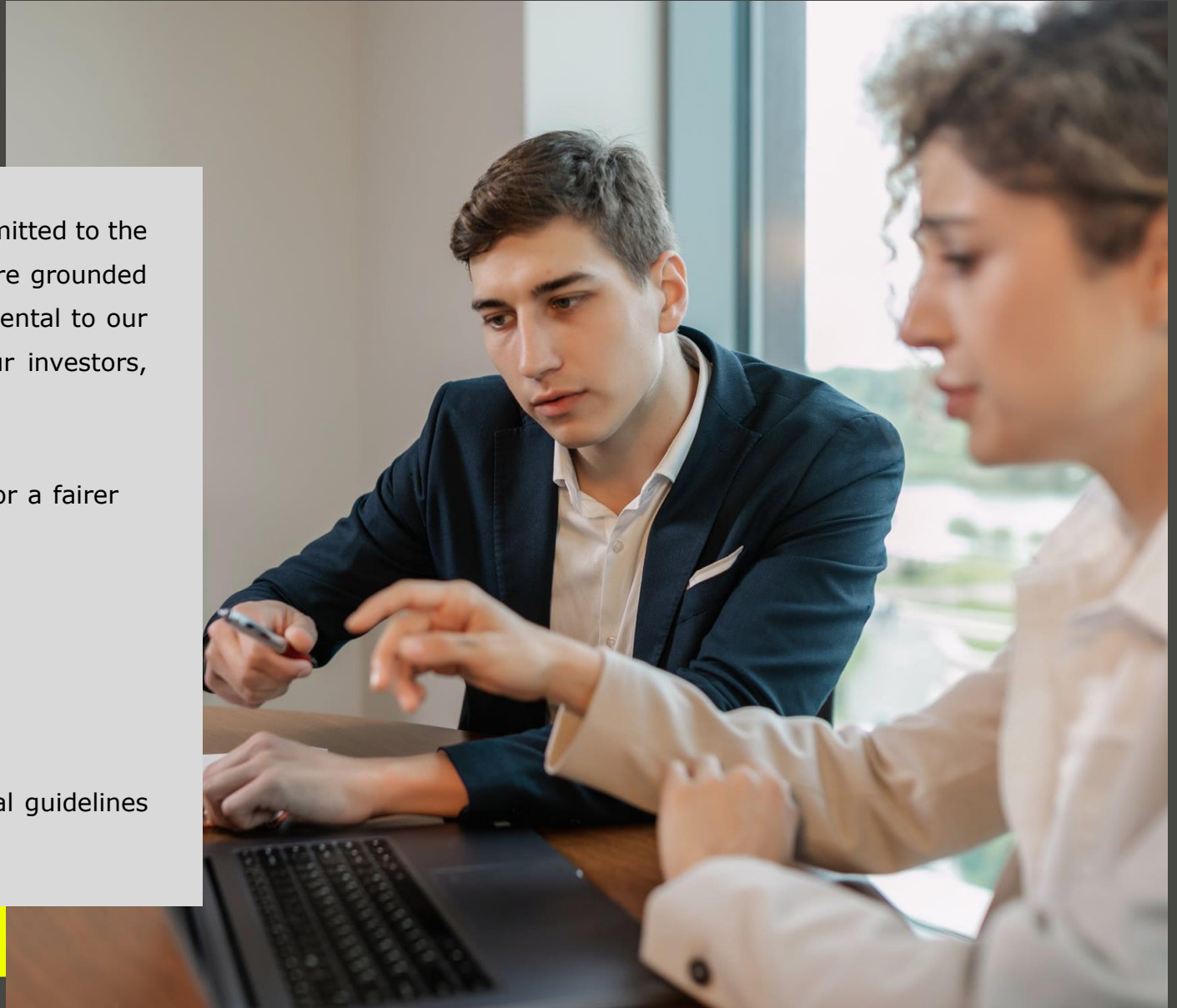
We are focused, and we have a healthy workplace:

- At V.tal, we have fun and praise accomplishments.
- Our environment is light. Cooperation prevails.
- We are enthusiastic, optimistic, and kind.
- We work in open spaces, and we are not hierarchic.
- We do not tolerate discriminatory behaviors.

3. Commitment to Compliance

No matter where we do business, we walk the talk.

- We respect internal and external applicable laws. We are committed to the highest standards of ethics and integrity, and our activities are grounded by a clear commitment to doing the right thing. It is fundamental to our mission and helps us earn the trust of the government, our investors, customers, partners, and suppliers.
- We must do our part, both as individuals and as a society, for a fairer society.
- To do the right thing, we learn and apply the rules.
- To expand our knowledge, we attend V.tal training programs.
- Before making any decision, we assess if it follows the ethical guidelines and the business rules.



3.1 In our workplace

3.1.1 We contribute to a healthy and harassment-free environment.

We listen carefully and treat everyone with respect.

At V.tal, respect is fundamental in our relationships with peers, supervisors, customers, suppliers, etc.

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

- Keep a healthy environment where mutual trust and respect prevail. Listen carefully to one who is speaking.
- Solve possible problems with professionalism with no abusive behaviors or exceeding your boundaries.
- Foster good relationships and embrace diversity.
- Be the example of correct behaviors and attitudes at the right times.
- Report any misconduct to the *Compliance* or People & Culture Teams.



