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CODE OF CONDUCT

I – INTRODUCTION:

This CODE OF CONDUCT contains rules and commitments to legal compliance, as well as a statement of values and ethical guidelines that guide ZOOMHOLDING in the conduct of its business and in the performance of its activities.

Not only does ZOOMHOLDING submit to its terms, as a legal entity and corporate body, but also its employees, directors, representatives, agents, business partners, service providers, outsourced workers, clients, or any natural or legal person that contracts with it, enters into partnerships, agreements, sponsorships, or performs any act capable of producing legal effects.

ZOOMHOLDING chooses to act in compliance with legislation and in observance of high ethical standards. But not only that. It also chooses to contract with individuals and legal entities that operate within the same compliance standards, establishing a corporate culture of integrity and compliance that reaches other spheres of society.

If you have been invited to read this instrument, it is because you maintain or intend to maintain a professional or contractual relationship with ZOOMHOLDING. Therefore, your full agreement and adherence to the terms of this Code constitute an essential step, being an indispensable condition for the formalization and maintenance of the established relationship.

We reiterate that, should there be any doubts, our Compliance Department will be available to clarify whatever is necessary. We are together in the common objective of Integrity, which is mandatory in post-modern society.

As constant support in our partnership, we suggest the following reflection in all decision-making:

- Will my conduct allow me to maintain the trust of those around me?
- Would my family and friends consider my conduct appropriate?
- Have I reflected on the impact on those who will be affected by my conduct?
- Would I feel comfortable if someone treated me in the same way?
- Would I feel comfortable if my conduct appeared in the media?
- Is my conduct in compliance with the law and with ZOOMHOLDING’s Integrity Policies?

We wish you a successful journey and a collective construction grounded in ethical awareness.

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II – DEFINITIONS:

In this Code of Conduct, the following shall be considered:

1.1 EMPLOYEES: All persons hired by ZOOMHOLDING with an employment relationship or through outsourced labor companies;

1.2 BUSINESS PARTNERS: All individuals or legal entities who, without employment or commercial representation ties, participate in ZOOMHOLDING’s Sales Programs, aimed at supplying IT goods and services directly to end consumers, acting in their own name and never on behalf of ZOOMHOLDING;

1.3 SUPPLIERS: All individuals or legal entities who, without an employment relationship, supply goods, materials, and inputs necessary for ZOOMHOLDING’s activities;

1.4 SERVICE PROVIDERS: All individuals and legal entities who, without an employment relationship, provide services related to ZOOMHOLDING’s core or support activities, or intellectual services such as legal, accounting, auditing, marketing, and similar;

1.5 CLIENTS: Legal entities, public or private, that interact with ZOOMHOLDING, demonstrating interest in its goods and services or merely seeking information, whether or not they eventually contract with ZOOMHOLDING;

1.6 THIRD PARTIES: The generic designation of any individual or legal entity that, not being a Client or Employee, contracts with or merely interacts with ZOOMHOLDING. Manufacturers, suppliers, business partners, and service providers are also considered Third Parties for the purposes of this Code of Conduct;

1.7 SENIOR MANAGEMENT: The company’s executives, according to the governance structure defined by its controlling entity;

1.8 INTEGRITY PROGRAM: Also called the Compliance Program, it is the set of internal rules and controls of ZOOMHOLDING, developed based on the analysis of risks inherent to its activities, and implemented through training, due diligence, and monitoring, with the purpose of preventing, detecting, and remedying irregularities, illegal acts, or misconduct within the corporate environment or in interactions with public agents or any individuals or legal entities, public or private, with whom it negotiates or interacts. ZOOMHOLDING’s Integrity Program shall always have a responsible party with autonomy to present suggestions, guidance, and proposals for improvement and effectiveness of the Program before any member of Senior Management;

1.9 CODE OF CONDUCT: The general internal rule of ZOOMHOLDING that summarizes the main themes requiring prioritization in its risk matrix, which are part of its Compliance Program and are mandatory for all Senior Management, Employees, Clients, Suppliers, Service Providers, Business Partners, and any Third Parties or Agents interacting with it. The CODE OF CONDUCT may be amended, and when this occurs, the new amendments shall prevail in the consolidated and compiled text of the new version;

1.10 INTERNAL POLICIES: Policies, regulations, and internal rules approved by Senior Management for specific matters that, by their nature, require detailed provisions for a specific audience. The CODE OF CONDUCT, together with INTERNAL POLICIES, forms ZOOMHOLDING’s Integrity Program.

