

# Code of Ethics and Conduct



sensedia

# Sumário

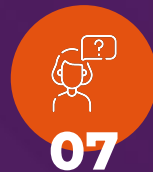
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We Hear You



“

It fills us with pride to see our wall of logos growing each day and seeing that important clients around the world drive us to continue innovating.

But without Sensediars, essential pieces in this trajectory of success and that do their best on a daily basis, none of this would be possible.

With our growth we need to continue with innovations, but we also gained the responsibility to conduct our businesses in an increasingly transparent and ethical way, applying good practices to the highest market standards.

Therefore, we are publishing Sensedia's Code of Ethics and Conduct, which brings together our values and serves as a basis for all of our employees to make their decisions.

”



**Kleber**

CEO at Sensedia.

**Bacili**



# Our Values





## #AwesomePeople

Our people are incredible!

+ Brilliant people inspire others, through their attitudes and achievements:  
Commitment; Sparkles in the Eyes; Teamwork; Consistency.

- Don't look only at your problem or your activity.  
Don't be great by yourself



## #ThinkBig

We aim high.

+ Be brave to risk and persist. Be innovative with ideas, products and attitudes:  
Boldness; Curiosity; Innovation; Courage.

- Don't be intimidated by the size of the challenges and don't give in at the first mistake.



## #OwnerShip

We are owners of the business.

+ Make it happen and be responsible for your attitudes.  
Inspire people: Autonomy; Entrepreneurship; Proactivity; Apologize instead of asking for permission.

- Don't dismiss opinions and suggestions for improvement (the business is also yours!).



## #DoEpicShit

We rock.

- + Persist until you achieve. Present solutions instead of complaints: Excellence; Focus on Results; Nonconformity; Agility.
- Don't abandon quality, even under pressure. Don't settle for the expected.



## #Solve4theCustomer

Nothing is impossible.

- + Be your customer's best friend. Deliver the best solution to the customer.
- Don't say "we can't do it". Don't agree without understanding the impact.



# What is the Code of Ethics and Conduct?

The Code of Ethics and Conduct aims to provide guidance on the attitudes expected in Sensedia's business and relationships, reflecting the commitment to responsible, transparent and respectful behavior.

Our employees are at all times involved in situations or decision-making that impacts Sensedia's image.

You represent us in a wide variety of ways. Therefore, there is a need for a document that presents guidelines for ethical conduct for institutional or business activities.



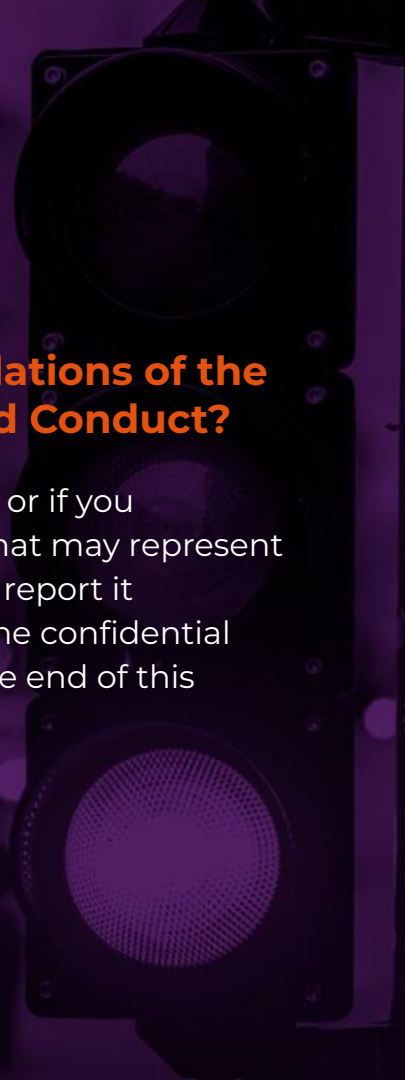
## Who should follow?

All Sensedia employees, regardless of position, function or relationship. Everyone has the commitment to understand, respect and practice all the rules to which the company is subjected.

