



ANTITRUST POLICY (FAIR COMPETITION)

VERSION 1.0

TABLE OF CONTENTS

1. Definitions	3
2. Objective	3
3. Applicability	4
4. Directives	4
4.1 Overview of Responsibilities	4
4.2 Related Policies	5
5. Responsibilities	5
6. Document Control	5



1. Definitions

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

TRADE ASSOCIATION: an organization formed by companies or professionals from a specific sector who come together to promote common interests, such as advocating for their rights, lobbying to influence government policies, sharing information and best practices, and conducting marketing or training activities. These associations can take various forms, including chambers of commerce, unions, cooperatives, industry associations, among others.

CODE OF ETHICS AND CONDUCT: clarifies the mission, culture, values, and principles of an organization, linking them to standards of professional conduct. The Code articulates the values the organization aims to promote among leaders and personnel, thus defining expected behavior.

ACTUAL OR POTENTIAL COMPETITORS: companies that operate or may come to operate, respectively, in the same market segment as CI&T.

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

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).

2. Objective

CI&T thrives in competitive markets and is committed to complying with all applicable antitrust and competition laws. These laws aim to ensure free market competition. Actions that violate these laws, such as agreements between competitors to fix prices or divide customers, territories, or markets, are prohibited and are not part of the way CI&T conducts its business.

3. Applicability

This policy applies to CI&T's People, who must observe and follow its guidelines regarding antitrust laws when engaging with any competitor, customer, or third parties, being aware that the penalties for violating these laws can be severe and include large financial fines, loss of business opportunities, and even individual fines and prison sentences in some countries. Besides penalties or fines, violations can also result in the loss of customer trust, which can have significant and lasting impacts on CI&T's business.

4. Directives

4.1 Overview of Responsibilities

CI&T's People:

- must not propose or enter into any agreement, arrangement, or understanding, formal or informal, with any actual or potential competitor of CI&T regarding prices, discounts, surcharges, sales promotions, bids, terms and conditions of sale or purchase, costs, profit margins, customers, territories or markets, market shares, salaries, recruitment or hiring of personnel, business plans or strategies, boycotts, or refusal to do business with any third party, or any other aspect of competition or CI&T's business;
- as provided in CI&T's Disclosure Procedures and Control Policy, available on the website ([Investor Portal](#)), they must not disclose CI&T's confidential information to third parties. This includes information related to the topics listed in the above item. If they receive such information from an actual or potential competitor (directly or indirectly), CI&T's People must not share or forward this information and must immediately notify the Compliance Team via compliance@ciandt.com;
- must obtain written approval from the Compliance Team before participating in any trade association on behalf of CI&T (whether through formal membership, attendance at meetings, or otherwise) and avoid contacts with competitor personnel at trade association events or other events that may create the appearance of improper agreement or inappropriate exchange of information among competitors. They must also promptly reject any



suggestion of improper agreement or inappropriate exchange of information among competitors, immediately notifying the Compliance Team via compliance@ciandt.com if they face such a situation.

4.2 Related Policies

This policy complies with the guidelines of CI&T's Code of Ethics and Conduct, available on the website ([Investor Portal](#)).

5. Responsibilities

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 Reporting Channel (ethics.ciandt.com).

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

6. Document Control

Version	Date	Description	Author
1.0	JUNE/2024	Creation	Julia Gomes (she, her) (Compliance Team)
1.0	JUNE/2024	Review	Compliance Team, Business Team and CFO
1.0	JUNE/2024	External law firm review	Cleary Gottlieb Steen & Hamilton
1.0	JUNE/2024	Audit Committee Review	Members of the Audit Committee
1.0	JULY/2024	Final Approval/Effective Date	Board of Directors