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III – RULES:

1. ACT IN ETHICAL AND LEGAL COMPLIANCE:

1.1 All valid and effective rules within the Brazilian legal system must be observed and complied with (Federal Constitution, Complementary and Ordinary Laws, Decrees, Resolutions, Normative Instructions, and other sub-legal regulations).

1.2 Foreign laws applicable to ZOOMHOLDING in the exercise of its activities must also be observed.

1.3 ZOOMHOLDING operates with a duty of ethical and legal compliance in all its relationships and expects its directors, employees, service providers, business partners, outsourced workers, and suppliers to act with the same duty. ZOOMHOLDING adopts control mechanisms to prevent contracting with those who demonstrably act in ethical or legal non-compliance.

2. ACT WITH SOCIO-ENVIRONMENTAL RESPONSIBILITY:

2.1 All manifestations, decisions, communications, measures, and actions of ZOOMHOLDING must observe technical, legal, and procedural criteria, in accordance with Brazilian Technical Standards, certification standards, quality standards, and other applicable guidelines.

2.2 ZOOMHOLDING conducts its activities with coherence between speech and practice. Decisions and conduct must be based on ethical values, technical criteria, and institutional responsibility, not on personal interests, internal or external pressures, or positions incompatible with corporate integrity principles.

2.3 ZOOMHOLDING operates with an ethical commitment to social and environmental responsibility, seeking to generate value for society through technological products and services that contribute to sustainable development, innovation, and conscious use of resources.

2.4 The company promotes **HSE (Health, Safety, and Environment)** practices, requiring compliance with applicable standards by all those who operate on its premises or on its behalf, including employees, service providers, partners, suppliers, and visitors.


2.5 Everyone must contribute to the identification, prevention, and elimination of situations that may pose risks to people’s health, physical and psychological integrity, or to the environment, by immediately reporting any unsafe or inadequate conditions to those responsible.

2.6 ZOOMHOLDING acknowledges that organizational, relational, and managerial factors may give rise to psychosocial risks capable of affecting people’s mental health, well-being, and performance. In this regard, it is committed to promoting a healthy work environment grounded in respect, ethical communication, cooperation, and the appreciation of human dignity, adopting measures to prevent, identify, and address situations that may cause psychological distress, embarrassment, or the degradation of the work environment.

2.6.1 Conduct that constitutes moral harassment, sexual harassment, intimidation, humiliation, discrimination, abusive behavior, or any form of psychological violence in the workplace is incompatible with the organization’s values and must be reported through the appropriate institutional channels for assessment and the adoption of appropriate measures.

2.6.2 ZOOMHOLDING also recognizes the importance of preventing psychosocial risks in the workplace, encouraging practices of respect, cooperation, and healthy coexistence among all employees, directors, partners, and third parties.

2.7 ZOOMHOLDING encourages the responsible and sustainable use of natural, technological, and material resources, and all must act with due care in the use of the company’s assets, equipment, supplies, and other resources, avoiding waste and promoting practices of reuse, recycling, and proper waste disposal.

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2.8 It is the duty of everyone to ensure environmental preservation, the safety of people, and the conscious use of corporate resources, contributing to a sustainable, responsible organizational environment aligned with good corporate governance practices.

3. PROHIBITION OF CORRUPTION AND BRIBERY:

3.1 ZOOMHOLDING repudiates any illegal act or form of corruption, extortion, bribery, or kickbacks. The practice of such illicit acts constitutes a crime, negatively affects relationships and the reputation of an institution, produces harmful effects on society, and is therefore intolerable. If any attempt, threat, or act of corruption or extortion is detected within the corporate environment, ZOOMHOLDING will take the appropriate measures, such as initiating an investigation process, filing a report, terminating contracts where applicable, and adopting other actions and procedures consistent with the infringing conduct.