Anyone who fails to act in accordance with this **Code of Ethics and Conduct**, including those who fail to report violations of the Code, may face various disciplinary measures.

## How to report violations of the Code of Ethics and Conduct?

If you become aware of or if you experience situations that may represent a violation of this Code, report it immediately through the confidential channel indicated at the end of this document.





## Do's

1. Practice and help encouraging the use of law and Compliance Policies.
2. Respect everyone, contributing to a more collaborative work environment.
3. Avoid situations that generate interest conflicts.
4. Respect the rules of confidentiality and protection of personal data - we must take care of Sensedia's data and information and only share it with authorized people.
5. Preserve Sensedia's property - image, brand, reputation, facilities, equipment, and others.
6. In social media, always respect Sensedia's values and this Code of Ethics and Conduct.

## Dont's

1. Disrespect, discrimination or any form of harassment in Sensedia's environment.
2. Using social media in violation of Sensedia's values.
3. Representing Sensedia in public statements or contracting obligations on its behalf without proper authorization.
4. Exposing or disclosing any Sensedia proprietary information or data without authorization.
5. To offer, pay, promise or receive benefits directly or indirectly to any public agent.

# 1 - NON-DISCRIMINATION

## What is this?

Unfair or differential treatment given to another person or group of people based on their race, color, ethnicity, gender, religion, creed, origin, nationality, economic status, sexual orientation, political opinion, age, special needs, obstetric, health or marital status, with the purpose of destroying or altering equality of opportunity or treatment in terms of employment and occupation.

## Non-discrimination policy

- I) In its recruitment processes, Sensedia evaluates candidates exclusively based on their competencies, cultural fit, expectations of the position and of the company's growth.
- II) We provide equal work opportunities to all the employees, regardless of creed, sexual orientation, disability, age or other personal characteristics.
- III) Sensedia prohibits any kind of discrimination, harassment and bullying against anyone on the basis of age, ancestry, color, disability, national origin, race, religion, sex, affective or sexual orientation, gender identity, appearance, political affiliation, marital status, financial status, or any other characteristic.

# 1 - NON-DISCRIMINATION

## Q&A

### Question:

I was hired by Sensedia and I am a person with a disability. Is the Level salary base and development opportunity the same for all employees?

### Answer:

All open positions (based on the Sensedia website) are for professionals with disabilities, regardless of their level. Candidates with disabilities are evaluated according to their skills, cultural fit, previous experience, last salary, pretension, analysis of our ranges, career structure, comparative analysis of experience and salary with the team they will integrate, just like any other candidate. Sensedia is committed to promoting equal opportunities in employment. If you are disabled or become disabled, we encourage you to tell us about your condition so that we can consider what reasonable adjustments or support may be appropriate

## 2 - COMBATING HARASSMENT

### What is this?

Harassment is any unwanted behavior, including behavior based on discriminatory factors, with the purpose or effect of disturbing, embarrassing, subduing, or otherwise affecting the dignity of others, or of creating an intimidating, hostile, or humiliating environment.

### Anti-harassment policy

I) We do not tolerate any form of harassment, such as sexual, moral or of any other nature, nor situations that represent disrespect, intimidation or threatens the relationship between employees, regardless of their hierarchical level.

II) Jokes, insults or insinuations which have the purpose or effect of causing harassment or which are otherwise discriminatory are not permitted

III) You should always treat people with cordiality and respect, remembering an important item in our Culture: #Standard, Ethics, Respect and Inclusion - and always try to encourage this behavior so that we have an environment free of harassment.

IV) Never distribute, share or display offensive material, of any nature, including inappropriate pictures or drawings. Never use Sensedia's resources to transmit offensive material.



## 2- COMBATING HARASSMENT

### Q&A

#### Question:

I got a nickname from my co-worker that I am not comfortable being called by. And now, everyone else calls me by this nickname. What should I do?

#### Answer:

It may be that your colleagues don't know how much this nickname bothers you. Try a conversation to clarify the situation and show your discomfort.

If the problem continues, go to your Human Resources Business Partner (BP), tell them about the initiatives you have already taken, because the specialized team will definitely support and reinforce your point of view. After the described actions, if the problem is not solved, report it to the reporting channel.



