



# **CODE OF ETHICS AND CONDUCT FOR THIRD PARTIES**

VERSION 3.0

## **CI&T Letter to our Third Parties**

We make a difference in everything we do, respecting ethical values and precepts!

And our commitment to respect is one of those values. The way we behave helps us to retain great people at CI&T, build business relationships with great partners, build great products, and nurture long, loyal relationships with our customers.

Thus, in order to further strengthen CI&T's commitment to ethics and transparency in its commercial relations, we created the Code of Ethics and Conduct for Third Parties.

We hope that this Code contributes to the maintenance of integrity in established relationships.

Whenever necessary, refer to the updated Code of Ethics and Conduct for Third Parties [on our website](#).

Have a good reading!

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## Introduction

### Opening

Our Code of Ethics and Conduct for Third Parties, including suppliers, intermediaries, supply chain partners, consultants, contractors or other service providers who share our commitment to ethical business practices, was created to guarantee the establishment of a harmonious relationship, in order to express our beliefs, guide the actions of all people and explain CI&T's attitude towards the different audiences with which it interacts.

It is an instrument that serves as a central guide and also a reference to support day-to-day decision-making and enable people to deal with the dilemmas they may encounter in their relationships, encouraging discussions on compliance with the code.

### Responsibilities

All third parties undertake to know and respect this Code of Ethics and Conduct for Third Parties, available on [CI&T's website](#), being aware that, in case of suspected violation, it may make use of the Communication Channels made available by CI&T.

### Culture, Values e Attitudes CI&T

Our values reflect our essence and support our decision-making. Our commitment to our values is crucial to ensuring that our behaviors align with Ethics.

They are:

- **We Shape the Future with Our Customers:** our partnerships open 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.

### Consistency in contracting our Third Parties

We are looking for third parties who work with commitment, impact, honesty, mastery and respect. We are true to our values and collaborate with our people and third parties. We are committed to communicating transparently.

We do not hire third parties if there is embarrassment, humiliation, discrimination or exclusion of people and groups, as well as if the third party's conduct is related to mistreatment of animals or the stimulation of environmental damage. It is also worth noting that it will be even more inadmissible if it involves children and forced or compulsory labor, on a non-voluntary basis, under threat of any penalty.

### **Third Parties selection process**

The third-party selection process at CI&T is based on technical and professional criteria such as competence, quality, punctuality, price, financial stability, etc. CI&T is prohibited from doing business with third parties of questionable reputation, or those that do not comply with the rules and requirements of this Code of Ethics and Conduct for Third Parties.

To be a third party of CI&T, it is necessary to comply with our values, comply with all applicable laws, observe the standards, policies and procedures shared by CI&T and, in general terms, act in accordance with the principles described below:

- Comply with all applicable laws;
- Prohibit acts of fraud and corruption;
- Respect the human rights of its employees and service providers;
- Comply with laws prohibiting child labor;
- Not to engage in or support the practice of forced, slave-like labor;
- Take responsibility for the health and safety of your employees;
- Act in accordance with applicable local and international regulations related to environmental protection.

We expect our third parties to comply with the topics detailed below.

### **Safety in the work environment**

We seek to maintain a safe and healthy workspace for our employees, respecting the safety standards and specifications for each function.

We expect our third parties to adopt similar practices (whether in our environment or in their own environment) to prevent potential health risks and occupational accidents with their employees and collaborators, providers or contracted persons. In this way, it will ensure the quality of the work environment and take responsibility for the individual and collective protection equipment that may be necessary, when applicable, in compliance with the determinations provided for in current legislation.

### **Equipment**

We expect our third parties to be extremely careful to safeguard, protect and value CI&T equipment that eventually, due to the commercial relationship established by the parties, were made available to them, using them only for agreed purposes and that are connected to our fundamental values. Such equipment

includes all of CI&T's physical property, as well as intangible property such as our brand and all forms of intellectual property.

Third parties must protect the equipment made available by CI&T against theft, breakage and/or improper use, in accordance with the specific rules defined in the Security Policy.

## **Impartiality and non-discrimination**

All people involved in the work dynamics with CI&T must be respected and treated with impartiality – whether in person or online – whether they are CI&T collaborators, third parties or service providers.

## **Disrespect and Harassment**

CI&T has a diverse group of people and a large number of third parties, so it is important to understand, respect and value the differences between them, including:

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

Diversity of thought, perspective and experience 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 and we expect our third parties to do the same.

Acts of disrespect, whether characterized as harassment, discrimination, bullying or intimidation and occurring in any medium (physical or virtual, including hangouts, chat, video conferences, social media, forums, written communications and speeches), are not tolerable. These behaviors are characterized as any actions that may interfere with the performance of work or any other treatment of a person and that create an intimidating, hostile or offensive environment.

