

CONFLICT OF INTEREST POLICY

1. Objective	1
2. Scope and applicability.....	1
3. Terms and definitions	2
4. Roles and responsibilities	3
5. General guidelines.....	4
5.1. External work for other companies or as a freelancer	5
5.2. Shareholding and Board Participation	5
5.3. Relatives or Persons with a Close or Romantic Relationship at Unico	6
5.4. Relatives or Persons with a Close or Romantic Relationship at Clients, Third Parties, or Competitors.....	7
5.5. Relatives or Persons with a Close or Romantic Relationship in Public Entities.....	8
5.6. Hiring of Public Agent or Former Public Agent	8
5.7. Development of Academic Work, Participation in Events, and Volunteering.....	9
5.8. Disclosure of potential conflict of interest situations.....	9
5.9. Situations not covered by this Policy	10
5.10. Applicable disciplinary measures	10
5.11. Assessment of possible conflicts of interest	10
6. Background documents.....	10
7. Final considerations	10
8. Review and Approval.....	11

1. Objective

This Policy establishes guidelines and procedures for the prevention of risks arising from situations that may characterize a conflict of interest, to be observed by all employees (“Seres”) and Third Parties acting on behalf of or for the benefit of Unico.

2. Scope and applicability

This Policy applies to all Unico Seres, in Brazil or abroad, as well as to Third Parties who have a relationship with Unico.

3. Terms and definitions

For the purposes of this Policy, the terms/expressions below have the meaning assigned to them in this section:

Public Agent	Any individual, national or foreign, who, even temporarily or without remuneration: (i) holds a position, employment, or public function at any level or sphere of government (Federal, State, or Municipal, in the Executive, Legislative, or Judicial Branches); (ii) holds a position, employment, or function in state entities or in legal entities directly or indirectly controlled by the public authorities (i.e., public or mixed-capital companies); (iii) works for a service provider contracted or agreed for the execution of typical Public Administration activity; (iv) is a leader of a political party or candidate for public office; or (v) is an employee of an international public organization or diplomatic representation.
Private Employee	Any individual who works, holds a position, or represents a private entity that interacts with Unico. This includes employees of Unico's clients, partners, or suppliers who operate in the private sector.
Relative	Refers to the spouse (including husband, wife, and partners in a conjugal relationship) as well as relatives in a straight line, collateral, or by affinity up to the 4th degree. Relatives in a straight and collateral line are: father, mother, and child (1st degree); siblings, grandparents, and grandchildren (2nd degree); uncles, aunts, nephews, nieces, great-grandparents, and great-grandchildren (3rd degree); cousins, great-great-grandparents, great-great-grandchildren, grand-uncles, and grand-nieces (4th degree). Relatives by affinity are: parents-in-law, son-in-law/daughter-in-law, brothers-in-law, sisters-in-law, stepfathers/stepmothers, and stepchildren.
Shareholding	Refers to the maintenance of any equity title of a legal entity, conferring to its holder all the rights and duties of a partner, limited to the respective participation in the share capital.
Person of Close or Romantic Relationship	Refers to a person of close relationship to the Unico Ser, including close friends, godfathers, godmothers, people with whom the Unico Ser has a partnership, and people with whom the Unico Ser maintains a romantic relationship (boyfriends/girlfriends or fiancés), as well as the mother or father of their common child.

Public Authorities	Any public entity in general, at any level or sphere of government (Federal, State, or Municipal, in the Executive, Legislative, or Judicial Branches), whether national or foreign, including international public organizations. It also includes public foundations, public companies, mixed-economy companies, or other types of entities wholly or partially controlled by the government.
Seres	Every person who maintains a statutory or employment bond with Unico. This includes members of the board of directors, partners, directors, employees (fixed or indefinite contract), or interns/apprentices.
Third Party	Any Unico representative and/or contractor acting on its behalf, interest, or benefit, including, but not limited to: a) Partners, consulting firms, suppliers, customs brokers, law firms, and/or any other service provider; b) Client using Unico's technology as a component of a tool, device, software, and/or any other type of own product.
Undue Advantage	Should be interpreted broadly and includes any item (tangible or intangible) that has value or can generate a benefit or advantage to the recipient, including, but not limited to: money, gifts, giveaways, trips, hospitality, entertainment, favors, services, promises, donations, job vacancies, among others.