3.1 In our workplace

3.1.1 We contribute to a healthy and harassment-free environment

What is considered abusive behavior:

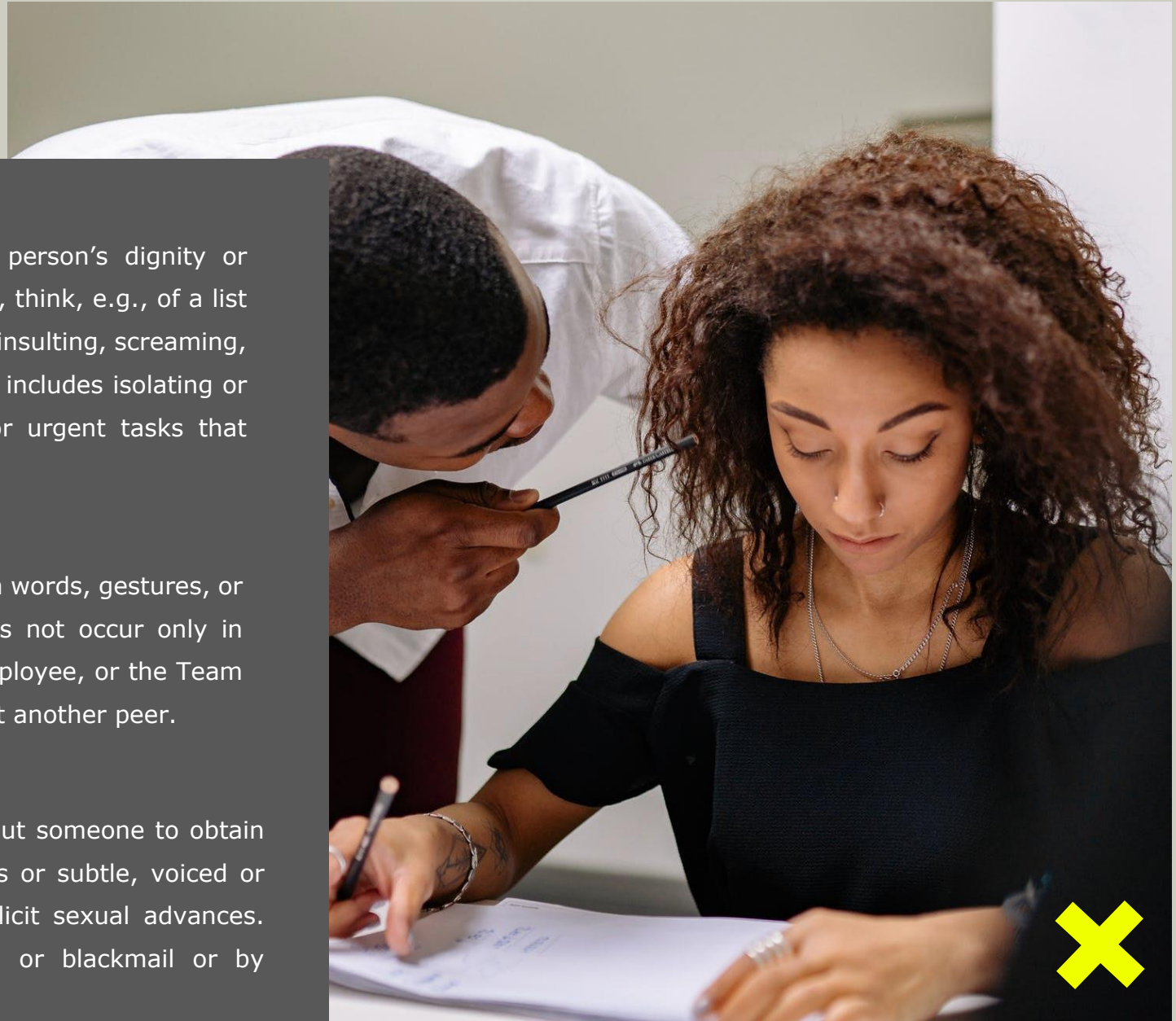
Behaviors, words, acts, gestures, or writings may hurt a person's dignity or physical, moral, or psychological integrity. To help understand, think, e.g., of a list of hateful attitudes, such as making accusations, threatening, insulting, screaming, humiliating, intimidating, spreading rumors, or gossip. It also includes isolating or socially excluding a person or imposing impossible goals or urgent tasks that become permanent.

What is considered moral harassment:

Repetitive and persistent abusive conduct that disqualifies with words, gestures, or attitudes a person's self-esteem, security, or image. It does not occur only in hierarchical relationships, i.e., a supervisor may target an employee, or the Team or an employee may target a supervisor. Or a peer may target another peer.

What is considered sexual harassment:

Embarrassing someone by flirting or making insinuations about someone to obtain advantages or sexual favors. These attitudes can be obvious or subtle, voiced or insinuated, written or using body language, or making explicit sexual advances. These attitudes may also materialize through intimidation or blackmail or by promising a promotion.



3.1 In our workplace

3.1.2 We embrace diversity and encourage inclusion.

Diversity is part of our essence. Different people, different experiences, different backgrounds, and different points of view broaden our perspectives and multiply the potentialities of our people and V.tal.

We do not tolerate discriminatory behaviors.

- We embrace diversity, and we do not discriminate against people because of their race, origin, gender or expression, sexual orientation, age, religion, physical and mental disability, social class, family, marital status, medical condition (including pregnancy), political affiliation, looks, lifestyle, among others.
- We are mindful and want to build an environment where people feel valued and included.
- We do not allow discriminatory or prejudiced jokes, social media posts, or comments in our internal and external interactions.
- We advocate for equal employment opportunities for candidates and Employees.



3.1 In our workplace

3.1.3 We contribute to a healthy & safe environment.

Our employees are our greatest asset. Therefore, we have a non-negotiable commitment to life. At V.tal, we are focused and have a healthy workplace, we promote transparency, understanding, and self-development, so our Team can become its best version.

Health & Safety Requirements: you should know and comply with the legal requirements, policies, good practices, and health & safety procedures at the workplace.

Hazards & Risks: you should take responsibility for building and keeping a safe environment, so you should assess the dangers and risks before you start your activities. Good recommendations include undergoing the required occupational medical exams and participating in training and health & safety programs.

Accidents & Emergencies: If an accident occurs, we must act fast and seek medical care to ensure the individual's well-being. Within 24 hours of the accident, you should report the accident by filling out an Occupational Accident Form (COT) through Vic (Helpdesk).



