

A nighttime city street scene with light trails from cars and buildings in the background. The text is overlaid on the right side of the image.

CODE OF ETHICS AND CONDUCT

v'tal

O futuro passa por aqui.

A nighttime city street scene with light trails from cars and buildings in the background. The scene is illuminated by city lights, with a mix of modern glass skyscrapers and older, ornate buildings. The light trails are primarily yellow and white, indicating car headlights and taillights. The buildings are lit up, with some windows glowing blue and others yellow. The overall atmosphere is one of a busy, modern city at night.

v-tal

o futuro passa por aqui.

V.tal is a company born with the mission of bringing customers the best fiber optic connection, democratizing access to the digital world, and transforming people's lives.

We are proud to be an innovative, inclusive and sustainable company that values diversity, respect and transparency in all its relationships. Our operations are neutral, balanced and non-discriminatory to all customers who share our infrastructure.

We know that fulfilling our mission requires an excellent team that shares our values and is committed to acting ethically and with integrity at all times.

Therefore, I present our Code of Ethics and Conduct, which guides our internal and external conduct and decisions and reflects our Culture and Vision for the future.

All V.tal employees must read, comply with and demand compliance with the Code of Ethics and Conduct, as it is key to guaranteeing our reputation, credibility and sustainability in the market.

Our team is always available to deal with any situation and to help in everyday situations. Please use the available communication channels if you have any questions or concerns.

V.tal is a company that makes a difference in the world. The future goes through here and depends on each one of us!