4. Roles and responsibilities

Area	Responsibilities
Internal Audit	Monitor and audit the effectiveness of the guidelines set forth in this Policy.
Compliance	- Clarify any questions related to this Policy; - Establish, execute, and improve the necessary procedures for its implementation, conflict of interest assessment, and compliance with this policy; - Analyze, approve, or reject exceptions to this policy and forward rejections for analysis by the Ethics Committee; - Verify compliance with and any violations of this Policy; - Monitor the effectiveness of the Policy's guidelines in Unico's daily operations, through controls, processes, and the Ethics Channel;

	• Conduct training and communication campaigns on the guidelines provided in this Policy.
Ethics Committee	• Analyze, approve, or reject exceptions to this policy forwarded by the Compliance team; • Supervise compliance with this policy together with the Compliance area through reports.
External communication	• Evaluate participation in events, spokespersons, and the use of Unico's logos, images, and brand.
Talent Acquisition	• Ensure that all candidates have their Conflict of Interest Assessment completed prior to accepting a job offer.
Seres	• Disclose to the Compliance team any situation that could be characterized as a conflict of interest; • Complete and update the Conflict of Interest Form whenever necessary; • Respect and disseminate the guidelines defined in this Policy; • Complete the training and qualifications related to this Policy.
Business Partner	• Guide Seres and managers on the proper compliance with this Policy; • Promote and support managers in cases where a conflict of interest situation is identified and communicated to them for the proper follow-up of the Seres; • Address any questions, suggestions, and improvements regarding the procedures and guidelines of this policy to the Compliance team.
Managers	• Ensure that all Seres on their team complete the Conflict of Interest Assessment form; • Follow up with the Seres on their team when a conflict of interest situation is identified and communicated; • Address any questions, suggestions, and improvements regarding the procedures and guidelines of this policy to the Compliance team.

5. General guidelines

Conflicts of interest generally occur in situations where private interests (such as financial, family, business, political, or personal interests) could compromise or, at least,

cast doubt on the ability to perform professional duties and obligations objectively, impartially, and in the best interest of Unico.

Seres, partners, suppliers, and service providers must act impartially and objectively, always in the best interest of Unico, not allowing private interests, or those of Relatives or Persons with a Close or Romantic Relationship, or any Third Parties to prevail over the interests of Unico.

Therefore, any situation of a real or potential Conflict of Interest must be immediately disclosed by Seres and Third Parties to the Compliance team, so that any risk mitigation measures can be implemented.

5.1. External work for other companies or as a freelancer

At Unico, we value your development and know that other professional challenges may be part of your journey. Therefore, we have established clear and objective guidelines for such cases to ensure transparency and integrity.

Unico allows you to have another job or work as a freelancer, provided that:

- **Reported and Approved:** any work for other companies or as a freelancer is communicated to and approved by the Compliance area.
- **No Conflict of Interest:** the work is not for companies that are in the technology sector, or are clients, partners, suppliers, service providers, or competitors of Unico.
- **No Impact on Productivity:** the working hours do not conflict with your hours at Unico or harm your responsibilities at Unico.
- **Use of Resources:** you will not use any Unico tools, equipment, or facilities (computers, software, meeting rooms, etc.) for external activities.
- **Confidentiality:** no information obtained during your work at Unico (whether from Unico, clients, or third parties) will be used in your other jobs.
- **Intellectual Property:** no work developed by you, by Unico's suppliers and service providers, or by any colleague may be replicated or used in other instances.
- **Flexibility:** activities with a workload of up to twenty hours per week will be permitted.

The following will be considered incompatible and, therefore, are not permitted:

- Activities that involve the same function you perform at Unico.
- Work involving the creation of technology products and services.
- Any work for direct competitors of Unico.
- A workload exceeding 20 hours per week.

5.2. Shareholding and Board Participation

Unico will allow "Seres" to **hold shares** in other companies, provided they follow the guidelines below.

a. Participation in Publicly Traded Companies

- Shareholding in any client, partner, supplier, or service provider of Unico is allowed, as long as the company is publicly traded.
- In such cases, the participation must be limited to 2% of the company's issued shares.
- The transactions must have been negotiated exclusively on a stock exchange, under normal market conditions.
- If your participation exceeds the 2% limit, the acquisition will require express authorization from Compliance and, depending on the case, from the Ethics Committee.
- It is crucial that there is no involvement in the management of these companies and no conflict of interest.

b. Participation in Boards and Committees

- Participation in up to five boards and committees is permitted, provided they are not in companies that are clients, partners, suppliers, or direct competitors of Unico.
- This participation must be pre-approved by the Compliance team or the Ethics Committee.

c. Prohibitions and Restrictions

- It is prohibited to invest directly in Unico's direct competitors or in strategic clients/suppliers. The exception is investments in publicly traded companies, which must respect the 2% limit to avoid conflicts.
- You may not be a partner, owner, board member, or have influence in technology companies that are direct competitors of Unico or operate in the same segment.

Shares acquired and participation in Boards and Committees prior to the Ser's entry into Unico or that occur during the performance of activities in violation of the above guidelines must be promptly reported to the Compliance team so that any necessary measures can be taken safely and responsibly.

If you already own shares or participate in Boards/Committees, report it promptly to the Compliance team. This will allow the necessary measures to be taken safely and responsibly.

