



unico

2025

Code of Ethics

Índice

| | | | |
|---|----|---|----|
| 1. Introduction to the Code of Ethics | 02 | 14. Information Security | 16 |
| 2. Institutional Message | 03 | 15. Workplace Environment: Conduct at UNICO Offices | 17 |
| 3. Way of Being: Culture and Values | 04 | 16. Internal Controls and Financial Statements | 21 |
| 4. Code of Ethics | 05 | 17. Travel and Expense Reimbursements | 22 |
| 5. Diversity | 06 | 18. Conflict of Interests | 23 |
| 6. Sustainability and Environment | 08 | 19. Donations and Sponsorships | 29 |
| 7. Ethics and Integrity | 09 | 20. Interaction with Public Agents | 30 |
| 8. Labor Laws | 10 | 21. Ethics and Sanctions Committee | 32 |
| 9. Political and Union Participation | 11 | 22. Ethics Channel | 33 |
| 10. Privacy | 12 | | |
| 11. Health and Safet | 13 | | |
| 12. Good practices on social media and events representing UNICO | 14 | | |
| 13. Use of Work Tools | 15 | | |

1. Introduction to the Code of Ethics

Our Code is our guide.

What it is

The Code of Ethics is a document that brings together Unico's principles and values. It serves to guide and define ethical behavior standards, helping to maintain transparency and respect for laws and workplace norms.

Objective

To guide our daily decisions and actions, align our company principles, and clarify how we expect our teams to behave with all individuals with whom we interact.

Target Audience

Our code applies to all employees and third parties who work with us, including Seres, contracted professionals, and partners.

2. Institutional Message



We are Unico: sharing values and inspiring is our way of making things happen.

We are the company transforming society through Reliable Digital Identity. We envision a future where everything that makes us unique is sufficient to prove who we are, expanding our opportunities and enabling experiences anywhere in the world, without borders.

Our solutions simplify the lives of thousands of people by enabling simple and secure access to services and transactions. Together, we are building a world with more transparent, fair, and fluid relationships between people and companies.

To achieve this, integrity and trust must be at the core of our actions, both within and outside Unico. We want to be remembered not only for the innovation and impact we generate but also for how we achieve it: with transparency, responsibility, and a firm commitment to the highest ethical standards. Here, we do the right thing, the right way!

Our Code of Ethics goes beyond a list of rules; it is a guide with everything you need to know to make decisions aligned with our values and the future vision we want to achieve. Let's embark on this journey together! Furthermore, all our policies and procedures are available on Unico's Intranet, where you will find all the details of our guidelines.

Unico Ethics Committee

3. Way of Being: Culture and Values



We are shaped by the culture and values we build.

At Unico, we are driven by the boldness to lead the construction of the future, constantly innovating and generating transformative impact, creating value, and establishing solid processes for people's daily lives. Here, the concept of teamwork goes beyond words. It is what connects us and allows us to create together, with autonomy and leadership, to solve problems and make decisions, always considering what is best for the business and for people.

We face challenges and changes as opportunities to grow and reinvent ourselves. For us, resilience is not about passively resisting, but about acting, adapting, and deciding together the next step, even in the face of challenges.

We believe in a transparent environment where we are not afraid of challenging conversations. Learning and open communication are the foundation for us to grow with respect, clarity, and maturity.

We do the right thing, the right way, with ethics and integrity, because we know that our choices reflect who we are and result in the future we want to build. This is how, every day, we shape Unico and expand our impact on the world.



4. Code of Ethics

Our way of doing the right thing and living better.

Since our founding, we believe that doing the right thing the right way is what guides us. Unico dreams big, and to get there, we are committed to acting and working with ethics, integrity, and transparency, being agents of change in the markets and communities where we operate.

This Code summarizes what we consider essential for everyone who wants to embark on this dream with Unico. It is, in a way, our "constitution," and it is everyone's duty to know and follow its guidelines. If you encounter anything that goes against what is stated here in the code, report it! Unico has an Ethics Channel managed by an external company, which can be accessed anonymously, guarantees confidentiality, and does not retaliate against those who report in good faith. Bad-faith complaints will be subject to investigation procedures and sanctions by the Ethics Committee.

