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SUMMARY

1. OUR ESSENCE.....	3
1.1 MISSION, VISION AND VALUES.....	3
1.2 OBJECTIVES OF THE CODE	3
2. GENERAL PROVISIONS	4
2.1 SCOPE	4
2.2 RENUANCE.....	4
2.3 DISCLOSURE AND AMENDMENT	4
2.4 INSTITUTIONAL POLICIES, NORMS AND PROCEDURES	4
3. GUIDELINES.....	5
3.1 RESPECT FOR PEOPLE	5
3.2 HARASSMENT AND MISBEHAVIOR.....	5
3.3 ALCOHOL AND DRUGS.....	5
3.4 RESPECT FOR DIVERSITY AND NON-DISCRIMINATION.....	6
3.5 MERITOCRACY AND FAIR SELECTION PROCESSES.....	6
3.6 CONFLICT OF INTEREST.....	6
3.7 POLITICS AND RELIGION	7
3.8 KINSHIP AND RELATIONSHIPS	7
3.9 EXTERNAL PROFESSIONAL ACTIVITIES.....	7
3.10 FAIR COMPETITION AND RESPECT FOR ANTITRUST LAWS.....	8
3.11 RELATIONSHIP WITH PUBLIC AGENTS	8
3.12 PREVENTION OF FRAUD, BRIBERY AND CORRUPTION	9
3.13 PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING.....	9
3.14 ETHICAL CONDUCT EXPECTED FROM THIRD PARTIES.....	10
3.15 GIFTS, PRESENTS AND HOSPITALITIES	10
3.16 DONATIONS AND SPONSORSHIPS	11
3.17 INFORMATION SECURITY, DATA PROTECTION AND CONFIDENTIALITY.....	11

Document Title	CODE OF CONDUCT AND ETHICS	Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022



Confidentiality 12

3.18 INTEGRITY OF FINANCIAL RECORDS 12

3.19 TRADEMARK AND INTELLECTUAL PROPERTY PROTECTION 12

3.20 INSTITUTIONAL COMMUNICATION - IMAGE, REPUTATION AND CONDUCT ON SOCIAL NETWORKS 13

 Conduct on social networks: 13

4. EFFECTIVENESS 14

 4.1 INTERNAL INVESTIGATIONS, CONSEQUENCES AND SANCTIONS 14

 4.2 HOW TO REPORT VIOLATIONS OF THIS CODE? 15

TERM OF AWARENESS AND COMMITMENT - CODE OF CONDUCT AND ETHICS 15

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



1. OUR ESSENCE

1.1 MISSION, VISION AND VALUES

The Beeteller Group is a business entity formed by services organized in the following companies: **Beeteller** (International Payment Facilitator, pursuant to Central Bank Circular 3,691/2013), **Beetellerpay** (payment institution member of the Brazilian Payment System, issuer of electronic currency and institutor of a closed payment arrangement, pursuant to the regulations of the Central Bank) and **Beeteller Real Token** (cryptoactive BRT, *stablecoin* paired with the Brazilian Real - BRL).

Since 2018, we have provided Brazilian users with access to international products and services, paying with local payment methods. Through our payment solutions, it is possible for Brazilian and global companies to expand their business, without worrying about local challenges.

At the heart of the group is the **MISSION** to *promote global financial inclusion through technologies that simplify business relationships between buyers and merchants.*

To ensure this end, our **VISION** is to *be, within the next 5 years, one of the leading payment providers in Latin America for companies worldwide.*

When we understand who we are and where we want to go, we understand the characteristics that we most appreciate so that there is always respect for people in our daily lives and reliability in the relationships we maintain, **VALUES** that translate the ethical and moral essence of Beeteller Group, inherent to its employees and respected by those who relate to it:

