

	PL-COM-001-I Anti-Bribery and Compliance Management System Policy - Zoomholding	Revisão: 0.0
		Data: 26/05/2026
		Elaborador: Gestão de Compliance
		Aprovador: Alta Direção

ANTI-BRIBERY AND COMPLIANCE MANAGEMENT SYSTEM POLICY

I – INTRODUCTION:

The Anti-Bribery and Compliance Management System Policy, together with the Code of Conduct and other ZOOMHOLDING policies, forms part of the Company’s Integrity Program.

Specifically, the Anti-Bribery and Compliance Management System Policy establishes the guidelines and principles governing ZOOMHOLDING’s Integrity Program, providing direction for the conduct of senior management, employees, service providers, partners, and other third parties acting on its behalf or in its interest.


The development of this Policy is grounded in ZOOMHOLDING’s ethical principles and values, as well as its commitment to compliance with applicable legislation, including, but not limited to, the Anti-Corruption Law and other national and international anti-bribery regulations.

This Policy forms part of the Integrity Program in a complementary relationship with the Code of Conduct and shall never replace or exclude it. In other words, both instruments govern ZOOMHOLDING’s relationships and those of all parties interacting with the Company, without one excluding the other.

Accordingly, as compliance with these provisions is mandatory, any individual who fails to comply with the Anti-Bribery and Compliance Management System Policy, the Code of Conduct, or any other ZOOMHOLDING policies shall be subject to disciplinary measures and, depending on the circumstances, may also face contract termination or the dissolution of partnerships established with ZOOMHOLDING.

II – PROVISIONS:

1. The provisions set forth in this Policy establish and reinforce the fundamental guidelines of ZOOMHOLDING’s Anti-Bribery and Compliance Management System, through which the Company commits to integrity, ethics, and transparency in all its institutional and commercial relationships.
2. Any form of bribery, undue advantage, or related practice, whether direct or indirect, in the public or private sector, is strictly prohibited.
3. The Company promotes ongoing initiatives aimed at achieving its strategic objectives, ensuring full compliance with and commitment to the requirements of the Anti-Bribery and Compliance Management System.

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4. ZOOMHOLDING is committed to the continuous improvement of the Anti-Bribery and Compliance Management System through monitoring, periodic risk assessments, internal audits, and the constant enhancement of its controls and processes.
5. The reporting of any indications of irregularities, regulatory violations, or conduct incompatible with this Policy and with applicable legislation is ensured and encouraged, including the possibility of anonymous reporting and without retaliation.
6. Technical and decision-making autonomy is guaranteed to the Integrity Committee, which forms part of the Compliance Management structure, ensuring its independence for the full exercise of its duties, including the investigation of reports and the recommendation of corrective measures.
7. ZOOMHOLDING observes, complies with, and promotes adherence to applicable anti-bribery laws and regulations, as well as other legal and regulatory provisions related to corporate integrity.
8. Failure to comply with this Policy will subject the offender to appropriate disciplinary measures, without prejudice to the penalties provided for under applicable legislation and the internal guidelines established in the Code of Conduct.

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