	<p style="text-align: center;"><b>PL-COM-004-I</b></p> <p style="text-align: center;"><b>Public Administration Relationship Policy - Zoomholding</b></p>	Revisão: 5.0
		Data: 26/05/2026
		Elaborador: Gestão de Compliance
		Aprovador: Alta Direção

## **PUBLIC ADMINISTRATION RELATIONSHIP POLICY**

### **I – PRESENTATION**

The Public Administration Relationship Policy, together with the Code of Conduct and other ZOOMHOLDING Policies, forms part of ZOOMHOLDING’s Integrity Program.

Specifically, the Public Administration Relationship Policy establishes the guidelines and rules that guide and regulate the relationships of ZOOMHOLDING’s Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners in their interactions with Public Administration entities.

ZOOMHOLDING interacts with public bodies and public officials in different ways: as a taxpayer, as a bidding company and contracting party for the supply of goods and services of public interest, as a user of services provided by public entities, and also as a party subject to the regulatory authority of Public Administration, particularly when obtaining licenses and permits.

This Policy is based on ZOOMHOLDING’s ethical principles and values and on its commitment to compliance with applicable legislation, including, but not limited to, the Anti-Corruption Law, the General Public Procurement Law, and other legislation governing procurement procedures and administrative contracts executed with Public Administration entities.


This Policy forms part of the Integrity Program in a complementary relationship with the Code of Conduct and never to the exclusion of it. In other words, both standards govern the relationships of ZOOMHOLDING and those who interact with it, without one excluding the other.

Therefore, as they are mandatory, anyone who fails to comply with the Public Administration Relationship Policies, the Code of Conduct, or other ZOOMHOLDING Policies shall be subject to disciplinary sanctions and, depending on the circumstances, termination of contracts or dissolution of partnerships established with ZOOMHOLDING.

### **II - RULES:**

#### **1. MANDATORY NATURE AND SCOPE:**

**1.1** The provisions set forth in this Policy regulate all internal and external relationships involving ZOOMHOLDING. Accordingly, all individuals and entities interacting with ZOOMHOLDING (Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners), regardless of the nature of the legal relationship, are required to observe the terms of this Policy in their interactions and relationships with Public Administration entities.

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**1.2** The provisions of this Policy apply to relationships with public bodies and public officials at all levels of government (Federal, State, and Municipal), as well as their agencies, foundations, and state-owned companies.

**1.3** For the purposes of this Policy, public officials are defined as any agent, representative, advisor, appointed or statutory office holder, employee, director, board member, or any person who exercises, even temporarily and without remuneration, a public office, position, or employment, whether elected or appointed, in any entity, agency, authority, or foundation within the Executive, Legislative, or Judicial branches, in Direct or Indirect Public Administration, state-owned companies, whether domestic or foreign, public international organizations, or any political party, including candidates running for public office in Brazil or abroad.

## **2. REAFFIRMATION OF DUTIES AND RATIFICATION OF ETHICAL STANDARDS PROVIDED IN THE CODE OF CONDUCT:**

**2.1** The provisions relating to legal and ethical compliance, as well as the anti-bribery and anti-corruption rules established in ZOOMHOLDING's Code of Conduct, are incorporated into the Public Administration Relationship Policies as if fully transcribed herein and must be strictly complied with by everyone who interacts with ZOOMHOLDING, including but not limited to members of Senior Management, Representatives, Agents, Employees, Suppliers, Service Providers, and Business Partners.

**2.2** ZOOMHOLDING reaffirms the rules set forth in its Code of Conduct and repudiates and prohibits the individuals mentioned in the preceding clause from accepting, offering, or giving, directly or indirectly, bribes, favors, money, gifts, benefits, or advantages of any kind in order to obtain advantages or influence decisions to be made by public officials.

**2.3** No employee or business partner shall suffer any form of penalty or retaliation from ZOOMHOLDING due to loss of business opportunities, delays in obtaining licenses, or any unfavorable result arising from their refusal to pay or receive bribes or any unlawful advantage.


## **3. COMMUNICATIONS AND MEETINGS WITH PUBLIC OFFICIALS:**

**3.1** All communications with public officials should preferably be made in writing, in order to ensure transparency. When verbal communication is unavoidable and may be conducted without violating ethical or legal standards, concise, precise, formal, and technical language must be used in order to avoid misunderstandings or ambiguous interpretations of the matters discussed.

**3.2** In interactions with public officials, any communication or action intended to circumvent or improperly influence public officials to act or remain inactive contrary to the public interest or to the lawful exercise of their duties is strictly prohibited.

