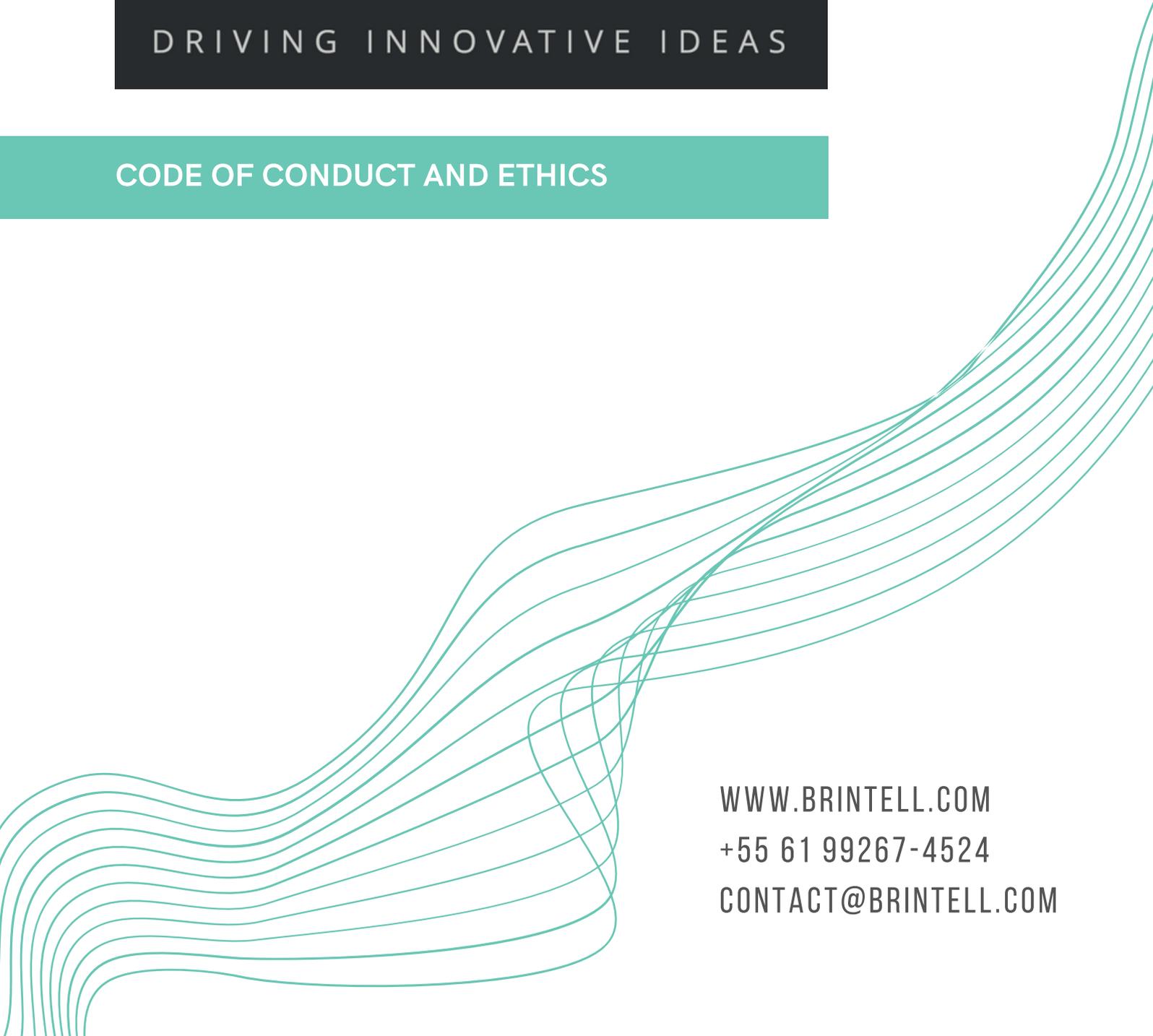


The Brintell logo features the word "Brintell" in a bold, white, sans-serif font. The letter "i" is stylized with a teal triangle above it. The letter "l" is stylized with a teal triangle to its right. The logo is set against a black rectangular background.

Brintell

DRIVING INNOVATIVE IDEAS

CODE OF CONDUCT AND ETHICS

A series of thin, teal-colored lines that flow from the bottom left towards the top right, creating a sense of movement and innovation.

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1. PRESENTATION

Brintell was born with the mission of making analytical insights accessible to business leaders so that they can make more assertive decisions based on data, in addition to accelerating and leveraging the use of technology and data through customized solutions and high visual impact.

It is not a simple mission and this Code of Conduct and Ethical Standards - CCES was developed with the aim of guiding the conduct of employees and showing partners, customers, public agencies, society and shareholders the ethical bases on which every person related to Brintell must be based on their relationships in the workplace.