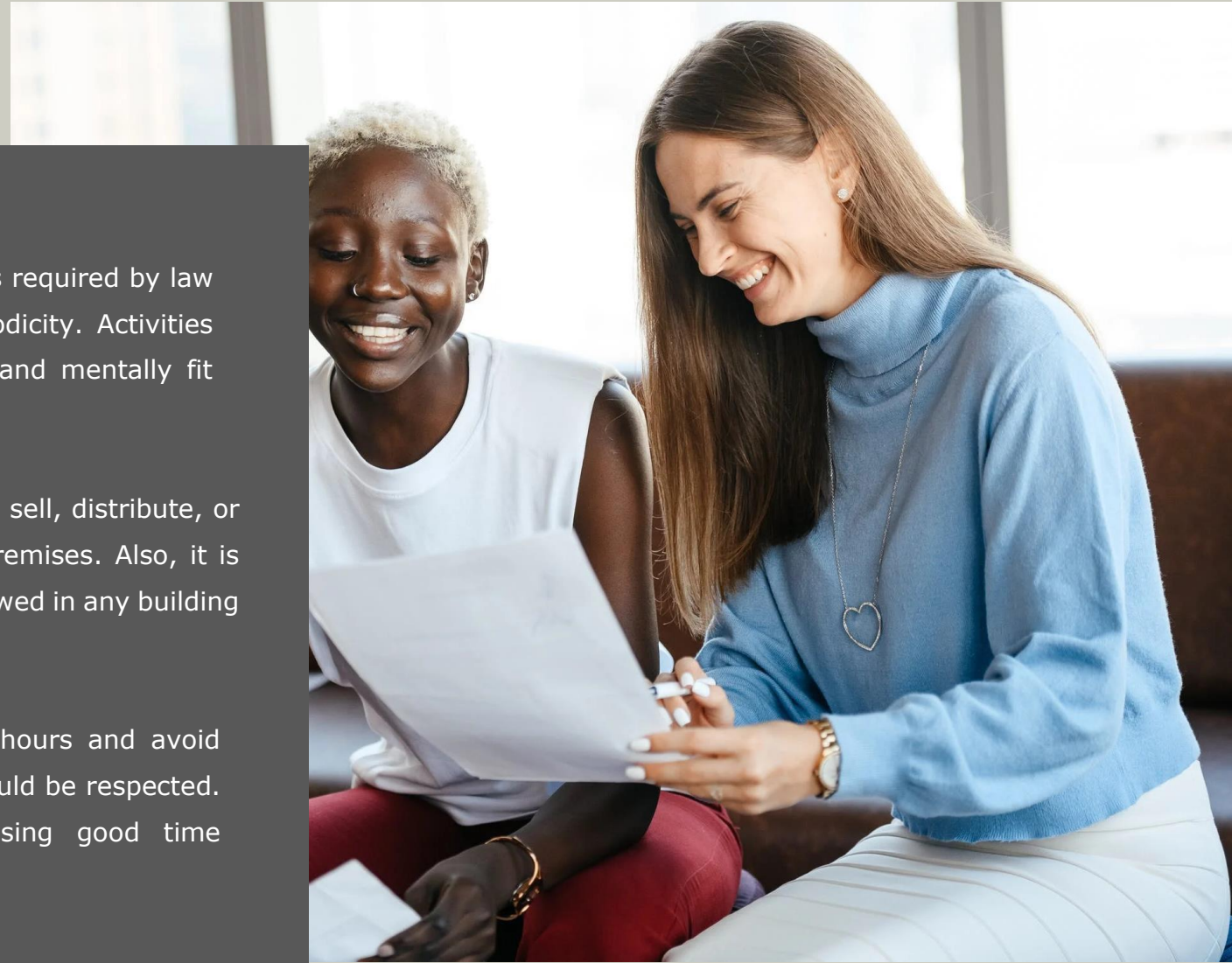
3.1 In our workplace

3.1.3 We contribute to a healthy & safe environment.

Training & Awareness: You should attend all training programs required by law regarding your duties and according to the recommended periodicity. Activities should only be carried out by adequately equipped physically and mentally fit employees.

Alcohol & Drugs: It is strictly prohibited to possess, incentivize, sell, distribute, or consume alcohol or any other drug while working or on V.tal premises. Also, it is worth remembering that, according to the law, smoking is not allowed in any building of the Company.

Working hours: You should respect the employees' working hours and avoid calling or sending messages off-hours. Breaks and lunchtime should be respected. Work should be performed during fixed working hours, using good time management skills.



3.2 Conflicts of interest interest

Conflicts of interest arise when a personal interest interferes or may interfere with the person's ability to act, judge, or make impartial decisions, i.e., when a business decision made by an employee is not only based on the professional criteria but also the personal criteria, that may not be to the best interest of V.tal.



