
	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

## TABLE OF CONTENTS

<b>OUR CODE OF ETHICS AND CONDUCT</b> -----	<b>2</b>
OUR VALUES -----	2
OUR VISION-----	2
OUR MISSION-----	2
WE MAKE DECISIONS AS A TEAM-----	2
SPEAK-----	3
<b>DOING YOUR PART</b> -----	<b>3</b>
WHAT YOU NEED TO DO: -----	3
IF YOU MANAGE PEOPLE, YOU ALSO NEED TO: -----	3
SOMETIMES WE ALL HAVE TO MAKE TOUGH DECISIONS. IF IN DOUBT, ASK YOURSELF:-----	3
WHAT HAPPENS IF I DON'T FOLLOW OUR CODE OF ETHICS AND CONDUCT? -----	4
<b>WE FOLLOW THE LAWS</b> -----	<b>4</b>
<b>WE RESPECT HUMAN RIGHTS AND EACH OTHER</b> -----	<b>4</b>
DIVERSITY-----	4
HARASSMENT-----	5
<b>WE DO NOT TOLERATE BRIBERY AND CORRUPTION PRACTICES</b> -----	<b>5</b>
<b>WE AVOID CONFLICT OF INTEREST</b> -----	<b>5</b>
<b>WE REGISTER GIFTS AND HOSPITALITY</b> -----	<b>6</b>
<b>WE ARE HONEST ABOUT OUR FINANCES</b> -----	<b>7</b>
WE COMPETE FAIRLY-----	7
<b>WE PROTECT INFORMATION AND KEEP COMPANY ASSETS SAFE</b> -----	<b>7</b>
<b>WE CARE ABOUT HEALTH, SAFETY AND WELL-BEING</b> -----	<b>8</b>
<b>WE TAKE CARE OF THE ENVIRONMENT</b> -----	<b>8</b>
<b>ETHICS COMMITTEE</b> -----	<b>9</b>
<b>REVIEW HISTORY</b> -----	<b>10</b>

PUBLIC	
Next Review: 10/2024	1
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

## Our Code of Ethics and Conduct

The Code of Ethics and Conduct is our basis for a sustainable, legal and inclusive management. We seek for a professional posture of our employees and those who work on behalf of Sencinet.

We operate with integrity, ethics and transparency, following the standards and guiding everyone in the Company in the daily decision making and activities that may generate risks.

Our Code is aligned with our values and helps us understand our ethical interactions with customers, suppliers, representatives and government employees.

### Our values

- Agility - we act and deliver quickly, for our customers and for our colleagues.
- Passion - we work hard, we believe in our team, we believe in our vision and we are determined to achieve it.
- Integrity - we do what is right. We take care of our employees. We fight for diversity and inclusivity. We help the communities in which we operate. We are humble and frugal. We lead by example.

### Our vision

- Be the best and safest software-defined network integrator, with end-to-end automation and full visibility of the customer journey.

### Our mission


- Make corporate networks fast, easy, secure and accessible to our customers.
- Each of our members plays an important role in achieving our goals. Our values, purpose and Code of Ethics and Conduct define who we are and what we stand for, strengthening and protecting the image of each member of our team and our Company.

### We make decisions as a team

Whenever you need help, talk to your Line Manager or use the Compliance Channel, Ask Compliance, by sending your questions to [askcompliance@sencinet.com](mailto:askcompliance@sencinet.com). Our Compliance team will answer your questions about our Code of Ethics and Conduct, internal policies and standards or any other question you have about our business and/or your responsibilities.

If you are a supplier, you will find information available [www.sencinet.com](http://www.sencinet.com) about how our guidelines apply to you.

PUBLIC	
Next Review: 10/2024	2
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

## Speak

Whenever you see any situation that may pose a risk to our business, our integrity or our image, any type of behavior suspected of fraud, corruption or acts that may represent violations of any local or international law or internal policies. Similarly, if you feel threatened or witness a threat against a colleague, harassment, discrimination or any kind of coercion or humiliation and want to make a complaint, please use our Reporting Channel, Your Voice, by sending your questions to [yourvoice@sencinet.com](mailto:yourvoice@sencinet.com). Our Ethics Committee will receive the complaints and open an investigation to verify the consistency of your suspicions.

We take into consideration your courage to act and state your concerns and will take steps to maintain the confidentiality of your personal information and the content reported.

