



Code of Ethics and Conduct

VERSION 3.0
September/2023

Letter from our CEO

CI&Ters,

We believe in our goal of being agents of transformation, unlocking business opportunities, technology and, above all, people's potential. By transforming and humanizing the corporate environment, we help make the world a better place.

To support us in this purpose, we have a well-defined set of values and a Code of Ethics and Conduct, strengthening the creation of a great place to work: safe, fair and offers equal opportunities for all.

Our continued success depends on maintaining our culture, which helps us to have the best people: working with us, offering excellent services and promoting long and loyal relationships. This Code of Ethics and Conduct serves as an important guide for CI&T to relate to customers, employees, suppliers, contractors, partners, shareholders and the community, considering that our business is based on trust.

I invite you to be part of our continuous evolution, improving and humanizing CI&T. Let's learn together, not only to make CI&T an amazing place to work but also an inspiring company for the future. This mosaic of our differences will define and shape our present and our future.

Regards,

Cesar Gon

Campinas - December 12th 2022

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Introduction

Definitions

CI&T: all references to "CI&T" include CI&T Inc as well as all CI&T Group companies.

CI&T's PEOPLE: direct or indirect employees, including but not limited to individuals under any employment contracts, individuals holding positions as directors and advisors. This definition will also encompass individuals acting as third parties contracted by CI&T, such as consultants or freelancers.

Opening

Our Code of Ethics and Conduct was created to ensure a harmonious work environment in order to express the culture, guide the actions of all CI&T's People and explain the attitude of CI&T towards the different audiences with which it interacts.

It is an instrument that serves as a central guide and also as a reference to support day-to-day decision-making and to empower CI&T's People to deal with the dilemmas they may encounter at work, encouraging discussions on code compliance!

Who should follow our Code?

All guidelines contained in this document must be known and observed by all CI&T's People, whether in day-to-day conduct or upon making decisions regarding any issues that may affect the best interests of CI&T's business.

CI&T also has a Code of Ethics and Conduct for Third Parties, available on the intranet and on CI&T's website ([Investors Portal](#))

Responsibilities

As a CI&T Person, you are the guardian of our principles of ethics and conduct. And, having this mission, you are responsible for communicating to the CI&T whenever you become aware of or witness any events that may violate this Code of Ethics and Conduct or any other CI&T security policies or rules.

Also, you must follow this Code, respect it and experience it in all your interactions, whether with colleagues, peers, leaders or subordinates, suppliers, customers, partners or third parties, traveling on business, communicating online or attending training or a social event.

CI&T Culture, Values and Attitudes

Our values reflect our essence and support our decision making. Our commitment to our values is crucial to ensuring that our behaviors are in line with high ethical standards.

They are:

Companies are made by people, and people shape our culture.

Diversity & Inclusion is what makes us human.

The power of choice takes us further.

Continuous development makes us better.

Collective intelligence amplifies our actions.

In order to demonstrate the practice of the Code of Ethics and Conduct of CI&T to all people, the Company's Senior Management seeks to disseminate its values and principles through periodic and continuous training so that everyone is in accordance with the Code of Ethics and Conduct.

Our way of being is supported by three pillars: People, Impact and Learning.

We call these pillars the CI&T Way, a triad that directs our purpose and reflects how we position our culture and its characteristics to the world.

The CI&T Culture is made by our PEOPLE: it is genuine, strong and fostered daily by our actions, processes and values. It is what drives us and puts us always ahead, at the forefront. It is the aspect of our day to day that we must always pay attention to when creating new things, ensuring cohesion and consistency.

At the center of this culture we have TRUST, which permeates who we are. It is what unites our culture and gives cohesion to what we believe and do, making culture a joint and ever-evolving construction.

Our Communication Channels

CI&T and its leaders encourage you to speak up. If you have a concern, have experienced or witnessed disrespectful, inappropriate, fraudulent, unethical or illegal behavior, including concerns about retaliation, please access our Reporting Channel - ethics.ciandt.com - with the option of anonymous registration.

CI&T individuals who can support you with reporting situations via the Reporting Channel whenever necessary:

- People Development Manager (PDM) or a person from the Executive Squad;
- People Team;
- Compliance Team (compliance@ciandt.com).

We are committed to treating any manifestation with extreme seriousness, regardless of how you communicate it. The most appropriate people within CI&T will deal with your case with utmost confidentiality and sensitivity.