Building an ethical, safe, and transparent environment is everyone's duty. Therefore, knowing and being aware of this document is mandatory. The guidelines apply to all Unico companies and businesses, and to the individuals who comprise them, regardless of position, function, or tenure. They also apply to contracted professionals and partners who work on behalf of Unico. Anyone who does not follow the guidelines will be subject to applicable measures and sanctions provided by law.



5. Diversity

Respecting diversity and embracing differences makes us unique.

We believe that our individual talents complement each other to create something much greater, valuing differences and promoting an inclusive culture. In other words, it is this diversity in the workplace that makes us unique.

In our offices or virtual spaces, we want to build places where you can feel safe and confident to share your ideas, opinions, and everything that makes you unique. We expect everyone to treat each other with respect and dignity.

We do not tolerate any type of prejudice or discrimination, whether based on sexual orientation, ethnicity, age, gender, religion, disability, origin, or any other characteristic protected by laws or norms, and we combat all of them.

Discrimination occurs when there is a distinction, exclusion, rejection, restriction, or preference based on race, ethnicity, gender, religion, political opinion, family status, physical or mental health status, disability, nationality, birthplace, age, social origin, sexual orientation, sexuality, physical characteristic, or other condition that causes stereotypes or prejudices ("personal condition"), in order to alter equality of opportunity or treatment in the workplace.

It can be practiced by anyone within the workplace, regardless of their position, and is motivated by a Personal Condition of the discriminated person. Whoever practices discrimination makes a negative value judgment about such Personal Condition and, from then on, promotes differentiated treatment for the discriminated person in the workplace. Unico does not tolerate discrimination!



5. Diversity

Respecting diversity and embracing differences makes us unique.

We have a PeopleX area that addresses Diversity, Equity, and Inclusion topics and frequently promotes campaigns, actions, and communications. We encourage everyone to participate and help promote a diverse, inclusive, and egalitarian work environment.

Cases of racism, xenophobia, LGBTQIAP+phobia, misogyny, machismo, ableism, or any other prejudice will be treated seriously and will not be tolerated by Unico.

If you experience, witness, or become aware of any situation of prejudice or discrimination at Unico or involving Unico personnel, please contact our Ethics Channel.

Remember: building a diverse and safe work environment is everyone's responsibility.

The training, campaigns, and communications we conduct, whether during onboarding or throughout the year, will provide more information and details about combating discrimination.

6. Sustainability and Environment



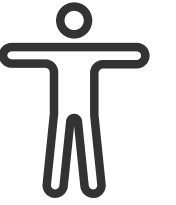
Acting sustainably is more than a practice; it is our commitment to the future.

At Unico, we know that a healthy ecosystem is the basis for everyone's quality of life and well-being. We act as agents of change in the communities where we are present and reaffirm our commitment to sustainability and the environment, respecting the laws of the countries where we operate.

As signatories of the UN Global Compact, we assume our commitment to the Ten Universal Principles, which cover Human Rights, Labor Rights, Environmental Protection, and Anti-Corruption. We carry out actions that help address societal challenges and bring this idea to all our business relationships, including our clients, partners, and suppliers.

We are also seeking ways to reduce our environmental impact. In our offices, we adopt practices of water reuse, energy saving, recycling, and proper waste disposal. We offset the carbon emissions from our business trips and the delivery of equipment to Seres and external collaborators.

7. Ethics and Integrity



Choosing the right path never goes out of style: it is what strengthens our business.

Doing the right thing the right way is more than a value; it is our way of being. It is present in everything we do, from our procedures to how we present ourselves and position ourselves in the market. At Unico, we are committed to acting with ethics and integrity, always complying with laws and regulations, especially those related to combating corruption and money laundering. For example, anti-corruption laws in Brazil, Mexico, and all regions where we operate. These include, but are not limited to:

- Brazilian Law 12.843/2013;
- Mexico - General Law of Administrative Responsibilities - LGRA;
- EUA - United States Foreign Corrupt Practices Act.

Our commitment is to honesty, good faith, and transparency in all our interactions, with public agents, private entities, and any other involved party. We always strive to act ethically and responsibly, building relationships based on mutual respect.