Felipe Campos
CEO

01

INTRODUCTION

02

THE V.TAL WAY

03

COMMITMENT TO
INTEGRITY

04

REPORTING
ILLEGAL OR
UNETHICAL BEHAVIOR

05

FINAL
CONSIDERATIONS

06

QUESTIONS,
FEEDBACK, AND
SUGGESTIONS

07

TERM

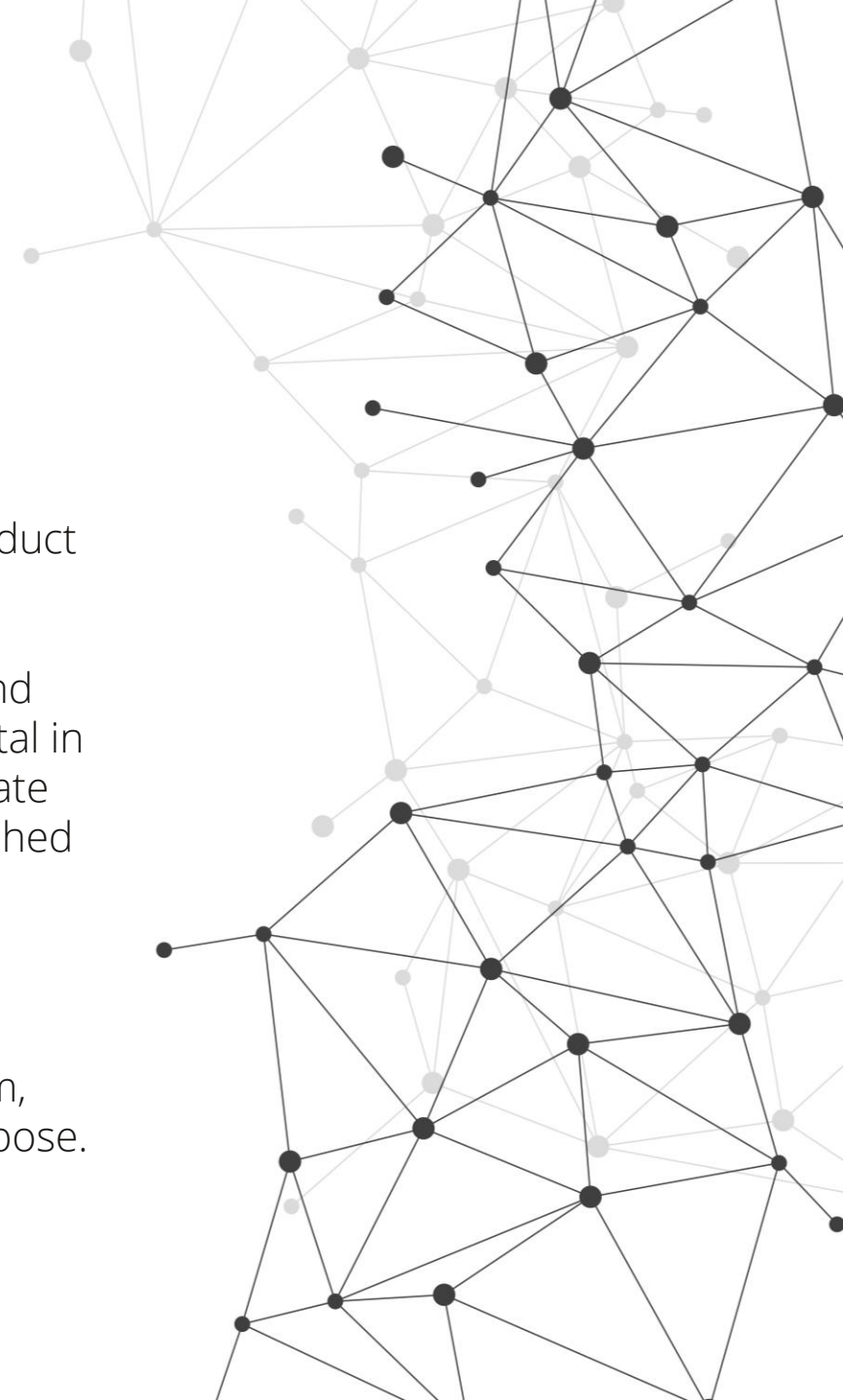
01

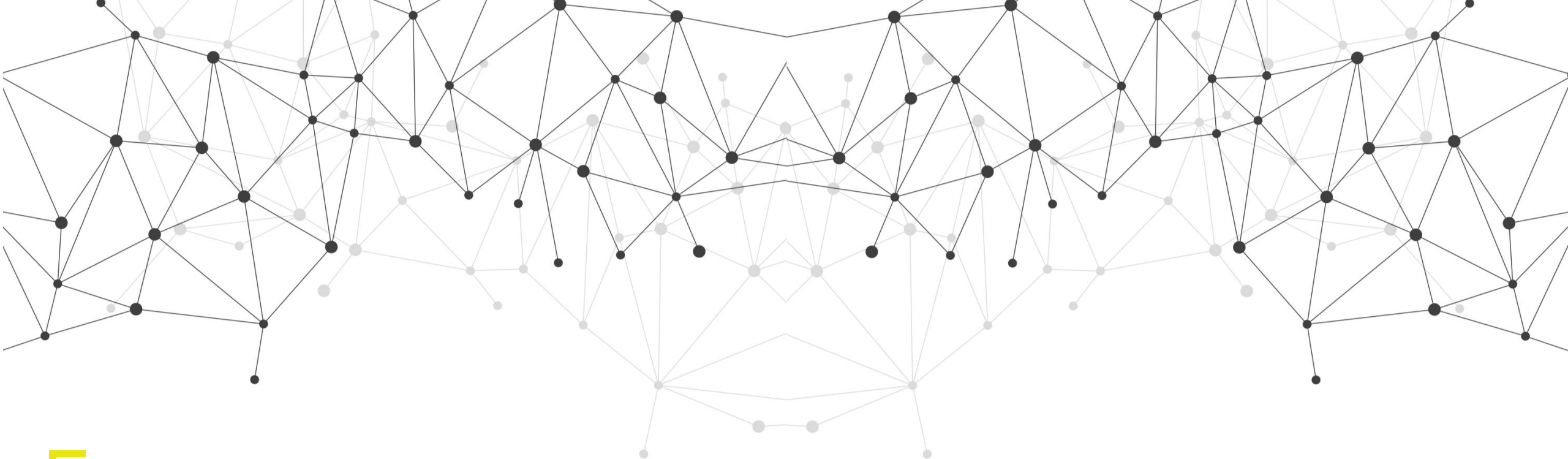
INTRODUCTION

WHAT IS THE CODE OF ETHICS AND CONDUCT?

The V.tal Code of Ethics and Conduct ("Code") establishes the rules of conduct and ethical principles expected of all our employees and third parties who interact with V.tal in all environments where we operate and, in the relationships, established due to our activities.

The guidelines presented herein should guide our daily decisions, strengthen our identity as a Team, and direct us to achieve our purpose.





WHO DOES THIS CODE APPLY TO?

This Code applies to all individuals and companies that comprise the V.tal Group, regardless of position or role (employees, members of Boards and Committees, officers, interns and apprentices) and to all third parties that have a relationship with V.tal (stakeholders, service providers, suppliers, customers, representatives, and business partners).

Everyone is responsible for becoming familiar with, understanding and complying with the guidelines of this Code and other V.tal policies, rules and procedures relevant to their work to ensure that ethical conduct is present and guides the daily exercise of all their activities.

02

THE V.TAL WAY

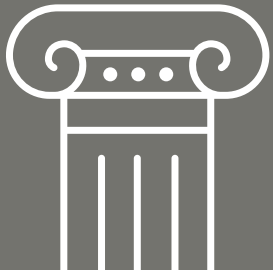
V.TAL GOVERNANCE

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



Neutrality

The basis of our business dictates that we cannot offer privileges to companies using our infrastructure. Our business relationships must always be impartial.



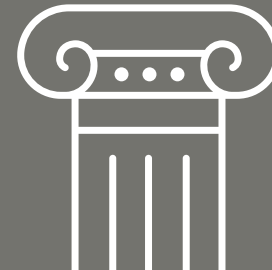
Confidentiality

This is vital to guarantee the security of data, business information, people and companies, protect V.tal's strategy, and preserve the credibility of our image in the market.