## 3 - CONFLICT OF INTEREST

### What is this?

Conflict of interest exists when an employee has personal interests or relationships that may influence or interfere - directly or indirectly - in their judgment and objectivity, to the detriment of Sensedia's interests.

Even if there is no conflict of interest, the simple perception of a conflict is enough to be considered a prejudicial issue, and should be reported to those involved or superiors, so that the issue can be addressed transparently.

### Conflict of Interest Policy

- I) Any form of protectionism or privilege in the relationship between leader and followers is unacceptable
- II) The employee is not allowed to assist a competitor, compete with or supply the company, or have a financial interest in partners, clients or suppliers.
- III) The existence of a family relationship or personal relationship between a leader and a subordinate, or any degree of direct subordination, is considered a conflict of interest.

### 3 - CONFLICT OF INTEREST

#### Q&A

##### Question:

I would like to refer a relative's company to provide services for Sensedia.  
Do I have to tell my manager or the legal department that I am related to the owner?

##### Answer:

Yes, because there is a potential conflict of interest if a relative owns or works for a supplier that Sensedia does business with.

This issue will be reviewed by your manager and the legal department.

## 4 - SOCIO-ENVIRONMENTAL RESPONSIBILITY

### What is this?

Socio-environmental responsibility occurs when companies voluntarily adopt attitudes, behaviors, and actions that generate benefits for society and the environment.

It is a voluntary practice because it should not be confused exclusively by compulsory actions..

### Socio-environmental responsibility policy

- I) Sensedia and its employees respect and defend human rights and social and environmental causes. We are always open to suggestions that benefit, in some way the environment or society.
- II) We support our employees when they organize or participate in charity causes.
- III) It is not allowed to use Sensedia's materials and/or property in a careless or relaxed manner that could in any way cause or generate waste.
- IV) All acquisitions must be evaluated case-by-case, considering the need, destination, and usage of the item.

