



POL-COR-001.2 Anti-Corruption and Anti-Bribery Policy

| Policy | | |
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Document Information

Issuer

| Area | Name | Position | Date | Signature |
|------------|------------------|--------------------------|------------|--|
| Compliance | Vanessa Siqueira | Chief Compliance Officer | 05/03/2026 |  <small>Vanessa Siqueira (5 de março de 2026 13:09:24 GMT-3)</small> |

Approver(s)

| Area | Name | Position | Date | Signature |
|-------------------|-----------------|-----------------------|------------|--|
| Subsidiary Leader | Otávio Argenton | Country Leader | 12/03/2026 |  <small>Otávio Argenton (12 de março de 2026 15:59:08 ADT)</small> |
| Finance | Joel Botelho | Head of Finance | 12/03/2026 |  <small>Joel Botelho (12 de março de 2026 17:58:57 ADT)</small> |
| Compliance | Corina Luck | Head Group Compliance | 11/03/2026 |  |

Document Revision History

| Version | Description |
|---------|---|
| 1.0 | Initial issue of the document. |
| 2.0 | Inclusion of Global Compliance Officer approval. |
| 3.0 | Exclusion of the term Policy Integrity in item 2.2. |
| 4.0 | Exclusion of the Federation Leader of the Integrity Committee. |
| 5.0 | Change the integrity line link. |
| 6.0 | Change of term "Compliance Function" to "Anti-Bribery Function" |



POL-COR-001.2 Anti-Corruption and Anti-Bribery Policy

References

| Identification | Description |
|-------------------------------|---|
| Brazilian Anti-Corruption Law | Federal Law No. 12,846 / 2013, sanctioned in August 2013 and which provide for the administrative and civil liability of legal entities for the practice of acts of corruption against public administration, national or foreign. |
| Corruption | It is the effect or act of corrupting someone or something with the purpose of obtaining advantages over others by means considered illegal or unlawful. |
| Bribe | Offering, promising, giving, accepting or soliciting an improper advantage of any value (which may be financial or non-financial) directly or indirectly, and regardless of location, in violation of applicable laws as an incentive or reward for a person acting or failing to act in relation to the performance of their obligations |

Definitions

| Term/Acronym | Definition |
|-----------------------|---|
| SGAS | ANTI-BRIBERY MANAGEMENT SYSTEM - Set of interrelated or interactive elements of an organization that seek to establish policies, controls and processes to achieve the objectives of preventing bribery practices |
| Public administration | Set of bodies and entities that manage and execute public businesses or services, through public officials, at the federal, state and municipal levels. |
| Public Agent | Any person who has legislative, administrative or judicial responsibility, or any person who exercises a public role for a public agency or a public company, or any agent or official of a national or international public organization, or any candidate for public office. |
| Integrity Committee | Committee formed by the Chief Compliance Officer, the Head of Finance and Country Leader, which aims to ensure the dissemination of ethical values, principles and conducts, as well as to ensure that they are complied with. Other participants may be invited, as required. |
| Undue advantage | The term covers any offer of anything of improper value made in a business context, for public agents, individuals or legal entities, directly or indirectly, for benefits without the right of SoftwareONE. |
| Anything of value | The term is broad, but it can be described as: promising, offering/giving or receiving, directly or indirectly, money or something of value, gifts, benefits and favors, provision of services that, in any other way, would have to be paid or acquired, contracts or other business opportunities, employment opportunities, medical expenses, education or any expenses related to the cost of living, offering business partnerships, travel, meals, accommodation, shopping or entertainment expenses to a public agent or business partner. |



POL-COR-001.2 Anti-Corruption and Anti-Bribery Policy

1.0 Objective

Based on the SoftwareONE Code of Conduct, establish the SoftwareONE Brasil and its Subsidiaries' Anti-Corruption and Anti-Bribery policy.

2.0 Description

2.1 General Points

This Policy, alongside SoftwareONE's Code of Conduct, consolidates the principles of our Organization in relation to legal responsibility and ethical business conduct, in line with other existing initiatives.

It also allows our employees to know and identify risk situations related to Law 12846/2013 - Brazilian Anti-Corruption Law.

The Anti-Corruption and Anti-Bribery Policy will be permanently disclosed to all employees, who must formally assume the commitment to comply with it, by signing the Term of Adhesion to the Anti-Corruption and Anti-Bribery Policy, via AdobeSign. In the same way, employees must know the terms of the Code of Conduct, which establishes the general principles on ethical standards, and accept them assuming the commitment to comply with the established there.

All Employees must observe the integrity standards set forth in this Policy and avoid interests and relationships that are potentially harmful or contrary to our ethical principles.

Ensuring compliance with the Anti-Bribery Management System and the SoftwareONE is the responsibility of all employees.

None of the employees or business partners acting on behalf of SoftwareONE will be penalized due to delay in the performance of their duties or loss of business, resulting from the refusal to pay or receive a bribe or to take any action foreseen as illegal in the Brazilian Anticorruption Law.