Transparency

We value honesty. We keep our operations, processes and decisions clear to ensure trust and credibility among stakeholders.



Independence

V.tal seeks to ensure that private or external interests do not influence our decisions, thus valuing the autonomy of our management and basing decisions on facts and objective analyses.



OUR PURPOSE

To foster a connection with the digital world, transforming people's lives.

Therefore, we must have the same identity, follow the same guidelines, and take our actions consistently.

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

Relationship

We play fair and trust each other.

Result

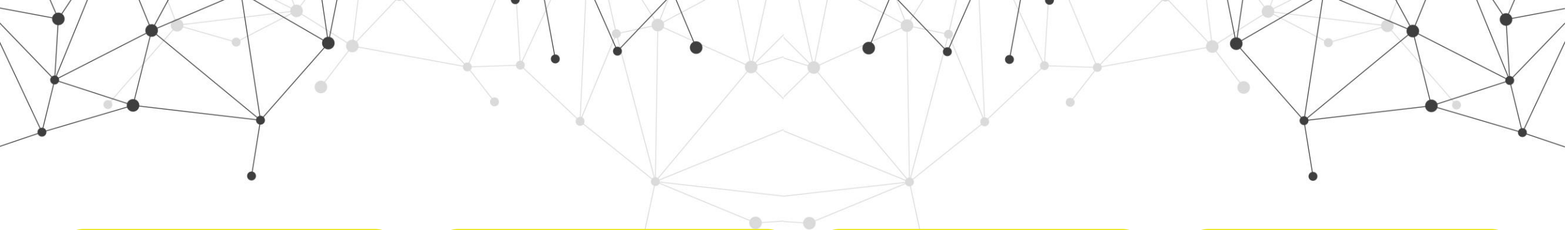
We are obsessed with excellence and high performance.

Innovation & learning

Our mantra is innovation and constant learning.

Environment

Work hard, play hard!



RELATIONSHIP

Our relationship is supported by the following behaviors:

- We are honest, neutral and transparent with each other and our customers.
- We deliver on our promises.
- We listen carefully and treat everyone with respect.
- We bring all problems to the table.
- We give feedback and ask for help.
- We empower people and give them credit.
- We do not tolerate toxicity.
- We focus on our customers.

INNOVATION AND LEARNING

There is no evolution without learning; therefore:

- 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 make mistakes.
- We don't make excuses; we look for solutions.
- We are nonconformists; we deepen our knowledge.

RESULT

The search for results happens daily in every decision:

- We are agile and risk-takers.
- We hire people who are better than us.
- We go beyond expectations.
- We are result-driven, not effort-driven.
- We are structured based on facts and data-oriented
- We do what needs to be done; we don't care about status.
- We don't do what's possible; we do our best.

ENVIRONMENT

We are focused and foster a healthy environment:

- We have fun and celebrate achievements.
- We promote an easy-going and cooperative environment.
- We are enthusiastic, optimistic and kind.
- We work in open spaces; we are not hierarchical.
- We do not tolerate discriminatory behavior.

03

COMMITMENT TO INTEGRITY

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

- **We maintain a healthy work environment**, free from any form of discrimination and behavior that may create, encourage or allow insults, intimidation or corruption.
- **We respect the laws, regulations, and internal rules**, and we seek to act with ethics and integrity in everything we do.
We act with integrity and without conflict of interest, always in the best interest of V.tal. Before making a decision, **we always assess whether it is in accordance with ethical guidelines** and business rules.
- **We build healthy, trusting relationships** with all stakeholders, including investors, government, customers, competitors, partners and suppliers.
- **We protect V.tal's resources and guarantee confidentiality**, information security and data protection.

WORK ENVIRONMENT

We contribute to a respectful and harassment-free environment

We listen carefully and respectfully

At V.tal, we value respect as a fundamental principle of our relationships with everyone, such as colleagues, managers, customers, suppliers, and others.

Five recommendations to follow in line with V.tal principles:

1. Maintain a healthy climate of mutual trust and listen to and respect everyone.
2. Solve problems that may arise through dialogue and professionalism without abusive behavior or overstepping boundaries.

1. Encourage good relationships and be patient with each professional's different profiles.
2. Set an example with the right behaviors and attitudes at the right time.
3. Report any misconduct to the **HR and Compliance** departments in order to correct any inappropriate behavior observed.



We combat harassment, abusive conduct and inappropriate behavior

V.tal repudiates and does not tolerate any type of abusive conduct, inappropriate behavior, bullying, sexual harassment and sexual assault, by its managers, employees, executives, interns or third parties who have a relationship with V.tal. These actions represent serious ethical and legal violations.

If any situation is identified that may constitute any of these behaviors, V.tal expects **immediate reporting to the Confidential Channel so that the fact can be duly investigated.**



***Abusive conduct
and inappropriate behavior***

These are behaviors, words, acts, gestures or even writings that may harm someone's dignity and physical, moral or mental integrity, even when not done repeatedly.