We will protect your identity and not allow any retaliation. Being coerced or threatened in any way so that you do not make the complaint will be considered a disciplinary offense and we will deal with it appropriately.

## Doing Your Part

### What you need to do:

- Be familiar with our code of ethics and apply it on your day-to-day
- Follow our code of ethics, even if it goes against a local custom
- Live the values of the company
- To know where to look for help
- Report irregularities
- Keep your mandatory training up to date


### If you manage people, you also need to:

- Be a connected leader and set the example for your team
- Create an open culture where people can raise questions without fear of retaliation
- Rely on your people to make decisions, but check your approach and understanding
- Regularly discuss our code of ethics with your team, including the consequences of not following our code
- Recognize people on your team who do the right thing.

### Sometimes we all have to make tough decisions. If in doubt, ask yourself:

- Is it in accordance with our code of ethics?
- Is that legal?
- Would I be happy to read about it in the newspapers or on social media?
- Am I comfortable with this decision?
- Can I explain my decision to my colleagues or my family?
- If you're not sure, talk to your Line Manager or our Compliance Channel.

PUBLIC	
Next Review: 10/2024	3
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

## What happens if I don't follow our Code of Ethics and Conduct?

### For our company

The consequences can be very serious. You can damage our reputation. We may face significant fines and penalties. We may lose our ISO certifications, which will prevent us from winning new business.

### For you

If you do not follow our code, we will take appropriate disciplinary action, including dismissal or enforcement of criminal liability for you, your Line Manager, and Sencinet as a company.

## We Follow the Laws

We comply with all laws, national and international, applied to the jurisdictions where the Company is present and where it has business.

Confidentiality and protection of privileged information, money laundering, environmental legislation, abolition of child labor, modern slavery, anti-corruption and anti-bribery, as well as the precepts of this Code must be understood and followed by all who interact with the Company.

We all must comply with international laws applied to the Company, such as the UK Bribery Act and the US Foreign Corrupt Practices Act - FCPA and equivalent laws applied to the local operation.

## We respect human rights and each other

Respect and the right to dignity are premises in the interactions between our professionals and managers, which should extend to our business, considering partners, customers, government and society.


Modern slavery is a growing global problem. Modern slavery includes human trafficking, slavery, and forced or compulsory labor. No form of modern slavery is acceptable in our operations, or in companies that work with us or on our behalf. And neither does child labor.

No one should be deprived of their identity documents, nor have to pay to work with us.

## Diversity

We value and welcome diversity. We will not treat anyone differently from anyone else because of their race; sex; religion/beliefs; disability; civil status or civil partnership; maternity or paternity; sexual orientation; gender identity; gender expression; responsibilities of care or for any characteristic. We do not tolerate any form of discrimination and are expressly prohibited in interpersonal relationships.

PUBLIC	
Next Review: 10/2024	4
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

## Harassment

We do not tolerate any form of harassment, whether verbal or nonverbal, in person or through social networks, and whether sexual, economic, moral or any other forms of harassment. Any professional, employee or third party who feels harassed may report to our Reporting Channel, Your Voice, [yourvoice@sencinet.com](mailto:yourvoice@sencinet.com).

We treat colleagues with respect and encourage others to do the same.

## We Do Not Tolerate Bribery and Corruption Practices

Bribery consists of offering, authorizing, demanding, obtaining or receiving any kind of gift, kickback or payment to obtain undue commercial advantage.

Our anti-bribery and anti-corruption policy apply worldwide and is the responsibility of all those who work for, with or on behalf of the Company, to read, understand and comply with it.

Violation of local anti-corruption and anti-bribery laws can lead to criminal and civil penalties for you, the company and our partners, so we encourage our members to report suspicious situations to your Line Manager or our Reporting Channel, Your Voice, [yourvoice@sencinet.com](mailto:yourvoice@sencinet.com).

Corruption can take many forms and therefore we must pay special attention to the following situations:

- Unusual cash payments.
- Generous gifts being given or received.
- Large or unusual payments to agents or third parties.
- Unexpected or illogical decisions when accepting projects or contracts.
- Ignoring normal bidding, contracting, or payment procedures.
- Procedures, financial controls, or company guidelines that are not being followed.

We should not hinder the investigative activity of the supervisory bodies, entities or public agents, nor interfere with their execution.


## We Avoid Conflict of Interest

Conflict of interest occurs when an individual's personal interests go against Sencinet's interests or interfere with the effective execution of its activities.