3.2 ZOOMHOLDING is subject to the anti-corruption and anti-bribery provisions set forth in Brazilian legislation, including Law No. 8,429/1992 (Administrative Improbity Law) and Law No. 12,846/2013 (Anti-Corruption Law), along with their respective regulations. It is also subject to foreign regulations, including the US Foreign Corrupt Practices Act of 1977 (U.S. Anti-Corruption Law) and the UK Bribery Act of 2010, as well as any applicable anti-corruption laws in the countries where ZOOMHOLDING may conduct its activities, affirming its commitment to fully comply with them, both on its own behalf and through its shareholders, directors, and employees.

3.3 It is prohibited for any individual or legal entity that maintains an employment or contractual relationship with ZOOMHOLDING, in the performance of its core or support activities, or on its behalf, to give, offer, pay, or promise benefits, advantages, or money, directly or indirectly, in any amount or value, to any public or private agent, governmental authority, or any other person, for the purpose of influencing any act or decision, or of obtaining privileged information or any type of pecuniary or non-pecuniary advantage.


3.4 All shareholders, directors, employees, service providers, business partners, contractors, and any individuals or legal entities that contract with ZOOMHOLDING are required to comply with Brazilian anti-corruption and prevention laws, as well as international regulations, under penalty of contract termination and other sanctions provided for in contracts or in the Policies that form part of this Code of Conduct.

3.5 ZOOMHOLDING will adopt appropriate and effective control procedures with the objective of ensuring the legality, integrity, and accuracy of its accounting records.

3.6 ZOOMHOLDING adopts, and requires its service providers, contractors, and business partners to adopt, practices for monitoring compliance with anti-corruption laws, with the objective of preventing acts of corruption, fraud, illicit practices, or money laundering by their shareholders, managers, employees, and/or any individuals or legal entities that interact with them.

4. RELATIONSHIP WITH PUBLIC ADMINISTRATION:

4.1 Since the beginning of its activities, ZOOMHOLDING has maintained a strong presence in the supply of technology goods and services to Public Administration entities at all levels of government. In its relationship with the Public Administration, ZOOMHOLDING subjects itself—and requires that all its employees, directors, agents, representatives, and business partners also subject themselves, within their respective responsibilities—to all the principles governing Direct and Indirect Public Administration, as well as to the rules and procedures governing public procurement (Law No. 8,666/93, Law No. 10,520/02, Law No. 13,313/16, Law No. 12,462/11, Law No. 14,133/2021, among others), the Anti-Corruption Law, the Criminal Code, and other applicable legislation. To this end, ZOOMHOLDING provides guidance and training to its employees to ensure they act in strict compliance

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with the law in procurement procedures, contract execution, and interactions with public agents and government entities.

4.2 ZOOMHOLDING requires its employees, directors, agents, representatives, and business partners to refrain from engaging in any acts that may compromise the competitive nature of a bidding process or that may result in undue advantage or benefit to ZOOMHOLDING or to any party with which it has any type of corporate, employment, contractual, or business relationship, whether direct or indirect.

4.3 ZOOMHOLDING's participation in bidding processes and in the execution of administrative contracts is conducted with integrity, always in compliance with the provisions of the solicitation documents and the contracts, without any form of collusion, favoritism, or engagement in fraudulent or unlawful acts, all of which are strongly repudiated and prohibited by ZOOMHOLDING.

4.4 All employees, directors, agents, representatives, and business partners acting on behalf of ZOOMHOLDING before the Public Administration are required to comply with this Code of Conduct and the relevant Internal Policies. Any violation of these rules will result in the application of disciplinary sanctions and contract termination, without prejudice to the appropriate legal measures, including reporting to the competent public authorities, where applicable.

1.1.1 5. INCENTIVES, GIFTS, MEALS, PRESENTS, AND HOSPITALITY:

5.1 Commercial incentives, such as commissions and sales-related concessions, constitute legitimate market practices when carried out in a transparent, institutional manner and in compliance with applicable laws and ZOOMHOLDING's internal policies. However, it is prohibited to offer or accept any monetary value, advantage, gift, present, or other form of business courtesy intended to improperly influence negotiations, decisions, or the obtaining of benefits.