Reading and understanding this CCES is essential to guide the conduct of employees in planning and carrying out their activities. Everyone is responsible for compliance and constant improvement. Here, we indicate the beginning of the path to be followed to reach the proposed goal.

Alex Cordon

CEO



2. GOAL

The Code of Conduct and Ethical Standards - CCEs aims to clearly define to all employees, as well as to clients, suppliers of goods and services and representatives, the conducts that guide Brintell's activities, in business and before society in general. The CCES must be present in the daily exercise of professional and personal activities.

In addition, this CCES defines the behavioral attitudes and practices that are expected to be adopted in relation to Brintell, as well as establishing values and standards of conduct so that everyone involved can understand, respect and practice them, contributing to the performance of correct, fair and respectful manner in relation to Brintell, public agencies, communities and partners.

Although this document deals with a variety of practices and procedures, the rules contained herein do not exhaust all situations and cases that may occur and may be complemented by other internal company policies or judged within an equity judgment.

3. SCOPE

The CCE establishes the conduct, guidelines and ethical principles that should govern the action of all employees, shareholders, customers, partners and representatives of Brintell and applies, obligatorily and without exceptions, to all employees, regardless of their hierarchical level or location.



4. PRINCIPLES

Brintell's principles are fundamental aspects of conduct that are expected of all employees, representatives, third parties, clients and partners of the Company. Such principles help consolidate Brintell's image as a straightforward company and with well-defined ethical values before society.

4.1 Always act correctly and fairly, with ethics, good faith, honesty, transparency and professionalism in the relationship with shareholders, professionals, customers, partners, contractors, public agencies, local communities and society in general.

4.2 Meet the requirements of Brazilian law in any sphere of activity, always acting with integrity.

4.3 Combat any form of fraud, direct or indirect, public or private, and any related practices, repudiating any and all forms of corruption, bribery, favoring, influence peddling and extortion in the relationships you establish for yourself, your employees, representatives, clients or through partners, between any entity or public/private agent, in any situation.

4.4 Reject and combat any and all forms of money laundering or financing of illicit activities, both directly and indirectly, as well as practices for hiding revenues and accounting practices in disagreement with the current legislation and the relevant accounting principles.



4.5 Be transparent and commit to the truth and clarity of conveyed information.

4.6 Know and comply with all Brintell regulations and procedures, especially those related to its integrity policies and standards.

4.7 Respect diversity, having no discrimination of ethnicity, color, gender, sexual orientation, ideology, nationality, religious belief, non-transmissible disease, position, function or any other personal, physical or social condition.

4.8 Regard the security of information of third parties, employees, customers and partners, not disclosing, under any circumstances, personal or strategic information obtained by any means.

4.9 Always seek to maximize the company's performance, as a way of guaranteeing its longevity, its investments, the financial return to partners and the adequate working conditions for employees.

4.10 Develop management policies and practices according to the best corporate governance practices.

4.11 Promote the dissemination of the compliance culture in the company through training and campaigns on the code of conduct and ethics and other awareness activities on the subject.

4.12 Efficiently manage your workforce in order to meet the professional expectations of employees, encouraging a healthy, innovative, productive, collaborative and respectful work environment, free from discrimination and any type of harassment, prejudice or illegal practice.



4.13 Hire only suppliers of goods and services that:

- I. Comply with the current legislation in Brazil and in the countries in which they operate;
- II. Comply with Brintell's Internal Controls;
- III. Ensure the security and confidentiality of information;
- IV. Provide quality products and services;
- V. Do not seek illegitimate and abusive advantages;
- VI. Do not adopt unethical procedures or any other practice that may constitute an act of corruption, whether of public or private nature, such as money laundering or illegal accounting practices;
- VII. Do not finance illegal activities;
- VIII. Do not use child or slave labor;
- IX. Do not harm third parties as a result of your relationship with Brintell.

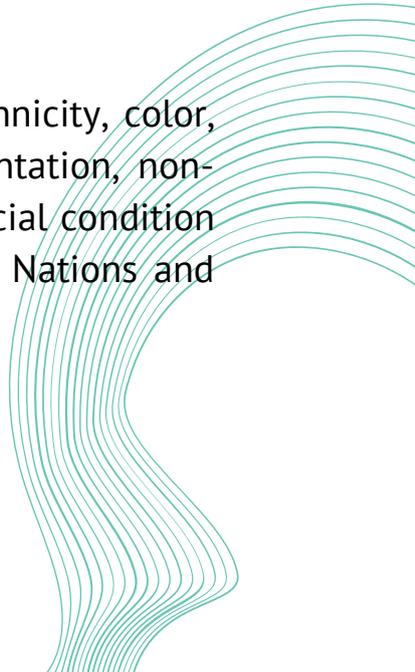
5. GUIDELINES

The guidelines are norms and instructions defined by Brintell in order to guide the activities and relationships of employees with the company and the market.