Examples of unwanted attitudes: accusations, threats, insults, shouting, humiliation, intimidation, use of foul language, spreading rumors and gossip, isolation, social exclusion, imposition of unattainable goals or urgent tasks that become permanent, among others.

Bullying

It is the repetitive and prolonged practice of abusive behavior that disqualifies, through words, gestures or attitudes, a person's self-esteem, security or image.

It happens regardless of hierarchical relationships; that is, a manager may bully an employee, or a team or employee may bully their own manager. It can also happen among peers.

Bullying examples

Demanding the execution of urgent tasks repeatedly and unnecessarily.

Systematically challenging all your decisions and criticizing the work done in an exaggerated or unfair way, especially in front of other people.

Assigning embarrassing or humiliating tasks.

Constantly shouting or reprimanding an employee, especially in front of colleagues.

Excessively and unnecessarily monitoring an employee's work.

Coercing an employee to perform tasks or behaviors that are contrary to their will – and outside their duties – under threat of negative consequences.

Not bullying examples

Requesting occasional and reasonable overtime, with adequate compensation.

Performance evaluations conducted by colleagues or superiors, as long as they do not cause an embarrassing situation for the person being evaluated.

Disagreements or specific conflicts among colleagues or between an employee and their superior.

Warnings or disciplinary measures proportionate to inappropriate behavior or violation of rules.

Demanding work or performance respectfully and reasonably.

Assigning tasks to subordinates in a reasonable and fair manner.



Sexual harassment and assault

Sexual harassment is the act of embarrassing someone with the intention of obtaining a sexual advantage or favor, including by taking advantage of a superior hierarchical position (i.e., bosses embarrassing subordinates in relation to sexual attitudes). Sexual assault consists of practicing a lewd act against someone without their consent, with the aim of satisfying one's own desire or that of a third party.

These attitudes can be clear or subtle; spoken or just hinted at; written or explicit in gestures or physical contact. They can also appear in the form of coercion or blackmail. These attitudes can manifest themselves in various ways, such as: (i) unwanted physical contact; (ii) sending text messages, emails or any digital communication with sexual content without the recipient's consent; (iii) repeated invitations to romantic or sexual encounters, even after clear refusal; among others.

Both sexual harassment and assault are crimes addressed by the Brazilian Criminal Code and can result in a conviction of up to five years in prison.

WE VALUE DIVERSITY AND PROMOTE INCLUSION

Diversity is part of our essence.

Personal differences, the 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 based on their race, origin, gender identity or expression, sexual orientation, age, religion, disability, nationality, social class, family, marital status, medical leave (including pregnancy), political affiliation, physical appearance, lifestyle, among others.

We raise awareness and take action to strengthen an environment where 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 equal opportunities and fair treatment for all.

EXAMPLES OF ENCOURAGED AND DISAPPROVED PRACTICES

Report any suspected discriminatory behavior.

Create a relaxed environment without the use of derogatory terms, nicknames or jokes directed at an individual.

Use inclusive language and avoid comments that could be considered offensive.

Discussions and presentation of ideas on relevant topics and cases.

Ignoring complaints or concerns from colleagues about discrimination or exclusion.

Using derogatory terms or nicknames when addressing colleagues or insisting on making unacceptable jokes.

Making assumptions about employees' abilities, interests, or behaviors based on their race, gender, sexual orientation, or any other characteristic.

Heated and disrespectful discussions with the use of inappropriate words.

WE GUARANTEE A SAFE ENVIRONMENT

Our employees are our greatest asset, which is why we have a non-negotiable commitment to their safety.

V.tal complies with all technical occupational safety requirements and standards to offer everyone a safe, healthy and accessible work environment.

We would like to remind everyone that they must work to create and maintain a safe environment by assessing dangers and risks before starting their activities.

Furthermore, if an accident occurs, acting quickly to ensure the well-being of those involved is vital.

The possession, encouragement, sale, distribution and consumption of alcohol and other drugs on the Company's premises or when working for V.tal is strictly prohibited, except for the consumption of alcoholic beverages at events predetermined by V.tal.

Furthermore, smoking inside the Company's buildings is not allowed.

WE PROTECT V.TAL'S RESOURCES

Protecting V.tal's assets and resources is one of our basic obligations.

This means using them correctly, responsibly and safely with common sense, avoiding waste and misuse.

All of V.tal's assets (including vehicles, computers, electronic systems and corporate use cards) must be used primarily for professional purposes. Using or withdrawing them for personal purposes, those of relatives, friends or colleagues is prohibited.

Some tips for protecting V.tal resources:

- Be sensible when using financial resources, always with prior authorization and in line with V.tal's authority and policies.
- When requesting refunds, make sure to request the exact amount spent.
- Use V.tal vehicles for Company activities only and in compliance with traffic laws.
- V.tal's computers and electronic systems are for performing its professional activities.
- Only use the V.tal brand in permitted activities and after authorization from the areas responsible. And don't forget to always follow the Brand Manual's standards and rules.