SoftwareONE executes its commercial and market relations practices in an ethical, transparent manner and in compliance with applicable laws.

SoftwareONE does not allow and tolerate any form of offering value to public agents and the private market in order to obtain undue advantages.

2.2 Anti-Bribery Policy

SoftwareONE, active in the portfolio management of software and cloud computing, holds the following items as fundamental standards of behavior:

- Bribery is prohibited;
- Comply with SoftwareONE's Anti-Corruption and Anti-Bribery Policy;
- Comply with other policies and procedures related to SoftwareONE's Anti-Bribery System;
- Comply with Brazilian corporate anti-corruption law 12.846/13 and other subscribed requirements applicable to the Organization;
- Meet the requirements of the Anti-Bribery Management System;
- Continuously improve the Anti-Bribery Management System.

If there is any knowledge or suspicion of bribery practices, employees are committed to reporting such a situation through confidential reporting channels, and no retaliation or sanctions will be tolerated against whistle-blowers who register in good faith.

SoftwareONE promotes a culture of Speak-Up, and any situation that seems wrong can be openly discussed between employees and their immediate superior or reported to the Integrity Committee. However, if it is the employee's preference, he / she may also choose to make an anonymous report via our Communication Hotline.



POL-COR-001.2 Anti-Corruption and Anti-Bribery Policy

SoftwareONE has an integrity Committee, which works independently to ensure the dissemination of ethical values, principles and conduct, as well as to ensure that they are complied with.

The Anti-Bribery Function is exercised by the Chief Compliance Officer (CCO) with total independence to deal with issues related to SoftwareONE's Anti-Bribery System, and reports to the Global Chief Compliance Officer and the Integrity Committee. Further details of the CCO authorities and responsibilities are defined in the POL-COR-001 Anti-Bribery Management System Policy.

Integrity Hotline:

<https://softwareone.integrityline.io/>

3.0 Responsibilities and Authorities

3.1 Integrity Committee

The Integrity Committee is responsible for direct action on this Policy:

- Ensure that the organization's strategy and SoftwareONE's Anti-Corruption and Anti-Bribery Policy are aligned;
- Assess the concrete or potential cases of violation of the Anti-Corruption and Anti-Bribery Policy, other policies and procedures and decide on the necessary actions;
- Periodically reassess the relevance and timelines of the precepts of the Anti-Corruption and Anti-Bribery Policy, as well as ensuring that the necessary actions for the disclosure of its contents and purposes are carried out;
- Set objectives related to the Anti-Corruption and Anti-Bribery Policy;
- Communicate SoftwareONE's Anti-Corruption and Anti-Bribery Policy internally and externally;
- Direct and support staff to contribute to the effectiveness of the Anti-Bribery Management System;
- Promote continuous improvement;
- Encourage the use of reporting procedures for suspicious and real bribes;
- Ensure that staff are not retaliated against, discriminated against or disciplined for reports made in good faith or based on a reasonable belief of violation or suspected violation of SoftwareONE's Anti-Bribery Policy, or for refusing to participate in bribery even if such refusal can lead to a business loss.

The Integrity Committee is committed to maintaining confidentiality about the identity of those who have reported and/or participated in the investigation into violation of the Anti-Corruption and Anti-Bribery Policy.

3.2 Chief Compliance Officer

The CCO has the responsibility and authority regarding this Policy to:

- Have access to all functions, records, property and personnel of SoftwareONE and its subsidiaries;
- Have full and free access to the Integrity Committee if any question or concern needs to be raised in relation to the bribe or the Anti-Bribery Management System and this Policy;
- Submit information related to the results and ongoing processes of reporting bribes to the Integrity Committee;



POL-COR-001.2 Anti-Corruption and Anti-Bribery Policy

- Guide SoftwareONE and its subsidiary professionals on issues related to integrity policies, procedures and conduct.
- Receive from the Global Chief Compliance Officer information on complaints occurred in the Brazil operation, reported in the Reporting Channel, as long as it is not related to itself.
- Support the Global Chief Compliance Officer in investigations.

3.3 Labour Relations

- Obtain the Term of Adhesion to the Anti-Corruption and Anti-Bribery Policy filled and signed via AdobeSign, or physically, as well as the SoftwareONE Code of Conduct.

3.4 Legal Location

- Support Chief Compliance Officer requests related to this Policy.

4.0 Penalties

All SoftwareONE Employees are required to comply with this policy, and the violation or non-compliance with the precepts described therein shall be considered a violation, which may result in the application of disciplinary measures.

5.0 Records

| Identification | Storage | Protection | Recovery | Retention | Order |
|---|-------------------------------------|------------|------------------|-----------------------------|-----------|
| Term of Adhesion to the Anti-Corruption and Anti-Bribery Policy - FOR.POL-COR-002.1 | Electronic files in Human Resources | Backup | Date of issuance | 5 years after year of issue | Eliminate |

Attachments

Not applicable

POL-COR-001.2 - Política Anticorrupção e Antissuborno - Inglês_v6

Relatório de auditoria final

2026-03-12

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