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

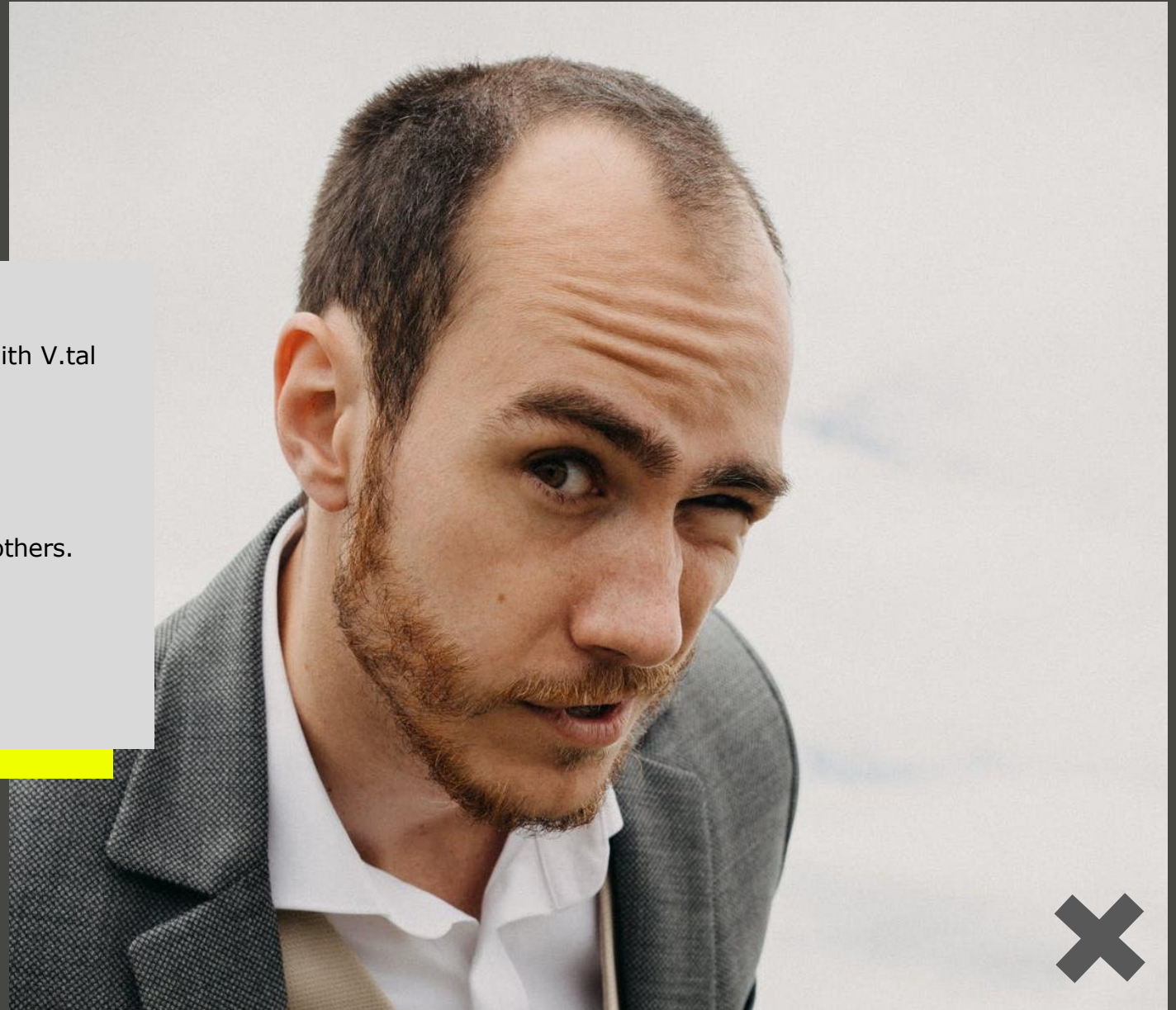
- We do not allow our personal interest to interfere with our choices and our professional performance.
- We avoid conflicts of interest.
- We seek the best solution, with lower risks to V.tal.
- We act with transparency in situations that can arise conflicts of interest.
- We follow the guidelines for transactions with Related Parties.

3.2 Conflicts of interest interest

3.2.1 In our workplace.

We do not allow:

- Engaging in activities that compete or appear to compete with V.tal business.
- Using insider information.
- Using V.tal resources for personal benefit or the benefit of others.
- Using the position held at V.tal for personal benefit or the benefit of others.



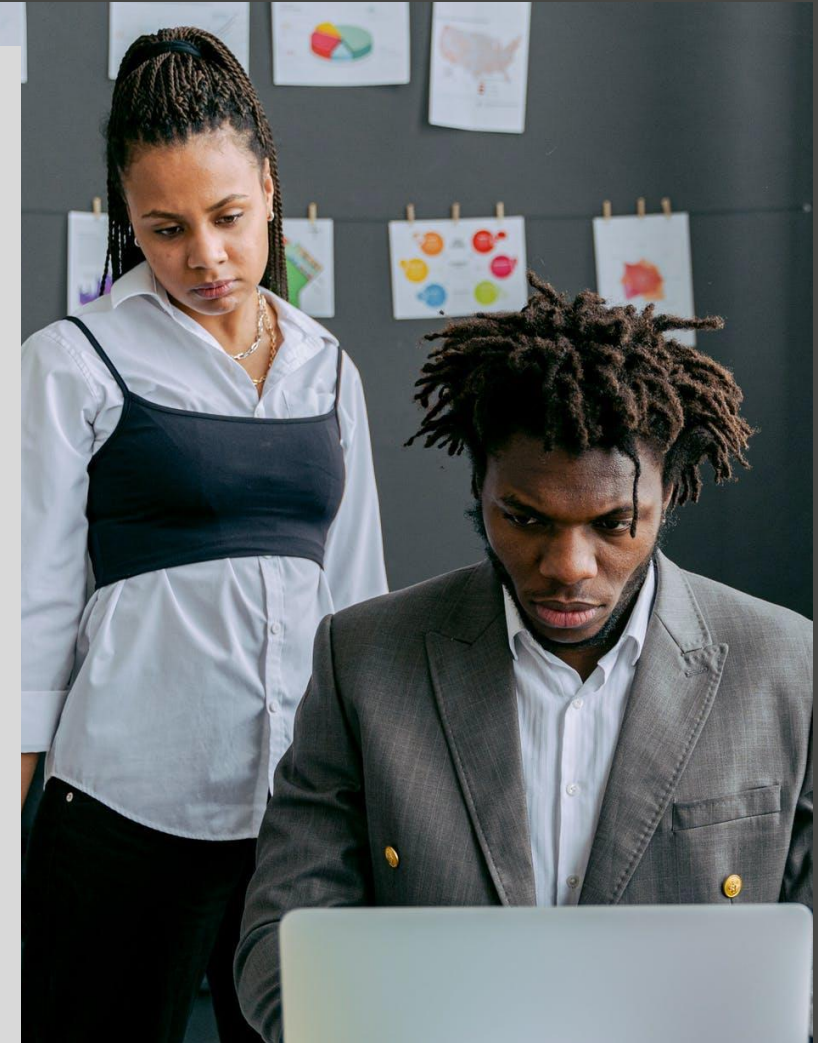
3.2 Conflicts of interest

3.2.2 In hiring direct or indirect family members.

Referring to the direct or indirect line of family members to V.tal is a common and acceptable practice. Still, the kinship condition must be informed to the People & Culture Department at the beginning of the recruitment process. Omitting this information is considered a Code violation. Also, the responsible departments must select, hire, and examine these job candidates on equal terms with candidates seeking a job at V.tal through other means.

Romantic relationships between employees are allowed if the persons involved are not hierarchically subordinated or have any administrative subordination within the same department or may influence management decisions, processes, evaluations, promotions, and other conflicting conditions not mentioned here. Even in cases where there is no subordination but some influence on the career decisions of the other person's behavior or activity, the employee may not participate in decisions that may benefit or harm the other employee.