Any questions regarding the Code of Ethics and Conduct can be sent directly to compliance@ciandt.com.

For other suggestions, questions, or complaints unrelated to our Code, you can use the other communication channels available via Google Chat, such as [ITTalk](#), [PeopleTalk](#), [FacilitiesTalk](#), [SecurityTalk](#) etc.

General Guidelines

Ethics and Conduct Commission

CI&T has an Ethics and Conduct Commission made up of representatives from the legal and compliance area, human resources, business area and information technology, all knowledgeable of the pillars that structure the values and culture of the CI&T. The Commission is responsible for advising the Compliance team with general

recommendations and for investigating possible violations of the rules, values and principles contained in this Code, in addition to deliberating on complaints received through our Communication Channels.

Code violations

Failure to comply with this Code may result in disciplinary action: verbal warning, including notification, written warning, suspension, dismissal or even dismissal with cause, in accordance with the applicable legislation. In some cases, CI&T may have a legal or moral obligation to report the results of an investigation to the competent legal authorities. Violations of Anti-Corruption Laws may be subject to administrative, civil, and criminal penalties and may even result in the disclosure of the act.

Non-retaliation

Retaliation means any kind of retaliation, whether subtle or explicit, against a person engaging in legally protected activities. Any person who has reported or participated in an investigation of a possible violation of this Code, policies or the law will not be retaliated against. If you believe you are experiencing some kind of retaliation, please contact compliance@ciandt.com or report it to the Reporting Channel (ethics.ciandt.com) so that the case can be appropriately addressed.

Cooperation with investigations

When a complaint related to ethics or conduct is made through our Communication Channels, an investigation process is initiated in order to consistently investigate the facts and support the consequence management process. Investigable cases may also come from security audits, and you may eventually be asked to participate in this process. CI&T guarantees full confidentiality for each situation treated, as well as the information provided, and expects your full collaboration in seeking the best way to solve the problem.

We respect our people, our company and our spaces

Safety in the workplace

To ensure the safety in the workplace, all CI&T's People must know and follow the emergency and safety procedures communicated and adopted by the company. Any risk situation must be immediately reported to CI&T through the available Communication Channels.

Careful use of resources and spaces

All CI&T's people must take care of our environment, such as tables, chairs, bathrooms, pantries, food areas and meeting rooms. Maintaining the organization and cleanliness of our environment makes work more productive and enjoyable and reinforces our respect for each other. Whether you work in the client's office or in a collaborative workspace, the same respectful conduct is expected of everyone! It is our responsibility to conduct and promote the diligent, conscious and responsible use of the environment and amenities offered by CI&T.

Illicit drugs and alcohol

The use of illicit substances and drugs is incompatible with the health and safety of our people, so they are prohibited.

We do not prohibit alcohol consumption, but it should occur only at appropriate times, specifically at commemorative events. Never drink in a way that impairs your performance at work or leads to inappropriate behavior. This may endanger your safety and/or other people's safety, violate the law, or embarrass your colleagues.

Impartiality

All CI&T's people must be respected and treated impartially – whether in person or online. Career decisions (promotions and performance appraisal) are made solely based on performance, contributions and opportunities, and depend on alignment with the Career Plan established for each position and CI&T's specific business needs. This also applies to any decision involving recruitment, hiring, compensation and job allocations processes.

It is the responsibility of all CI&T individuals to comply with the guidelines outlined in the Diversity, Equity, and Inclusion Policy, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)).

Disrespect, Harassment and Non-discrimination

CI&T has a diverse group of people; that is why it is important to understand, respect and value the differences between them, including:

- differences in race, nationality, ethnicity, gender, gender identity, sexual orientation and identity, age, body dimensions, marital status, religion/beliefs, socioeconomic status, physical or mental disabilities, and veteran status;
- educational differences, differences of origin, lifestyle, experiences, possession of material goods, family composition, perspectives, opinions and knowledge.

The diversity of thoughts, perspectives and experiences is essential for innovation to incorporate the advantages of collective intelligence. We are constantly adapting our work, environment and equipment to ensure equal opportunities and accessibility so that everyone can collaborate.

Acts of disrespect, whether characterized as harassment, discrimination, bullying or intimidation and occurring in any medium (physical or virtual, including online meetings, chat, videoconferences, social media, forums, written communications and speeches) will be subject to disciplinary action. These behaviors include any actions that may interfere with the performance of work or any other way a person is treated, which creates an intimidating, hostile or offensive environment. Even if you consider it a joke, it's disrespectful if someone gets offended by it. So always evaluate your position, your behavior and ensure a friendly environment at CI&T.