5.2 Institutional gifts are considered to be items of modest value distributed as a business courtesy, preferably bearing the brand or identification of the offering institution.

5.2.1 For the purposes of this Code, institutional gifts may be offered or accepted as a business courtesy, provided they are not in the form of cash, checks, bank transfers, negotiable instruments, or any other financial equivalent, and provided that they have a maximum annual individual value of **R\$ 250.00 (two hundred and fifty Brazilian reais)** per person or recipient institution. The offering or acceptance of gifts must not be associated with any expectation of reciprocity, condition, or favor of any kind, nor may it compromise the independence, impartiality, or reputation of ZOOMHOLDING and its employees.

5.2.2 The provisions of this Code regarding the offering or acceptance of gifts also apply to situations in which such advantages are directed to **family members, relatives, or individuals related to employees**, when they may be linked to the existing professional relationship.

5.3 Payment for meals may be made up to a maximum limit of R\$ 250.00 (two hundred and fifty Brazilian reais), also observing the specific rules set forth in the Internal Policy governing reimbursement procedures on this matter. The payment of meals must be associated with meetings or events of a technical, institutional, or commercial nature, particularly when intended for the presentation of products, services, or technical information. Whenever possible, such meals should take place in a group setting. Exceptionally, an individual meeting may occur during business hours if it is the only way to reconcile schedules, which must be duly justified and recorded in the institutional calendar, while also observing the other requirements established in the company's Internal Policy governing this matter.

5.3.1 Amounts exceeding those specified in Clause 5.3 may be authorized in international travel or at events involving Strategic Partners in the private sector, when the circumstances of the meeting, the standard of the venue, or customary market practices so justify, provided that the expense is linked to a legitimate institutional or commercial purpose.

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5.3.1.2 The exceptions specified in the preceding clause must be duly justified, documented, and submitted for approval by the responsible manager or the Compliance area, always observing the principles of reasonableness, transparency, and the prohibition of any expectation of undue advantage.

5.4 It is expressly prohibited to offer or accept **presents**, understood as goods or services of significant commercial value that do not fall within the concept of institutional gifts, such as perfumes, jewelry, watches, high-value beverages, gift baskets, electronic equipment, or any similar items.

5.5 For the purposes of this Code, hospitality is defined in accordance with Decree No. 10.889/2021 as the offering or payment of expenses related to transportation, meals, lodging, courses, seminars, conferences, events, fairs, or similar institutional activities.

5.5.1 Hospitality may be granted or accepted when it serves a legitimate institutional, commercial, technical, or relationship purpose, and must always observe the principles of reasonableness, transparency, proportionality, and integrity, as well as be aligned with ZOOMHOLDING's institutional interests.

5.5.2 The granting or acceptance of hospitality must not, under any circumstances, create an expectation of favoritism, influence commercial or institutional decisions, compromise the independence of the parties involved, or affect ZOOMHOLDING's reputation.

5.5.3 The offering or receipt of hospitality must also comply with the following criteria:

- a)** have an institutional, technical, commercial, or product/service promotion purpose;
- b)** occur in a transparent manner and be consistent with customary market practices;
- c)** have a reasonable value proportionate to the purpose of the event or activity;
- d)** not occur in situations involving sensitive decision-making processes, ongoing contractual negotiations, or circumstances that may give rise to conflicts of interest;
- e)** not be directed with the purpose of obtaining undue advantage or personal benefit .

5.5.4 Whenever there is any doubt regarding the appropriateness of hospitality, the employee must consult their immediate manager or the Compliance Management area in advance.

5.6 Gifts and hospitality must always be offered or received on **behalf of the institutions involved**, never on a personal basis.

5.7 If any director, agent, representative, or employee of ZOOMHOLDING receives a gift, present, or hospitality in violation of the provisions of this Code and it is not possible to refuse it immediately, they must arrange for its return to the sender, keeping a record of the return and reporting the matter to the Compliance Management area. If return is not possible, or when the costs of returning it are disproportionate, the item may be donated to a non-profit entity, upon decision of the Compliance Management area and communication to the sender.


