



CONFLICT OF INTEREST POLICY

VERSION 3.0
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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, including but not limited to 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.

CODE OF ETHICS AND CONDUCT: it clarifies an organization's mission, culture, values, and principles, linking them to standards of professional conduct. The Code articulates the values that the organization wants to promote in leaders, in our people, and, by doing so, defines the desired behavior. As a result, codes of ethics and conduct become benchmarks by which individual and organizational performance can be measured.

CONFLICT OF INTEREST: A conflict of interest is when, due to its own interest or the interest of a third party, a related person may be influenced to act against the company's principles, making an inappropriate decision, or failing to fulfill any of their professional responsibilities.

THIRD PARTIES: natural or legal persons, non-CI&T collaborators, who are directly or indirectly related to CI&T, such as: service provider(s), supplier(s), partner(s), consultant(s).

RELATED PARTIES: People in senior leadership roles who have a direct influence on the management of CI&T, specifically statutory directors and members of the board of directors. Additionally, close relatives and entities controlled by these individuals or their close relatives.

I. Objectives

This policy aims to establish the necessary guidelines to ensure transparency and independence in CI&T's relationships, as well as to effectively manage any conflicts of interest that may arise.

II. Applicability

This policy applies to all CI&T's People.

III. Directives

Compliance with the guidelines and regulations established in this Policy must be respected by all CI&T's People. Leadership, in particular, must be aware of situations that may lead to the practice of acts contrary to the values and principles contained in the Code of Ethics and Conduct and CI&T Policies.

Related persons subject to this Policy shall act with responsibility, diligence, and transparency, making decisions that do not contradict CI&T's interests, always seeking to keep CI&T's good reputation and image, the values and principles contained in the Code of Ethics and Conduct, and the safety and integrity of its activities and relationships.

In case of any doubts or identification of any situation that does not comply with the CI&T's Code of Ethics and Conduct or CI&T Policies, all people have the duty to report to their direct leadership, HR, or utilize the other communication channels established in the CI&T Code of Ethics and Conduct (NAVEX Reporting Channel, available on our Ethics Portal at ethics.ciandt.com or via email at compliance@ciandt.com).

III.I. Types of Conflict of Interest

Conflict of interest occurs when one party attempts to influence decisions or make them on their own behalf, considering their own interests rather than those of the organization.



In order to provide a better understanding of each type of conflict, the respective definitions of conflict of interest scenarios are presented below:

- Real conflict: a situation in which there is, in fact, a conflict of interest;
- Potential conflict: a situation that could evolve into a conflict of interests;
- Apparent conflict: a situation that appears to be a conflict, but the person is not sure.

In case of doubt, contact compliance@ciandt.com.

III.II. Related Party Transactions

Transactions with related parties include any transactions, such as agreements, sales, purchases, transfers of real and personal property, payments or loans between CI&T and (a) companies that are directly or indirectly controlled by, or are under common control; (b) associated companies; (c) key management personnel, that is, persons with authority and responsibility for planning, directing, and controlling the activities of the CI&T, including directors and senior managers, as well as close members of the families of such individuals (any immediate family member, which means any child, stepchild, parent, stepparent, spouse, sibling, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, or sister-in-law of such person, in other words, any person - other than a tenant or an employee - sharing the household with them, in case they may be expected to influence or be influenced by these people in the dealings with CI&T); and (d) companies in which a substantial share (10% or more) of the voting power belongs, directly or indirectly, to any person described in item (c) or over whom that person is capable of exercising significant influence.

Transactions between CI&T and its Related Parties must be monitored in accordance with the rules and regulations of the U.S. Securities and Exchange Commission (SEC), including the prohibition of personal loan to directors and executive officers and subject to the types of financing expressly authorized by



law and by the SEC rules, with a view to also complying with Section 402 of the Sarbanes-Oxley Act of 2002 (SOX).

The monitoring of Related Party Transactions is carried out in accordance with the guidelines established in CI&T's Related Party Transactions Policy, available on its intranet and website ([Investor Portal](#)).

III.III. Relationship with Auditors

In order to also ensure compliance with the Sarbanes-Oxley Act (SOX), a company may not be contracted by CI&T to perform any similar audits or verifications, if the CEO, CFO, chief financial or accounting officer, or equivalent position, has worked or been part of this public audit firm or has participated in any audit position for that issuer during the period of one (1) year prior to the start date of the audit.

In addition to this scenario, and in accordance with section 303 of the SOX, any attempts by executives and board of directors to influence in any way the audits conducted to assess the integrity of the financial statements are subject to SOX penalties.

It is illegal for any Related Person, or any other person acting under its direction, to take any action to influence, coerce, manipulate, or mislead any independent public or certified accountant involved in the performance of an audit of that issuer's Financial Statements for the purpose of making them materially misleading.

