



CONFLICT OF INTEREST POLICY

VERSION 4.0

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1. Definitions

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

CI&T PEOPLE: direct or indirect employees, including but not limited to individuals in employment contracts, individuals holding senior management positions or board members.

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.

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.

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

2. Objective

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.

3. Applicability

This policy applies to all CI&T People.

4. Directives

Compliance with the guidelines and regulations established in this Policy must be respected by all CI&T 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 (Ethics Reporting Channel at ethics.ciandt.com or via email at compliance@ciandt.com).

4.1 Types of Conflicts 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.

4.2 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](#)).

4.3 Relationship with Audits

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.

4.4 Conflict of interests in the workplace

4.4.1 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.

4.4.2 Work or Service Provision Outside of CI&T

It is prohibited for all CI&T People to perform work or provide services (including acting as a board member) under any employment arrangement (as an employee; legal entity; freelancer; among others) if any of the following criteria apply to their case:

- **performing it during CI&T's working hours***; or
- **performing it for clients; or**
- **performing it for competitors (companies listed in this [internal list](#) or those in the Information Technology sector with annual turnover equal to or greater than 20 million US dollars).**

*Given the flexibility in working hours provided by CI&T, work at CI&T can be performed during business hours (from 8 AM to 5 PM) or as agreed with the PDM, such as from 9 AM to 6 PM or from 10 AM to 7 PM, always respecting current labor legislation. The Compliance team may contact the hierarchical superior or PDM to request or confirm information whenever necessary.

Additionally, if you hold the position of Partner, Executive Director, or Executive Manager and wish to perform work or provide services outside of CI&T, prior approval from the Nomination Committee is required. To do this, fill out [this form](#) and send an email notifying the Compliance team at compliance@ciandt.com.

If you do not hold the positions mentioned above, work or service provision is permitted as long as it does not conflict with the prohibitive guidelines in the first paragraph and that you do not disclose confidential information from CI&T, nor use CI&T assets to carry it out.

Since it is not always easy to determine whether external services or work represent conflicts of interest for CI&T, please contact the Compliance Team at compliance@ciandt.com if you have any questions.

Please keep in mind that all external services or work performed must comply with applicable legislation and the ethical principles outlined in CI&T's Code of Ethics and Conduct.

4.4.3 Referral and Management of Close Associates

CI&T People may refer people from their personal circle, including close relatives, to be considered for service provision and recruitment processes at CI&T. In this case, however, they must clearly state the nature of their relationship with the candidate at the time of the referral and maintain an impartial stance, without any involvement in the hiring process. Before the actual hiring, the hiring individual must conduct an analysis to verify the roles and work routines in order to avoid potential or apparent conflicts of interest.

CI&T People may not independently participate in the management or decision-making regarding existing or potential business relationships of CI&T, as well as in the performance evaluation and recognition issues involving their relatives, spouse, partner, or close friend. This includes being the sole person responsible for hiring for a position for which one of these individuals is being considered.

4.4.4 Gifts, Presents, Hospitality, and Entertainment

It is the responsibility of all CI&T People to comply with the guidelines set forth in the Gifts, Presents, Hospitality, and Entertainment Policy, available on the intranet and the CI&T website ([Investor Portal](#)). The Compliance Team will be available for consultation via email at compliance@ciandt.com whenever necessary.

5. Responsibilities

All CI&T 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.

6. Applicable Documents

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

7. Document Control

| Version | Date | Description | Author |
|---------|----------|-------------------------------|-------------------------|
| 1.0 | OCT/2021 | Creation | Compliance Team |
| 4.0 | NOV/2024 | Review | Compliance Team |
| 4.0 | DEC/2024 | Audit Committee Review | Audit Committee Members |
| 4.0 | DEC/2024 | Final Approval/Effective Date | Board of Directors |