	PL-COM-002-I Employee Policy - Zoomholding	Revisão: 5.0
		Data: 26/05/2026
		Elaborador: Gestão de Compliance
		Aprovador: Alta Direção

EMPLOYEE POLICY

I – INTRODUCTION:

The Employee Policy, together with the Code of Conduct and other ZOOMHOLDING policies, forms part of the Company’s Integrity Program.

Specifically, the Employee Policy establishes the guidelines and rules that guide and regulate the daily activities of individuals who maintain an employment relationship or provide continuous services within ZOOMHOLDING’s facilities, regardless of the position or role they hold.

ZOOMHOLDING expects its Employees to embody the values that underpin its Integrity Program and to act as promoters of a culture that influences all of their actions and decisions.

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 employment and service relationships without one excluding the other.

Accordingly, as compliance with these provisions is mandatory, any Employee who fails to comply with the Employee Policy and/or the Code of Conduct shall be subject to disciplinary measures and, depending on the circumstances, may also face termination of their Employment Agreement or Service Agreement.

II – RULES:


1. MANDATORY COMPLIANCE AND SCOPE:

1.1 The rules set forth in this Policy govern employment relationships and continuous service relationships established between individuals and ZOOMHOLDING. For the purposes of this Policy, such individuals shall hereinafter be referred to simply as **EMPLOYEES**.

1.2 Non-shareholder administrators, Directors, Members of the Board of Directors (if applicable), and General Managers are included within the concept of **EMPLOYEE** for the purposes of this Policy.

1.3 The provisions set forth in this Policy complement ZOOMHOLDING’s Code of Conduct and the individual employment or service agreement executed with those performing their duties at headquarters, branch offices, under remote work arrangements, or at the premises of legal entities that maintain contractual relationships with ZOOMHOLDING, regardless of position or function.

1.4 The obligation to comply with and observe this Policy, the Code of Conduct, and any other policies remains in force throughout the entire duration of the Employment or Service Agreement. However, certain obligations—such as confidentiality and non-disclosure—shall remain in effect even after termination of the contractual relationship.

 <small>zoomtech zoomstore WEAL Prime8 BRITi Ciel</small>	PL-COM-002-I Employee Policy - Zoomholding	Revisão: 5.0
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2. TECHNOLOGICAL RESOURCES, IMAGES, VIDEOS, AND SOCIAL MEDIA:

2.1 For the purposes of this Policy, Information Technology resources include computers (PCs) or notebooks, portable devices (smartphones, tablets, storage devices), network servers, internet and intranet access, devices used to access email, chat, Skype, applications and platforms for virtual meetings and conferences, or other technological communication tools, as well as any other resources, whether or not expressly mentioned herein, that may be made available by ZOOMHOLDING, regardless of whether the Company owns, possesses, or merely holds the right of use to such resources through loan, lease, licensing, or any other legal arrangement.

2.2 All information created, stored, transmitted, or carried through Information Technology resources made available in the corporate environment belongs to ZOOMHOLDING.

2.3 The Employee is required to comply with all terms of the Information Security Policy, committing to make responsible use, and in accordance with applicable legislation (such as the General Data Protection Law and its regulations), of the assets, data, information, and Information Technology resources available in the corporate environment or as a result of it.


2.4 Users of Technological Resources must adopt all good Information Technology governance practices, especially, but not limited to:

- a)** Keeping software and antivirus programs always up to date;
- b)** Observing the principles set forth in the General Data Protection Law when processing personal data that may circulate within the corporate environment;
- c)** Mandatory non-use of public network connections to access ZOOMHOLDING data or servers;
- d)** Being responsible for maintaining the confidentiality of logins, passwords, badges, and any personal-use codes, keeping them secure and confidential, with any type of transfer strictly prohibited under any circumstances or pretext, and being responsible for changing the password or code at the slightest suspicion of a confidentiality breach;
- e)** Not using or installing software identified as pirated or unauthorized on the Information Technology resources provided by ZOOMHOLDING, under any pretext or claim;
- f)** Complying with all Standard Operating Procedures adopted in the corporate environment and all recommendations issued by the technological support advisory;
- g)** Not allowing the circulation of any written, video, image, or audio message containing content that is inappropriate or irrelevant to the work environment, and also being required to report to the immediate superior any such message that comes to their knowledge.