- **PASSION** - to be committed to what you do, to push yourself to learn, and to face challenges with courage, drive, creativity, and determination.
- **INTEGRITY** - doing what is right, being an example, inspiring confidence and righteousness, acting and relating ethically, within the best market practices.
- **FLEXIBILITY** - ability to adapt to the specific needs of each client quickly, respecting the particularities of their business; efficient adaptability.
- **DIVERSITY** - to welcome plurality and respect differences; to take a stand against discrimination and prejudice; to act in favor of isonomy; to promote a more inclusive work and business environment that allows growth, exchange of experiences, and equal opportunity and voice; to understand and respect the cultural plurality of the countries where we do business;
- **INNOVATION** - identifying unprecedented opportunities, exploring new paths; producing insightful solutions, with creativity, efficiency, and boldness.

1.2 OBJECTIVES OF THE CODE

The main objective of institutional ethical alignment consists in maintaining a line of personal and professional conduct consistent with Beeteller Group's principles, preserving its future and respecting its history.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



The financial environment, of constant regulatory and market evolution, demands an effective alignment of the strategy, projects and processes of companies with what they value most, and the Code of Conduct and Ethics is a guide to compliance of the Beeteller Group.

2. GENERAL PROVISIONS

2.1 SCOPE

This policy applies to all Beeteller Group products and companies, including partners/shareholders, officers and employees (regardless of position, role or tenure, including salaried, contract, temporary, interns, apprentices, etc.) .

Also applicable to individuals and companies who have a business relationship with the Beeteller Group, such as suppliers and service providers (whenever they are acting on behalf of the group companies in any way).

No one has the right to violate, ask or induce anyone to violate the provisions contained in this Code. No individual will be coerced to act in disagreement with the laws, the institutional values or in disrespect to the internal workforce organization - hierarchy and organizational chart - by any member of the Beeteller Group, and the occurrences must be reported to the institution through the denouncement channels.

2.2 WAIVER

Under no circumstances shall Beeteller Group's failure or delay in exercising any right mean that such right is waived. In the same sense, the singular or partial exercise of a right does not prevent the full exercise of it or of any other right.

2.3 DISCLOSURE AND CHANGE

- The Code will be available for consultation on the company's virtual platform on Bitrix24, and will be presented to the public it covers during onboarding (new employees) and/or orientation and training at (employees and service providers);
- In contracts entered into by Beeteller Group Companies, there must be a clause stating that the other party is aware of and complies with the Code;
- Any modification of the Code, or preparation of a document related to it, must be made available to all interested parties;
- Reading and understanding this document is the responsibility of every employee, customer, and other people (internal or external) who participate in the company's activities.
- The *Term of Awareness and Commitment* must be filled out and signed after reading the Code, serving as evidence that the provisions have been fully understood and will be applied on a daily basis.

2.4 INSTITUTIONAL POLICIES, RULES AND PROCEDURES

- Each employee undertakes to comply with and respect all Beeteller Group's institutional policies, standards and procedures, as well as the provisions, amendments and supplements deriving therefrom, such changes being notified by e-mail or any other means.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Institutional policies regulate in detail specific matters of interest to the Beeteller Group and must be fully consistent with the provisions of this Code of Conduct and Ethics and applicable law.
- The established norms and procedures should be compatible with the policies.
- Internal regulations are stored in Bitrix24 and are part of the Beeteller Group Compliance Program.

3. GUIDELINES

3.1 RESPECT FOR PEOPLE

Beeteller Group is committed to providing a healthy, respectful, dignified and inclusive work and business environment based on courtesy, empathy, warmth, transparency and cooperation. In order to maintain respectful relationships, it is everyone's duty to preserve human rights, differences and working relationships in accordance with the provisions contained in this Code.

Beeteller Group, in the form of the Brazilian legislation in force, will not employ and will not condone the hiring, by third parties and business partners, of *forced or compulsory labor* and/or *child labor*.