To ensure fair behavior, the Company prohibits its employees from:

- Act in processes of hiring suppliers of products and services or any commercial association with companies of which they are partners or representatives as individuals or legal entities of kinship, up to the third degree.
- Act as manager/leader or be subordinate to colleague with natural or civil kinship, up to the third degree.

PUBLIC	
Next Review: 10/2024	5
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhão	Version Date: 27/10/2022

- Have a significant ownership interest in a competing business or work for a competitor or supplier while you are an employee of the Company.
- Engage in conflicting activities or that generate incompatible schedules, impairing your work shift and impairing professional performance.
- Use your position (or any inside information) for personal gain or in a way that could harm the Company's business, nor its image or position to take advantage of others.

We expect everyone who works for, with or on behalf of the Company, to be open and honest, whatever the part or level of our organization they work in. It is the individual's obligation to bring to the knowledge of hierarchical superiors or competent bodies, situations and doubts about possible conflicts of interest.

All details on these aspects are covered in our [Conflict of Interest Policy](#). Any questions related to the subject can be addressed through our Compliance Channel, Ask Compliance, sending your questions to [askcompliance@sencinet.com](mailto:askcompliance@sencinet.com).

### **We Register Gifts and Hospitality**

We discourage the offering or acceptance of gifts, payments or hospitality as a way to stimulate or reward business relationships.

Our employees may receive and/or offer prizes, gifts or hospitality, providing they have no commercial value, such as contracted campaign materials, or amounts **limited to US\$30**. The receiving of any gift is prohibited during the processes of hiring suppliers, customers or in the conclusion of partnerships.


We understand that different cultures have different customs and respect the tradition of the countries where we do business. However, we must always act considering our Code of Ethics and Conduct first, acting in accordance with Sencinet's values, obeying the internal regulations, designed to ensure compliance with local laws.

In any situation, upon receiving a gift that exceeds the value of 30USD, we must register the offer and obtain the approval of what was received, through the Compliance site [Gifts & Hospitality](#) in Intranet.

All details related to these aspects are covered in our [Gift and Hospitality Policy](#) and [Anti-Corruption and Anti-Bribery Policy](#). Any questions related to the matter can be addressed through our Compliance Channel, Ask Compliance, sending your questions to [askcompliance@sencinet.com](mailto:askcompliance@sencinet.com).

We do not support or make donations (in cash or in kind) to any candidate, party, political campaign or give support to any elected authority. Our Company respects the right of our staff to support political activities, as long as it is not associated with the name or image of Sencinet.

PUBLIC	
Next Review: 10/2024	6
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhão	Version Date: 27/10/2022

### **We Are Honest About Our Finances**

We do not tolerate any wrongdoing in the financial conduct of our business, including fraud, tax evasion, tax evasion facilitation or money laundering.

Theft, obtaining personal advantage, false representation, non-disclosure of information, abuse of power or distortion, deletion or falsification of records are considered fraud.

The consequences of non-compliance with the rules on fraud or any other type of financial misconduct can result in severe penalties and long periods of imprisonment.

If you are dealing with any type of suspected act of fraud or any other financial misconduct, you should report the situation to our Reporting Channel, Your Voice, via [yourvoice@sencinet.com](mailto:yourvoice@sencinet.com)

### **We compete fairly**

We value honesty, transparency, respect and trust in all our negotiations.

We believe in the resources we have, to obtain a legitimate competitive advantage: our people, our knowledge and our experience, we are always committed to acting ethically, in accordance with our values, policies, laws and regulatory obligations.

We respect the rules regarding the disclosure of commercial and confidential customer information to other parts of the Company.

We believe in free markets and respect the right of our competitors to conduct their business, we do not pressure or coerce our customers to choose us at the expense of our competitors.

We prefer to talk about our own strengths rather than talk about our competitors and discourage public statements about other companies. When necessary, the citation of competitors is important for the use of accurate, up-to-date and relevant information, complying with our regulatory obligations and legislation in terms of where we obtain our information.

We respect fair trade laws in the case of countries that have anti-competitive agreements.


### **We Protect Information and Keep Company Assets Safe**

We value the confidentiality and privacy of all information held by the Company, whether from customers, suppliers, business partners or our own.

We have internal policies and procedures that ensure the security of information and services provided by the Company. We prohibit the use of privileged information obtained in service for the company for undue personal gain.