2.5 The Employee declares awareness that ZOOMHOLDING has monitoring procedures for all equipment, Information Technology resources, systems, and network activities, regardless of their physical location. Even when certain technological resources are made available for the individual use of specific employees or for the performance of certain functions, the Employee acknowledges that monitoring procedures will still apply.

2.6 In carrying out the monitoring procedures provided for in the previous clause, ZOOMHOLDING may cancel any employee's access to Information Technology resources at any time, with or without prior notice.

2.7 ZOOMHOLDING employees may not presume any right to personal privacy or confidentiality of personal data transmitted through the technological resources provided by ZOOMHOLDING due to

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personal access or use, even if such use occurs outside working hours.

2.8 Images and videos captured by mobile phones, cameras, or any other recording device are prohibited within ZOOMHOLDING’s facilities or those of its clients, contractors, or third parties, except for images previously authorized by Senior Management for use by the Communications and Marketing department or for the performance of the Employee’s duties or the fulfillment of contracts executed by ZOOMHOLDING..

2.9 The use of Social Networks for personal purposes during working hours is prohibited. Outside working hours, the Employee must respect the values of this Policy and the Code of Conduct, especially—but not limited to—when mentioning the name of ZOOMHOLDING or any of its Employees or Third Parties with whom it interacts.

2.10 All negotiations with clients, suppliers, service providers, business partners, or any third parties must be conducted in writing, including through electronic means provided by ZOOMHOLDING. Telephone or other voice or video communication methods may be used to clarify questions that do not affect the content of a negotiation or the formulation of a proposal. If such clarifications naturally result in changes to the content of a proposal or to a necessary condition thereof, the Employee must record the meeting in written minutes and obtain confirmation of its terms from the involved party, which may be done through electronic correspondence.

2.11 Failure to comply with any rule provided in this second clause may constitute serious misconduct by the Employee and may result in the termination of their Employment Contract.


3. PROTECTION OF COMPANY PROPERTY, ASSETS, AND OTHER RESOURCES:

3.1 The Employee must make sustainable, rational, and reasonable use of the property, assets, and resources made available by ZOOMHOLDING, such as, but not limited to, internal facilities, furniture, materials, vehicles, equipment, computers, software, brand, and trade name. These resources must be used only to promote and develop activities that are inherent to the corporation and in accordance with the purpose for which the asset is intended or was made available. The use of any asset or resource for personal purposes of the Employee, their family members, relatives, friends, or third parties will not be permitted.

3.2 The Employee shall be responsible for replacement costs and any other damages caused by the improper, abusive, inappropriate, or illegal use of any type of asset or resource made available by ZOOMHOLDING, even if it is not owned by the Employee.

3.3 When authorized to use vehicles owned by ZOOMHOLDING, the Employee will be personally responsible for their proper use and for full compliance with all applicable legal regulations, especially those established by the Brazilian Traffic Code, being liable for any and all damages caused to ZOOMHOLDING or to third parties as a result of legal violations or misuse of the vehicle. The Employee will also be responsible for the payment of fines issued due to traffic violations and for the points added to their driver’s license resulting from each violation.

3.4 Periodic maintenance of corporate vehicles will be arranged by the Employer. However, the Employee who uses a company vehicle will be responsible for requesting corrective maintenance if they identify any defect or malfunction in the vehicle.

 <small>zoomtech zoomstore weal Prime8 BRITi Ciel</small>	PL-COM-002-I Employee Policy - Zoomholding	Revisão: 5.0
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4. EMPLOYEE RELATIONSHIP WITH CLIENTS:

4.1 According to the ZOOMHOLDING Code of Conduct, Clients are legal entities, under Public or Private Law, that interact with ZOOMHOLDING by demonstrating interest in its goods and services or by merely seeking information, and may or may not ultimately enter into a contract with ZOOMHOLDING.

4.2 ZOOMHOLDING understands that the relationship with and satisfaction of its clients—guided by ethical, legal, and socially responsible principles—constitute the foundation for the growth and expansion of its activities.

4.3 The Employee has the duty to serve each client, regardless of their economic size, in a clear and objective manner, and with dedicated effort to meet deadlines, technical conditions, and quality standards defined in certifications and in the proposal offered.