5.1 PROHIBITED CONDUCTS

5.1.1 Disclosure or sale of personal and/or confidential information from customers, partners, employees or third parties.

5.1.2 Any type of discrimination or prejudice based on ethnicity, color, gender, ideology, nationality, religious creed, sexual orientation, non-transmissible disease or any other personal, physical or social condition or other situations protected by Brazilian law, the United Nations and the Global Forum (OECD).



5.1.3 Any conduct that may create a hostile, offensive or intimidating workplace, as well as any conduct that constitutes an offense to moral or physical integrity such as moral and/or sexual harassment.

5.1.4 Any conduct in which employees prevail in their position or function to obtain or grant any improper courtesy or advantage, whether in the form of gifts, financial compensation or benefits of any nature.

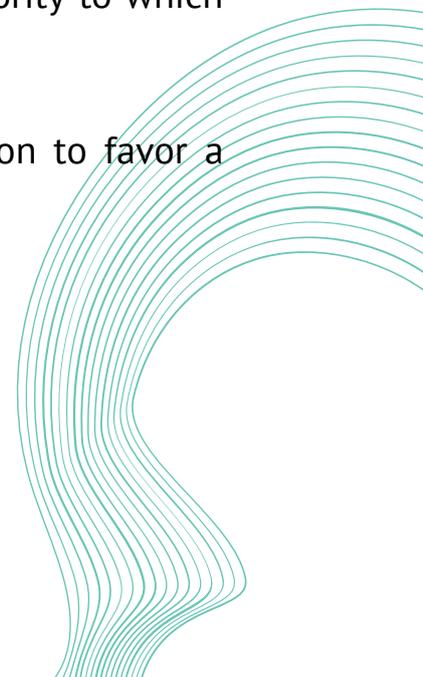
5.1.5 Any conduct in which employees obtain any personal benefits or third-parties advantages by using Brintell's information.

5.1.6 Any conduct in which employees, third parties, customers, representatives and partners in general promise, offer or give to any entity or public/private agent, or to people related to it, bribes, kickbacks, gifts, accommodation, amenities, payments or payment promises for facilitation of hiring processes.

5.1.7 The use of any and all forms of illicit payment for obtaining an advantage in the relations with third parties, understanding that the concept of "advantage" includes an exchange of favor with the guarantee of obtaining benefits or rights, even if legitimately owed to Brintell.

5.1.8 Any conduct in which the employee obtains a license, permit or any other authorization from a state entity or public authority to which the company would not be entitled.

5.1.9 That the employee fails to act or make any decision to favor a third party, at the expense of the company's interest.



5.2 GENERAL RULES

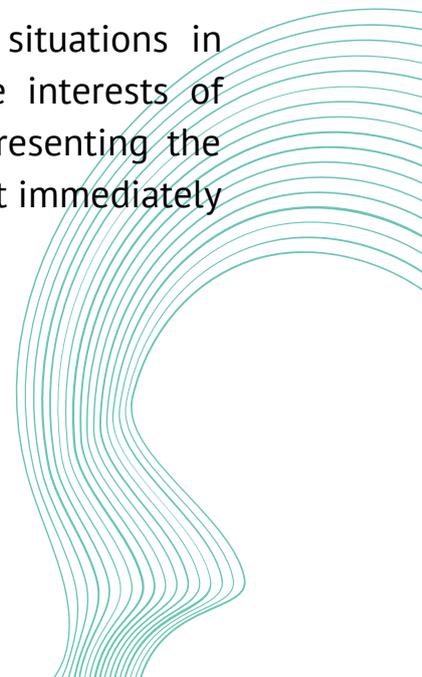
5.2.1 Brintell does not engage in political activities. Employees who wish to participate in any electoral process must do so individually, without involving the name or resources of the company, which does not support candidates or political parties, and does not contribute to election campaigns. No professional is authorized to request participation, support or funding from any candidate or party.

5.2.2 Referring friends to existing Brintell vacancies is an acceptable practice. The respective areas are responsible for deciding on the selection and hiring, according to objective criteria and company norms, with no influence on the admission, promotion or dismissal of those involved.

5.2.3 All candidates applying for selection processes, including those nominated, undergo a Compliance and/or Assessment evaluation, so that the chosen professional meets the interests of Brintell and the prerequisites of the vacancy.

5.2.4 Employees must maintain confidentiality on relevant information related to Brintell that has not yet been disclosed to the market and ensure the confidentiality of company information, by signing a confidentiality agreement.