III.IV. Conflict of interests in the workplace

III.IV.I: Selection and hiring of third parties

The hiring of service providers or other suppliers - individuals or legal entities - who, at some point, have or had a direct relationship with any person from CI&T is allowed, provided that the process is conducted with transparency and in order to avoid suspicions of personal benefit.

For example, we have the following situation: a person can nominate the wife/husband's company, to be a supplier or provide services for CI&T, as long as the nominated company participates in the quotation process together with other companies, thus demonstrating transparency and fairness of the process.

In this scenario, it is important that the person who made the appointment is not involved in the selection/approval process of suppliers/service providers and/or the values inherent in the contractual relationship.

III.IV.II: Work outside of CI&T

CI&T collaborators must not carry out external professional activities under any work regime (as an employee; contractor; freelancer; among others) for other companies without the explicit authorization of CI&T, via compliance@ciandt.com.

Exceptions to this rule include: conducting academic work (such as being a professor and giving/organizing academic lectures or events), providing training, or holding ownership stakes in non-competitive companies to CI&T (for example, as an angel investor).

Please remember that in any situation, CI&T employees should not disclose confidential CI&T information, perform activities during their CI&T work hours, or commit time that conflicts with their CI&T responsibilities, nor should they use CI&T assets for the benefit of third parties.

III.IV.III: Indication and management of close people

People are allowed to nominate people from their personal cycle, including close relatives, to be considered for service provision and selection processes at CI&T. In this case, however, they must make clear the nature of their relationship with the candidate at the time of nomination and assume an impartial position, without any involvement in the hiring process. Before the actual hiring, an analysis must be conducted by the person responsible for hiring to check positions and work routines to avoid potential or apparent conflicts of interest.

You cannot participate alone in the management or decision-making about potential or existing CI&T business relationships and about performance appraisal and recognition issues involving your relatives, spouse or wife, partner, or close friend. This includes being the only person responsible for hiring a position for which one of these people is being considered.

III.IV.IV: Gifts, presents, trips, hospitalities and entertainment

Collaborating persons are prohibited from obtaining, promising, authorizing or providing any undue advantage, payments, gifts, presents, hospitalities, entertainment or the transfer of any benefit to any other person, whether a Public Agent or not.

Before providing or accepting any gift, present, trip, hospitality or entertainment, please apply our criteria to confirm that:

- it is for an appropriate purpose and is not intended to secure undue advantage or otherwise improperly influence the recipient;
- it is allowed by our policies;
- it is permitted by the recipient's policies and by any agreements between CI&T and recipient's employer;
- it is reasonable in value and appropriate under the circumstances;
- the gift, meal, entertainment or travel was not requested;



- the gift does not have a significant value (it should not exceed USD 100.00 on average);
- the gift is not delivered before or after the submission of commercial proposals or response to an offer, while approvals or decisions are pending;
- giving/receiving the gift does not violate any law in the country you are in;
- if the gift is a courtesy, such as attending an event (domestic or international), it is not conditioned to favors in a bidding procedure or choice of suppliers.

The offering and/or receiving of gifts* do not require prior approval, but the above-mentioned criteria must be respected. Otherwise, please contact compliance@ciandt.com.

Gifts are promotional items with **no commercial value and contain CI&T branding. They are distributed in an impersonal manner as a form of courtesy, regular promotion, or advertising during events and special occasions. Examples include pens, notebooks, calendars, notepads, thermos bottles, USB drives, mugs, keychains, etc.*

IV. Responsibility and Violations

All CI&T's People have the obligation to comply with and uphold this Policy.

A violation of the guidelines in this Policy may result in disciplinary action, including but not limited to a warning, suspension, or termination of employment. In addition to CI&T Group sanctions, violations may also be referred to civil or criminal authorities when necessary or otherwise appropriate.

Any non-compliance with this Policy, as well as with the Code of Ethics and Conduct, and any other CI&T guidelines, norms, or policies, should be reported through the Ethics Portal (etica.ciandt.com).

Any questions regarding this policy can be directed to compliance@ciandt.com.

V. Applicable Documents

- CI&T Code of Ethics and Conduct. Available at: [CI&T Governance Documents - website](#)

VI. Document Control

Version	Date	Description	Author
1.0	OCT/2021	Compliance Analysis	Compliance Team
1.0	OCT/2021	Legal Analysis	Marcela Masiero Lindner
1.0	OCT/2021	Final Approval	Board of Directors
2.0	SEPT/2022	Compliance Review	Flávia Cabral
2.0	NOV/2022	Legal Review	Marcela Masiero
2.0	DEC/2022	Final Approval	Board of Directors
3.0	JULY/2023	Compliance Review	Flávia Cabral, Julia Gomes and Marcela Lindner
3.0	JULY/2023	HR Review	Carla Borges
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3.0	SEPT/2023	Final Approval	Board of Directors