This Code of Ethics is our ally. If you have any doubts about a possible illegal practice, consult it. We do not tolerate any act of corruption! If you suspect, witness, or become aware of any illegal practice committed by someone inside or outside Unico that involves our activities and businesses, please contact our Ethics Channel.

8. Labor Laws



We defend labor rights in a safe, healthy, and respectful environment.

Our activities respect labor legislation in all countries where we operate and do business. We guarantee equal employment conditions, free from any form of distinction and discrimination, and promote fair and dignified remuneration, in addition to access to training and promotion.

We prohibit the use of child labor and do not condone any practices analogous to forced labor, human trafficking, and any type of modern slavery. We are committed to making efforts to ensure that operations are free from such practices, whether in relation to Unico's own personnel or service providers.

Employees receive salaries and benefits in accordance with current legislation, the terms of collective agreements and conventions, judicial decisions, and terms of conduct adjustment (TAC), whenever applicable.

We have initiatives aimed at salary equity and gender equity programs that support and value the journey of women at Unico. We also ensure the collection of labor charges, social security contributions, and taxes related to payroll.

9. Political and Union Participation



We respect individual choices and expect attitudes guided by common sense and responsibility.

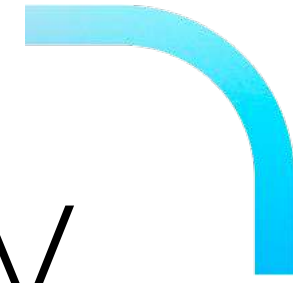
At Unico, we believe in the importance of freedom of expression and the right of each individual to actively participate in society. However, although you are free to express your opinions, support electoral campaigns, join political parties, and run for public office, Unico is a non-partisan company, meaning it does not adopt political positions. Therefore, we do not allow you to use Unico's resources, tools, or spaces for political-partisan activities, such as conducting electoral campaigns, partisan propaganda, or attempting to win votes.

We know that conversations about politics happen daily, and that is natural. But we expect you to exercise good judgment: if this topic arises during lunches, coffee breaks, or meetings, respect the opinions of colleagues, including those who prefer not to take a stance or discuss the matter.

Now, if you intend to run for public office in the upcoming elections, inform the Compliance area by the candidate registration date. During the campaign, you will need to take an unpaid leave of absence from your position. If elected, the termination process will begin. Otherwise, you may return to your position without prejudice.

Finally, it is also important to state that Unico respects and supports union participation and class councils in accordance with legislation.

10. Privacy



We handle personal data ethically, carefully, and securely.

Data is people to Unico, and protecting it is one of our core principles. We believe that everyone should have control over their data through a unique digital identity. This is only possible because our business is based on data security, privacy, and protection.

We respect legal, regulatory, and contractual requirements in all regions and countries where we operate. We also follow the guidelines of applicable Data Protection Authorities, such as the National Data Protection Authority (ANPD). The protection of data subjects and compliance with these requirements are essential for our business. Therefore, it is everyone's duty to participate in training, actions, read and understand our policies, processes, and procedures regarding Privacy, Information Security, and Data Protection.

Privacy and data protection are at the core of what we do, being considered from the creation of our products, with the adoption of the privacy by design concept. We collect data only for specific, clear, and legitimate purposes, retaining it for the necessary time for these purposes.

Unico has a DPO (Data Protection Officer) and a dedicated Privacy team to ensure that we follow the best and most advanced practices in data privacy and protection. This team is responsible for keeping us aligned with market laws and regulations, and therefore also conducts training and communication campaigns on the topic.

If there is any type of violation or infraction, such as unauthorized access, data leakage, or improper processing of data and/or personal information, appropriate measures will be taken and applied.

11. Health and Safety



We care for our health and safety at work, respecting our physical integrity and that of others.

We are committed to ensuring a safe and healthy environment for everyone who frequents our offices and workspaces. Therefore, Unico follows all health and safety laws, in addition to adopting norms, procedures, and good practices related to Occupational, Mental, and Work Safety in all our facilities.

In accordance with legislation, Unico annually elects a CIPA (Internal Accident Prevention Commission), which is trained and also organizes training and communication campaigns on the topics set forth in the law.

We expect you to take care of your physical and mental health and safety. And also, take care of your team and everyone you interact with in your work activities. And, if you notice any incident related to these topics in the workplace, notify your leadership and the Compliance area.

