

**SAVIXX**

trading

**CODE OF CONDUCT**

April 2024

## CODE OF CONDUCT

### **When the environment is conducive, good work thrives.**

Many of today's critical inquiries revolve around morality and ethics, issues that deserve our utmost attention. Therefore, this Code of Conduct should be widely disseminated within our company, as it will actively shape our lives and become an integral part of our organizational culture.

Being ethical isn't about only behaving ethically when it's convenient; it's a constant commitment. It reflects our core values, while morality is intertwined with our interactions in society. In practical terms, the goals of ethics and morality align closely. They both serve to establish the principles that shape our conduct, defining our character, humanity, and virtues, and they provide guidance on how to navigate social norms. If Brazilian law or other specific Savixx policies impose broader obligations and duties than those outlined in this Code, they take precedence and must be adhered to. Conversely, if the law or Savixx policies impose narrower obligations and duties than those outlined in this Code, the terms of this Code prevail.

The Company, along with its employees, partners, and suppliers, both individually and collectively, bears the responsibility of adhering to this Code in all their interactions, consistently fostering this culture and mode of operation.

All employment contracts, service agreements, and supply contracts, in every action or business involving Savixx's interests, shall adhere to this Code.

At Savixx, doing what's right is paramount. There are no shortcuts to success. While we are driven by performance and results, we seek earnings that stem from the sweat of our brows, the creativity of our minds, and the strength of our arms. This mirrors the ethos of the modern world and represents how we will propel Savixx even further. It's imperative that we all grasp and embody this ethos.

## MISSION, VISION, AND VALUES

### THE HEART OF OUR COMPANY

Our mission is to deliver top-notch and highly competitive international trade solutions while upholding a commitment to stability, excellence, and innovation. We aim to drive dynamism and profitability within the sectors we serve.

### BUSINESS PERSPECTIVE

Our aspiration is to remain a benchmark in the industry, recognized by our customers, employees, and partners as an ethical, efficient, innovative, and transparent company.

### CORPORATE PILLARS

**Long-Term Vision:** Maintaining a clear understanding of our objectives and the ability to anticipate market threats and opportunities proactively;

**Creativity and Innovation:** Endeavoring to craft innovative, viable, and fitting solutions for every situation and business;

**Quality assurance:** Our dedication to upholding the highest standards in our processes and services, with a constant focus on quality and precision;

**Customer-Centric Approach:** Operating with a foundation built upon the needs of our customers and providing solutions that exceed their expectations;

**Ethical Integrity:** Our commitment to conducting business with unwavering ethics and transparency in all our interactions with customers, employees, and partners;

**Dedication:** Wholehearted commitment of our partners, directors, and collaborators to the organization's goals;

**Social responsibility:** Our commitment to creating value for society through targeted initiatives and conscientious actions within the communities we serve;

**Persistent Excellence:** Our unwavering commitment to continuous improvement and the pursuit of excellence.

## ESSENTIAL

This Code seeks to ensure uniformity in the behaviors expected from all our employees, regardless of their department. Our reputation is the result of collective effort; each of us bears responsibility for upholding and enhancing the image of trust and credibility we've cultivated. This is crucial for our ongoing pursuit of excellence and for shaping a brighter future for both our clients and ourselves.

Our work is how we meet our needs and pursue our dreams. Yet, we'll only achieve our goals if everyone pitches in, consistently showing utmost dedication in their tasks, fostering better collaboration among us. Hence, it's imperative that each of us adheres to this Code of conduct.

May it serve as both, a reference and a guide, for our day-to-day work issues, reflecting our ethos. Our objective is to embody an ethical, responsible, transparent, and respectful demeanor towards all those we engage with. While it may not encompass every conceivable situation we encounter, it provides direction on the conduct we should uphold within and beyond the organizational sphere.

This Code of Conduct is a crucial component of the individual employment agreement. The regulatory measures outlined within apply to all employees, irrespective of hierarchical position or contractual form. It is incumbent upon each employee or service provider to review this Code, comprehend their obligations, and adhere to the prescribed guidelines. Compliance with these provisions is mandatory for the entire duration of the employment contract, and no individual may claim ignorance thereof.

We understand that a minor slip-up can escalate into unimaginable proportions, and inappropriate behavior can have profound consequences for our business.

## PRIDE IN YOUR WORK

Savix should consistently be perceived by clients and the market as a reputable and trustworthy organization. Acquiring a job or securing a client is challenging, but maintaining them demands daily diligence. If we adhere to the values of our actions with simplicity, attention, care, and promptness, our work will consistently be recognized as a competitive advantage.

It's fundamental that these principles are reflected in our actions.

Our Human Resources policies are designed to uphold fairness, transparency, impartiality, and professionalism, ensuring equal job opportunities for all individuals within the Company.