PLEASE NOTE

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



COMPLIANCE WITH LEGISLATION, REGULATIONS AND INTERNAL RULES

Everyone is responsible for strictly complying with applicable legislation, regulations and internal standards when performing their duties.

In line with our commitments, the Integrity Program and applicable national and international legislation, **it is non-negotiable that all employees** – or third parties acting on our behalf, for our benefit or in partnership with us – **cannot commit illegal acts.**

ZERO TOLERANCE FOR ACTS OF CORRUPTION, FRAUD, FACILITATION PAYMENTS AND BRIBERY

V.tal requires compliance with all applicable national and international laws and regulations against acts of corruption, including, but not limited to, the provisions:

(i) of Law No. 12,846/2013 (Anti-Corruption Law); (ii) of Decree No. 11,129/2022 (Regulatory Decree of the Anti-Corruption Law); (iii) of Law No. 8,429/1992 (Administrative Misconduct Law); (iv) of Law No. 13,813/2013 (Conflict of Interest Law); (v) of Law No. 14,133/2021 (Bidding Law); (vi) of the United States Foreign Corrupt Practices Act (FCPA); and (v) the UK Bribery Act (UKBA).

- **Fraud:** any act performed to obtain illegal gains to the detriment of another person, such as falsifying, improperly altering or adulterating documents, proposals, accounting data, contractual clauses, reimbursement requests (for food, taxi, mileage expenses, among others) and/or manipulating results.
- **Corruption:** act of promising, offering or giving, directly or indirectly, even through an intermediary, an undue advantage to a government official or a third person related to them.
- **Facilitation payments:** goods, services or values promised or delivered with the intention of speeding up a process or ensuring the execution of a routine government action, such as the issuance of permits, licenses or issuing of other official documents.
- **Bribery:** offering money, gifts or undue advantages to someone in exchange for benefits in one's own interest or that of third parties.

V.tal does not tolerate acts of fraud, corruption, bribery or facilitation payments. In particular, it is expressly prohibited:



Promising, offering or giving, directly or indirectly, any undue advantage to a government official or third party related to it (corruption) or to any private individual (bribery). V.tal prohibits the practice in relations with government officials and private agents.



Defrauding bidding processes or administrative contracts – engage in fraud in public tenders and government contracts, whether domestic or foreign, or offer an undue advantage to a bidding competitor



Hindering investigation or inspection activities - establish any type of obstruction, intervention or difficulty in the actions of public bodies, entities or agents in their activities, investigations or inspections.



Requesting or receiving any type of bribe or undue advantage from private or public officials.

ANTI MONEY LAUNDERING AND TERRORISM FINANCING

V.tal strictly complies with the provisions of Law No. 9,613/1998

(Law on Anti Money Laundering) and is committed to preventing and combating money laundering and the financing of illicit activities, in order to ensure a safe and secure environment protected from such actions.

IMPORTANT CONCEPTS

01

MONEY LAUNDERING

act of hiding or disguising the nature, origin, location, disposition, movement or ownership of assets, rights or values arising, directly or indirectly, from a criminal offense.

02

FINANCING OF TERRORISM

the act of distributing resources to finance criminal activities or organizations related to terrorism. It is strictly forbidden to camouflage the illicit origin of financial resources using legal operations of V.tal or its resources in order to give a lawful appearance to any amounts.



CONFLICTS OF INTEREST

Conflicts of interest occur when an individual's private interest interferes, or may interfere, with their 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.

The conflict of interest may be real, potential or apparent:

REAL

there is a clear, perceptible conflict of interest.

Example: You work in the procurement department, and you were suggested to hire a company owned by a family member, so your decision will not be impartial.

POTENTIAL


the situation has not yet escalated into a conflict, but there is a strong possibility that there will be a conflict of interests in the future.

Example: your spouse is looking for a job with your potential supplier and you may be influenced by this.

APPARENT

any situation that may give rise to the presumption that legitimate interests of V.tal may be or may be being overlooked in favor of a private interest.

Example: your sister works at your potential supplier, and you don't think that will influence your decision.



Everyone must take actions and ***make decisions that are in the best interests of V.tal***, ensuring that actions and decisions are not influenced by personal interest and ***do not conflict with the interests of V.tal***, or cause damage to its image and reputation.



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

- Do not allow personal interests to affect our choices or professional performance.
- Eliminate conflict of interest.
- They look for the most appropriate and lowest risk solution for V.tal.
- They are transparent in situations with potential conflict of interests.
- Follow the guidelines set out in the Conflict of Interest Policy.



We do not allow

That employees carry out another professional activity that competes and/or conflicts with those carried out by V.tal.

Use of privileged information (obtained internally or externally, including from companies previously worked with).

Use of V.tal resources in a primarily non-professional manner, to meet personal purposes, those of relatives, friends or colleagues.

Use of the position held at V.tal to obtain any type of advantage, personal or professional, for oneself or for third parties.