6. DONATIONS AND SPONSORSHIPS:

6.1 ZOOMHOLDING is authorized to engage in donations and sponsorships aimed at supporting cultural, social, sports, environmental, educational, and health-related initiatives.

6.2 The approval of resources allocated to sponsorships and donations shall be determined by Senior Management, with the support of the Compliance Management whenever necessary.

6.3 Any donation or sponsorship made with the intent of obtaining an improper advantage or benefit is strictly prohibited by ZOOMHOLDING for its employees, directors, family members, and third parties.

6.4 ZOOMHOLDING neither makes nor authorizes donations or contributions of a political or partisan nature. It is prohibited for any employee, director, representative, or related third party to associate the company's name, image, or any of its resources with political or partisan activities or campaigns.

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7. CONFLICT OF INTERESTS:

7.1 A “Conflict of Interest” is identified when personal interests or the interests of third parties directly or indirectly related to an employee, director, representative, agent, supplier, business partner, or service provider of ZOOMHOLDING may pose a risk of influencing or compromising the fulfillment of an obligation or ethical commitment, whether or not resulting in material or non-material damages to ZOOMHOLDING or to third parties.

7.2 ZOOMHOLDING does not tolerate non-compliance with this Code of Conduct or with any legal or contractual obligation due to conflicts of interest. Whenever such a conflict is identified, the employee, director, representative, agent, supplier, business partner, or service provider of ZOOMHOLDING must report it to their immediate supervisor or to the Compliance Management, so that, in the relevant activity or business relationship, they may be replaced by another individual, in order to safeguard against actions carried out under a conflict of interest.

7.3 To prevent situations of conflict of interest, the Employee must inform their immediate manager whenever they have a personal, family, or close relationship with individuals who work, directly or indirectly, for suppliers, manufacturers, business partners, competitors, or any third parties that maintain a relationship with ZOOMHOLDING or with companies within the same corporate group.

8. ACTING WITH CONTRACTUAL RESPONSIBILITY:

8.1 All contracts entered into with ZOOMHOLDING’s clients, whether public or private, regardless of the contracting party’s location or headquarters, economic size, or corporate structure, shall be conducted with contractual responsibility throughout all phases (pre-contractual, contractual, and post-contractual). Responsible contract management involves taking all necessary and appropriate measures to ensure the timely performance of the contractual scope, with quality, excellence, and strict adherence to the terms of the commercial proposal.

8.2 We act diligently and spare no effort to fulfill the agreements entered into. Negligence, imprudence, or lack of due care in the execution of contractual obligations is not tolerated. In the event of any circumstance arising after the submission of the proposal, beyond ZOOMHOLDING’s control and not caused by it, the client shall be promptly informed in a transparent manner, and all efforts shall be made to mitigate the risks of non-performance.

8.3 ZOOMHOLDING conducts its business and contractual relationships in a transparent and fair manner, providing clear, comprehensive, and accurate information regarding all processes, products, and services. ZOOMHOLDING values long-term business relationships: its products and services deliver legitimate results and benefits to clients and, therefore, when extraordinary circumstances arise that affect contract performance, ZOOMHOLDING makes every effort to mitigate their resulting effects.

9. COMPLYING WITH AND ENFORCING THE DUTY OF SECRECY AND CONFIDENTIALITY:

9.1 ZOOMHOLDING complies with and enforces, among its employees, directors, agents, and representatives, the confidentiality of **Confidential Information** exchanged in negotiations and contractual arrangements with its clients, business partners, suppliers, and service providers. ZOOMHOLDING understands that **Confidential Information** includes all information, whether oral or written, including in electronic form, owned by the disclosing party, including but not limited to strategic business plans and forecasts, internal processes and procedures, proposals, briefings, products and services, pricing, market research, financial or commercial data and projections, information obtained from manufacturers, and any other related information that is not considered public or widely known, or that is required to be disclosed by legal obligation.