3.2 HARASSMENT AND MISBEHAVIOR

Sexual harassment occurs when someone in a higher position in the hierarchy seeks to obtain an advantage or binds employment, promotions, terminations, threats of dismissal, punishment or any other condition of employment in exchange for sexual favors, innuendoes and demands. Sexual harassment is a crime¹ and will be treated as such by Beeteller Group. For the purposes of this Code, sexual harassment also includes embarrassing someone with the intent to receive sexual favors or benefits, unwelcome sexual advances (verbal or physical), or sexually suggestive jokes.

Moral harassment occurs by abusive actions, which, through gestures, acts, words or attitudes, make the work environment offensive, humiliating and intolerable. It is moral harassment to disqualify a person through words, gestures or attitudes during the exercise of his/her activity; to start rumors, spread false information and similar or to continue them, generating in the victim strong and violent psychological pressure, threatening his/her employment or degrading the work environment, regardless of hierarchy and employment relationship. Excessive aggressiveness, disrespectful comments or public exposure of colleagues and leaders can also be considered harassment, and may also be subject to sanctions

Beeteller Group believes that it is everyone's duty to combat and report any bullying that is sexist and/or could be characterized as sexual harassment or bullying.

3.3 ALCOHOL AND DRUGS

- To maintain a healthy and respectful work environment, certain rules regarding alcohol and drug consumption must be observed. The consumption of alcohol on Beeteller Group premises is prohibited - except on festive occasions and celebrations duly authorized by the Group's management or at external corporate activities associated with the Beeteller Group. In exceptional cases, everyone must observe consumption in moderation and personal conduct.

¹ Crime foreseen in the Penal Code - art. 216-A.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Beeteller Group does not allow intoxicated employees and service providers to perform their activities or to remain on our premises.
- Employees and service providers are strictly prohibited from using or being under the influence of illicit drugs in the performance of their professional activities.

3.4 RESPECT FOR DIVERSITY AND NON-DISCRIMINATION

Beeteller Group believes that different skills, perspectives, experiences and life stories enrich learning and the products and services offered by the Group. Therefore, it understands that it is everyone's duty to recognize and respect diversity and differences, as well as the characteristics and personal choices of each individual, taking a stand against any kind of discrimination based on ethnicity, creed, nationality, gender, sexual orientation, age, citizenship, religion, regional origin, physical disabilities, marital status, etc., political stance or fostering any form of prejudice or hate speech.

The Beeteller Group is constantly examining its attitudes in order to identify situations of prejudice and take measures to provide a culture of inclusion and acceptance.

3.5 MERITOCRACY AND FAIR SELECTION PROCESSES

Beeteller Group values meritocracy in its recruitment, selection, evaluation and promotion processes. Candidates must be evaluated only by their ability to meet the specifications of the desired positions/functions, and by no other criteria, adapting candidates to the profile of conduct and institutional values, as set forth in this Code.

- All *employees* have the opportunity for professional growth.
- The *collaborators* are valued by means of participative management, the creation of opportunities for personal and professional development, training, recognition of good performance, remuneration, and benefits.
- The investments in training will always be made in a fair and strategic way, by means of an evaluation of the essential and managerial competencies of its collaborators.

3.6 CONFLICT OF INTEREST

Everyone at Beeteller Group behaves with integrity and transparency, not letting personal interests unduly interfere in our decisions. Any situation or conduct generated by the clash between Beeteller Group and private interests that may compromise institutional interest or improperly influence it will be considered a *conflict of interest*:

- The professional performance of employees or service providers in the performance of their duties at Beeteller Group;
- The ability to make employee actions or decisions for the benefit of Beeteller Group;
- The ability to take actions or decisions of members, third parties, suppliers and service providers, and even public agents;
- Professional conduct by improperly obtaining personal benefits for oneself and/or for others.

Those who feel they may be in a situation of potential conflict of interest must report the situation to the Compliance and Risk area before and during the term of the business relationship that binds them to Beeteller Group, so that the case may be analyzed and properly conducted.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



Examples of situations that are not permitted: Using company resources for private purposes; sharing confidential information obtained in the company for external activities; favoring customers or third parties for personal interest; etc.