Internal changes, such as transfers or promotions, can conflict with the employment agreement. You should immediately inform your direct supervisor and the People & Culture and Compliance departments if this happens. In rare situations where exceptional circumstances are unclear, the Integrity Committee shall be involved to arbitrate constitutes noncompliance with the guidelines outlined in this Code of Ethics and Conduct.



* At V.tal, the following persons are considered family members: 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, cousins, and second-degree nephews; great-grandparents, great uncles and second-degree uncles.

3.2 Conflicts of interest

3.2.2 In hiring direct or indirect family members.

We do not allow:

- Family and/or romantic relationships among employees under hierarchical or administrative subordination within the same Department.
- Hiring relatives of employees at the management level for open positions within the same Committee, even if there is no direct hierarchical subordination.
- Family and/or romantic relationships between employees who may directly influence the performance of the tasks performed.
- Employees with family and/or romantic relationships assess each other in the 360-performance assessment.



3.2 Conflicts of interest

3.2.3 In relationships with suppliers and business partners.

Relationships with suppliers and business partners must only rely on V.tal compliance practices and follow the procedures for selecting, negotiating, and hiring third parties. All our negotiations are transparent, and our business relationships are ethical.

Our potential suppliers and business partners are assessed and selected using transparent, honest, and non-discriminatory criteria.

V.tal discloses its principles and code of conduct to its suppliers, so they must adhere to these principles and rules, as provided in V.tal's Code of Ethics and Conduct for Third Parties.

Relationships with suppliers and business partners are immediately terminated if there is a risk of reputational harm to the company's interests due to their failure to comply with the legal, tax, labor, social security, environmental, and occupational health & safety related issues.

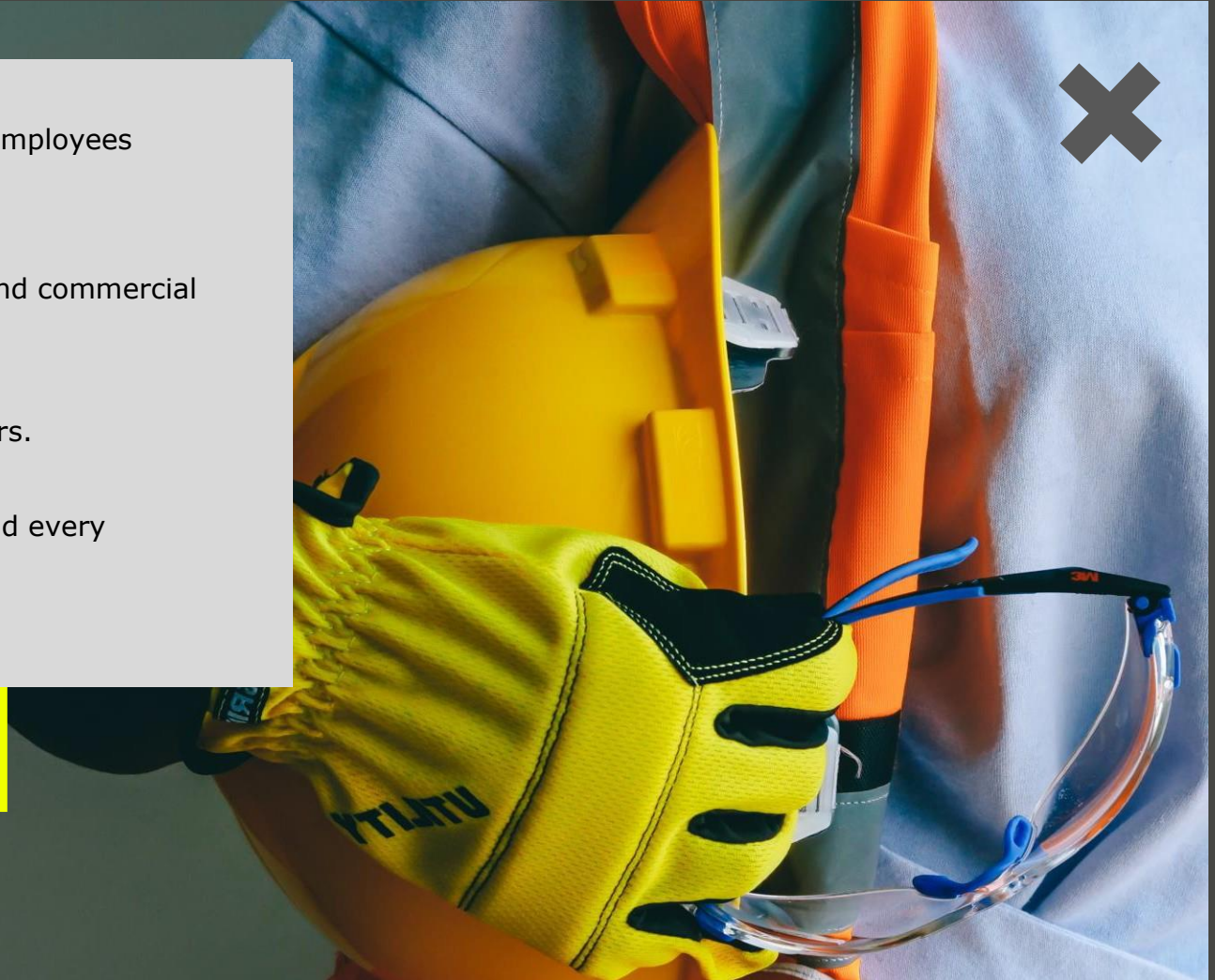


3.2 Conflicts of interest

3.2.3 In relationships with suppliers and business partners.

We do not allow:

- Hiring companies that are owned, managed or directed by V.tal employees or by any of their direct or indirect family members.
- Hiring suppliers for reasons other than their technical, financial and commercial capacity.
- Benefitting or giving any privilege for selecting and hiring suppliers.
- Hiring companies that employ enslaved persons or child labor, and every employee must report this practice.