12. Good practices on social media and events representing Unico



What we share is more powerful than it seems, so we must act with common sense on social media.

Our approach to external communication and social media is designed to protect Unico's integrity and reputation. We have an External Communication team that manages our social media and speaks officially on behalf of the company. Therefore, you should not respond to criticism and negative comments about Unico in posts. Only our institutional page can do this.

Nowadays, each person's profile is analyzed by their social media posts. If you mention where you work, you need to be extra careful. We respect freedom of expression, but as an employee, your posts and behaviors can be associated with the company. Therefore, it is forbidden to respond on social media on behalf of Unico, disclose confidential information, or post inappropriate or offensive content that could harm Unico.

Cases of breach of confidentiality, discrimination, harassment, and offenses on social media go against the principles of this Code.

Additionally, any participation in lectures, seminars, external events (online or in-person) on behalf of Unico must be approved by the External Communication team. The same applies to press contacts. Interviews can only be granted with the accompaniment of a member of this team.

13. Use of Work Tools



We protect data and information, which is why we manage corporate tools.

When we talk about work tools, we are referring to everything you use in your daily professional life provided by Unico, such as hardware, software, documents (digital or printed), among others. Each of us is responsible for the proper use of resources aligned with our policies, processes, procedures, and guidelines disclosed in our institutional channels. Therefore, everyone must know and strictly follow our Technology, Information Security, and Privacy guidelines; in addition to participating in training and promoting awareness actions.

Unico uses solutions for monitoring tools, devices, and its environment, whether physical or virtual. This monitoring is in accordance with approved rules, communicated, and disclosed in our institutional channels when applicable. For information security reasons, our resources must be used exclusively for the execution of your work activities at Unico.

In case of misuse, compromise, data leakage, or any infraction that puts Unico's intellectual property at risk, those involved will be subject to applicable measures. Always consult the policies and procedures on the Intranet and stay tuned to our institutional channels.

In case of doubts, contact the Compliance area. Be Unico to know more!

14. Information Security



Preservar e proteger dados e ativos é essencial em todas as nossas ações diárias.

Data and information are Unico's main asset, our "secret sauce." That's why we always invest in new security technologies. However, you remain our greatest ally in protecting the company and our assets.

It is essential that you know the Information Security Policies, complete mandatory training, and safeguard all information assets such as documents, spreadsheets, presentations, source codes, passwords, and other company assets with which you interact in your professional activities.

You must protect the intellectual property produced at Unico and keep it confidential, even after the termination of the employment relationship. All innovations created in physical or virtual environments or with equipment and software provided by the company belong to Unico and must remain our assets, even after your departure.

During and after the employment relationship, you must treat all information as confidential, including commercial, financial, operational, legal, technological data, business secrets, and any other information related to the company's activities and business.

15. Workplace Environment: Conduct at Unico Offices



A good environment doesn't happen by chance. It stems from our consciousness and how we choose to be together.

Respect

Unico's offices are spaces for meetings, connections, exchange of ideas, and strengthening our culture and values. They were designed to encourage interaction and ensure everyone feels comfortable and secure.

We are committed to creating a respectful and inclusive work environment for everyone, regardless of position and hierarchy. We do not tolerate any type of discrimination or prejudice, whether in our virtual or physical spaces.

Therefore, leadership positions must ensure that their team members have a work environment free from insinuations, restrictions, prejudices, and/or discrimination of any nature. Furthermore, they must manage their teams respectfully, courteously, and with urbanity, not using abusive language, not subjecting them to humiliating or embarrassing situations, not making criticisms or bad jokes, including jokes and/or comments with sexual connotations, not isolating team members, and not withholding tasks or functions due to punishment and/or mere personal preference.



15. Workplace Environment: Conduct at Unico Offices

A good environment doesn't happen by chance. It stems from our consciousness and how we choose to be together.

Creating a respectful and inclusive work environment involves combating harassment in all its forms, especially moral and sexual harassment.

Sexual harassment in the workplace can be defined as conduct of a sexual nature practiced in the workplace against someone's will or without their express consent, in verbal, non-verbal, or physical forms, manifested by words, gestures, physical contact, or other means, with the effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, or destabilizing environment. In other words, it is a reprehensible behavior of a sexual nature, considered unpleasant, offensive, and impertinent.