If you have any questions, please contact our Compliance and Risk team.

3.7 POLITICS AND RELIGION

- The Beeteller Group is absolutely politically neutral and does not make contributions in any form to public officials, political parties or organizations, or candidates for elective office.
- We respect freedom of speech, as well as the political and religious association of our employees.
- The *political activities* of employees must occur strictly within the personal sphere, without any connection to or even suggestion of support from the Group, and must not use corporate resources (infrastructure, e-mails, systems, etc.) to carry them out. Public political opinions should make it clear that they do not represent the position of the Beeteller Group. We recommend that party political trappings and personal items be avoided on the Group's premises.
- Beeteller Group assures *freedom of religion* and under no circumstances will religious or creedal grounds justify harmful actions, omissions, violations and preferences; religion or creed will only be used as a basis for decision making when to preserve one's right to freedom of religion, equality and the preservation of this Code.
- If you have questions, see or become aware of any political or religious misappropriation within the company, please contact our Compliance team immediately.

3.8 KINSHIP AND RELATIONSHIPS

- At the Beeteller Group we respect the personal and family relationships that connect our employees and contractors. However, having close personal relationships with other members of the Group is a potential conflict of interest.
- Kinship and close relationships must be notified to the Compliance and Risk area, for a case-by-case analysis to verify the configuration (or not) of conflict of interest.
- The relationship of subordination between family members (spouse, partner or relatives, blood or kin, in a direct or collateral line, up to the fourth degree, namely father, mother, children, grandparents, grandchildren, nephews, nieces, cousins, uncles, in-laws and brothers-in-law). This situation must be avoided, since it can generate conflict of interest during the performance of the activities of the parties involved.

Reporting a situation of possible conflict of interest is not a violation of the Code of Conduct and Ethics, on the contrary, failure to report is a violation.

3.9 EXTERNAL PROFESSIONAL ACTIVITIES

An Outside Professional Activity is when an employee has another professional activity, paid or unpaid, in addition to the one performed at Beeteller Group, even if on a casual or occasional basis. These activities are permitted, provided that the rules below are observed:

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Be performed outside of Beeteller Group business hours (according to the hours established in the employment contract or service contract);
- They do not conflict with Beeteller Group values;
- Do not interfere or could interfere with Beeteller Group decision making in an objective and transparent manner;
- Does not impair the quality of the work performed by the employee or service provider for the Beeteller Group
- No information and/or resources obtained via Beeteller Group are used;
- It does not mean to make, sell or offer any product or service that competes with the Beeteller Group;
- Compromises or may compromise in any way the interests, strategy, reputation and image of the Beeteller Group.

If an employee has doubts about some external activity and believes he or she may be violating the provisions of this Code, he or she must report the situation immediately to the People Management area, for verification with Compliance.

3.10 FAIR COMPETITION AND RESPECT FOR ANTITRUST LAWS

- The Beeteller Group believes that fair competition is beneficial to the development of care practice, teaching and research, which is why it defends the freedom of the market, observing the ethics and technical and legal criteria in decisions about pricing policies, participation or not in activities and competition.
- Making investments based on confidential and privileged information is not only unethical, it is also illegal. All payments made or received by the Beeteller Group or its employees and service providers in the course of their work for the Group must be expressly provided for in a contract and/or fully and accurately reflect a transaction lawfully entered into
- All contractual conditions must be explicit, documented, and fulfilled in accordance with current legislation and fair market practices.
- We do not engage in practices that aim to prevent or restrict fair competition (e.g., agreements on prices, collusion in bids, customer allocations, terms of purchase and sale, production and sales quotas or market allocations, etc.).
- Employees are prohibited from appropriating inventions or business opportunities that have been created or developed through the use of company assets, information, procedures or methods, or because of or on the occasion of their corporate position, unless with the consent of all directors.
 - No employee shall compete with the Beeteller Group directly or indirectly.
 - All information about Beeteller Group that is not publicly available shall be considered confidential information.