There should be no embarrassment, humiliation or exclusion of people and groups in any of our relationships. The work should not be related to animal abuse or encouragement to produce environmental damage, in addition to the illegal exposure of children and minors.

Violent behaviors or threats of violence (verbal or physical, including with weapons) among our people, customers, partners and suppliers violate CI&T values and are not justifiable under any circumstances. Any person who is involved in such behavior or who brings hazardous materials to the workplace will be subject to disciplinary action.

Disrespectful behavior and harassment can occur in many contexts and represent a violation. Moral harassment is the exposure of individuals to humiliating and embarrassing situations in the workplace, repeatedly and over an extended period, in the course of their activities. On the other hand, disrespectful behavior is isolated, inappropriate conduct, meaning isolated situations that can cause moral harm but do not necessarily constitute moral harassment.

Some examples of **inappropriate conduct** include (events that occur occasionally):

- an internet or intranet post (for example, on Workplace, Facebook or Twitter, or on a blog);
- a message sent via instant messaging apps (e.g. Chat, Skype, Slack or WhatsApp);
- intimidating behavior;
- a physical gesture.

Some examples of **moral harassment** are (facts that occur repeatedly):

- Removing the employee's autonomy or contesting, at any time, their decisions;
- Ignore the presence of the harassed person, addressing only the other employees;
- Yelling or speaking disrespectfully;
- Threats of termination or loss of promotion;
- Assign pejorative nicknames.

The **sexual harassment** involves unwanted conduct of a sexual nature and includes, but is not limited to, the following examples:

- Sending, obtaining or displaying sexually suggestive, obscene and/or indecent images or other materials;
- Sexually suggestive, obscene or indecent comments or jokes (directed at a particular person or made more generally);
- Repeated unwanted requests for social gatherings;
- Unwanted displays of affection;
- Repeated unwanted attention, such as phone calls, text messages or messages to an individual for no work-related reason;
- Unwanted physical contact of a sexual nature;
- When a person in a position of power makes unwanted sexual suggestions or implies that employment decisions may be affected by the acceptance or rejection of these suggestions.

Supplier relationship

The process of hiring a product supplier or service provider of any kind should always be in the best interest of CI&T. The selection process should be based on technical and

professional criteria such as competence, quality, timeliness, price, financial stability, etc. It is prohibited to do business with suppliers or service providers with questionable reputations or those who do not comply with the norms and requirements of the Code of Ethics and Conduct for Third Parties, which was created to ensure the establishment of a harmonious relationship with the aim of expressing our beliefs, guiding the actions of all CI&T individuals, and clarifying our stance in relation to the various stakeholders we interact with.

CI&T expects its suppliers to be in compliance with our values and adhere to the following guidelines:

- Comply with all applicable laws;
- Prohibit acts of fraud and corruption;
- Respect human rights;
- Comply with laws that prohibit child labor, slave labor, or practices similar to slavery;
- Assume responsibility for the health and safety of people;
- Operate in accordance with applicable local and international standards related to environmental protection;
- Seek to build and develop an Integrity Program, primarily to mitigate corruption and fraud risks against public administration or private companies.

Personal Conflict of Interest

A personal conflict of interest is a situation or circumstance that reasonably or unreasonably appears to be a conflict, where your own personal interests (or those of a family member or close friend) may affect your ability to act in the best interests of CI&T or interfere with your objectivity and obligation to CI&T. It can have serious consequences for both you and the company. Such conflicts can undermine trust in our business.

Examples of potential conflicts of interest include: working for two or more companies concurrently, recommending family members and close friends to participate in a selection process in which the employee has influence, receiving trips, hospitalities, entertainment, or presents from clients and suppliers, and recommending a company for participation in a third-party hiring process in which the employee has influence in the selection process.

Another example of what constitutes a conflict of interest is a company not being able to be contracted by CI&T to perform any audits or similar checks if the CEO, CFO, Director of Accounting, or equivalent position has worked for or been a part of this public audit firm or has held any position in the audit of this issuer during the 1-year period prior to the start date of the audit.

In accordance with the rules of the SEC (Security Exchange Commission), the American regulatory body, any attempts by the executive group and/or the board to influence, coerce, manipulate, or fraudulently induce any public or certified independent auditor involved in the performance of an audit of CI&T's financial statements for the purpose of making such financial statements materially misleading are subject to the penalties of these rules.