It is not necessary for the practice of sexual harassment in the workplace to occur exclusively on Unico's premises; it can occur due to a work relationship. Sexual harassment can occur in relation to a person who is providing services remotely, for example. Furthermore, even if outside the work environment and/or working hours, conduct may be configured as sexual harassment if it is related to work.



15. Workplace Environment: Conduct at Unico Offices

A good environment doesn't happen by chance. It stems from our consciousness and how we choose to be together.

Moral harassment is an abusive, frequent, and repetitive conduct, manifested verbally, in writing, or non-verbally, through words, acts, omissions, gestures, or behaviors that humiliate, embarrass, and/or disqualify a person or group, affecting their dignity and physical and mental health, and impacting their professional and personal life.

It is a form of violence that aims to emotionally and professionally destabilize the person and can occur through direct actions (among others, accusations, insults, shouting, public humiliations) and indirect actions (among others, spreading rumors, isolation, refusal to communicate, gossip, and social exclusion). This phenomenon can occur subtly, disguised, and undeclared.

Moral harassment is a practice for which time and duration are important. It is not a one-time act of violence. The actions that characterize moral harassment are frequent, repeated, and reproduced over time.

Sexual harassment and moral harassment are vehemently combated by Unico and are not tolerated under any circumstances. The training, campaigns, and communications we conduct, whether during onboarding or throughout the year, will provide more information and details about combating harassment.



15. Workplace Environment: Conduct at Unico Offices

A good environment doesn't happen by chance. It stems from our consciousness and how we choose to be together.

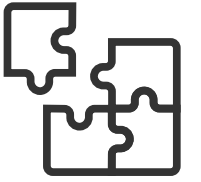
Alcohol and Drugs

The use of illegal substances and the possession of drugs on our premises is strictly prohibited. We also do not accept any employee performing their professional activities while intoxicated or under the influence of illicit drugs, nor remaining on Unico premises under such conditions. The consumption of alcoholic beverages in offices may occur occasionally, provided they are supplied by Unico and comply with legislation. Consumption must occur at appropriate times, and you cannot resume work immediately afterward, ensuring your safety and that of others. Remember: if you drink in the offices, do not drive!

Lost and Found

Take care of your belongings. We know that unforeseen events happen, but Unico cannot be held responsible for items lost in the offices.

Now, if you find a lost item, contact the Facilities team. They are responsible for managing our offices and are always ready to help as needed.



16. Internal Controls and Financial Statements

Properly documenting our work helps us achieve our objectives.

Unico follows all applicable laws and accounting standards in its financial records, always committed to documenting its transactions with accuracy and transparency.

To achieve this, it is important that you respect the policies, deadlines, and financial guidelines applicable to all purchasing processes, accounting closing, and preparation and disclosure of financial statements. This helps ensure that financial information, expenses, revenues, and taxes are treated correctly and appropriately in our controls.

Risk management through the implementation and monitoring of internal controls, external or internal audits, policies and procedures, and the Compliance Program exists to provide reliability and business continuity for Unico to all interested parties. By following the established guidelines, you contribute to achieving our objectives, commitments, and values.

17. Travel and Expense Reimbursements



We manage our expenses responsibly, ensuring they are necessary and avoiding excesses.

Accurate, clear, and honest information is vital for us to meet our goals, financial obligations, and administrative duties. Therefore, we expect each of us to avoid unnecessary expenses, unauthorized expenses, or excessive expenses.

All expenses, such as accommodation, food, transportation, or others, must have fiscal receipts for accountability upon return. Remember: expenses outside policies or without justification may be denied. If in doubt, speak with your leader or consult the Finance or Facilities team before incurring the expense.

During corporate travel — whether for business, visits, programs, or internal awards — it is important to follow the rules for using corporate cards, reimbursement, and using taxis or mobility apps, always respecting the current Finance and Facilities policies.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

Conflict of interest is a form of corruption and one of the topics we must always be aware of in our daily lives at Unico. It occurs when a personal interest influences our way of working or making professional decisions that are better for the company.

