 <b>ZOOMHOLDING</b> <small>zoomtech zoomstore weal Prime8 BRITi Ciel</small>	<b>PL-COM-003-I</b> <b>Business Partners Policy - Zoomholding</b>	Revisão: 5.0
		Data: 26/05/2026
		Elaborador: Gestão de Compliance
		Aprovador: Alta Direção

## **BUSINESS PARTNERS POLICY**

### **I – PRESENTATION:**

The Business Partners Policy, together with the Code of Conduct and the other ZOOMHOLDING policies, forms part of its Integrity Program.

Specifically, this Policy establishes the guidelines and rules that guide and regulate relationships with individuals or legal entities that interact with ZOOMHOLDING in order to promote business, regardless of the legal nature of the relationship.

ZOOMHOLDING expects its Business Partners to incorporate the values that guide its Integrity Program and promote a culture that influences all of their actions and decisions.

This Policy is an integral and inseparable part of the Code of Conduct, complementing it. Both standards govern ZOOMHOLDING’s relationships with its Business Partners.

Failure to comply with this Policy or the Code of Conduct may result in disciplinary sanctions and, depending on the case, termination of the contract or partnership with ZOOMHOLDING.

### **II – RULES:**

#### **1. OBLIGATION AND SCOPE:**

**1.1** The rules established in this Policy regulate contracts and partnership agreements between ZOOMHOLDING and individuals or legal entities for the promotion of business, regardless of the legal nature of the relationship.

**1.2** These rules are incorporated into ZOOMHOLDING’s Code of Conduct and the Contract or Partnership Agreement executed with ZOOMHOLDING, regardless of the Business Partner’s location, headquarters, or industry sector.


**1.3** Compliance with this Policy, the Code of Conduct, and any other ZOOMHOLDING policies remains mandatory throughout the entire duration of the Contract or Partnership Agreement and, depending on the obligation, such as confidentiality duties, may remain in force even after the termination or expiration of the agreement.

**1.4** Business Partners must ensure compliance with the Code of Conduct and ZOOMHOLDING’s Policies by their employees, agents, representatives, and their own business partners.

**1.5** Business Partners must also comply with the integrity programs of manufacturers and suppliers that interact with ZOOMHOLDING, including but not limited to their codes of conduct, policies, and other regulations applicable to business partners.

#### **2. DUTY TO COMPLY WITH CONSUMER PROTECTION RULES:**

**2.1** For the purposes of this Policy, a consumer is considered to be any individual or legal entity, including public administration bodies, that acquires ZOOMHOLDING’s products or services through the activities of its Business Partners.

 <b>ZOOMHOLDING</b> <small>zoomtech zoomstore weal Prime8 BRITi Ciel</small>	<b>PL-COM-003-I</b> <b>Business Partners Policy - Zoomholding</b>	Revisão: 5.0
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**2.2** Business Partners are fully responsible before consumers, third parties, manufacturers, suppliers, and ZOOMHOLDING for any violation of consumer protection laws, particularly those requiring transparency and clear and accurate information.

**2.3** Business Partners are prohibited from omitting information or exaggerating the performance of products or services marketed by ZOOMHOLDING.

**2.4** They are also prohibited from omitting relevant technical information about any product or service offered by companies belonging to ZOOMHOLDING or making any communication capable of misleading the client.

**2.5** Business Partners may not propose conditions or offers that have not been effectively guaranteed by ZOOMHOLDING companies or by the manufacturers and suppliers that interact with them.

### **3. DUTY OF CUSTOMER SATISFACTION:**

**3.1** ZOOMHOLDING understands that customer relationships and satisfaction, based on ethical, legal, and socially responsible principles, constitute the foundation of its growth and expansion.

**3.2** Whenever customer service is part of the Contract or Partnership Agreement, the Business Partner must ensure that service is provided clearly, objectively, and in strict compliance with deadlines, technical conditions, and quality standards established in the contract.

**3.3** The Business Partner must follow up with customers until their questions are fully resolved and the contracted scope is completely fulfilled, ensuring total customer satisfaction within the contractual limits.

**3.4** All actions and communications must be clear, truthful, courteous, empathetic, and precise.

**3.5** Business Partners may not make extra-contractual commitments on behalf of ZOOMHOLDING companies or the manufacturers and suppliers that interact with them.

### **4. CONFIDENTIALITY AND DATA PRIVACY:**

**4.1** Regardless of the existence of a specific confidentiality agreement, Business Partners are obligated to maintain confidentiality regarding all matters, proposals, contracts, documents, and communications involving information belonging to ZOOMHOLDING companies, manufacturers, clients, or third parties interacting with ZOOMHOLDING. This obligation remains in effect even after the termination of the contract or partnership agreement. Violation of confidentiality obligations may subject the Business Partner to liability for damages caused to ZOOMHOLDING, its clients, manufacturers, or third parties.

**4.2** Business Partners must also ensure that their employees, agents, and representatives comply with confidentiality obligations.


**4.3** They must comply with all laws related to personal data protection, including but not limited to the Brazilian General Data Protection Law (Law No. 13,709/2018). Personal information of individuals, including employees and clients, may not be disclosed to third parties without the explicit consent of the data subject, a judicial order, or legal authorization.

**4.4** Business Partners may not publicly comment on businesses, projects, or any information belonging to ZOOMHOLDING or its associated manufacturers and suppliers without specific authorization.

### **5. DUTY OF GOOD FAITH AND RELIABILITY OF INFORMATION:**

**5.1** Business Partners must conduct their activities with integrity, ethics, and good faith. All information and documents provided to ZOOMHOLDING must be authentic, accurate, complete, truthful, and signed by individuals with effective authority of representation.