3.11 RELATIONSHIP WITH PUBLIC AGENTS

For the purposes of this Code, "*public officials*" will be considered to be any persons who, even if temporarily or without remuneration:

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	

- exercise a public function;
- work or hold a position in a Brazilian or foreign public agency;
- work or hold a position in a company or institution controlled or managed by the government;
- represent or hold a position in a political party;
- represent candidates for political office.

Beeteller Group is committed to conduct the relationship with public agents in an ethical and transparent manner, observing the interests of its companies, acting against fraud and corruption, in compliance with the Brazilian legislation in force, as well as in accordance with the provisions set forth in this Code, in the internal rules and in the institutional policies.

3.12 PREVENTION OF FRAUD, BRIBERY AND CORRUPTION

We are fully committed to the fight against corruption; we ensure compliance with the anti-corruption laws of each of the countries in which we operate. No employee or stakeholder may make or offer payments, money or securities to an individual (including a government agent or official), company or organization in any country, directly or through intermediaries, as a bribe or for the purpose of improperly obtaining a benefit or preferential treatment for the Beeteller Group.

- The Prevention of Money Laundering and Terrorist Financing Policy - PLDFT must be observed;
- A *bribe* is an amount paid to government agents to speed up or facilitate a process. *Corruption* is the phenomenon whereby public or private agents abuse the power entrusted to them so that, in exchange for illegitimate benefits, they give preference to the private interests of the corruptors. These practices must be avoided, even if permitted by local legislation or accepted by society.
- Employees must value ethics and integrity in all their business relationships, never promising, offering or accepting payments that are not strictly related to the activity performed within the contractual parameters established between the parties. Beeteller Group has zero tolerance regarding attitudes that are or resemble bribery, corruption or fraud.
- In our business relationships with third parties - suppliers or customers - Beeteller Group rejects any incentive that may distort the scope of the established business relationship, also disapproving any and all conduct intended to offer any benefit to start or maintain their business relationships.

3.13 PREVENTION OF MONEY LAUNDERING AND TERRORISM FINANCING

There is the possibility that third parties may attempt to use Beeteller Group's services for "money laundering". Money laundering consists of a set of commercial or financial operations that aim to incorporate into the economy goods, rights or values, directly or indirectly originated from any criminal offense. It is through "money laundering" that "dirty money" (originating from illicit activities) is transformed into "clean money" (with a licit appearance).

There is also the possibility that third parties may attempt to use Beeteller Group's services for "terrorist financing," which is intended to provide funds for terrorist activities.

Beeteller Group condemns these practices and in case of suspected misuse of our companies' services, all employees should:

- Collect as much information as possible about the third party, following the relevant internal policies and procedures;

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Do not allow the integration of third parties who may use Beeteller Group's services to launder your assets;
- Inform the Compliance and Risk area immediately if there is reasonable suspicion of illegal activity of a third party already integrated into the Beeteller Group system, pointing out all the evidence that substantiates this suspicion.

Always prevent and seek guidance from Beeteller Group in case of doubts, consultations and clarifications by contacting the Compliance and Risks area.

3.14 ETHICAL CONDUCT EXPECTED FROM THIRD PARTIES

- In order to promote a fair environment committed to sustainable development, Beeteller Group expects *third parties to behave* ethically and transparently in line with its values, acting in accordance with the laws and regulations governing the industry, safety and the work environment, as well as with regulations related to the nature of their activities provided directly or indirectly to the institution, also observing good practices and confidentiality, as well as the commitment to Beeteller Group's internal policies, procedures and regulations.
- Third parties, as signatories of this Code, undertake to disclose the values and rules contained herein to all of their partners, associates, contracted professionals or subcontractors, who are involved in any activity related to the Beeteller Group.
- Third parties will not be allowed to offer a commission, favor, gratuity, entertainment, or any item of value to any employee in order to obtain a favor from the institution.
- Relationships will not be established with third parties that show discrimination, lack of respect and dignity in the treatment of its employees, as well as the use of child labor and/or labor considered analogous to slavery.
- The Beeteller Group encourages third parties to implement their own compliance tools, consistent with the parameters set forth in this Code.