## **DO WHAT'S RIGHT, NOT WHAT'S EASY**

Our history is shaped by our employees, so each individual's actions within the organization have and will continue to have a significant impact on our journey. They can also have devastating effects on our image, reputation, and good name. Therefore, it's crucial to build relationships and conduct ourselves in a manner that aligns with what is morally right.

What follows are a series of guidelines that must be followed and disseminated by everyone. When an employee encounters a situation not covered in this Code, it is expected that they always use common sense and reach out to their direct manager, the People, Culture, and Management department, or other communication channels provided by the company.

Our leaders play a vital role and are responsible for guiding, ensuring adherence to, and promoting the content and values of this Code among employees. Moreover, they should encourage, foster, and cultivate a work environment that supports the consistent and ongoing exercise of these values.

## OUR FOUNDATION

**Respect:** Relationships within the workplace must be respectful. Everyone is entitled to individuality, privacy – both in their personal lives and regarding their data – and to fair and dignified treatment, without any form of discrimination. This is essential for fostering a healthy and harmonious environment conducive to creative, innovative work, and the development of ethical leadership.

**Diversity:** Our culture values diversity. We are committed to respecting individuals from all regions and social classes, regardless of sexual orientation, skin color, beliefs, or professional and intellectual backgrounds.

**Hierarchy:** Every team member, irrespective of their role, department, position, or compensation, shall be treated with respect and consideration, and their contributions acknowledged and valued. They are entitled to a work environment conducive to their personal and professional growth and with the freedom to express themselves.

**Relatives:** Referring relatives and friends for job opportunities is a common and accepted practice. However, the relevant departments shall make decisions regarding selection and hiring, and assess recommended candidates on an equal footing with those applying through other channels.

**Individual responsibilities:** All our employees are expected to maintain work quality, identify opportunities, demonstrate business acumen, and eliminate waste, always seeking ways to grow and sustain our business. Each employee is expected to safeguard the company's assets and reputation.

**Expenses:** Approval of operational expenses (such as taxi, Uber, meals, hotels, airfare, among others) for each employee should be conducted, at minimum, by their immediate superior following Savix's rules and policies.

**Daily Information:** Each employee must handle the information managed by them with attention and care. Documents related to their activities should be properly stored, and confidential materials should not be left on desks. Computers and mobile phones must always be password-protected according to a policy determined by the IT department.

**Updating Personal Data:** Employees must keep their personal data up to date at all times.

**Confidentiality of Information:** Our team members must maintain confidentiality and utmost secrecy regarding non-public information about business, clients, practices, trade secrets, know-how, prices, operations, and financial results, at all times, even after their departure from the organization, including maintaining the privacy of data and information related to employees and any individual who may, in any way, have a relationship with the company. All members must avoid disclosures and refrain from commenting on Company information in public places, aiming to protect the organization's image.

**Intellectual Property:** Intellectual property is a strategic asset of the Company, including patents, trademarks, know-how, technical process and market information, and customer information. The results of intellectual work and strategies generated by the employee are the exclusive property of Savixx.

**Image and Reputation:** The behavior of our employees also contributes to the value of the Company's image. Therefore, our employees are responsible for our image and must carefully safeguard it, always acting in line with our principles and values.

**Assets and Materials:** All employees must take care of the assets provided for carrying out their work. Examples of property include financial resources, budgetary funds, intellectual property, electronic devices, internal reports and documents, confidential information, vehicles, office supplies, equipment in general, software, and real estate.



Printed or digital information, confidential reports, and documents are the property of the Companies and should not be shared externally without express authorization.

**Digital Resources:** Access to digital resources such as the internet, social media, emails, corporate phones, internal network, computers, and other equipment is primarily intended for professional use. These resources should not be used for activities unrelated to the business, conducting external business, playing games, making prank calls, or engaging in discriminatory acts. The use of these resources for political propaganda, accessing or disseminating pornography, or engaging in illegal activities is prohibited. The access account (login) for computers, internet, and copiers is personal and non-transferable, and the access password should never be shared with others, whether from the Company or outside of it.

It is not allowed to download and install programs unrelated to the Company's activities or to access the professional email account through any means other than the tool provided by the Company without prior authorization.

We reserve the right to monitor the use and access of all corporate resources and digital systems, and users of the systems should not expect privacy in their use of such systems and resources. Periodic browsing audits will be conducted on all company computers.

**Social Media Conduct:** Social media platforms are vital communication tools and are integral to the daily lives of our professionals. Access to social networks and media is permitted, but their use must align with the guidelines of this Code, without hindering work progress or tarnishing the reputation of the companies or their clients.

Given its impact on our business, our employees should exercise discretion in what they say or post on social media. Employees should make it explicit that their views do not represent or speak for Savixx.