RELATIONSHIP BETWEEN EMPLOYEES, FAMILY MEMBERS AND RELATIVES

The referral 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 at the beginning of the recruitment process.

V.tal will observe equal opportunities for all, regardless of indication. V.tal does not tolerate any type of illegal or undue favoritism in the employee selection and hiring process.

V.tal understands the possibility of an emotional relationship between employees.

However, those involved must not occupy any level of hierarchical or administrative subordination within the same Board, as well as any type of influence on management decisions, processes, evaluations, promotions and other conflicting conditions not specified in this Code.

We do not allow

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

RELATIONSHIP WITH SUPPLIERS AND BUSINESS PARTNERS

V.tal only deals with honest, qualified and duly regularized third parties to provide services. All potential suppliers and business partners of V.tal will be evaluated and selected using clear, honest criteria and without any discrimination.

V.tal does not tolerate any type of illegal or undue favoritism in the selection and hiring process of third parties.



We do not allow

- Hiring of companies owned, managed or directed by V.tal employees or their direct or indirect family members.
- Hiring of suppliers for reasons other than technical, economic and commercial capacity.
- Favoritism or privileges of any nature in the selection and hiring of third parties.
- Hiring companies that are involved in slave or child labor.
- Hiring of companies that behave contrary to current legislation.



POLITICAL-PARTY DEMONSTRATIONS

V.tal maintains a position of neutrality and impartiality in relation to any political-partisan manifestations.

V.tal does not sponsor, finance or make donations to political campaigns, candidates or political parties.

V.tal respects the right of its employees to engage in the political life of their respective countries. However, any individual campaign or distribution of material involving a political nature must not be carried out in our work environment or through our resources.

Furthermore, political-partisan statements must always be presented as personal opinions, without any association with V.tal.

Finally, any political demonstrations carried out by V.tal employees must not contain t-shirts, logos or any brands that identify the company.

RELATIONS WITH COMPETITORS

V.tal respects and encourages free competition.

Exercise our commitment with free competition and a competitive market means acting in an absolutely independent manner in the market and never carrying out actions prohibited by law and contrary to V.tal's ethical principles.

We do not allow

- Encourage or participate in illicit agreements with any competitors.
- Set prices for products and services for distributors and resellers.
- Participate in or defraud the free competition in bidding or competition processes.
- Agree on prices in tenders, competition or other terms and conditions of the offer.
- Restrict or eliminate the production or supply of products and services.
- Provide, receive or disclose Competitively Sensitive information from V.tal to any third parties or competitors.
- Use, provide, receive or disclose Competitively Sensitive Information from other companies (direct competitors or not).
- Restrict the actions of competitors.
- The exchange of competitive information with Oi (or any other operators) is expressly prohibited.

“Competitively Sensitive Information”

is data in the private domain of a company that, if disclosed, may alter competitive strategies or distort the regular competitive process, such as production costs, information on pricing, customers, suppliers, competitive strategy, products, services, among others.

Violating such obligations may result in legal sanctions against V.tal, as well as disciplinary measures and legal punishments, including criminal ones, for violators.

RELATIONS WITH THE GOVERNMENT AND PUBLIC SECTOR

In our business, we may interact with the public sector.

Everyone must always be honest, accurate and frank in all negotiations and contacts with public officials.

WE ARE ALIGNED WITH THE ETHICAL PRINCIPLES OF V.TAL WHEN

Interactions with public officials happen for legitimate reasons. In other words, with a lawful, relevant, ethical reason and with interlocutors with the appropriate competence and function for this representation.

We are transparent and record all meetings in the corporate agenda or in the internal controls created by the area.

We use impersonal dialogue and more formal, clear and concise language.
Our meetings take place in corporate locations that are consistent with the topics covered.

We strictly follow V.tal and public sector policies when offering or accepting hospitality and other courtesies.

GIFTS, PRESENTS, HOSPITALITY AND OTHER BENEFITS

We know that giving or receiving courtesies is a common practice in companies, but we cannot fail to be aware of the risks involved.

The offering of gifts, presents and hospitality must be related to the commercial activity carried out by V.tal and in no way be used as a mechanism to influence the business decision-making of third parties.

Know each item

GIFTS

These are objects of low value or no commercial value, distributed in a generalized manner as advertising, publicity or small courtesy, such as pens, bottles, stickers, keychains, etc.;

PRESENTS

Are items or services for personal use and that have commercial value that do not fall within the definition of gifts;

HOSPITALITIES

Offer of services or expenses for transportation, food, accommodation, courses, seminars, congresses, events or fairs.

Before offering or accepting courtesies, ensure compliance with the guidelines of the Gifts, Presents, Hospitality and Entertainment Policy, as well as the policy of the third parties who offered or will receive it.

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 publish.