## 4 - SOCIO-ENVIRONMENTAL RESPONSIBILITY

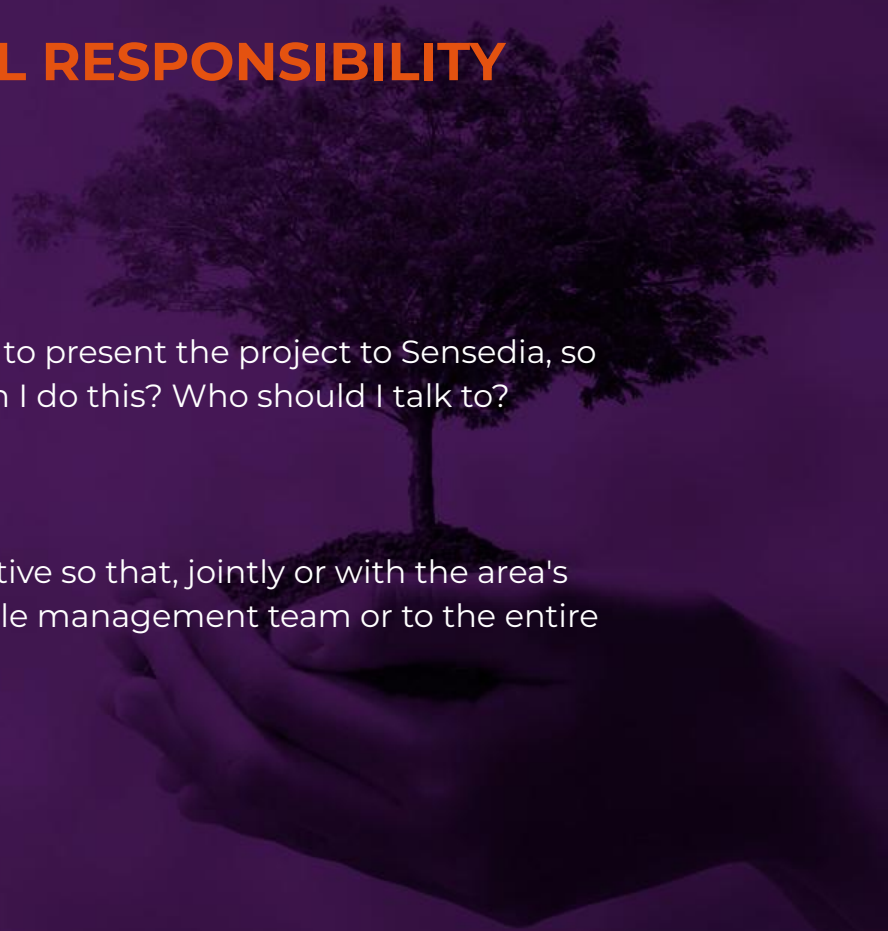
### Q&A

#### Question:

I am a volunteer for a social cause and wanted to present the project to Sensedia, so that the company can get involved as well. Can I do this? Who should I talk to?

#### Answer:

Yes, go to HR and talk to them about the initiative so that, jointly or with the area's approval, you can present the idea to the people management team or to the entire Sensedia



## 5- CONFIDENTIALITY AND DATA PRIVACY

### What is this?

Insider information is relevant data about the company and its business and must be treated confidentially, as well as the personal data of the employee(s), clients and the like. Strategic information can affect Sensedia's business. In some cases, the break of confidentiality and the use of this information may violate laws, especially if it is used to benefit oneself or a competitor.

### Confidentiality and Data Privacy Policy

I) The employee must be extremely careful to avoid inadvertent disclosure of information in routine business and social conversations with friends and relatives.

II) Do not discuss or work with Sensedia's documents in public places where others can hear or see, including restaurants, elevators, hallways, and any non-secure spaces. The employee must always lock their computer or notebook when away or leaving their workstation.

III) You may have access to confidential and proprietary information, and even inside the company it may only be disclosed to those whose knowledge is extremely necessary.

IV) It is not allowed to share users and passwords amongst employees or third parties; access must be unique and personal.



## 5- CONFIDENTIALITY AND DATA PRIVACY

V) The access to websites with content that is inappropriate to the work environment (e.g., pornographic or whose content is not in line with the purpose of your job) and/or offensive content is prohibited.

VI) Sending false, depreciative, or malicious information using our devices is prohibited.

VII) In talks and participation in seminars and other public events, the non-disclosure of confidential information about Sensedia and its business must be strictly respected. Both the participation as an exhibitor at events and the topics to be exposed - in case they deal with confidential

or proprietary matters of Sensedia - must be previously approved by the leadership of the employee involved and, if applicable, the Compliance team.

VIII) We must all be guardians of Sensedia's confidential data. So if you notice something confidential being exposed, talk to your manager, the Compliance team or report it through the channel informed at the end of this document.

IX) In relation to personal data and its processing, the provisions of the Data Protection Laws (GDPR, CCPA, LGPD and others) must always be taken into consideration..

## 5 - CONFIDENTIALITY AND DATA PRIVACY

### Q&A

#### Question:

When in doubt about what data I can or cannot share publicly, how should I act?

#### Answer:

Any and all types of information disclosure must have the approval of your manager and the Compliance team.

Remember that strategic information, including sales information, is confidential and may not be commented on and/or shared with other teams or outside the work environment.

#### Question:

I am working on a new project at a client, which I think is very interesting and innovating. Can I tell my friends and family about it?

#### Answer:

Details can only be revealed to friends or relatives if they are already public information. For example, if already published on the Internet by the company that Sensedia provides services to (client). Otherwise, the information will be treated as confidential and should not be released.

## 5 - RESPONSIBLE USE OF AI

### What is it?

Artificial intelligence is a field of computer science that seeks to create programs and algorithms that enable computers to act and make decisions in a manner similar to humans. As a result, AI has become widely used by organizations in the business context, whether to improve products, services, or internal processes. However, its use must be done responsibly and in accordance with the ethical principles of Sensedia.

### Responsible AI Use Policy

I) The development and implementation of AI in internal solutions and processes should be conducted ethically, and the use of AI should uphold the principles of explainability and transparency, meaning that criteria and models should be accessible and clear to users.