**Mobile Devices:** When using equipment such as laptops and smartphones, only information strictly necessary for the task should be made available, always observing confidentiality, integrity, and availability, avoiding the leakage of information that may impact Savix's business and that of our clients.

**Internal and External Communication:** Only designated professionals authorized to act as spokespersons are allowed to speak on behalf of the Company.

If an employee is approached to provide information, interviews, lectures, or write articles on behalf of Savix to any media outlet, the employee must inform their superior.

**Parties and Gatherings:** Celebrating and hosting festive events for employees and their families is permitted. Behavior at these occasions must respect the terms of this Code.

**Political Engagement:** We respect the political beliefs of our professionals. Employees engaging in political and civic activities should do so in their personal capacity, without any association with their responsibilities at Savix. These political activities should be carried out outside of work hours and premises and without the use of company resources. The dissemination of any political propaganda in our communication channels is prohibited.

**Anti-Corruption:** We unequivocally condemn any activity that may constitute corruption under applicable law. Employees involved in corruption cases will be subject to disciplinary measures and dismissal for just cause. Savix reserves the right to investigate any acts, whether suspicious or not, of corruption or harmful to the Public Administration and report such acts to the competent public authorities.

Acts of corruption include those defined in the Penal Code, the Anti-Corruption Law (Law No. 12,846/2013), and other applicable regulations. This encompasses, among other actions, promising, offering, or donating, directly or indirectly, undue advantage to a public official, engaging in any fraudulent act in procurement processes with the government, etc.

**Internal Sales:** Employees and service providers interested in making sales within the company may do so with prior authorization from their direct manager.

## OUR WAY OF OPERATING

### WITH OUR CUSTOMERS

Our company is committed to:

**Standard of Excellence:** The relationships we forge with our customers must embody our values and strive for excellence. We should consistently provide comprehensive information and guide customers on the products and services we offer.

Activities and business dealings that could potentially harm our image and principles, or pose a risk to the organization, should be ceased. Our conduct in customer relations should adhere to local and international laws and practices.

**Customer Service:** Our commitment to customer service is founded on mutual respect for contracts, deadlines, and negotiated terms. Additionally, we prioritize maintaining confidentiality regarding values and business strategies shared with us.

**Customer Orders:** We consider and align customer demands with our resources, deadlines, local laws, and this Code of Conduct. We strive to meet the objectives and deadlines agreed upon between parties.

**Customer Interaction:** Our employees are expected to avoid taking advantage of customer relationships, engaging in abuse of power, verbal aggression, false statements, or unfair business practices.

**Business Opportunities:** We strictly prohibit making improper payments, offering gifts, or providing advantages to individuals or companies to facilitate, influence, or enable the sale of services. This prohibition applies to private clients or members of the Public Administration, both domestic and foreign, at all levels.

## OUR WAY OF OPERATING

### WITH PARTNERS

**Conflicting Activities:** It's strictly prohibited to engage in business dealings or make decisions that, according to Savix's judgment, may pose potential conflicts of interest. Our employees shouldn't establish or maintain commercial ties with companies whose contracting falls under their direct responsibility, or which, for other reasons, might present a conflict of interest. If an employee is uncertain whether their actions constitute a conflict of interest, they should consult their manager, who will decide in line with the principles outlined in this Code. If such relationships are maintained by managers or directors, they must be disclosed to shareholders.

**Gifts and Benefits:** Corporate gifts as acts of courtesy, not aimed at gaining advantages or influencing negotiations, may be accepted and offered by Savix. Employees shouldn't accept gifts on their behalf or on behalf of the company without prior notice to their immediate supervisor. Moreover, employees shouldn't accept gifts or benefits intended to influence or facilitate business transactions with the expectation of receiving undue privileges. Accepting cash gifts is strictly prohibited.

**Return of Gifts:** Gifts or tokens received in contravention of the conditions set forth in this Code should be returned to management, and the Compliance department will determine their disposition.

**Ownership Relationships:** Hiring suppliers who have relatives or family members of the employee directly or indirectly responsible for such procurement among their partners or managers is not allowed.

**Respect for Contractors:** When dealing with partners and contractors, respect and integrity must be upheld in the interest of Savix's reputation. Suppliers should be evaluated based on clear and equitable criteria, and all decisions should be supported by technical and economic considerations.

**Supplier Contracts:** Suppliers, service providers, and partners can only engage in activities upon the existence of a contract signed by individuals authorized to execute such agreements.

## OUR WAY OF OPERATING

### ADHERENCE TO THE CODE OF CONDUCT:

Suppliers, service providers, and partners must be familiar with the principles outlined in this Code.

Any action or behavior in violation of the provisions of this Code may lead to contract termination. Additionally, suppliers must comply with legal requirements and adhere to applicable anti-corruption legislation.