3.15 GIFTS, PRESENTS AND HOSPITALITIES

Gifts, presents, and hospitality, given or received from suppliers and other partners are common practices in the business environment, representing courtesy, goodwill, and the value of relationships. When exchanging these items, it is very important that we use common sense, as long as some criteria are met:

- Always observe and obey the law.
- Employees and partners may only offer *gifts on* behalf of the Beeteller Group that are approved by the Board of Directors.
- *Gifts* can only be offered if they are institutional standards elaborated by the Marketing area (e.g. pens, diaries, etc.)
- Do not influence or appear to influence our decisions or the decisions of those with whom we have a business relationship;
- Do not favor or appear to favor a specific trading partner;
- To refuse favors or benefits that have commercial value, offered by clients, suppliers, partners, third parties, public agents or other public or private entities.
- Gifts from third parties should be refused, but if refusing the gift would cause significant damage to the relationship with the business partner, the employee:
 - You can keep the gift, as long as its value is limited to US\$20.00 (twenty dollars or equivalent in other currencies);

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Unreturned gifts worth more than US\$20.00 (twenty dollars or the equivalent in other currencies) must be turned over to the Compliance team for a raffle, auction, collective use, or donation to charity.
- In all circumstances it is forbidden to accept or offer entertainment that may embarrass third parties (e.g. of a sexual nature).

3.16 DONATIONS AND SPONSORSHIPS

Donations and sponsorships are common actions in business relationships and allow involvement with the community, provided they occur in accordance with the law. Beeteller Group values donations and sponsorships that have a philanthropic character (sociocultural, educational interests, etc.), as long as they do not represent or appear to represent a favor or benefit to Beeteller Group or any of its employees.

- *Donation* is an act in which the donor, by liberality, transfers money from his assets or assets that can be estimated in money (goods, services, technical assistance, training, financial assistance, etc.) to another individual or legal entity, which accepts them. Donations can occur with or without present or future conditions
- *Sponsorship* has a promotional purpose, in exchange for some kind of consideration.
- Donations from Legal Entities to political parties, candidates for public office, or political campaigns are not allowed.
- Any contributions by way of charity, support, or sponsorship that seek to influence business decisions or to meet direct or indirect personal benefits are prohibited.
- Donations for religious purposes, donations to individuals, or donations in kind are also not permitted.
- Beeteller Group does not allow donations or sponsorships to entities linked to public agents, their advisors or family members.
- All transactions related to donations and sponsorships must be properly accounted for and reported to the Compliance and Risk area.

3.17 INFORMATION SECURITY, DATA PROTECTION AND CONFIDENTIALITY

- All information and documents must be stored in official virtual environments, channels informed by Beeteller Group, previously approved by the Information Technology team.
- Files created, received, or stored in the Beeteller Group virtual environment or on your authorized electronic devices are considered the property of Beeteller Group.
- Beeteller Group logins and credentials are personal information and should not be shared with third parties, not even with colleagues in the company.
- Access to any type of data (including, but not limited to, employee, customer or third-party data), is permitted only on a need-to-know basis. Any type of personal data should only be accessed by those who really need access to fulfill a certain purpose and must comply with institutional policies and current legislation.
- In addition, data may only be used for the purposes previously reported and analyzed, which means that any use of personal data must be evaluated in advance. The processing of personal data must always observe the restriction of the purposes for which it is intended.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



- Improper access to customer information can subject the accessor (and Beeteller Group) to a range of disciplinary and regulatory sanctions, including criminal penalties. If you have any questions, please contact Beeteller Group Information Technology/Information Security.
- Access (information, tools and systems) must comply with the Cybersecurity Policy, the internal data protection norms and the legislation in force.