9.2 Likewise, **Confidential Information** belonging to ZOOMHOLDING must be treated with the same duty of confidentiality, and its disclosure is prohibited to any employee, director, agent, business

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partner, service provider, or contractor. The duty of confidentiality shall be observed even after the termination of the employment relationship, service agreement, or any equivalent contractual instrument.

10. RELATIONSHIP WITH EMPLOYEES:

10.1 ZOOMHOLDING values each employee as both an individual and a professional, promoting a work environment based on respect, dignity, diversity, and equal opportunities.

10.2 Any form of discrimination based on race, color, gender, religion, language, political opinion, nationality, physical or social condition, marital status, age, pregnancy, or any other personal characteristic is not permitted, whether in recruitment, selection, training, compensation, promotion, or any other employment-related processes.

10.3 It is the duty of all, regardless of role, function, or hierarchical position, to contribute to a work environment that is ethical, respectful, collaborative, and free from abusive practices. Behaviors such as abuse of power, moral or sexual harassment, intimidation, coercion, defamation, insults, or any form of psychological or physical violence are not tolerated.

10.4 ZOOMHOLDING does not permit the use of labor under illegal, degrading, or slavery-like conditions, nor child labor, repudiating such practices and refraining from maintaining business relationships with any parties that engage in or encourage them.

10.5 Romantic relationships between employees must adhere to principles of transparency and integrity, and situations involving direct hierarchical subordination or undue influence over decision-making or management processes are prohibited.

10.6 Subject to the provisions of the preceding clause, such relationships may occur provided that they are disclosed to the immediate manager and do not interfere with professional activities, the work environment, or the company's institutional image. Any conflict of interest arising during the relationship must be promptly raised and reported to the immediate manager or to the Compliance área.


11. RELATIONSHIP WITH SUPPLIERS, SERVICE PROVIDERS, MANUFACTURERS, AND OTHERS:

11.1 The relationship with suppliers, service providers, and manufacturers of the products marketed by ZOOMHOLDING is fundamental to the execution of its activities. ZOOMHOLDING honors the performance of all contracts entered into with its suppliers, service providers, and manufacturers of the products it resells.

11.2 ZOOMHOLDING's employees, directors, and agents are required to ensure the transparency, authenticity, and integrity of information during and after each quotation, negotiation, and contracting process. Likewise, ZOOMHOLDING requires its suppliers to ensure the same transparency, authenticity, and integrity in the information provided to ZOOMHOLDING, especially, but not limited to, requests for quotations that support the proposals submitted by ZOOMHOLDING in bidding processes. Manufacturers are required to disclose the existence of any anticipated discontinuation of a product that is subject to quotation.

11.3 Suppliers (including distributors) and manufacturers are required to ensure that the terms of the approved proposals are strictly complied with, not only with respect to the specifications of the supplied goods, but also regarding delivery deadlines, warranty, updates, replacement of parts, and related obligations. They shall indemnify ZOOMHOLDING for any and all damages for which it may be held liable, whether before private parties or Public Administration entities, as a result of non-compliance with the conditions offered.

11.4 If a supplier or manufacturer, under any circumstances, has direct contact with ZOOMHOLDING's clients or is required to fulfill, in relation to them, any obligation provided by law or contract, it shall

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make every effort to comply with such obligation within the applicable deadlines and technical specifications. It shall also observe the same ethical principles, quality standards, and full client satisfaction, as well as all principles and obligations set forth in this Code of Conduct.

11.5 Suppliers, manufacturers, and any third parties contracting with ZOOMHOLDING are not permitted to use its assets, services, or employees for their own benefit or for the benefit of third parties.

11.6 ZOOMHOLDING reserves the right to terminate, for cause, and to suspend payments to suppliers, manufacturers, and any third parties that violate any provision set forth in this Code of Conduct. Prior to adopting such measures, ZOOMHOLDING may, at its sole discretion, conduct audits at the premises of suppliers, manufacturers, or third parties.

11.7 Suppliers, manufacturers, and any third parties contracting with ZOOMHOLDING are required to report any instances of non-compliance committed by employees or any individual interacting with ZOOMHOLDING.

11.8 Any individual or legal entity contracting with ZOOMHOLDING is required to provide the documents requested in due diligence procedures conducted by the requesting area or by the Compliance area.

