



# **CODE OF ETHICS AND CONDUCT**

VERSION 4.0

## 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.

**THIRD PARTIES:** individuals or legal entities, not CI&T employees, who are directly or indirectly related to CI&T, such as: service providers, suppliers, partners, consultants.

## 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 a guardian of our principles of ethics and conduct. It is your duty to comply with the guidelines in this document, as well as all CI&T policies and procedures, and disciplinary measures may be taken in case of non-compliance. To report situations that violate CI&T's Code of Ethics and Conduct, visit [ethics.ciandt.com](https://ethics.ciandt.com).

The Code of Ethics, policies, and procedures of CI&T must be followed in all your interactions, whether with colleagues, peers, leaders or team members, suppliers, clients, partners, or third parties, while traveling for business, communicating online, or participating in training or social events.

## 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:

**We Shape the Future with Our Clients:** Our partnerships pave new paths and create what comes next.

**Collaboration Is Our Superpower:** Together, we amplify our strength and drive collective success.

**Excellence Is Our Standard:** Excellence is the foundation of everything we do.

**Results Fuel Our Ambition:** Our relentless pursuit of impact ensures continuous growth.

**We Master the Infinite Game:** We are quick to learn, adapt, and reinvent, thriving in perpetual innovation.

**Diversity Unites Us:** Each person enriches our community, their unique perspectives fueling our collective intelligence.

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 report it in our Ethics Reporting Channel – [ethics.ciandt.com](https://ethics.ciandt.com) – with the option of anonymous registration.

CI&T's People who can support you with reporting situations via the Ethics Reporting Channel whenever necessary:

- People Development Manager (PDM) or a person from the Executive Squad;
- People Team;
- Compliance Team ([compliance@ciandt.com](mailto: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. For more information, please access the Ethics Reporting Channel Investigations and Non-retaliation against the Whistleblower Policy, available on the [intranet](#) and CI&T's website ([Investor Relations Portal](#)).

Any questions regarding the Code of Ethics and Conduct can be sent directly to [compliance@ciandt.com](mailto: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**, **FacilitiesTalk**, **SecurityTalk**, **Riley**, etc.

## General Guidelines

### Ethics and Conduct Commission

CI&T has an Ethics and Conduct Commission composed of representatives from the Legal and Compliance departments, Human Resources, Business, and Information Technology areas, all of whom are well-versed in the pillars that underpin CI&T's values and culture. The Commission oversees all activities necessary for the proper handling and investigation of complaints under the Compliance department's purview, received through the Ethics Reporting Channel ([ethics.ciandt.com](https://ethics.ciandt.com)).

### 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](mailto:compliance@ciandt.com) or report it to the Ethics Reporting Channel ([ethics.ciandt.com](https://ethics.ciandt.com)) so that the case can be appropriately addressed.

## **Cooperation with investigations**

CI&T's People and third parties may be asked to participate in the investigation process of reports. CI&T ensures total confidentiality for each situation addressed, as well as for the information provided, and expects full cooperation in finding the best resolution for the issue.

## **We respect our people, our company and our spaces**

### **Safety in the workspace**

To ensure safety in the workplace, health and safety communications and guidance are frequently provided through our internal communication channels. All CI&T's People must be aware of 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 communication channels provided.

CI&T is committed to identifying and evaluating risks and opportunities related to occupational health and safety, with the goal of implementing measures to mitigate these risks. Our work plan is established to prevent injuries and occupational diseases, promoting a safe and healthy work environment.

Additionally, CI&T is committed to the continuous improvement of the occupational health and safety management system. Non-conformities, accidents, and incidents will be investigated and addressed effectively with corrective actions.

### **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.

## Health of Our People

We care about the health of all our people. Therefore, you must observe and comply with the policies, procedures, and guidelines provided through CI&T's internal communication channels on this topic.

## Substance Use

We do not prohibit the consumption of alcohol, but it must be done in moderation and only during celebratory events at CI&T. Never drink in a way that impairs your work performance or leads to inappropriate behavior. This could jeopardize your safety and/or that of others or cause discomfort to 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.

## Disrespect, Harassment, and Non-Discrimination

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

CI&T encourages working with a diverse group of people, which is why it is important to understand, respect, and value differences, including:

- Differences in race, nationality, ethnicity, gender identity, sexual orientation, age, body size, marital status, religion/beliefs, socioeconomic status, physical or mental disabilities, and veteran status;
- Differences in education, origin, lifestyle, experiences, material possessions, family composition, perspectives, opinions, and knowledge.

Diversity of thought, perspectives, and experiences is essential to fostering innovation that leverages the advantages of collective intelligence. We are continually adapting our work, environment, and equipment to ensure equal opportunities and accessibility, allowing everyone to collaborate.

There must be no embarrassment, humiliation, or exclusion of individuals and/or groups in any of our relationships. Work must not involve animal mistreatment, encouragement of environmental harm, or the illegal exposure of children or minors.

Violent behavior or threats of violence (verbal or physical, including weapons) among CI&T's People, clients, partners, and suppliers violate CI&T's values and are not justified under any circumstances. Anyone involved in such behavior or bringing dangerous materials into the workplace will be subject to disciplinary action.

Acts of disrespect characterized as harassment, discrimination, bullying, intimidation, etc., occurring in any medium (physical or virtual, including virtual meetings, chat, videoconferences, social media, forums, written communications, and speech), will be subject to disciplinary action. These behaviors include actions or omissions that interfere with work performance or treatment of a person, creating an intimidating, hostile, or offensive environment. Be mindful that what you consider a joke might be perceived as disrespectful by someone else. Always evaluate your actions and behavior to ensure a friendly environment at CI&T.