It is the responsibility of all CI&T's People to comply with the guidelines outlined in the Conflict of Interest Policy, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)). The Compliance department is available for consultation via email at compliance@ciandt.com whenever necessary.

Compliance with the Law

CI&T does not tolerate the practice of illegal activities under any circumstances. Violations of the law can result in significant harm to CI&T, including financial penalties, contract denial, imprisonment for criminal conduct, and damage to our business relationships and reputation. Individuals involved in such practices will be subject to disciplinary action and also to the applicable law, whether it is local, regional, or national.

Whenever there are doubts about the legality of an action or behavior, guidance should be sought through your management or through the communication channels provided by CI&T.

Improper Use of Insider Information (Insider Trading) and Disclosure and Control Procedures

Federal and state laws in the United States of America and Brazil, as well as laws in other foreign jurisdictions, prohibit trading in the company's stocks or debt securities while in possession of relevant confidential information about the company. To comply with the law, CI&T's People must adhere to the guidelines of the Insider Trading Policy and CI&T's Disclosure and Control Procedures.

It is the responsibility of all CI&T's People to comply with the guidelines outlined in these policies, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)).

We are compliant with Anti-Corruption Laws

Corruption is the act of providing, promising, or receiving 'items of value' in order to gain an undue advantage or unduly influence the recipient. 'Items of value' are understood to be anything that is valued by the person someone is trying to influence, whether or not it has commercial value. It does not matter if the item of value is funded by CI&T, third parties, or personal resources. The mere act of offering something of value can violate the law, whether or not it is accepted by the recipient.

We require all CI&T's People to comply with all applicable Anti-Corruption Laws. To be in compliance:

- Do not offer bribes - CI&T's People are strictly prohibited from giving, offering, gifting, promising, or authorizing a third party, directly or indirectly (through intermediaries), any valuable item to any person (whether a public official or not) with the purpose of influencing any act, decision, or grant to gain an undue advantage;
- Do not accept bribes - CI&T's People are strictly prohibited from accepting or requesting any valuable item from any person to perform or omit any action or decision to provide a benefit to third parties or CI&T itself;
- Do not manipulate results to meet targets, including providing false information in CI&T systems, whether to achieve positive results or to conceal negative results;
- Do not structure transactions to bypass approval processes and other internal controls;

- The offering of gifts, presents, trips, hospitality, and entertainment can be considered a corruption offense when offered to public officials and individuals in their close relationships and families with the intention of receiving some benefit in return. The guidelines of the Anti-Corruption Policy, available on the intranet and on CI&T's website ([Investors Portal](#)), must be observed;
- Regarding private entities such as business partners and customers, the offering or receiving of gifts, presents, trips, hospitality, and entertainment must follow the guidelines of the Conflict of Interest Policy, available on the intranet and on CI&T's website ([Investors Portal](#)). All cases that do not fall under the express authorizations of this policy must obtain **prior approval** from the Compliance team, through compliance@ciandt.com;
- Report irregular situations - CI&T's People must report any actual or potential violation of this Code and/or Anti-Corruption Laws through one of the available Communication Channels.

The list of behaviors above is merely illustrative. Any suspicion of corrupt and/or fraudulent acts is strictly prohibited and will be duly investigated by CI&T.

CI&T reaffirms its commitment to complying with legislation related to the prevention and combat of money laundering and terrorism financing.

To regulate this matter, CI&T has an Anti-Corruption Policy, available on the intranet and on CI&T's website ([Investors Portal](#)), to establish the main guidelines and CI&T's stance on combating all forms of corrupt conduct.

Regarding Brazilian legislation, [here](#) you can find more details about the Brazilian Anti-Corruption Law (Law N°. 12,846/2013). CI&T is subject to all local legislations such as the FCPA, UK Bribery Act, Decree 11,129/2022, Money Laundering Law N°. 9,613/1998, and other applicable legislations.

We prioritize compliance with the bidding process and the proper conduct of contracts with the public sector

Whenever CI&T participates in public bids or enters into contracts with the public sector, the applicable current legislation must be respected, with emphasis on the Public Procurement

Law (Law N°. 14,133/2021), Brazilian Anti-Corruption Law, and the Federal Acquisition Regulation (FAR).

CI&T will conduct its participation in the bidding process and the management of public contracts following the principles of ethics, transparency, and good faith. Any fraud or conduct that may harm them is strictly prohibited.