The data used in your work must be kept confidential, used in accordance with the Company's guidelines for the processing of personal data by employees working for, with and on behalf of the Company.

PUBLIC	
Next Review: 10/2024	7
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

Confidential information should not be disclosed or discussed deliberately. They should be used for commercial and/or legal purposes only.

We must ensure that all data incidents are reported to data protection regulators and request that any suspicious data breaches be reported immediately to the Sencinet DPO, [dpo@sencinet.com](mailto:dpo@sencinet.com).

When using social media, you should be aware of how you represent yourself. You never know who is looking at your posts; you may well be connected to colleagues, our customers, partners and suppliers. Even if you think it might be private, it may not be.

In some areas where employees examine sensitive information, the use of online devices or social media is prohibited. Inappropriate behavior involving social media will be treated in accordance with our disciplinary procedure and serious cases may be seen as serious misconduct, which may result in dismissal.

### **We Care About Health, Safety and Well-being**

We believe that Sencinet's business should not harm or cause harm to third parties, so information about health, safety and well-being should be treated transparently.

We are concerned with the adequate use of the equipment and essential training by employees in the execution of their functions.

Any activity that endangers the health and safety of employees should be stopped immediately. Maintaining the physical integrity and satisfaction of our members is our Company's priority.

Our focus is to keep our employees healthy and happy, and we believe that their productivity is closely linked to these factors.

We do not allow workers to perform their duties under the influence of alcoholic beverages, drugs or any other substance that may jeopardize or risk professional behavior or judgment. In addition, we prohibit the sale, possession, distribution or preparation of any legal or illegal products and substances in any of the Sencinet's workplace or facility.

### **We Take Care of the Environment**

We promote sustainable development, education and environmental awareness.


We pursue that our activities are based on reducing pollution and minimizing the impacts of our operation on the environment.

We expect everyone to follow the environmental laws and regulations that apply to them and our business, as well as our environmental standards and commitments. Many of the commitments in our environmental policy affect our day-to-day work. We encourage:

- Less consume.
- Reuse whenever possible.
- Recycle when it cannot be reused.

PUBLIC	
Next Review: 10/2024	8
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	



	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

- Design new products, services and equipment to use less energy and natural resources.
- Manage energy and natural resources wisely in all parts of the business.

Sustainability criteria should be considered in the execution of new projects, ensuring that the environmental management system is defined in accordance with ISO 14001:2015.

### Ethics Committee

Our Ethics Committee, defined by the Resolution of the Executive Board, will be responsible for the preparation, revision and dissemination of this Code, ensuring the relevance, updating, dissemination and application of the same. The Commission analyses the nature and frequency of violations of the Code, recommends preventive and corrective actions, monitors infringement processes and encourages employees to engage in ethical and impartial conduct. The Committee will also be responsible for the governance of the Reporting Channel, Your Voice.

### Penalties


When we notice any irregularity or transgression of our Code of Ethics and Conduct, identifying their responsibilities, the Company will apply fair disciplinary measures to employees, according to the disciplinary process of each country. In the case of involvement of companies, third parties or partners, contractual sanctions will be applied, without prejudice to other applicable legal measures.

### Our communication channels

All your complaints about fraud, corruption, unlawful acts, violations of the Code of Ethics and Conduct, or any other matters that may harm our principles and interests, should be forwarded to our Reporting Channel, Your Voice, by email: [yourvoice@sencinet.com](mailto:yourvoice@sencinet.com).

If you have any questions about proper behavior in a real day-to-day situation, please contact our Compliance Channel, Ask Compliance, by email: [askcompliance@sencinet.com](mailto:askcompliance@sencinet.com).

PUBLIC	
Next Review: 10/2024	9
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	

	<b>CODE OF ETHICS AND CONDUCT</b>		
	Type: Institutional Policy		Version: 3
Area: Compliance	Author: Compliance Team	Approver: Hermann Maranhó	Version Date: 27/10/2022

### Review History

<b>version</b>	<b>Data</b>	<b>Author(s)</b>	<b>Revised content</b>
1	01/12/2020	Compliance Team	Document Creation
2	17/02/2021	Julia Limas	Exchange of the terms "Line of Compliance" for "Compliance Channel" and "manager" for "line manager"
3	Xx/xx/xx	Compliance Team	Change in G&H link and general text adjustments

PUBLIC	
Next Review: 10/2024	10
Uncontrolled if printed or downloaded Please consider the environment before printing this document.	