4.4 The Employee has the duty to follow up on client service until their questions are fully resolved and until the full scope of the contracted services is completed and the client is fully satisfied, within the limits of the contracted proposal. In this process, actions and communications must be clear, truthful, courteous, empathetic, and precise.

4.5 The Employee has a duty of secrecy and confidentiality regarding all matters, proposals, contracts, and exchanges of messages involving information from ZOOMHOLDING’s Clients, regardless of the signing of a specific agreement. This obligation will remain in force even after termination of the employment contract, for any reason, under penalty of liability for any damages caused to ZOOMHOLDING or its Clients.

4.6 The Employee is prohibited from omitting relevant information regarding any technical data related to the products or services provided by ZOOMHOLDING, or from making any type of communication capable of misleading the Client.

4.7 Employees may not propose conditions or make any offers to Clients that have not been effectively guaranteed by the Manufacturers or Suppliers.


4.8 For the purposes of this Policy, considering that the concept of Client is broad—that is, it does not depend on whether a contract has been signed—all the rules provided in this clause must be observed without distinction, regardless of whether the Client has entered into a contract with ZOOMHOLDING.

5. EMPLOYEE RELATIONSHIP WITH MANUFACTURERS, SUPPLIERS, SERVICE PROVIDERS, BUSINESS PARTNERS, AND ANY THIRD PARTIES:

5.1 The Employee is prohibited from using their position or role, as well as ZOOMHOLDING’s materials, supplies, resources, and equipment, to gain personal benefit in conducting business or to benefit manufacturers, suppliers, service providers, business partners, or any third parties that contract with ZOOMHOLDING.

5.2 The prohibition above extends to the Employee’s relatives, friends, and family members, or to any person associated with the Employee who seeks to benefit, directly or indirectly, from any type of advantage.

5.3 The Employee has the duty to report to their Immediate Supervisor or any ZOOMHOLDING Director any attempt by a manufacturer, supplier, service provider, business partner, or any third party to obtain advantages or information, or to offer advantages and benefits to the Employee, with the

 <p>ZOOMHOLDING zoomtech zoomstore WEAL Prime8 BRITi Ciel</p>	<p>PL-COM-002-I Employee Policy - Zoomholding</p>	Revisão: 5.0
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intent to influence decisions, conduct or withhold business, obtain information considered confidential under the Code of Conduct, or secure any other advantage or benefit.

5.4 The Employee has the duty to report to their Immediate Supervisor or any ZOOMHOLDING Director any occurrence of unethical or illegal practices, or the use of unethical or illegal means by suppliers, service providers, business partners, or any third parties contracting with ZOOMHOLDING that come to their attention, even if such practices or means were not directed at ZOOMHOLDING, its Employees, or its Clients.

6. CONDUCT, PROFESSIONAL RESPONSIBILITY, AND CONFLICT OF INTEREST:

6.1 The Employee must perform their duties while observing the obligations inherent to their role, as defined in the Individual Employment Contract, and also respecting Standard Operating Procedures, Technical Specifications, Internal Regulations, and the Quality Standards established within the corporate environment, in force before or during the Individual Employment Contract.

6.2 Employees are authorized to participate in events promoted by Third Parties, such as lunches, dinners, or cocktails, provided that the following criteria are jointly observed:

a) The event is strictly technical or commercial in nature and not exclusively directed at ZOOMHOLDING Employees;

b) The event has no partisan, ideological, political, associative, discriminatory, anarchist, or revolutionary content, and under no circumstances or pretext contains content that could compromise any ethical or integrity principle established in the ZOOMHOLDING Code of Conduct and Policies;

c) The event is not intended to disguise or conceal an attempt to create a Conflict of Interest with Employees, potentially compromising ethical or legal obligation;

d) The Employee is present at the event together with another Employee, and both must observe the rules regarding acceptance or offering of gifts, presents, and hospitality, as well as any other practices that could attempt to influence negotiations or obtain benefits, even if not expressly addressed in the ZOOMHOLDING Code of Conduct or Policies;

e) Employees must not consume alcoholic beverages during formal events that require technical-professional presentation to third parties, nor engage in any act that could compromise ZOOMHOLDING's commercial reputation or violate the ethical standards of its Integrity Program.