All CI&T's People, acting on behalf of the company, must cooperate with any investigations and audits conducted by the public sector.

We protect our people, our information, and our business

Privacy and Information Security

All individuals must protect confidential information of CI&T and its clients against inappropriate use and disclosure, and must take necessary measures to prevent unauthorized disclosure of such information, including compliance with security policies and rules of use and disclosure established by the client and CI&T. In doing so, we protect our colleagues, our company, our assets, our client's information, and mitigate the risks of exposure and the damage that exposure can cause to the CI&T brand. It is expected that all CI&T's People be advocates of Information Security, reporting incidents and suspicious events in accordance with the guidelines established in the Information Security Policy, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)).

We value the privacy of personal information of all CI&T's People or our clients. If you have received personal information, make sure you have permission to access it. If confidentiality has been requested, do not pass on the information. CI&T has a Privacy and Data Protection Policy, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)).

Any information received, sent, or stored on any CI&T asset (notebooks or other devices) or traveling through its network may be monitored. CI&T individuals must act professionally whenever they use CI&T resources, including Internet access or any other type of external system. This commitment also applies to activities carried out on client systems and

facilities or with access provided by them. If CI&T and the client have different rules, the stricter ones will apply to the context.

Source code plays a critical role in delivering CI&T's service, making it crucial proprietary information. Leaking this code can cause financial harm to the business, and attackers can also use it to exploit vulnerabilities in our network. Leaking source code or any other CI&T proprietary information may result in disciplinary action, including but not limited to a warning, suspension, or termination of employment. In addition to CI&T sanctions, violations may result in referral to civil or criminal authorities, when necessary or otherwise appropriate.

Assets

CI&T people must take extreme care to safeguard, protect and enhance the company's assets and only use them for legitimate work purposes that are connected to our core values. These assets include all of CI&T's physical property, as well as intangible property such as our brand and all forms of intellectual property.

We must protect all equipment allocated for the performance of our tasks against theft, breakage and/or inappropriate use, in accordance with CI&T's Information Security guidelines.

All persons must keep allocated equipment under control and must take appropriate measures to protect against unauthorized access, including family, friends and friends.

If you find CI&T equipment without supervision, report it through the available Communication Channels.

Brand

The CI&T brand is a valuable asset, and all visual identity rules must always be observed and respected. CI&T's People shall not use the CI&T brand for any purpose that is not

related to their duties or if there is no authorization from the company to do so.

Intellectual property

CI&T has contractual clauses to protect the intellectual property and copyright of its information and its customers. The result of the work of CI&T's People, during the term of their contract with the company, that is related to its current or future business belongs exclusively to CI&T. The protection of confidential information and intellectual property of the company remains in force even after the termination of the employment contract or services agreement with CI&T.

Social Media

Social media interactions must align with the company's values and this Code. In case of doubts, please reach out to our Communication Channels.

When using Social Media:

- Do not post content that is disrespectful, harassing, or discriminatory in any message or post, whether personal or related to CI&T, our business, our clients, our business partners, or our people, whether using your personal channels or official company channels;
- Obtain appropriate approvals before using any CI&T material (created or produced in/for CI&T). To do so, you should contact the Global Growth Partners team (ggp@ciandt.com) to request authorization;
- Be transparent, identify yourself, and make clear your association with CI&T, as well as your role here, when commenting on CI&T matters. Make it clear when you are sharing your personal opinion;
- Obtain appropriate approvals from the Global Growth Partners team (ggp@ciandt.com) before participating in external events representing CI&T or in professional social media posts where you are representing the company. Ensure you use your role appropriately and directly related to the position you hold;
- Protect non-public information related to CI&T's business, research and development activities, clients, or other business partners;

- Do not disclose customer names or relevant CI&T information, as only CI&T as a company is authorized for such disclosures;
- Be mindful of your own privacy and respect the privacy of others.

We have Business Ethics

Expenses

CI&T's People that are authorized to incur expenses for business purposes are responsible for everything they report and for the receipts provided, following the rules established by the company.

Purchases

All purchases and payment of invoices made by CI&T must follow the corporate process and must be formally requested and duly authorized by the person responsible for it.

Finance

If your work involves the financial recording of CI&T transactions, make sure you are familiar with all relevant policies, including those related to revenue recognition. Never interfere with the audit of financial records. Similarly, never falsify any company records or accounts.