- Do not speak on behalf of V.tal on social media. There are official profiles for this.
- If you identify something that needs evaluation, or that exposes V.tal, send the evidence to the email marketing@vtal.com. We are talking about both a logo and any other institutional symbol applied to websites, blogs or unofficial social profiles.
- Do not use social media to express dissatisfaction that can be resolved internally, nor to express offensive content that harms the image of V.tal or the dignity of its members.
- When using images on V.tal's official profiles, choose neutral positions and do not contain inappropriate, exaggerated content or content related to politics, religion, football, the brand of a V.tal client, among others. This also applies to our professional profiles on the intranet, Teams, email, among others.

INFORMATION SECURITY, PRIVACY AND PROTECTION OF PERSONAL DATA

INFORMATION SECURITY

V.tal information must be used exclusively for professional purposes, in your activities at the Company. We play an important role in protecting businesses, preventing misuse and unauthorized access.

It is everyone's duty to guarantee the security and protect the integrity and confidentiality of the information processed by V.tal in its systems and equipment. Everyone must follow V.tal's presented guidelines to protect information.

Remember that what we produce in our day-to-day work is V.tal's intellectual property. In other words, we must not delete, destroy or take this information with us when we eventually terminate our employment contract. Our commitment to protecting Company information must be maintained even after professional relationships have ended.

PRIVACY AND DATA PROTECTION

V.tal values respect for the privacy and protection of the personal data of its employees, customers, representatives of suppliers or service providers and all other people with whom it has a relationship.

We have a legal, ethical and contractual commitment to the protection of such data and, to this end, we must:

- Use personal data ethically and responsibly, respecting all V.tal policies, standards, manuals and internal procedures on the subject;
- Process only relevant and necessary personal data, anonymizing, returning, discarding or ceasing the use of others;
- Maintain the confidentiality, availability, integrity and authenticity of personal data, applying technical and administrative information security measures;
- Notify any information security incidents to our customers, data subjects and/or competent authorities when necessary;
- Ensure respect for privacy and protection of personal data from the conception to the launch and maintenance of products or services, through risk assessments conducted by the Data Controller and constant monitoring;
- Participate in training and other internal awareness activities on privacy and data protection and ensure adherence to these initiatives.

Any situation or suspicion of misuse of personal data must be immediately reported to: ***pp-privacidadevtal@vtal.com.br***. Privacy and protection of personal data is everyone's effort: Everyone must know their role and responsibilities to fulfill this mission.

PRIVILEGED INFORMATION

V.tal employees must avoid talking about matters relating to the work carried out at V.tal in public places, and must maintain absolute confidentiality regarding any confidential, sensitive or privileged information to which they have access in the performance of their professional activities at V.tal.

The use of information obtained as a result of work performed for your own benefit or that of third parties or to the detriment of V.tal constitutes a violation of this Code and applicable legislation and may result in the adoption of disciplinary measures and legal implications.

EXAMPLES OF ENCOURAGED AND DISAPPROVED PRACTICES

- Maintain total confidentiality regarding confidential, sensitive or privileged information to which you have access.
- The properly guided discussion, in formal internal meetings, of sensitive information related to V.tal, exclusively with employees who may have access.
- Contact the competent area in case of doubts regarding the processing of V.tal information.
- Sharing confidential V.tal information in external environments and/or with third parties, especially with competitors.
- Sharing sensitive information with other sectors, even internal to V.tal, without prior authorization.
- Exchanging sensitive information, even between employees in constant contact with this type of data, in environments outside the company.

04

REPORTING 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 suspected violation of laws, regulations and V.tal's internal policies. To this end, we offer a direct, secure and confidential channel for reporting these occurrences - the ***Confidential Channel.***



CHECK OUT THE CHANNEL

<https://canalconfidencial.com.br/vtal/>
0800 721 0783



When opening a report on the Channel, try to present evidence, facts, data, local and details of the incident that allow for the proper investigation of the infraction. The more information, the more assertive the investigation will be.

Reports may be submitted anonymously.

Be as transparent and collaborative as possible with investigations.

V.tal guarantees the confidentiality and anonymity of any and all complaints.

Use the channel to report cases in good faith related to harassment, fraud, misconduct, discrimination, among other topics.

However, do not use the Channel to:

complaints or clarifications about V.tal processes and procedures, outbursts, gossip, reports without sufficient data for investigation or reports of bad faith or statements with a conspiratorial or revengeful purpose. Reports made in bad faith also constitute a violation of the provisions of this Code and may lead to the application of disciplinary measures.

V.tal also guarantees that it will not retaliate against people who submit reports based on good faith, and that it will take all necessary measures to investigate the facts and protect the identity of the whistleblower.

V.tal guarantees that all reports will be duly investigated, with complete impartiality and confidentiality.

If violations are proven, V.tal will adopt the disciplinary measures applicable to each case, regardless of the position or function held by the offender, including in relation to members of senior management and third parties.

Disciplinary measures will be decided on a collegial basis and may be applied in the form of a verbal or written warning, suspension or termination of the employment contract, regardless of any legal proceedings being initiated, in accordance with the internal Disciplinary Measure procedure.