6.3 Making statements that defame or disparage Manufacturers, Suppliers, or Service Providers that interact with ZOOMHOLDING or its competitors is considered a serious violation.


6.4 A conflict of interest occurs whenever Employees use their duties to influence decision-making or make decisions on behalf of ZOOMHOLDING or any group company to gain personal advantage, directly or indirectly, for themselves or others, including through the use of legal entities.

6.5 Employees have the duty to perform their activities impartially, honestly, and transparently, always in accordance with the objectives and values of ZOOMHOLDING or its Parent Company.

6.6 Employees are prohibited from:

a) Participating, directly or indirectly, as a partner, shareholder, or under any other title, in a business that competes with or could act contrary to ZOOMHOLDING's interests;

b) Influencing, directing, or manipulating budget results or quotation processes involving supply proposals to gain advantage for themselves or third parties;

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c) Seeking, granting, or maintaining business opportunities to obtain personal gain or benefit family members or third parties;

d) Receiving, directly or indirectly, money, goods, services, advantages, or any personal benefits from third parties that conduct or intend to conduct business with ZOOMHOLDING;

e) Influencing or interfering in supplier selection or contracting processes to benefit themselves or third parties;

f) Receiving commissions, percentages, or any form of remuneration from suppliers, partners, or third parties with contractual relations with ZOOMHOLDING, except when expressly provided for in the contract between the Employee and ZOOMHOLDING.

6.7 All Employees have the duty to report to their immediate management any situation that may constitute a conflict of interest. Immediate management must, in turn, report the matter to Senior Management or the Compliance area.

6.8 If an Employee identifies that they are in a potential or actual conflict of interest situation, they must immediately report it and refrain from participating in decisions, negotiations, or procedures related to the matter until the situation has been properly evaluated.

7. PARTICIPATION IN PROFESSIONAL ASSOCIATIONS, POLITICAL PARTIES, AND VOLUNTEERING:

7.1 ZOOMHOLDING values and supports the right of its Employees to representation before duly constituted Unions and Professional Associations, recognizing it as a legitimate and democratic practice.

7.2 ZOOMHOLDING understands that political participation is a citizen's right and can be exercised to assume responsibilities that contribute to the country's development. Therefore, ZOOMHOLDING does not intervene, prevent, or negatively influence its Employees' participation in political parties.

7.3 In cases where an Employee wishes to run for political office, they must notify the company in advance, requesting immediate leave from their duties and subsequent termination of employment.


7.4 Any practice, action, communication, or act that implies support for candidates or political parties, causes embarrassment, engages in partisan discussions, discrimination, threats, or any type of discomfort to colleagues, inside or outside the corporate environment, is unacceptable and will be considered a serious violation.

7.5 ZOOMHOLDING has an ethical and legal commitment to social responsibility and therefore supports the promotion of citizenship, volunteering, and engagement with social and community issues. Employees who actively participate in such movements may occasionally take part in volunteer activities during working hours, provided they notify and receive prior authorization from their immediate Supervisor, and as long as their regular work duties are not adversely affected.

8. PROFESSIONAL DEVELOPMENT:

8.1 The Employee must participate in all training sessions and evaluations promoted by ZOOMHOLDING throughout the term of the Individual Employment Contract, especially—but not limited to—those aimed at professional development, optimal utilization of human resources, and their reassignment in support of ZOOMHOLDING's activities.

8.2 We believe in the development and training of Employees through a continuous process of

 <small>zoomtech zoomstore weal Prime8 BRITi Ciel</small>	PL-COM-002-I Employee Policy - Zoomholding	Revisão: 5.0
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mutual cooperation. We encourage Employees to maintain ongoing learning and to share it within their work teams as a means of collective growth.

8.3 The Employee must commit to regularly participating in courses, training sessions, seminars, and professional development events promoted or funded by ZOOMHOLDING, focused, among other things, on skill enhancement, role reassignment, occupational safety, updates, and the strengthening and improvement of the Integrity Program.

9. MISCELLANEOUS:

9.1 ZOOMHOLDING reserves the right to amend the Employee Policy, regardless of the Employee's consent. The new version will be fully compiled and made available through ZOOMHOLDING's official communication channels (electronically or in physical documents) and will also be published on ZOOMHOLDING's homepage.

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