5.2.5 Employees, trainees and apprentices must avoid situations in which there may be a conflict of self-interest with the interests of Brintell and, when this is not possible, refrain from representing the Company in the matter in question, communicating the fact immediately to their immediate superior.



5.3 INTERNAL CONTROLS

5.3.1 Brintell must maintain correct and complete information regarding its financial situation and results of operations, in addition to maintaining an adequate structure of processes, controls and procedures that ensure the effectiveness and integrity of the company's information.

5.3.2 All employees must execute and maintain correct records that reflect the company's activities and comply with their responsibilities in accordance with Brintell's internal controls. Incorrect, incomplete or inappropriate records are inadmissible.

5.3.3 Brintell's Internal Controls must be executed in compliance with the guidelines defined in the Company's current internal regulations and the established procedures.

5.3.4 Remediation of control deficiencies identified by internal or external audits is responsibility of the manager, who must prepare an action plan in conjunction with the Internal Controls area and ensure, under continuous monitoring, its correct execution.

5.3.5 It is the duty of Brintell's employees to ensure the correct execution of the company's automated and systemic controls, through the proper use of the systems and procedures adopted by the company.

5.3.6 Employees must understand and comply with all applicable rules, laws and regulations.

5.3.7 If any employee becomes aware of or suspects any situation that involves false, misleading information or leakage of confidential information, he/she must report the fact immediately.



5.4 SECURITY AND INTEGRITY OF INFORMATION

5.4.1 It is the duty of Brintell employees to seek complete information for the performance of their activities, ensuring the quality of the materials and documents prepared by the company.

5.4.2 Employees must maintain the confidentiality of strategic information and information related to relevant acts or facts not yet disclosed to the market, as well as ensure that others do so, except when required by law.

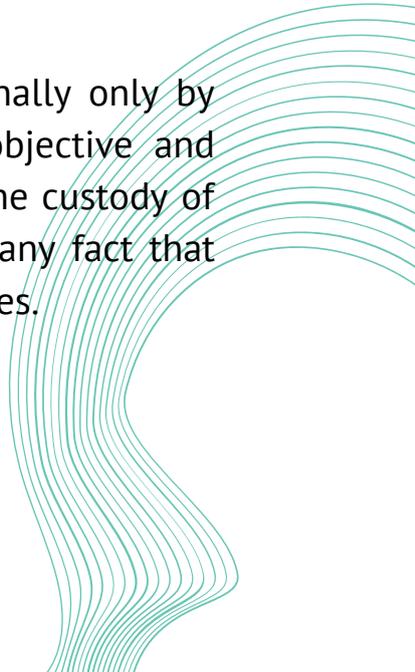
5.4.3 Employees are not permitted to copy software protected by copyright, developed internally and/or by licensing agreements, unless the copyright or license holder expressly authorizes the copy.

5.5 COMMUNICATION AND INSTITUTIONAL IMAGE

5.5.1 Brintell considers transparency in its relations with its professionals and the community to be a fundamental issue for building an environment of mutual trust and responsibility at all levels.

5.5.2 Therefore, Brintell's internal or external business communication must disseminate true information, always guaranteeing a respectful relationship with our stakeholders.

5.5.3 Information must be disclosed internally and externally only by those who are authorized to do so and in a precise, objective and appropriate manner. Each professional is responsible for the custody of the information at their disposal and must communicate any fact that may seem strange or incompatible with the company's values.



5.5.4 False, slanderous or malicious statements about colleagues or about the company, its business, partners or customers may be subject to disciplinary and/or criminal sanctions.

5.5.5 Brintell's image must be built and preserved daily by all professionals as its most important asset. Any individual or collective action or attitude that compromises the company's reputation and credibility will be considered a serious violation and will result in termination of the employment contract.

6. FINAL DISPOSITIONS

Due to the dynamics of business and society, unforeseen situations and doubts related to the application of the CCE may arise. In this case, one should seek the representative of Brintell to expose, in a clear, complete and transparent way, the events so that the company can take the appropriate steps.

This CCES should be widely disseminated to all employees, customers, suppliers of goods and services as well as partners. This CCES must be periodically reviewed, and any changes must be approved by the Executive Board.



TERMS OF COMMITMENT

I declare, for all purposes, that I have received a full copy of Brintell's Code of Conduct and Ethical Standards - CCES, that I am aware of its provisions and undertake to fully comply with them.

further declare that I have been informed of the obligation to comply with all situations and circumstances that are directly or indirectly related to Brintell's activities.

Finally, I declare that in the event of situations in which there is no express provision in this CCES regarding the required or expected conduct, I will immediately inform Brintell's representative.

Name of employee or legal representative:

Executive Board/Superintendence/Company:

Date and location

Signature