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

Violent behavior or threats of violence (verbal or physical, including weapons) between our people, customers, partners and third parties violate CI&T's values and are not justified under any circumstances. Any violation of this Code may result in a breach of contract.

## **Compliance with the Law and Compliance with Anti-Corruption Laws**

CI&T rejects any form of corruption, favoring, extortion or payment of bribes, as well as does not tolerate the practice of illegal activities, under any circumstances. No treat, gift, money or any kind of good that implies value may be offered, given, received or demanded as a benefit of any nature, bribe or any other

type that violates CI&T policies or other Company policies. This includes any personal favors offered by customers or third parties, or requested by employees or collaborators for customers or third parties.

Anyone involved in such practices will be subject to:

1. disciplinary action, when a CI&T employee;
2. termination of the business relationship, when dealing with a third party company;
3. applicable law, whether local, regional or national.

CI&T requires all of its people to comply with all applicable Anti-Corruption Laws. To follow the Anti-Corruption Laws, they:

- Do not offer bribes – CI&T people are strictly prohibited from giving, offering, gifting, promising or authorizing a third party, directly or indirectly (through intermediaries), any item of value to any person for the purpose of influencing any act or decision or concession, to gain advantage;
- Do not accept bribes – CI&T people are strictly prohibited from accepting or soliciting from anyone any valuable item to perform or omit any action or decision to provide a benefit to third parties or to CI&T itself;
- Report irregular situations – CI&T people must report to the company any actual or potential violation of this Code and/or the Anti-Corruption Laws through one of the available Communication Channels.

Exchanging business gifts may be appropriate under certain circumstances. If any of the following situations occur, it is a sign that it is not appropriate to receive or give gifts:

- The gift was requested;
- The gift is delivered before or after the submission of business proposals or response to an offer, while approvals or decisions are pending;
- Giving/receiving the gift violates any law in the country where you are located;
- If the gift is a courtesy and is conditioned to favor in a bidding process or choice of third parties.

Violations of the law can result in significant harm to CI&T, including financial penalties, denial of contracts, imprisonment for criminal conduct and damage to our business relationships and reputation.

Thus, we expect our third parties to embrace this cause together with CI&T and adopt practices to fight corruption in all its forms and in any aspect of their business, both with CI&T, as with other institutions and throughout its production/service provision chain.

Whenever there is any doubt about the legality of an attitude or behavior, guidance should be sought through the Communication Channels provided by CI&T. Here you can find more details about the [Brazilian Anti-Corruption Law](#) (No. 12.846, DATED AUGUST 1, 2013).

## Privacy and Information Security

All persons and third parties of CI&T must know and follow our Information Security Policy. Everyone must perceive Information Security as the appropriate way to protect people, our company, our assets, our customers' information, third parties and to mitigate the risks of exposure and the damage that such exposure can cause to the CI&T brand.

CI&T expects everyone to be a defender of Information Security, reporting incidents and suspicious events, following the best practices on the subject.

We value the privacy of personal information, whether that of CI&T people, customer people, third parties, service providers or others. If you have received personal information, please make sure you are authorized to access it. If confidentiality was requested, do not pass the information on.

## Confidential Information

Confidential information is CI&T's intellectual property and everyone is committed to protecting it from inappropriate use and disclosure.

Thus, both CI&T collaborators and third parties must follow and adopt the necessary measures to prevent the unauthorized disclosure of confidential information, including respect for security policies and rules of use and disclosure, both established by CI&T or its customers.

Third parties are not allowed to copy, photograph or disclose any information about CI&T, its customers or third parties, without the prior and express authorization of CI&T.

## Trademark

The CI&T brand is a valuable asset and all visual identity rules must always be observed and respected. Third parties cannot use the CI&T brand for any purpose without express authorization from the company to do so.

CI&T does not authorize the disclosure of its name, brand, logo and other signs, as well as associate the supply of goods or services to it, and it is necessary to request the prior consent of CI&T and the respective approval of the text and materials to be disclosed.

## Ethics in Business

CI&T works actively to ensure compliance with all its policies and ensures that activities are carried out with integrity, based on the highest ethical standards.

We aim to establish transparent bonds and encourage good coexistence between our employees and third parties, and we expect everyone to act ethically and with integrity in the development of their activities.



## **Subcontracting**

If there is a need for subcontracting by our third parties, this must be established in the contract.

If subcontracting is authorized, third parties will remain jointly and severally liable to CI&T for all acts, commitments and responsibilities assumed by the subcontractor, ensuring that CI&T, under no circumstances, suffers any loss or damage resulting from any action and/or non-compliance with obligation, especially, but not limited to, those related to the labor, tax or social security sphere.

And we expect subcontractors to also follow this Code of Ethics and Conduct for Third Parties, reinforcing our guidelines as a corporation.