**3.3** Meetings related to ZOOMHOLDING's activities, particularly those involving contracts or interactions with public officials, should observe, whenever possible, the following guidelines:

- a)** participation of at least two ZOOMHOLDING employees;
- b)** prior communication to the immediate manager, when applicable;
- c)** prior scheduling, preferably through institutional e-mail;

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**d)** definition of the subject to be addressed and, whenever possible, identification of the individuals likely to participate in the meeting;

**e)** holding the meeting either in person or electronically;

**f)** recording the matters discussed and the participants present through e-mail, memoranda, notes, minutes, or other equivalent records.

**3.4** Prior to any communication or meeting with public officials, it is recommended that information regarding ZOOMHOLDING's Compliance Program and the existence of the Code of Conduct and the Anti-Bribery Management System Policies be provided, in order to demonstrate ZOOMHOLDING's commitment to compliance with these standards.

**3.5** Minutes generated or recorded by electronic systems, including those using artificial intelligence, must be consolidated into a final version and shall only produce legal effects after being signed by the participants of the meeting.

**3.6** If there is disagreement regarding the content of the minutes, the party may refuse to sign them. If the disagreement is partial, the party may request that their statement or reservation be expressly recorded in the body of the minutes.

#### **4. UNACCEPTABLE PRACTICES:**

**4.1** In interactions with public officials and public entities, any act or conduct, whether by action or omission, that violates the provisions of the Code of Conduct or any ZOOMHOLDING Policy is unacceptable. Likewise, the following conduct is considered unacceptable:

**4.1.1** Engaging in acts intended to limit or obstruct inspection activities conducted by Public Administration in the legitimate exercise of its supervisory authority, whether related to tax, sanitary, customs, or any other matters. In such cases, the employee must adopt an ethical, formal, and respectful posture, performing all acts necessary to enable the proper conduct of inspections without creating any obstacles.

**4.1.2** Using ZOOMHOLDING's name to express opinions regarding the actions of public bodies or public officials.

**4.1.3** Making false statements on behalf of ZOOMHOLDING before public bodies or public officials.


**4.1.4** Failing to report to Compliance Management any attempt of bribery or corruption involving public officials, employees, representatives, agents, suppliers, service providers, business partners, third parties, or members of ZOOMHOLDING's senior management.

**4.1.5** Making so-called facilitation payments or promises of advantages aimed at ensuring or accelerating the performance of acts or the obtaining of licenses favorable to ZOOMHOLDING.

#### **5. PARTICIPATION IN PUBLIC TENDERS AND ADMINISTRATIVE CONTRACTS:**

**5.1** Participation in public procurement procedures and the execution of administrative contracts must comply with all applicable legal provisions, including Law No. 14,133/2021, Law No. 13,303/2016, and any other laws that may replace or supplement them.

**5.2** It is prohibited to collude with public officials, individuals, third parties, competing companies, or

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partner companies in order to perform any act that may frustrate the competitive nature of a public bidding process, such as adjusting proposals, bid-rigging, or other unlawful practices.

**5.3** It is prohibited to submit commercial proposals in bidding procedures knowing that the proposal cannot be executed if awarded.

**5.4** Fraudulent acts during the execution of administrative contracts are strictly prohibited.

**5.5** The use of fraudulent means to obtain changes in contract specifications, extensions of delivery deadlines, increases in quantities, renewal of contract terms, or any other advantage arising from contracts executed between ZOOMHOLDING and Public Administration entities is prohibited.

**5.6** ZOOMHOLDING repudiates the conduct described in this clause and requires strict compliance by everyone who interacts with the company.

## **6. HIRING OF FORMER PUBLIC OFFICIALS:**

**6.1** The hiring of individuals who previously held public office within any Public Administration entity is prohibited for a period of six months from the date of their dismissal, removal, termination, resignation, or retirement. After this period, hiring may be authorized by Senior Management, which may rely on the opinion of Compliance Management. If authorization is granted, the hired individual may not perform any function related to procurement procedures conducted by the entity where they previously served, nor may they perform functions directly or indirectly related to contracts executed between ZOOMHOLDING and that entity.

## **7. MISCELLANEOUS**

**7.1** In addition to disciplinary sanctions, termination of contracts, and dissolution of partnerships, failure to comply with the provisions of this Policy may result in reports being filed with the relevant public bodies, as well as with police authorities and the Public Prosecutor's Office for the investigation of criminal liability, without prejudice to civil liability for compensation of material and non-material damages caused to ZOOMHOLDING or to third parties.

**7.2** ZOOMHOLDING reserves the right to amend the Public Administration Relationship Policies without the consent of any party. The updated 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 amendments to this 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