These provisions must be reflected in contracts entered into with third parties, and this Code of Conduct shall be a mandatory part of any and all contracts entered into by the Company.

**Confidentiality:** Contracts with suppliers or partners should include provisions regarding the confidentiality of customer and/or Company information, as well as provisions on privacy and personal data protection, in accordance with LGPD rules (General Data Protection Law, No. 13,709/2018).

**Political Activity:** The rules regarding political activity designated for employees also apply to partners in the performance of their activities on Savixx premises.

## OUR WAY OF OPERATING

### WITH THE COMMUNITY, TRADE ASSOCIATIONS, AND THE COUNTRY

**Respect for Regulatory Bodies:** We denounce actions that could be seen as anti-competitive, monopolistic, or in violation of national laws governing business practices. Savixx adheres to the procedures and directives mandated by law and regulatory bodies.

**Fair Competition:** Our goal is to outperform competitors through quality, creativity, innovation, flawless execution, and exceptional service, not through illegal or unethical business practices. Our employees are expected to act ethically and fairly towards our competitors. Disclosure of non-public matters or information that could tarnish the integrity and reputation of rival companies is strictly prohibited. We believe in the principles of a free market and refrain from engaging in any form of manipulation, concealment, false statements, or other unfair practices.

**Trade Unions:** We recognize trade unions as representatives of our employees and strive to align their interests with those of the organization.

**Company Visits:** Visits by third parties (students and interested parties) are permitted for institutional purposes. The guidelines outlined in this Code must be adhered to during such visits.

**Sponsorships and Donations:** Political sponsorships and donations to candidates, political parties, or affiliated associations are not permitted. We acknowledge our societal role and may provide support to communities through reputable non-governmental organizations dedicated to promoting culture, education, and environmental conservation, always in accordance with our guidelines.

## OUR WAY OF OPERATING

### WITH THE COMMUNITY, TRADE ASSOCIATIONS, AND THE COUNTRY

Likewise, offering gifts, favors, and hospitality to public officials in general is strictly prohibited, defined as anyone holding a position or function in government agencies or entities, both domestically and internationally, directly or indirectly, at all levels.

**Government Business and Bids:** We respect the authority of the Public Administration at all levels and will always maintain a constructive relationship with such authorities in accordance with current laws and regulations. Participation in tenders or any other form of contracting with the public sector must not deviate from any of the principles established in this Code. Information provided to government agencies must always be accurate and complete, in accordance with the established requirements.

## OUR WAY OF OPERATING

### WITH THE ENVIRONMENT

**Environmental Awareness:** We value environmental consciousness among our team members and strive to adhere to best practices in this regard.

### ACCOUNTING AND AUDITING

**Accounting Records:** Our accounting records must accurately reflect Savixx's operations. Financial and commercial transactions should be properly documented in the books and records handling such transactions. No employee is permitted to engage in irregular financial agreements with partners, record accounting entries without support from actual operations, or neglect to document accounting entries when such operations occur.

**Record Assurance:** Ensuring the accuracy of records is the responsibility of all members of our organization. All balance sheets and other financial statements must be supported by appropriate and accurate documentation.

**Financial Reporting:** Clarity is key in all financial reports, which should be provided to auditors. Compliance with current legislation is paramount, and we must not condone actions aimed at tax evasion or circumventing applicable tax and monetary laws and regulations. Payments should only be made to the individuals or entities that have provided the corresponding products/services, except when supported by documentation indicating otherwise.

Documentation related to any payments, made or received, must be provided to the financial and accounting department and kept on file for the time required by law or applicable regulations.



## **QUESTIONS AND REPORTING**

Any suspicious behavior that may constitute a violation of the law, this Code, any other corporate policy, as well as improper or suspicious accounting and financial practices, must be immediately reported to your direct supervisor or the People, Culture, and Management department ([gcg@savixx.com.br](mailto:gcg@savixx.com.br)).

For inquiries regarding the use, handling, sharing, rights, and responsibilities regarding personal data, including general topics related to the Brazilian General Data Protection Law (LGPD), please contact: [dpo@savixx.com.br](mailto:dpo@savixx.com.br).

## **PENALTIES**

Violation of the rules outlined in this document will result in the following penalties, without prejudice to legal actions inherent in the subjects and legislation contained in this Code:

1. Verbal warning
2. Written warning
3. Suspension
4. Termination

Penalties are applied according to the severity of the violation by the People, Culture, and Management department, in conjunction with the immediate supervisor.

## **CHANGES AND MODIFICATIONS**

Changes and modifications to this Code will be communicated to all employees through digital and/or physical means, as necessary.

This document will be accessible for everyone in the folder: Público/GCG/Código de conduta Savixx.

# SAVIX

trading

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