These conflicts of interest can lead to fraud, corruption, and negatively affect the environment and relationships within the company. Want an example? Imagine a manager promoting a relative or hiring a company with which they have a family connection, without following the proper competitive bidding process.

To avoid such situations, we list below some important rules on the topic. To access the complete guidelines, consult our Conflict of Interest Policy.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

Affective/Family Relationships

At Unico, referrals and hiring of family members or individuals with whom you have an affective relationship are permitted, provided there is no hierarchical relationship between you. In other words, no one can have authority over or be directly subordinate to the other.

We recommend that you do not work on the same team as a family member or someone with whom you have an affective bond, as this can impact the performance of everyone involved, including your colleagues. If a relationship arises during your time at Unico, inform your leader and complete the Conflict of Interest Compliance form.

You should also avoid participating in professional evaluations of anyone with whom you have a family or affective relationship. Additionally, if invited to forums or committees that could generate conflict, notify the PeopleX team and recuse yourself from these discussions.

Furthermore: if you have a family or affective relationship with someone who works at a competing company, client, or supplier, notify the Compliance area by filling out the Conflict of Interest form. Do not participate in negotiations, price discussions, or any stage of the process involving that person.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

Gifts, Presents, Hospitality, and Entertainment

Gifts, presents, dinners, event tickets, congresses, competitions, or shows are common practices in the corporate world. But be careful! Offering or accepting courtesies from business partners requires attention, as it can be interpreted as an undue advantage or even corporate corruption.

Before offering anything, you need to know the rules of the business partner. Check their company's Code of Ethics to find out what values are permitted. Additionally, every gift, present, hospitality, or entertainment offered by Unico must be registered in the gifts and presents form. Don't forget: acceptance must be formalized by email, in which the recipient confirms that the Compliance or Legal department is aware of the receipt.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

And if you are the recipient?

Before accepting any courtesy, pause and ask yourself: does this appear to be a Conflict of Interest? Is the offeror expecting something in return? If the answer is "yes" or even "maybe," the best course of action is to decline.

All receipts of presents, hospitality, or entertainment must be registered in Unico's gifts and presents form and communicated to your direct manager, in addition to respecting our values and policies.

What if the business partner is a public agent?

Anti-corruption laws prohibit the offering of undue advantages to public agents, with severe penalties for those involved. In general, at Unico, we do not allow any type of gift, hospitality, or benefit in such cases. Any exception requires approval from the Compliance and Government Relations departments.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

Other professional and educational activities

Do you have other professional activities besides Unico? Whether it's a second formal job, freelance work, MEI, consulting, or even participation in another company, this can generate a conflict of interest. Therefore, it is essential to follow our guidelines. Before starting a regular and continuous activity outside Unico, check if your contract allows it, as some contracts stipulate exclusivity. Contact the Compliance department to verify your situation. If your contract allows a second activity, follow these rules:

1. The new activity cannot coincide with your work hours at Unico;
2. It cannot be with competing companies or in the same market segment as Unico;
3. The activity must be reported to Compliance, PeopleX, and your direct manager;
4. Under no circumstances can it be performed using Unico's tools or resources.

18. Conflict of Interests



Our policies help us make the best decisions and stay on the right path.

Investments

You cannot be a partner (not even a minority shareholder) in competing companies, clients, or suppliers. The only exception is for publicly traded companies, provided your stake does not exceed 2% of the share capital.

Academic activities and events

If you are a professor or speaker, be careful not to disclose confidential information about Unico, such as processes or products, in your participation in events, seminars, classes, or lectures. If you are unsure whether the information you intend to use is public, speak with Compliance first.

Never forget: a Conflict of Interest is not always a violation of the Code of Ethics, but knowing about it and not communicating it is. Report possible incidents using our form and read the Conflict of Interest Policy.

19. Donations and Sponsorships



We carefully analyze each donation or sponsorship to ensure clarity and understanding for all parties involved.

A donation is a voluntary contribution made without expectation of return. At Unico, donations are only made to legitimate, reliable institutions that account for the use of funds, products, or services provided. We do not make donations to individuals; any exception must be approved by the Compliance department.

Sponsorship, on the other hand, involves receiving compensation in exchange for the value, product, or service offered. All sponsorships must be approved by Marketing, registered in the correct accounting account, and have a clear commercial or strategic justification for Unico.