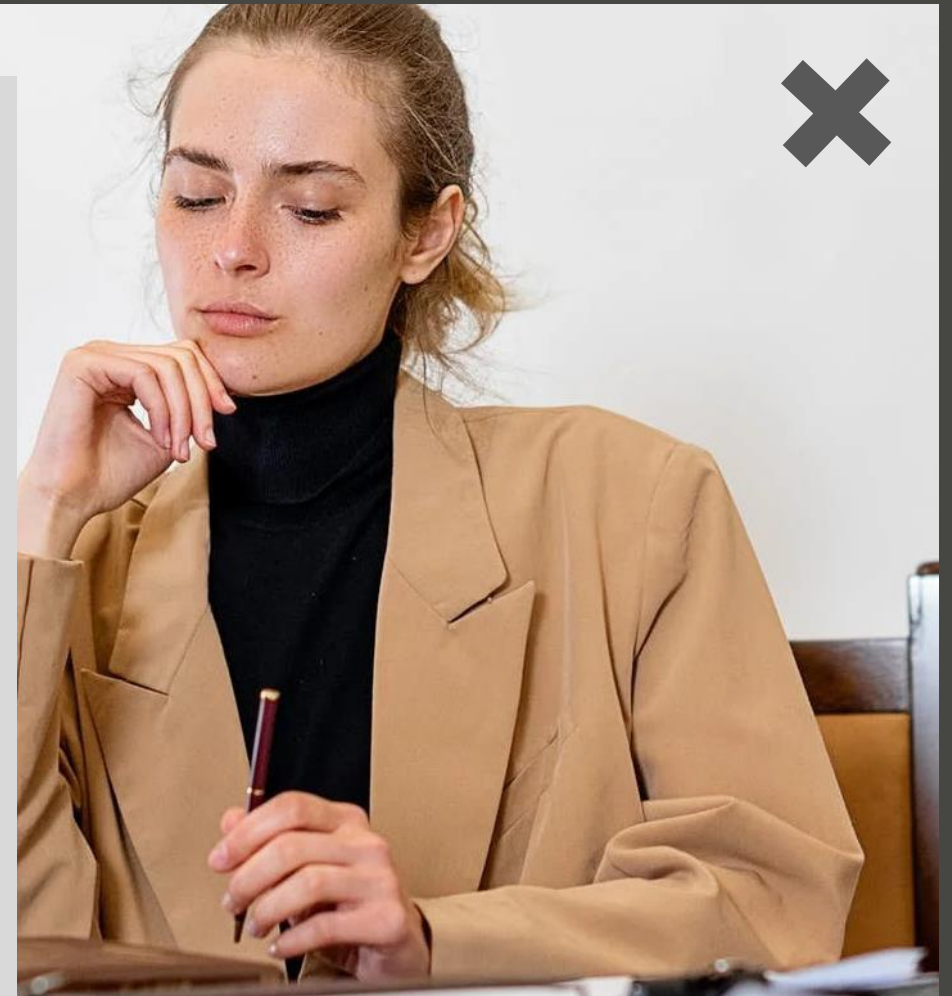
3.2 Conflicts of interest

3.2.4 In Relationships with Competitors.

We are committed to fair competition, and a competitive market involves never engaging in activities that violate the applicable laws and/or V.tal ethical principles.

We do not allow:

- Making formal or informal agreements with competitors for setting, increasing, or stabilizing prices and profit margins. Including coordinating bids, initiatives, or price recommendations.
- Setting minimum prices of the products and services for the distributors and resellers.
- Dividing the market or allocating customers, business accounts, or sales territories.
- Directly or indirectly violating fair competition in proposals or bids.
- Entering into arrangements to agree on the prices of bids, competitions, or any other terms and conditions of the offer.
- Limiting or eliminating the production or the supply of products and services.
- Restricting our competitor's performance.



3.3 Our Relationship with the Government & Public Sector

We may have to communicate with the public sector in our business activities. Due to the greater exposure to possible corruption, all interactions with general agents are considered risk points for us. Therefore, all our relationships with the public sector should be handled with the utmost attention, respect, integrity, ethics, and transparency, and we have specially qualified departments that should be activated as needed.

We are in line with V.tal ethical principles when:

- Our interactions with public agents are legit, i.e., the reason is legal, relevant, and ethical, and the interlocutors are correctly skilled and have the power to represent the company in such a situation.
- Our communication is objective, using a more formal, clear, and brief vocabulary.
- We act transparently and record all the meetings in the company's agenda or the departments' internal controls.
- We strictly comply with the policies issued by V.tal and by the public sector to offer or accept gifts or corporate hospitality.



3.3 Our Relationship with the Government & Public Sector

Important:

- V.tal does not sponsor, fund or make donations to political campaigns, candidates or political parties. Also, any personal campaign or distribution of materials involving politics or religion must not be carried out in our workplace or through our resources.
- If you receive a court order or legal claim you should immediately forward it to our Legal & Regulatory Committee, to: **ld-contencioso@vtal.com**.



3.4 Freebies, Gifts, corporate hospitality & other benefits

We know that giving and receiving amenities is a common practice in companies. Still, we must understand that providing and receiving amenities is ordinary in companies, but we must consider the risks involved. It includes freebies, gifts, or even invites to events and meals. For this reason, we are very cautious and transparent, and we should follow the best practice policies in this regard.

Meaning of each item:

- **Freebies:** Objects without commercial value used as advertising, promotion or small courtesy.
- **Gifts:** Products or services for personal use with commercial value.
- **Hospitality:** Meals, trips, entertainment, among others.



3.4 Gifts, corporate hospitality & other benefits

What you should know and do:

- Understand the risks involved in polite actions. Act with transparency and follow our internal policies.
- To avoid seeming inappropriate influence, none of our employees and their closest family members should accept freebies, gifts, or benefits equivalent to \$100 (one hundred U.S. dollars) or more.
- Refuse freebies, gifts, invitations, trips, or any other amenity not foreseen in our policies, and which exceed the limit above. Especially if you notice a potential attempt to influence or expect retribution, if it is a condition to close or promise a deal, or if it falls under any of the hypotheses prohibited in our policy.
- Before offering amenities, strictly follow the guidelines outlined in our Policy for Freebies, Gifts, Hospitality & Other Benefits, and the receiving third-party's policy.
- Pay particular attention when dealing with public agents, so respect V.tal policy and the public sector's rules.
- Amenities cannot be given in cash, check, or interest, nor be customary.



3.5 Combating corruption, prevention of money laundering, and terrorism financing

In line with our commitments, the Compliance Program, and the applicable national and international laws, it is a non-negotiable principle that none of our employees– and none of the third parties acting on our behalf or partnering with us – should commit illegal acts.