Confidentiality

- It is essential to take care of confidential information, whether oral or written.
- *Confidential Information* is all *information* whose unauthorized access may cause irreparable damage to the business and/or the reputation of the organization, whether explicitly identified as "confidential" or not.
- *Public information* is *information* whose disclosure does not harm the organization in any way.
- Personal data of our *stakeholders* is considered restricted information. Personal data is any form of data that can be used to identify an individual. The Beeteller Group protects this data in order to protect the privacy of individuals and their fundamental rights.
- We must therefore keep and maintain in the strictest confidence any information about the Beeteller Group and our *stakeholders* that is made available to us and avoid talking about it in public spaces or sharing it on social media. We must also be cautious within our own facilities about the circulation of information, as not everyone needs to have access to all the information at the same time.
- All customer information and the customer portfolio is considered confidential and sensitive information and cannot be shared with *stakeholders*, except in specific cases protected by a signed and in force Confidentiality Agreement and Contract.

3.18 INTEGRITY OF FINANCIAL RECORDS

- The accuracy and integrity of Beeteller Group financial reports, financial records or audit reports are critical to business decision making and trust. They must comply with internal controls as well as all applicable laws and regulations.
- The information recorded and provided must be transparent, complete and accurate based on adequate documentation and in sufficient detail to demonstrate that the Beeteller Group produces complete and transparent reports on its financial condition.
- All employees involved in record keeping must act in accordance with accounting principles, signing only those documents that they believe to be accurate and true.
- No financial input or information should distort or mischaracterize the true nature of any given financial transaction.

3.19 TRADEMARK AND INTELLECTUAL PROPERTY PROTECTION

- Beeteller Group (and its companies') brands and the knowledge produced internally in the development of its activities or in partnership with third parties are Beeteller Group assets and must be protected at all times by all employees, service providers and partners covered by this Code, with respect for the Beeteller Group's corporate identity.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	

- Beeteller Group (and its companies) does not authorize the use of its trademarks for commercial purposes without the company's prior written consent.
- The results of the intellectual work and strategic information generated in the Beeteller Group are its exclusive property and make up the intellectual property of the institution, which involves the right to protection of ideas and creations internally or in partnership with third parties. In this sense, they are projects, research, publications, trademarks, patents, copyrights, administrative tools developed, *software* registrations, techniques, studies, statistical data, etc.
- You must protect institutional brands and intellectual property from misuse, misappropriation or use for personal gain. The same care and respect must be observed with respect to the intellectual property and trademarks of others.
- Questions or requests for use authorization should be directed to the Communication and Marketing area.

3.20 COMMUNICATION INSTITUTIONAL - IMAGE, REPUTATION AND CONDUCT ON SOCIAL NETWORKS

Beeteller Group is committed to open and systematic dialogue with our stakeholders based on transparency, consistency and truthfulness. Whenever we act as representatives of the company in professional or social situations, we must follow the corporate values and principles of integrity expressed in this Code. It is always important to be aware that we are part of the Beeteller Group, so our attitudes may reflect on the reputation and image of the company.

- The use of logos, fantasy names, among other attributes that identify the company for any type of marketing action or art creation, must be carried out by the Communication and Marketing area.
- Information about the products and services provided must be truthful, complete, up-to-date, and, whenever applicable and necessary, supported by reliable data.
- Publicity or public relationship contacts that involve institutional representation and may affect the company's image must be made through and under the guidance of the Communication area, and official statements will be made exclusively by Beeteller Group spokespersons.
- No employee may speak to the press on behalf of the company, only the spokesperson formally instituted by the Beeteller Group.
- The person authorized to grant interviews, publish an article, or use any other form of public manifestation on behalf of the institution must restrict his comments to the technical aspects of the content, in a precise and direct manner, respecting the confidentiality of information obtained from the company.