II) Projects involving the use of AI must have a designated individual responsible for their ongoing supervision, aiming to minimize errors, incorrect decisions, and potential harm caused by AI. This includes verifying the accuracy of any results to prevent injustices or discriminations.

III) When using generative AI tools or systems in projects, the following areas must be consulted: Legal, Compliance, and Information Security. Additionally, all Privacy and Information Security policies and procedures must be respected.

IV) AI should be used to assist in Sensedia's business development. Therefore, significant decisions remain the responsibility of individuals.

V) Sensedia commits to continuously follow and share its ethical principles across businesses, governments, clients, employees, and society in general in all its AI products and models.

## 6 - IMAGE AND REPUTATION

### What is this?

Image is the perception that we create in a momentary, punctual and individual way with our behaviors. In turn, this perception influences our reputation, that is, a bad image does not necessarily mean a bad reputation, but as Sensedia, we value and defend the good image and reputation of our employees in the performance of their activities.

### Image and reputation policy

I) Sensedia does not question the freedom of expression, but reminds us that the negative repercussion of an opinion published on social media can damage the relationship of an employee with colleagues, clients, suppliers and with Sensedia itself.

II) It is allowed that Sensedia's name be linked to personal posts, such as on Facebook, Instagram and others, as long as this does not compromise our image and/or reputation. Posts must also not be linked to conduct repudiated by Sensedia, that may affect its image in the market or contain any confidential or restricted information.

III) As an employee, you must be careful with your conduct in public environments, whether in circumstances of your professional activity or in situations of your private life, acting with prudence and caution, not exposing Sensedia or putting your own career at risk.

## 6 - IMAGE AND REPUTATION

### Q&A

#### Question:

In what kinds of posts can I tag Sensedia?

#### Answer:

Posts that show the employee's participation in internal events, training, endomarketing actions, social actions sponsored by Sensedia are allowed.

In all cases, postings that may in any way directly or indirectly compromise or affect Sensedia's image in the market or contain any confidential or restricted information are not allowed.



## 7- INTELLECTUAL PROPERTY

### What is this:

Intellectual property is a strategic asset for Sensedia. This includes technical details and data, product information, process, market, trademarks, trade secrets, know-how, amongst other items that could benefit a competitor if they knew about it.

### Intellectual Property Policy

I) The result of the intellectual work and strategic information generated in Sensedia is the company's exclusive property.

II) Employees are responsible for treating as confidential any information about intellectual property to which they have access as a result of their work, using it carefully.

No disclosure of such information is allowed without the express authorization of the Executive Board.

III) Confidential information in response to requests from government authorities should be addressed to the Legal Department and the Compliance team.



## 7- INTELLECTUAL PROPERTY

### Q&A

#### Question:

While participating in an event I was asked about the API Management Platform architecture. How should I proceed?

#### Answer:

In the answer you can talk about the use and benefits of its use by a client. However, you must never reveal the specificities of the product architecture that are not exposed by Sensedia

## 8 - SENSEDIA'S PROPERTY AND RESOURCES

### What is this?

Sensedia's property, equipment and facilities are intended exclusively for use in its operations and may not be used for private purposes, except in specific situations defined by the Company.

This includes all forms of physical and intangible property such as facilities, inventory, information technology (IT) and intellectual property, as well as Company data and information.

It is everyone's obligation to protect Sensedia's resources and use them for their intended purposes. Furthermore, it is everyone's duty to use these resources responsibly and sensibly, as if they were your own.

### Attention:

Sensedia may, regardless of any notice and at any time, monitor, audit, access, among other actions, without prior notice, the corporate communication tools, including their content and use - e-mails, telephones, voice mail, internet and other company systems - to the extent permitted by law.

## 8-SENSEDIA'S PROPERTY AND RESOURCES

### Sensedia's Property and Resources Policy

I) The result of the intellectual work and strategic information generated in Sensedia is exclusive property of Sensedia.

II) Physical property is not allowed to be destroyed, disposed, sold, transferred, loaned, or donated without proper legal and the area manager approvals. Also, before taking such actions, you must ensure that no confidential data remains on the equipment.