V.tal strictly forbids:

- **Accepting or receiving any bribe** that implies, promises, offers, or gives any undue advantage to a national or foreign public agent - or someone related to him. Bribery is also unacceptable in relations between private companies. The most common forms of corruption include facilitating payments, bribes, rebates, donations and sponsorships, contributions to political parties, and gifts.
- **Obstructing investigations or inspections** – any obstruction, intervention, or obstacle to the activities performed by public agencies, entities, or agents during their work, investigation, or examination. Moreover, within the scope of activities performed by regulatory agencies and supervisory bodies within the national financial system.
- **Money laundering and terrorism financing, as well as financing of proliferation of weapons of mass destruction** - illegally concealing the origin of money using V.tal's business lawful operations or resources for such activities to seem legal.
- **Bid rigging** - practicing fraud in commercial bids or agreements signed with national or foreign governments or good undue advantage to a competitor bidder.



3.5 Fighting corruption, prevention of money laundering and terrorist financing

When V.tal engages in business relationships in foreign countries, it must follow their anticorruption laws.

We must comply with all antibribery and anticorruption laws and regulations, both national and international applicable to our business.



3.6 Using social media

We encourage our people to mindfully connect with all audiences (internal or external). Also, we need to be aware of the quality of the content, as we are responsible for what we post.

- You should not speak on behalf of V.tal on social media. We have official profiles.
- If you identify anything that should be checked or is exposing V.tal, you should send a copy to: marketing@vtal.com. This includes our logo or any other institutional symbol used on websites, blogs, or unofficial social profiles.
- You should not use social media to express your dissatisfaction that can be resolved internally, nor express offensive content that may harm V.tal reputation or its members' dignity.
- When you publish images on V.tal official profiles, you should always prefer a neutral position; appropriate content, not exaggerated, or related to politics, religion, football, or to V.tal client's brands. This also applies to our professional intranet, Teams, and email profiles.



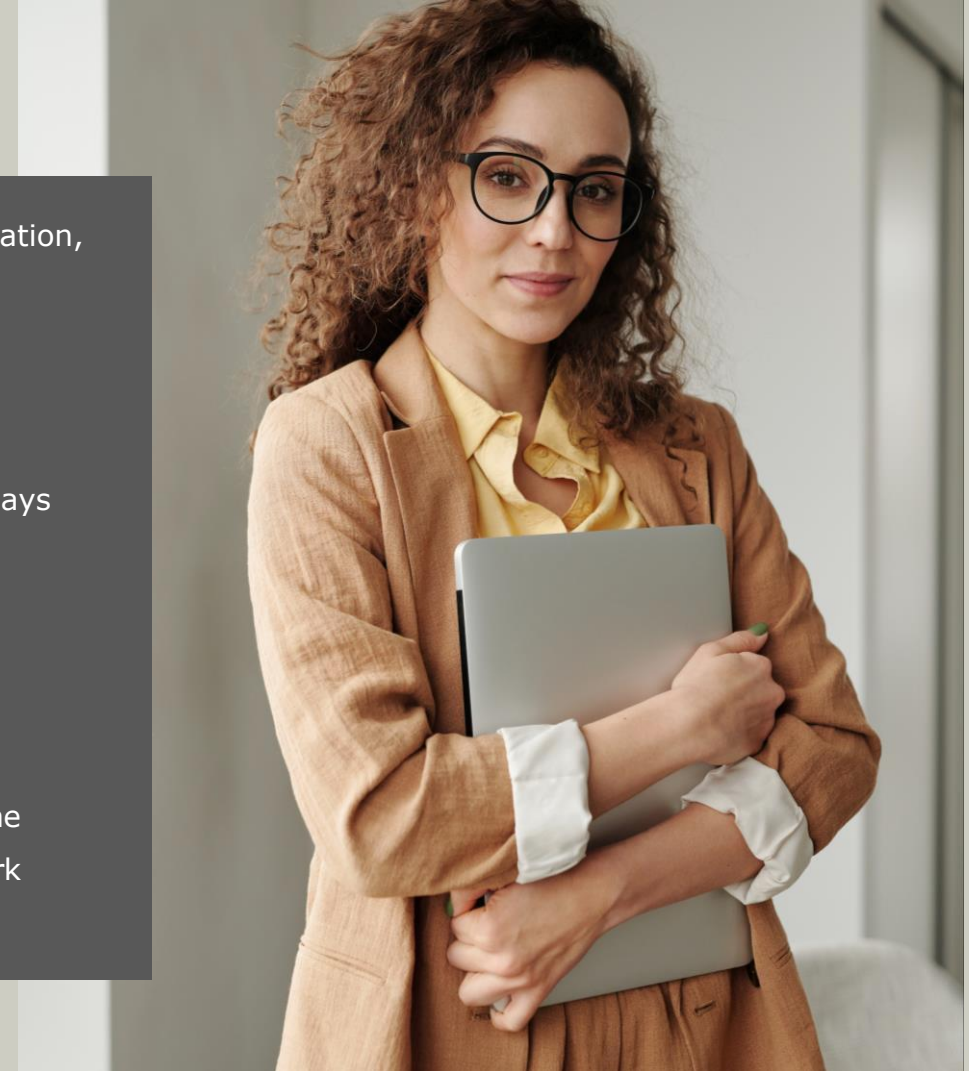
3.7 Using V.tal resources, assets, information & systems

3.7.1 We protect V.tal resources.

Protecting the Company's assets and resources is one of our primary duties, meaning that we should use them with common sense, incorrectly and responsibly, and not waste or misuse them.

- You should be responsible for the proper use of V.tal financial resources, with prior authorization, and in line with V.tal policies and procedures.
- You should request refunds that precisely reflect your expenditures.
- You should only use V.tal vehicles for activities related to the Company, and you should always follow traffic laws.
- V.tal computers and electronic systems should only be used for your professional activities.
- You should only use V.tal marks for approved activities after receiving authorization from the relevant departments. And don't forget to follow the rules and guidelines under our Trademark Guide.

Attention: V.tal reserves the right to monitor the use of its assets and resources at its discretion, including computers, *devices*, emails, and systems.