Conduct on social networks:

- Information regarding the routine, processes and internal flows of Beeteller Group or exclusively intended for members of the institution should not be published and shared on any type of social network, applications or communicators for cell phones, tablets, etc.

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	

- Do not get involved in discussions for which you do not have technical information. When you identify a controversy or criticism on social networks involving Beeteller Group activities, inform the Communication area.
- All users who identify the Beeteller Group (or its companies) in their profiles on social networks, carry the image of the institution. Do not post messages of defamatory, offensive or hostile nature that may cause damage to the institutional image or may give the impression that they reflect a position of Beeteller Group.
- Do not comment on social networks, applications or communicators about company rumors, business and company-related information, offenses to competitors, or matters of other colleagues, areas or sectors.
- Do not publish, share or interact in publications that may negatively affect the image or reputation of the Beeteller Group or that may negatively expose the performance of the professionals who work in it or that imply sensationalism or self-promotion, unfair competition, violation of dignity or privacy of customers and professionals, violation of confidentiality and secrecy. This includes the publication of images, self-portraits, audios, videos, etc., that may incur in the restrictions set forth in this item and/or in the other situations prohibited in this Code.
- Do not interact on unofficial communication channels that may be impersonating Beeteller Group. In case of doubt about the authenticity of the media, immediately contact the Communication area.
- The materials published in the official communication channels of the Beeteller Group may be freely shared, provided the image and reputation of the institution are preserved.
- The use of internet and social networks, during working hours, is restricted to professional purposes and must comply with the specific regulations present in the Cybersecurity Policy.
- Cases of denunciation or signs of conduct incompatible with the provisions of this Code regarding the use of social networks will be analyzed by the People Management area in conjunction with the Compliance and Risks area.

4. EFFECTIVENESS

The breach of this Code of Conduct and Ethics by the parties covered by it will be rigorously investigated by Beeteller Group.

4.1 INTERNAL INVESTIGATIONS, CONSEQUENCES AND SANCTIONS

- Every employee must comply with the guidelines in this Code, as well as Beeteller Group's internal policies and procedures, and cooperate with internal investigations whenever necessary.
- Depending on the gravity of the facts, the cases that require sanctions, educational or disciplinary measures, may range from a warning to the termination of the employment contract. In the case of third parties or suppliers, the sanction may go as far as contract termination or invalidation of the company as a supplier/third party to Beeteller Group.
- Failure to comply with this Code of Conduct and Ethics may be subject to judicial measures, administrative sanctions, and internal disciplinary measures, according to the applicable legislation. Even if administratively liable, the person who violates this Code may also be civilly and criminally

Document Title	CODE OF CONDUCT AND ETHICS		Document No: BG-COD-R&C-002	Version: 2.0
Responsible area:	Compliance & Risk	Date of last change:	07/11/2022	



liable for the actions and omissions due to eventual damage caused, considering the legislation in force.

4.2 HOW TO REPORT VIOLATIONS OF THIS CODE?

- Any case, suspicion or indication of violations of this Policy, as well as occurrences of illegal or irregular conduct or other matters that may result in losses to Beeteller Group, must be reported by e-mail to *compliance@beeteller.com*
- The Beeteller Group does not tolerate *retaliation of* any kind, especially against the whistleblower. We guarantee the confidentiality and security of the contact, and the contact can be anonymous or not.
- All reports will be treated confidentially, and the whistleblower may choose to remain anonymous if they so choose. Reports will be handled *confidentially, fairly, respectfully, and reasonably*.
- All complaints will be received, registered and investigated by the Legal area and by Compliance and Risks.
- The conclusion of the investigations may determine the review and eventual alteration of processes or procedures, seeking the mitigation and/or extinction of the fact that generated the violation occurrences, and reorienting existing actions and workflows.
- The whistleblower that proves to make a false report or that aims to satisfy personal interests of his own or of Third Parties, or that harms the image of Third Parties, may suffer legal or disciplinary measures, as provided by the Brazilian legislation in force.