**5.2** Business Partners must inform ZOOMHOLDING of any situation that is inconsistent with the Code

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of Conduct or ZOOMHOLDING policies that may hinder the proper continuation of a business relationship.

**5.3** ZOOMHOLDING does not engage in business that could damage its reputation or credibility or that of the manufacturers and suppliers that interact with it.

## **6. RELATIONSHIP WITH COMPETITORS:**

**6.1** ZOOMHOLDING repudiates and prohibits Business Partners from using unethical or illegal practices or means to obtain or use trade secrets or other confidential information belonging to third parties, including, without limitation, the improper solicitation or receipt of confidential information from clients, employees, collaborators, partners, or any third parties, regardless of whether such information belongs to a competing company or to other third parties.

**6.2** Business Partners are prohibited from damaging the reputation of competitors or their products, as well as from making false or misleading statements in an attempt to promote business.

**6.3** Business Partners must comply with all laws related to competition, antitrust, and fair dealing in all relationships in which they act in their own name, on behalf of ZOOMHOLDING, or on behalf of any Manufacturer or Supplier that interacts with ZOOMHOLDING, whenever contractually authorized.

## **7. RIGHT OF AUDIT, ASSESSMENT AND MONITORING:**

**7.1** Business Partners acknowledge ZOOMHOLDING's right to conduct audits and assessment and monitoring procedures in order to verify compliance with the rules set forth in ZOOMHOLDING's Code of Conduct and Policies. For this purpose, Business Partners undertake to cooperate with such control mechanisms by responding to requests for documents, reports, and information, as well as by providing access to their facilities for possible on-site inspections.

**7.2** Business Partners are required to adopt any corrective actions indicated by ZOOMHOLDING following the use of any control mechanism, under penalty of termination of the Partnership or rescission of the Contract executed with ZOOMHOLDING.


**7.3** ZOOMHOLDING expects Business Partners to provide effective assistance in the investigation of any inquiries conducted within the scope of its Compliance Program, even if the Business Partner is not involved in the investigation as the reported party.

**7.4** When investigations, audits, or assessment and monitoring procedures are based on indications of irregularities by the Business Partner or on reports received through the Communication Channel, the costs necessary for such procedures shall be borne by the Business Partner.

## **8. INTEGRAL ANNEXES TO THIS POLICY:**

**8.1** The provisions concerning legal and ethical compliance, as well as the anti-bribery and anti-corruption rules set forth in ZOOMHOLDING's Code of Conduct and in the Anti-Bribery and Compliance Management System Policy, are deemed to be incorporated into the Business Partners Policy as if fully transcribed herein. Business Partners are required to strictly comply with and observe such provisions in all of their interactions, whether or not they are related to the Business Partnership established with ZOOMHOLDING.

**8.2** If Business Partners have any interaction with Public Administration entities or officials, they must comply with the Public Administration Relationship Policies, which also form part of ZOOMHOLDING's Integrity Program.

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**8.3** The provisions set forth in the Employees Policy shall apply to Business Partners whenever relevant, particularly those concerning the prohibition of conflicts of interest.

## **9. MISCELLANEOUS:**

**9.1** Business Partners are required to respect and ensure that their employees, agents, representatives, and other partners respect the intellectual property rights of ZOOMHOLDING and of the Manufacturers and Suppliers that interact with it. No partnership shall be interpreted as implying corporate participation, transfer of assets, or transfer of rights of any nature, whether financial, material, intellectual, or otherwise.

**9.2** All prohibitions related to corruption, bribery, and the acceptance or offering of gifts, presents, meals, hospitality, and courtesies provided for in ZOOMHOLDING's Code of Conduct must be observed by Business Partners and equally applied in their relationships with ZOOMHOLDING's Employees and with the Manufacturers and Suppliers that interact with ZOOMHOLDING. Accordingly, Business Partners may not bribe or transfer any illicit benefits to any employee in any form, including, but not limited to, money, negotiable instruments, or payment vouchers, in an attempt to obtain advantages, illicit benefits, or even to maintain partnerships with ZOOMHOLDING and the Manufacturers and Suppliers that interact with it.

**9.3** Business Partners must maintain all governmental licenses necessary for the performance of their activities and must comply with all applicable labor, social security, tax, environmental, insurance, and regulatory obligations, as well as with the requirements of professional councils or regulatory bodies applicable to their activities.


**9.4** Business Partners shall always act in their own name and, therefore, may not, under any circumstances, act or enter into transactions on behalf of ZOOMHOLDING or on behalf of the Manufacturers and Suppliers that interact with it, unless expressly authorized by contractual provision.

**9.5** Any act carried out by a Business Partner that violates the rules set forth in the Code of Conduct, this Policy, or any other ZOOMHOLDING Policies, as well as the rules established in the Codes of Conduct of the Manufacturers and Suppliers that interact with ZOOMHOLDING, shall subject the Business Partner to the appropriate compensation and indemnification for damages caused, including those affecting image and reputation. Such violation may also result in the immediate termination of the Partnership or rescission of the contract if, at ZOOMHOLDING's discretion, the violation is not subject to correction or, if correctable, is not remedied by the Business Partner after proper notification by electronic or physical means.

**9.6** In addition to the provisions of the preceding clause, ZOOMHOLDING may, depending on the nature of the violation committed, report the Business Partner to the competent police authorities and to the Public Prosecutor's Office.

**9.7** ZOOMHOLDING reserves the right to amend the Business Partners Policy without the consent of the Business Partner. The new version shall be fully compiled and made available on ZOOMHOLDING's homepage and shall enter into force upon its publication on the Internet. It is the responsibility of anyone who interacts or contracts with ZOOMHOLDING to monitor any updates to the Business Partners Policy.

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

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**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