## **Competition and Antitrust**

CI&T respects the laws that promote free competition between companies and all people must carry out their activities in a fair and lawful manner, in order to avoid any kind of misleading conduct.

Third parties must comply with all trade, competition and antitrust laws in order to guide their actions in competitive environments and value good corporate practices. Encouraging free competition, in accordance with legal principles and best antitrust practices, is the conduct that CI&T values.

Gathering information about CI&T's competitors is considered a legitimate activity if it is conducted in a legal and ethical manner. CI&T people must never obtain information about competitors, customers or partners using illegal means, nor may they disclose confidential information about CI&T. If we receive any confidential information, we will not misuse it. Third parties are not authorized to request information of this nature from CI&T without prior authorization.

CI&T repudiates the conduct of third parties that promote actions with the intention of generating influence or appear to influence business decision-making. Any inappropriate behavior must be reported on our Communication Channels.

## **Conflicts of Interest**

Our third parties must report all actual, potential or perceived conflicts of interest to CI&T's Compliance team ([compliance@ciandt.com](mailto:compliance@ciandt.com)) before entering into a relationship with us, or as soon as they become aware of a conflict after entering into a relationship.

## **Human Rights**

We support and respect the rights expressed in the International Charter on 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 must report if you experience human rights violations and act or seek guidance if you witness or become aware of any violations.

CI&T promotes human rights in its activities and procedures, aiming to establish relationships with third parties who share the same principles and values, including: decent working conditions and compliance with labor and social security obligations; respect and appreciation of diversity; inclusion of people with disabilities; prohibition of child labor, as well as it does not admit the exploitation of children and adolescents in its processes; slave or slave-like work; forced labor; modern slavery and human trafficking.

CI&T will report situations observed if it experiences human rights violations. You may also seek legal advice if you testify or become aware of any violations, understood as activities that are potentially illegal, unethical, fraudulent or any other situation that causes concern or embarrassment.

## **Environmental Responsibility**

We promote environmentally sustainable economic growth. We incorporate good environmental practices into our business strategy and operations. We focus our actions on three areas:

- Running efficient operations;
- Enabling the sustainability of customers and third parties;
- Engaging our people, leaders, business partners and other stakeholders.

We expect our third parties to contribute to our efforts and adopt social, economic development and environmental protection actions, in order to reduce the environmental impact of their operations and comply with current environmental legislation, applicable to their reality.

That is, we seek to do business with third parties who adopt the best practices with their people, service providers and the community, who comply with current legislation, do not adopt disrespectful, harassing or discriminatory conduct, do not expose people, personal data or information confidential information of its customers, partners and collaborators and adopt practices to protect the privacy rights of all people.

In addition, we expect that the selected third parties have the necessary procedures and tools to guarantee high quality in the execution of services and/or in the supply of their products to CI&T, allowing CI&T to carry out audits of its processes when necessary, aiming at the excellence of the contracted scope.

## **Confidential communication channels for complaints and prohibition of retaliation against your collaborators**

We expect our third parties to allow their employees to report concerns in the workplace (as an ethics hotline), ensuring a fair investigation process, as well as resolution of grievances and protection from retaliation.

## **Communication channels**

If the third party has a good faith concern, is experiencing or witnessing disrespectful, inappropriate, fraudulent, unethical or illegal behavior, including concerns about retaliation, it should access one of our Communication Channels.

We are committed to treating any feedback extremely seriously, regardless of how you communicate it. The most suitable people within CI&T will handle your case with the utmost confidentiality and sensitivity. It is important to take great responsibility when making a report, as knowingly providing inaccurate or misleading information could result in serious consequences for the person making the report.

All complaints regarding violations of the Code of Ethics and Conduct for Third Parties can be sent directly to one of the following Communication Channels:

- **CI&T Ethics Reporting Channel:** [ethics.ciandt.com](https://ethics.ciandt.com)
- **Telephone (United States):** 1-833-602-2018

Questions about this document should be sent to:

- **Email:** [compliance@ciandt.com](mailto:compliance@ciandt.com)

This Code guarantees the confidentiality of the information provided and protects the complainant against retaliation.

## Disrespect to the Code

We expect all third parties to know and follow this Code. Failure to comply with this Code may result in termination of the business relationship. The third party company must be aware that CI&T may, from a legal or moral obligation, report the results of an investigation to the competent legal authorities, or may choose to do so. Violations of Anti-Corruption Laws may be subject to penalties.

CI&T reserves the right to change and update the content of this Code at any time, maintaining the latest version available on the website.

## Document Control

Version	Date	Description	Author
1.0	JUL/2020	Creation	Compliance Team
3.0	JUL/2024	Review	Compliance Team
3.0	JUL/2024	Audit Committee Review	Committee Members
3.0	JUL/2024	Final Approval/Effective Date	Board of Directors