The Compliance department conducts due diligence (prior analysis), meaning the analysis of institutions receiving our donations and sponsorships, and has the power to veto any operation if risks are identified for Unico.

No sponsorship or donation can be used to influence competitive processes. We also do not make donations to political parties or candidates, always upholding our values and ethical principles. Want to know more? Consult our Donations and Sponsorships Policy.

20. Interaction with Public Agents



Our relationship with public agents must always be ethical and transparent, reinforcing our commitment to the law.

In recent years, many serious infractions have occurred in the relationship between public agents and private companies. Corruption is characterized as a set of illicit practices in this type of relationship. Therefore, interaction with public agents is a delicate topic for any company, and at Unico, it is no different.

20. Interaction with Public Agents



Our relationship with public agents must always be ethical and transparent, reinforcing our commitment to the law.

Here, only the Government Relations team is authorized to represent and speak officially on behalf of Unico with public authorities. However, in your daily activities, you may need to interact with public agents, whether as clients, suppliers, or regulators. Therefore, pay attention to the following guidelines:

- **Communicate in advance:** if you have a meeting scheduled with a public agent, notify the Compliance and Public Policy teams. Without the approval of these areas, you cannot represent Unico before public agents;
- **No gifts or advantages:** do not pay for meals, gasoline, taxis, or offer gifts, presents, or hospitality to public agents. Any exception requires approval from the Compliance team;
- **Well-documented meetings:** meetings with public agents must be formalized by email, clearly explaining the objective, topics to be discussed, and attendees. Whenever possible, take minutes of what was discussed and never go alone. We recommend that at least two Unico employees be present.

Report irregularities: during an interaction, if a public agent indicates that the handling of an issue depends on any type of benefit or advantage, end the conversation immediately and report the situation to the Compliance team. And, if you witness or hear about any insinuation regarding undue advantage or bribery, report it immediately through our Ethics Channel.

21. Ethics and Sanctions Committee



Ethics guides us, therefore caring for ethics means caring for all of us.

We have an Ethics Committee, which meets periodically to discuss and address infractions of this code and Unico's policies; in addition to being the guardian of this code. The rules and structure of the Ethics Committee are defined in an internal regulation approved by Unico's Board of Directors, based on the committee's own proposal.

All suspicions, complaints, or reports will be investigated according to the guidelines of our Internal Procedure for Receiving and Investigating Complaints.

Violations and infractions of the Code of Ethics will be subject to the application of applicable sanctions and measures, which may vary depending on the scenario, such as warnings, suspensions, educational retraining, termination (with or without just cause), contract rescission, among others.



22. Ethics Channel

A secure, confidential, and anonymous channel for anyone to report conduct not aligned with our Code of Ethics.

The foundation for Unico's strength and continuity lies in the commitment of everyone to our Code of Ethics. If, for any reason, you suspect a possible violation of our rules, laws, or norms, it is essential that this be communicated quickly and clearly.

We believe that everyone should feel safe to tell us what is happening. You can speak with your manager or report through our Ethics Channel.

Furthermore, it is essential that all communications be made in good faith. To ensure that the investigation is fair and correct, we follow the following principles:

1. Anonymity will be guaranteed, unless the whistleblower expressly states that they wish to be identified;
2. Confidentiality, impartiality, and independence of the entire investigation process will also be guaranteed. All complaints will be initially evaluated, but those that do not minimally present elements that allow the identification of the alleged agent and the reported situation may be disregarded;
3. Bad-faith complaints, with the intention of harming someone, may lead to disciplinary sanctions;
4. Any attempt at retaliation will also be treated seriously and may lead to sanctions.

Unico values an ethical and transparent environment, therefore any doubt or concern should be communicated responsibly. The training, campaigns, and communications that we conduct, whether during onboarding or throughout the year, will provide more information and details about the ethics channel and how to report through it.

Classification and Version Control

This document is classified for public use.

| Version | Elaboration | Review | Approval | Approval Date |
|---------|-------------|--|-------------------|---------------|
| 2.0 | Compliance | Head of Risk, Audit and Compliance Management | Ethics Cmittee | 16/04/2025 |

unico