We emphasize that, in addition to this Code of Ethics and Conduct, our financial executives, including the CEO and CFO, as well as other financial professionals such as accountants, controllers, and financial directors, must adhere to and follow the following rules:

- Honest and ethical conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely, and understandable disclosure in periodic reports to be filed by the issuer;
- Compliance with applicable government rules and regulations.

Worked time report

When required by CI&T or the law, you must accurately report all hours worked, leaves and vacations. Never ask or suggest that people under your supervision inaccurately report hours worked or hours not worked.

Clients

Generating value for our customers is a fundamental principle of CI&T. To achieve this goal, CI&T is committed to providing high quality and excellent services, always honoring its commitments. All CI&T's People must respect the contractual agreements made with our clients, as well as respect the client's rules and culture, in all existing relationship opportunities.

The Client's Code of Ethics and Conduct, when applicable

Both the CI&T Code and the client's Code must always be respected. Any incompatibility between them should be discussed with your leadership and addressed with the customer, if necessary and appropriate. It may also be necessary to discuss it with CI&T's People Area (HR) or with Legal. Our Communication Channels can support you in these moments of impasse. When in doubt, the stricter code will apply to the context.

Competition

CI&T respects laws that promote free competition between companies, and all persons of the company must carry out their activities in a fair and lawful manner in order to avoid any kind of misleading conduct. Collecting information about CI&T's competitors is considered a legitimate activity if it is conducted in a legal and ethical manner. CI&T's People should never obtain information about competitors, customers or partners using illicit means.

If there is any contractual obligation that an applicant for a job or new CI&T's People may have with former employers, such as confidentiality or non-compete agreements or to not poach/hire former clients or colleagues to work with us, we expect these people to be

aware of this and notify their people manager immediately, if a work requirement may conflict with these obligations. And we expect former CI&T's People to behave the same in their new jobs.

We care about the world

Human Rights

We support and respect the rights expressed in the Universal Declaration of Human Rights and the International Labor Organization Declaration on Fundamental Principles and Rights at Work, in line with the United Nations Guiding Principles on Business and Human Rights. You are required to report if you experience human rights violations and take action or seek guidance if you witness or become aware of any violations.

The CI&T Group repudiates any form of slave, forced or child labor (with the exception of what is permitted by law) and complies with all applicable labor laws globally.

Environmental Responsibility

We promote environmentally sustainable economic growth. We incorporate good environmental practices into our strategy and business operations.

We focus our actions on three areas:

- Performing efficient operations;
- Enabling sustainability for customers and suppliers;
- Involving our people, leaders, business partners and other stakeholders.

Our efforts to minimize negative environmental impacts also include improving our energy efficiency, decreasing our water consumption and reducing our waste. We comply with all environmental laws and regulations.

We encourage and allow environmentally sustainable practices among our people, customers, suppliers and non-profit organizations that we support.

Impact on communities and social responsibility.

We support our people who choose to volunteer their time and skills to impact individuals, communities and society through our corporate initiatives.

We promote initiatives within the company with a focus on social contribution through the promotion of donation campaigns and opening space for social institutions to publicize their activities. All requests for donations, sponsorships, or partnerships must go through the analysis and prior approval of the Procurement Team (procurement@ciandt.com).

We also contribute directly to local communities through tax incentives and we do not support organizations that have a discriminatory policy or practice.

Document Control

Version	Date	Description	Author
1.0	OCT/2021	Document Creation	HR and Legal teams
1.0	OCT/2021	Legal Review	Cleary
1.0	OCT/2021	Final Approval	Board of Directors
2.0	SEPT/2022	Compliance Review	Flávia Cabral and Rodrigo Sabino
2.0	SEPT/2022	Legal Review	Mariana Queiroz and Marcela Lindner
2.0	NOV/2022	Ethics Commission Approval	Ethics Commission
2.0	DEC/2022	Final Approval	Board of Directors
3.0	JUL/2023	Compliance Review	Flávia Cabral and Julia Gomes
3.0	AUG/2023	Legal Review	Mariana Queiroz and Marcela Lindner

3.0	AUG/2023	Information Security Review	Marcelo Barbosa Lima
3.0	AUG/2023	ESG Review	Ana Paula Fraga and Kelcy Matsuda
3.0	AUG/2023	Ethics Commission Review	Members of Ethics Commission
3.0	SEPT/2023	Audit Committee Review	Members of Audit Committee
3.0	SEPT/2023	Final Approval	Board of Directors