III) The same is true for intangible property (non-material, such as photos, videos, projects, information), and cannot be provided or allowed to be used by third parties without proper approvals.

IV) It is everyone's duty to observe and report to the manager, even if it does not pertain to their primary activity, about the non-utilization of infrastructure, software, systems, and others, in order to optimize the use of resources.

V) It is everyone's duty to watch over the proper use and sense of Sensedia's financial resources in all situations.

## 8 - SENSEDIA'S PROPERTY AND RESOURCES

### Q&A

#### Question:

My department has obsolete equipment that has been unused for quite some time.  
Can I sell or donate it to someone?

#### Answer:

No, the equipment must be taken to the manager. We can send it so that he can forward to the responsible area (property and/or IT).



## 9 - ANTI CORRUPTION

### What is this?

Corruption is acting dishonestly or illegally in exchange for money or some personal gain.

Sensedia is committed to complying with anti-corruption legislation and money laundering prevention such as, but not limited to: Law n° 12.846/13 (Anti Corruption), USA Foreign Corrupt Practices Act ("FCPA", Foreign Corrupt Practices Act) and the UK Bribery Act ("UKBA", UK Anti-Bribery Act).

### Anti-corruption policy

I) Sensedia does not allow an employee to offer or accept bribes or similar payments to or from any natural or legal person (public or private), in any country, for any reason related to the company's business or otherwise.

II) Any violation of the anti-corruption legislations mentioned above, by any employee, will result in disciplinary action, which may result in dismissal, in addition to any possible civil and criminal penalties.

III) Any violation of the anti-corruption legislations mentioned above, by any employee, will result in disciplinary action as per the following item, including dismissal, in addition to possible civil and criminal penalties.

## 9-ANTI CORRUPTION

### Q&A

#### Question:

We are running a business opportunity involving public agents. Can we send a gift to our focal point?

#### Answer:

As a rule, no gifts, courtesies or benefits should be offered or given, under any circumstances, to public officials and their relatives or to third parties related to them with the purpose of influencing decisions of public authorities in favor of Sensedia's interests or third-party collaborators. In each specific case, we must check the Code of Ethics of the public body to find out if less valuable gifts can be sent.

## 10 - SANCTIONS

Managers and employees who violate Sensedia's Code of Ethics and Conduct will be subject to internal sanctions.

The sanctions to be imposed could be, for example:

- **Compliance Training recycling.**
- **Formal warning.**
- **Loss or cut of variable compensation.**
- **Suspension.**
- **Dismissal**

The sanctions will be evaluated by the managers of each area, together with the Human Resources Department, Compliance and the Legal team, graduated in a transparent, reasonable and proportional way, according to:

- (I) the seriousness of the infraction;
- (II) possible recurrence;
- (III) proportionality;
- (IV) damage caused to Sensedia, including in relation to compromising the work environment and its image to third parties.

## 11 - WE HEAR YOU

“We Hear You” is Sensedia’s reporting channel. Through it, you can ask questions, share ideas, concerns, suggestions, complaints, correct errors and communicate about misconduct that violates Sensedia’s values and culture, our Code of Conduct, Sensedia’s policies or laws and regulations.

When registering a report, you can choose to make it anonymously or identified. Even if you opt for anonymity, you will be able to follow the treatment of your record, as well as its outcome. Findings of the investigation and remedial action taken may remain confidential at Sensedia’s discretion.

Therefore, the privacy and confidentiality of those involved in the process will be respected to the maximum extent possible and the process will be conducted by Sensedia Compliance team, with the support of the Ethics and Culture Committee.

Sensedia does not tolerate any retaliation or reprisal against anyone who, in good faith, reports a possible violation.

Thus, “[We Hear You](#)” is the online tool that allows safe communication between you and Sensedia and is available in Portuguese, English and Spanish versions.

[Click here](#) if  
you need  
help!





## Still have questions?

Talk to the **HR** or the Compliance team  
for further orientation. =)



[Compliance@sensedia.com](mailto:Compliance@sensedia.com)