3.7 Using V.tal resources, assets, information & systems

3.7.2 Information Security.

You should use V.tal information only for professional purposes. We are essential in protecting the company's businesses and preventing misuse or unauthorized access. You must pay special attention to information classified as confidential, including those privileged or protected by law.

Six information security recommendations:

- Credentials (ID, passwords, and identification credentials) are personal and non-transferable.
- Be careful not to share sensitive information or post them on social media, and be sure not to leave them on workstations or forget them in meeting rooms.
- If you need to print something, do not leave the material on the printer. Secured methods for archiving documents also apply when you work from home.
- Never share information about V.tal businesses and strategies you may access through your work at V.tal.
- Avoid conversations about sensitive or competitive information in virtual environments or when you work from home or in public places such as elevators, restaurants, taxis, airports, and airplanes. If you need to share files, including sensitive information, use our official channels, such as Microsoft Teams or Outlook, our corporate email.
- Never use confidential or legally protected information for personal benefit or to the benefit of others. Based on this information, you should not advise your family, friends, or others to make investments. Be sure not to share sensitive information with V.tal competitors. Be careful with what you say during meetings with associations, unions, and benchmark work.



Remember that V.tal intellectual property also includes our work product. So, you should not delete, destroy, or take such information with you you're your employment agreement terminates. Our duty to protect the Company's information remains even after our professional engagement ends.

3.8 Privacy & Data Protection

Based on Data Protection Laws around the world, V.tal needs to ensure the privacy and protection of the personal data of our customers, business partners, and employees. This way, we reinforce our stakeholders' trust.

- You should learn and apply the Data Protection laws and regulations.
- You should continuously improve the security measures.
- In your routine, you should assess the effects of your decisions regarding people's privacy and use the most adequate solutions.
- You should not collect, store, retain, share, transfer, delete, or otherwise process personal or sensitive data without ensuring that such procedure complies with our guidelines and policies.
- You should only share personal data with authorized persons and retain information during the necessary times, per the applicable laws and regulations.
- You should respect people's choices regarding their privacy and the use of their data.
- When using collaborative video calling tools, ensure you are not recording meetings without authorization or sharing it with unauthorized people.
- If you know about a security-related incident or data misuse, immediately report the situation to our Privacy Team by sending an email to: PP-PrivacidadeVtal@vtal.com.



If you have any questions about the topic or if you are developing a project or product involving the processing of personal data, you should contact V.tal's Privacy Team and our DPO, the law firm Baptista Luz Advogados, by sending an email to: **PP-PrivacidadeVtal@vtal.com**.

3.9 Risk Management

Risks are part of every business, and each employee plays a crucial role in preventing them. We incentivize our employees to be agents who can identify possible problems and discuss solutions.

Here, at V.tal, we believe everyone is part of risk management, and prevention is the most intelligent way to help us meet our goals and ensure business continuity. In this regard, you should identify the risks, assess how much they can harm our strategy and/or impact our business, and take action to overcome their adverse effects.

▪ You should:

- Protect V.tal and the people by reporting problems with potential risks to find the best solution.
- Properly identify and assess the risks and anticipate and look for the best response strategies before deciding.
- Provide open and collaborative inputs to the corporate process regarding risk management and business continuity for V.tal's protection and interest.



4 Integrity Committee

The only instance is responsible for assessing all issues relating to responsibility, behavior, and ethics inside V.tal. It determines the disciplinary actions and controls and reviews this Code.

It is formed by three executives of the Company: the Vice-President of the Legal Department, the Vice-President of the People & Culture Department, and the Vice-President of the Governance, Risks and Compliance Department. The disciplinary actions established by this Committee shall follow the internal Disciplinary Regime, which range from verbal or written warning to suspension or termination of employment, despite the filing of a judicial proceeding.



5 Reporting illegal and unethical behaviors

Under the V.tal way, our relationships should be based on respect, integrity, neutrality, and transparency.

V.tal incentivizes its employees and third parties to report any violation of the laws, regulations, or V.tal's internal policies. In this regard, we provide a direct reporting channel that is safe and confidential - the **Whistleblowing Channel**.

- You should always clarify your doubts and check whether a situation follows the precepts in our Code. Talk to your supervisor, People & Culture, or the *Compliance Teams*. However, you should present a report if you identify any situation that may harm V.tal, its employees, or other problems.
- When submitting a report through the Channel, you should include evidence, facts, data, date, and details. More information helps the investigation be more assertive.
- You should be transparent and collaborative with investigations.
- Use the channel to report cases, in good faith, related to harassment, fraud, misbehavior, and discrimination. But not use the Channel to make complaints or inquiries about V.tal processes and procedures, tantrums, gossip, reports without sufficient investigation data, in bad faith, intrigues, or vindictive communications.



TO ACCESS THE WHISTLEBLOWING CHANNEL:

- By web, at: <https://www.ethicsandconductchannel.com/vtal/>
- By phone, call: 0800 721 0783 (only for Brazil)

6 Conclusion

We should always follow the most restrictive rules, as applicable. Employees joining V.tal should understand and know all the guidelines under this Code and other internal policies (whether their knowledge is mandatory) to guide their behavior.

This Code applies to everybody, so everybody must know this Code and the specific policies and self-training. Such an action represents the formalization of the knowledge and the commitment of each employee to comply with them. Alleging ignorance or lack of understanding of the Code and the Policies does not exempt your responsibility to follow V.tal guidelines.

**V.tal policies, standards,
and internal procedures**

**serve as a supplement
to this Code and should also
be followed.**

7 Questions, comments & suggestions

This code does not end here. Your participation is essential for our company's improvement. So, send your inputs, doubts, comments, and suggestions about this Code to the Compliance *Team* (**PP-ComplianceVtal@vtal.com**). For more information, check our intranet. Your collaboration is vital!

Suppliers, third parties, representatives, and business partners should also follow this Code

through the V.tal Code of Conduct for Third Parties in all activities engaged with us.

This Code of Ethics and Conduct

Governance, Sustainability and Audit Team

PP-ComplianceVtal@vtal.com

enters into force as of its publication and will be reviewed every two years. On such dates, every employee needs to formalize the knowledge of this document.

v·tal