Below is an illustrative list to help clarify some important concepts.

**Inappropriate conduct** is a one-time disrespectful behavior. Some examples include:

- An offensive post on the internet or intranet (e.g., on Workplace, Facebook, X, or a blog);
- An offensive message sent through instant messaging apps (e.g., Chat, Skype, Slack, or WhatsApp);
- Intimidating behavior;
- A physical gesture that demonstrates disrespect.

**Moral harassment** is any abusive conduct that occurs repeatedly to psychologically destabilize the victim. Examples include:

- Undermining an employee's autonomy or constantly questioning their decisions;
- Preventing an employee from expressing their opinions about work;
- Ignoring the presence of the harassed person and addressing only other employees;
- Personal insults or offensive remarks;
- Threats of any kind (e.g., dismissal or loss of promotion);
- Assigning derogatory nicknames.

**Sexual harassment** involves behaviors, words, gestures, or actions of a sexual nature that are unwanted by a superior. These actions are intended to gain advantages, sexual favors, or create a

hostile, intimidating, or humiliating environment for the victim, among others.

**Sexual misconduct**, on the other hand, does not require a hierarchical relationship.

Examples of sexual harassment or misconduct include:

- 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 specific person or made more generally);
- Repeated unwelcome invitations to social gatherings;
- Unwanted displays of affection;
- Repeated unwanted attention, such as phone calls, text messages, or other messages unrelated to work;
- Unwanted physical contact of a sexual nature;
- A person in a position of power making unwanted sexual advances or implying that employment decisions could be influenced by the acceptance or rejection of such advances.

## **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's People, 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 and the Gifts, Presents, Hospitality, and Entertainment Policy, available on the [intranet](#) and CI&T's website ([Investor Relations Portal](#)). The Compliance team is available for consultation at [compliance@ciandt.com](mailto: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, Anti-Money Laundering and Combating The Financing of Terrorism Policy and Gifts, Presents, Hospitality, and Entertainment Policy, available on the [intranet](#) and on CI&T's website ([Investors Portal](#)), must be observed;

- Tratando-se de agentes privados, tal como parceiros de negócio e clientes, o oferecimento ou recebimento de brindes, presentes, viagens, hospitalidades e entretenimentos deve seguir as diretrizes da Política de Brindes, Presentes, Hospitalidades e Entretenimento, disponível na [intranet](#) e no site da CI&T ([Portal de Investidores](#));
- 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, Anti-Money Laundering and Combating The Financing of Terrorism 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 CI&T's and its Clients' confidential information against improper use and disclosure, and must take necessary measures to prevent unauthorized disclosure of such information, including adherence to the security policies and rules of use and disclosure established by the client and CI&T. By doing so, we protect colleagues, our company, our assets, our clients' information, and mitigate the risks of exposure and the damage such exposure could cause to CI&T's brand. All CI&T's People are expected to champion Information Security by reporting incidents and suspicious events in accordance with the guidelines established in the Information Security Policy, available on the [intranet](#) and CI&T's website ([Investor Relations Portal](#)). Additionally, it is the responsibility of all CI&T's People to familiarize themselves with the information security procedures available on the [intranet](#).

We value the privacy of personal information for all CI&T's People and its clients. If you receive personal information, ensure you are authorized to access it. If confidentiality is required, do not share the information further. CI&T has a Privacy and Data Protection Policy, available on the [intranet](#) and CI&T's website ([Investor Relations 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's People must act professionally whenever using CI&T resources, including internet access or any other type of external system. This commitment also applies to activities carried out in clients' systems and facilities or using access provided by them. If CI&T and the client have different rules, the stricter rules will apply to the context.

The leakage or exposure of source code or any other proprietary information belonging to CI&T or the client 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 be referred to civil or criminal authorities as necessary or otherwise appropriate. It is the duty of all CI&T's People to follow information security policies and procedures while performing their duties, regardless of the environment in which they are working (CI&T's infrastructure, the client's, or any other third-party company).

## **Assets**

CI&T's 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's 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's 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](mailto: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](mailto: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 non-public 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

It is the duty of all CI&T's People to comply with both CI&T's Code and the client's Code. Any incompatibility between them should be discussed with your leadership and addressed with the client if necessary and appropriate. It may also be necessary to consult with the HR Area or CI&T's Legal team. Our Communication Channels are available to support you in these moments of impasse. In case of doubt, the stricter code will apply to the context.

## Competition

CI&T respects the laws that promote free competition among companies, and all CI&T's People must perform their activities in a fair and lawful manner to avoid any form of deceptive conduct. Guidelines on this topic can be found in the Antitrust Policy (Fair Competition), available on the [intranet](#) and CI&T's website ([Investor Relations Portal](#)).

The collection of information about CI&T's competitors is considered a legitimate activity if conducted legally and ethically. CI&T's People must never obtain information about competitors, clients, or partners through unlawful 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 and does not engage in 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 aim to always promote sustainable development in our business and company culture through awareness and practices that respect environmental principles. The guidelines on this topic can be found in the Environmental Policy, available on the CI&T's intranet and website ([Investor Portal](#)).

We focus our actions in three areas:

- Executing efficient operations;
- Enabling the sustainability of clients and suppliers;
- Engaging our people, leadership, business partners, and other stakeholders.

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

We encourage and enable environmentally sustainable practices among our people, clients, suppliers, and the nonprofit organizations 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](mailto: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	Creation	Compliance Team
4.0	JUL/2024	Review	Compliance Team, Legal Team, Information Security Team, ESG Team and Ethics Commission
4.0	SEP/2024	Audit Committee Review	Members of the Audit Committee
4.0	NOV/2024	Final Approval/Effective Date	Board of Directors