12. RELATIONSHIP WITH COMPETITORS:

12.1 Notwithstanding its competitive and assertive negotiation profile, ZOOMHOLDING strictly complies with applicable laws and fair competition practices. In its relationships with competing companies, ZOOMHOLDING conducts itself in accordance with ethical market practices and complies with the laws of Brazil and of the countries in which it operates.

12.2 Any communication, practice, conduct, message, or statement that may harm the image of competitors is prohibited.

12.3 It is prohibited to make false or misleading statements about competitors or about the products and services they provide.

13. DATA PROTECTION:

13.1 In the course of its activities, ZOOMHOLDING may process personal data, including collection and storage. Accordingly, in compliance with Law No. 13,709/18 — the Brazilian General Data Protection Law (LGPD) — ZOOMHOLDING implements Information Security measures aimed at protecting information and the privacy of personal data. Such protective measures also extend to the company's internal environment, with the purpose of safeguarding the data of its employees.

13.2 Furthermore, in compliance with Law No. 13,709/18 — the Brazilian General Data Protection Law (LGPD) — all employees and any individuals or legal entities interacting with ZOOMHOLDING are required to adopt the necessary measures or standard operating procedures to ensure the protection of personal data circulating within the corporate environment. This includes ensuring that such data is accessed and/or processed only by individuals who require such information for the performance of their functions or duties, and that only data strictly necessary for the execution of ZOOMHOLDING's activities is collected, including, but not limited to, data considered sensitive under the LGPD, that is, data capable of giving rise to discrimination.

13.3 The disclosure of personal data collected or stored by ZOOMHOLDING is prohibited. However, when, in the regular course of its activities, the disclosure of personal data to third parties is indispensable, the employee shall be required to verify, on each occasion, that the data subject's consent has been obtained, as well as to adopt all appropriate procedures to ensure the preservation of the confidentiality of such personal data.

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13.4 The processing of data shall be limited to the minimum necessary for the fulfillment of its purposes.

13.5 The processing of children’s personal data shall be carried out with the specific and explicit consent of at least one parent or legal guardian.

13.6 Data subjects shall always be guaranteed easy and free access to information regarding the form and duration of processing, as well as to the entirety of their personal data.

13.7 In accordance with the Privacy by Design principle, privacy shall be adopted as a priority, ensuring visibility and transparency, and safeguarding the data subject’s privacy from data collection through to its deletion.

14. TRANSPARENCY AND INSTITUTIONAL COMMUNICATION:

14.1 ZOOMHOLDING guides its communication and marketing activities by the principles of **transparency, accuracy, social responsibility, and respect for the public**. The information disclosed must be clear, precise, and accessible, based on truthful content and in compliance with applicable laws, the principles and values set forth in this Code of Conduct, and the company’s other institutional values.


14.2 ZOOMHOLDING is committed to maintaining transparent, responsible, and accessible communication with its clients, business partners, employees, public authorities, and society at large. Information related to its products, services, activities, and institutional positions shall be disclosed in a clear, accurate, and appropriate manner, and any form of misleading, omissive, or deceptive communication capable of inducing third parties into error is prohibited.

14.3 The use of social media, digital platforms, or any other electronic means of communication shall observe the principles of responsibility, respect, and prudence, especially when there is direct or indirect reference to ZOOMHOLDING, its group companies, its employees, partners, or its activities.

14.4 Only the company’s legal representatives, or individuals formally authorized by them, may speak, provide clarifications, or issue statements on behalf of ZOOMHOLDING before the press, media outlets, or press offices. The disclosure of confidential, strategic, or unauthorized information is prohibited, as is making statements on behalf of the company without the express authorization of its legal representatives.

14.5 Information to be made available to the public, especially that related to consumer rights, as well as to the products and services provided by ZOOMHOLDING, shall be disclosed through official corporate channels, such as the institutional website, customer service channels, SAC (Customer Service Center), corporate email, or other institutional communication means.