05

FINAL CONSIDERATIONS

Everyone must seek to understand and be aware of all the guidelines of this Code and other internal policies so that they can guide their behavior while acting on behalf of V.tal.

Formal knowledge of this Code and specific policies, as well as the completion of specific training, are mandatory and applicable to everyone. This act represents the formalization of knowledge and commitment to fulfilling it. Ignorance or lack of awareness of the Code and Policies does not exempt the responsibility to act in accordance with V.tal guidelines.

V.tal's internal policies, standards and procedures complement this Code and must also be observed.



06

QUESTIONS, CRITICISMS AND SUGGESTIONS

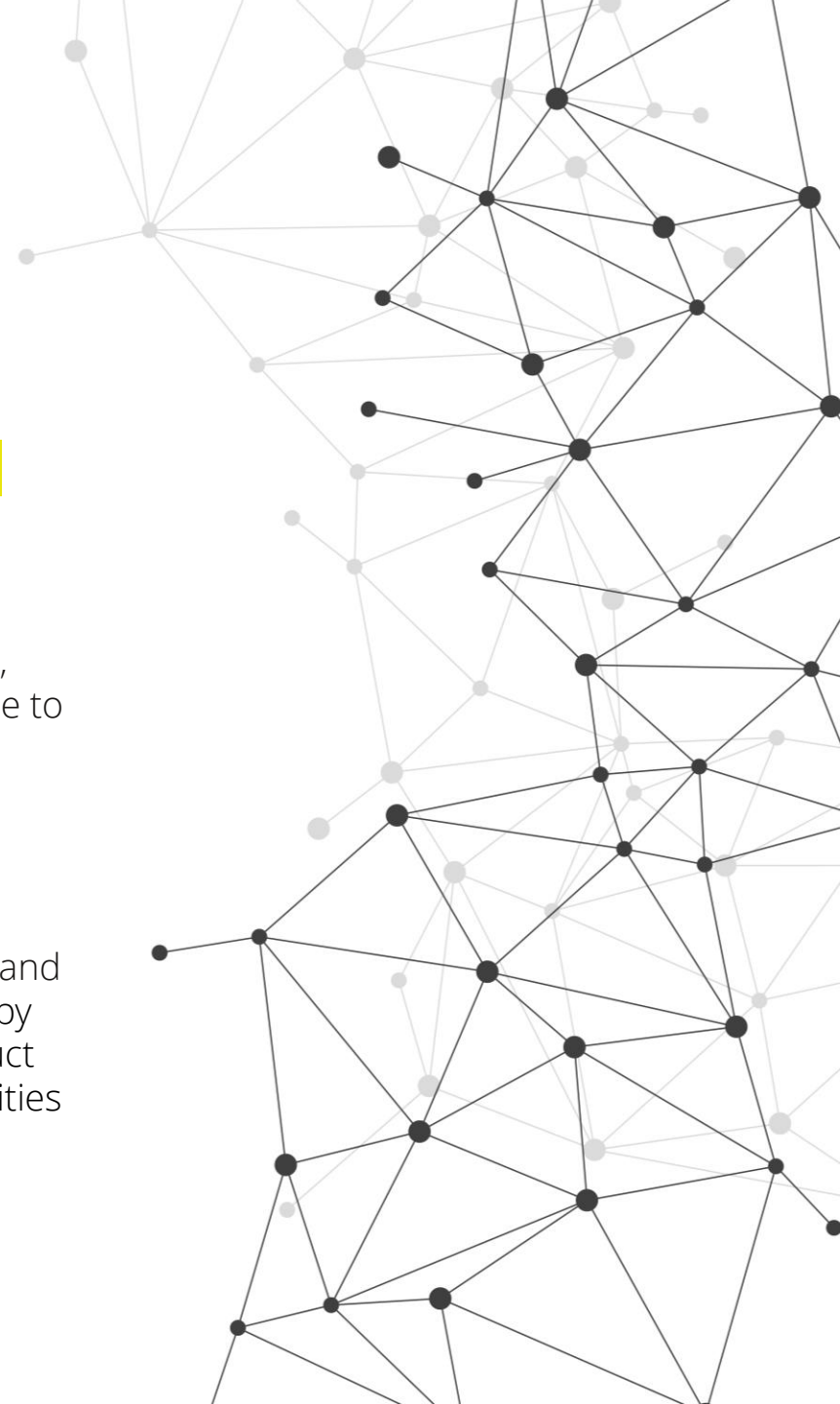
This Code does not end here. Your participation is important for the improvement of V.tal.

Collaborate and present your questions, criticisms or suggestions about this Code to the Compliance Area (PP-ComplianceVtal@vtal.com). For more information, visit the intranet. We are counting on you!

Suppliers, third parties, representatives and business partners must also be guided by this Code through the Ethics and Conduct Manual for Third Parties in all their activities with V.tal.



PP-ComplianceVtal@vtal.com



07

VALIDITY

The Code of Ethics and Conduct comes into force upon publication and will be reviewed every 2 years.