14.6 ZOOMHOLDING, on its own behalf and on behalf of its parent company, is committed to promoting transparency in its communication with its employees, sharing, whenever appropriate, relevant institutional information regarding its activities, guidelines, strategic planning, and corporate initiatives. For this purpose, the company may carry out programs, institutional events, meetings, training sessions, and other internal communication initiatives aimed at disseminating information of interest to the organizational environment.

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		Elaborador: Gestão de Compliance
		Aprovador: Alta Direção

15. REPORTING CHANNEL, COMMUNICATIONS, AND INVESTIGATION OF REPORTS:

15.1 AS AN INTEGRAL PART OF ITS INTEGRITY PROGRAM, ZOOMHOLDING, THE PARENT COMPANY OF ZOOMHOLDING, PROVIDES A REPORTING CHANNEL ACCESSIBLE TO ANY INDIVIDUAL, REGARDLESS OF WHETHER THEY HAVE A COMMERCIAL OR PROFESSIONAL RELATIONSHIP WITH THE COMPANY, THROUGH THE FOLLOWING ADDRESS:

[HTTPS://WWW.CONTATOSEGURO.COM.BR/ZOOMHOLDING](https://www.contatoseguro.com.br/zoomholding)

15.2 The Reporting Channel is intended to receive communications related to compliance with this Code of Conduct, Internal Policies, and ZOOMHOLDING's Integrity Program, and may be used to submit reports of irregularities, as well as inquiries, complaints, suggestions, compliments, or any other communications related to the conduct of employees, directors, representatives, partners, suppliers, agents, or third parties acting on behalf of the company.

15.3 All communications received through the Reporting Channel shall be reviewed and processed by ZoomHolding's Compliance Management, which shall be responsible for assessing the nature of the report and adopting the appropriate measures, which may include the collection of information, preliminary analysis, or the initiation of an internal investigation procedure.

15.4 Investigation procedures shall be conducted with independence, confidentiality, impartiality, and due respect for the principles of adversarial proceedings and full defense, in accordance with the Internal Policies on Accountability Investigation and the Application of Penalties, as well as with the Bylaws of the Integrity Committee, the latter to be prepared by the Compliance Management and approved by Senior Management.

15.5 The confidential handling of the information received and the protection of the whistleblower's identity shall be ensured, whenever requested or when circumstances so require, and any form of retaliation against individuals who make reports in good faith is prohibited.

15.6 Upon verification of a violation of applicable laws, this Code, or other Internal Policies, disciplinary measures proportional to the severity of the conduct may be applied, without prejudice to any applicable legal liabilities.

15.7 In cases involving employees, disciplinary measures may include warning, suspension, or termination of the employment contract, including termination for cause, when circumstances provided for under applicable law are met.


15.8 With respect to suppliers, partners, service providers, or any third parties, a violation of the provisions of this Code may give rise to the application of contractual sanctions, including termination of the contract or the cessation of the business relationship.

15.9 ZOOMHOLDING promotes the broad dissemination of its Reporting Channel and encourages its responsible use by employees, partners, and other individuals who interact with the company. Information regarding the operation and purpose of the channel is also provided during new employee onboarding processes, as well as in training sessions, institutional communications, and other initiatives related to the Integrity Program.

16. POSSIBILITY OF AMENDMENT:

16.1 This Code of Conduct constitutes an institutional document that forms part of ZOOMHOLDING's Integrity Program and is subject to periodic review and updates, in accordance with the needs to improve the governance, compliance, and management practices of the company and its parent company.

16.2 Updated versions shall be subject to **documented information control**, in accordance with the internal procedures of the **Integrated Management System (IMS)**, and shall also be made available on the company's institutional website.

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16.3 The availability of the updated version of the Code of Conduct through the company's institutional channels, including on the internet, shall be considered the official means of communicating its content to individuals who interact with the company.

Nilton Pedro da Silva Junior
Chairman of the Board of Directors / CEO

Cassiano Hilario Bernardo da Silva
Vice-Chair of the Board of Directors

Natasha Utescher
Member of the Board of Directors

Marcelo Silveira
Corporate Governance Director

Lisiane Paula Pelisser
Finance Director

Rafael de Souza Petrella
Innovation Director