5.3. Relatives or Persons with a Close or Romantic Relationship at Unico

Unico will allow **relatives and people in close or romantic relationships to work simultaneously** at the company. However, the guidelines below must be observed in such situations:

- a) No Subordination: Relatives or people in a relationship may not have a direct or indirect reporting line up to the 2nd degree (e.g., a manager and a vice president in the same area).
- b) No Influence: Under no circumstances may they use the relationship to improperly influence each other's work or professional development.
- c) Mandatory Disclosure: Any relationship, regardless of the degree, must be immediately communicated to the Compliance and People teams. For new hires, the information must be provided before accepting the job offer. Relationships that arise during employment at the company must also be promptly reported.
- d) No Favoritism: "Seres" may not favor, influence, or encourage the hiring or promotion of relatives or people in close or romantic relationships.
- e) Recusal from Processes: Under no circumstances may "Seres" participate in the hiring process, performance evaluation, or any practice aimed at favoring relatives or people in close or romantic relationships. If a member of the People X team is involved, the process must be transferred to their direct manager.

5.4. Relatives or Persons with a Close or Romantic Relationship at Clients, Third Parties, or Competitors

Unico considers it natural that Relatives or Persons with a Close or Romantic Relationship of Unico Seres may eventually work at clients and Third Parties. In these cases, Seres must carefully observe the guidelines below:

- a) The employment of Relatives or Persons with a Close or Romantic Relationship of Seres at clients, competitors, or Third Parties must be promptly reported to the Compliance team.
- b) Seres may refer clients or Third Parties where their Relatives or Persons with a Close or Romantic Relationship work. However, the Seres may not exert undue influence for the potential partnership or contract and may not participate in the negotiations and/or decision to establish the partnership.
- c) Seres should not, as far as possible, participate in business, activities, or partnerships involving other companies where their Relatives or Persons with a Close or Romantic Relationship work.
- d) Seres may not pass on confidential or strategic information to direct and indirect competitors.
- e) It is not permitted to have close relatives working at direct competitors of Unico; if this situation occurs, the Compliance team must be notified immediately.
- f) Any cases of this nature must be previously communicated to the Compliance team so we can assist in mitigating any conflicts.

5.5. Relatives or Persons with a Close or Romantic Relationship in Public Entities

It is common for Relatives or Persons with a Close or Romantic Relationship of Seres to eventually work for Public Authorities. In these cases, Seres must carefully observe the guidelines below:

- a) Seres who have Relatives or Persons with a Close or Romantic Relationship in Public Authorities must immediately or annually update the information about the existence of the relationship with Compliance.
- b) Seres may not, under any circumstances, interact with the Public Authority of which their Relative or Person with a Close or Romantic Relationship is a part.
- c) Seres or third parties may never exert or attempt to exert undue influence with Public Officials to whom they are a Relative or Person with a Close or Romantic Relationship to try to obtain benefits for Unico.
- d) Seres or Third Parties may never promise, offer, or give an improper advantage to a Public Official to whom they are a Relative or Person with a Close or Romantic Relationship to try to obtain benefits for Unico.
- e) Any cases of this nature must be previously communicated to the Compliance team so we can assist in mitigating any conflicts.

5.6. Hiring of Public Agent or Former Public Agent

Unico does not employ and/or keep on its staff Public Officials who perform any type of public function in parallel with their work at the company.

However, we understand that it is possible for Seres or Third Parties to have been Public Officials, and for these situations, it is necessary to analyze whether the former Public Official is subject to a cooling-off period, and if the remuneration received is consistent with the new position held, with their peers at Unico, and with market standards. This also applies to those on leave.

Seres and Third Parties must carefully observe the guidelines below:

- a) Seres who have been Public Officials in the past must immediately disclose this information to the Compliance team, describing their role, the government body where they worked, and any possible correlation with Unico's market.
- b) Seres or Third Parties may not, under any circumstances, interact with the Public Authority of which they were a part. If the activities of the Ser or Third Party require such interaction, the participation of at least one other Unico employee during the interaction will be necessary.
- c) Seres or Third Parties may never exert or attempt to exert undue influence with Public Officials with whom they worked or interacted in the past to try to obtain benefits for Unico.
- d) Seres or Third Parties may never promise, offer, or give an improper advantage to a Public Official with whom they worked or interacted in the past to try to obtain benefits for Unico.

5.7. Development of Academic Work, Participation in Events, and Volunteering

Unico encourages Seres to continue pursuing their academic development. In this sense, it is natural for students to constantly develop papers, projects, or other criteria for verification and evaluation purposes by the educational institution. Furthermore, it is also common for Seres to be invited to speak at events, lectures, or meetings given the knowledge and prestige they have in our market.

In the situations above, Seres must carefully observe the guidelines below:

- a) Seres are not authorized to use sensitive or confidential information to which they had access through their work at Unico as a basis or source for academic work.
- b) Seres are not authorized to use sensitive or confidential information to which they had access through their work at Unico during events, lectures, meetings, or class discussions.
- c) Seres must never position themselves academically as spokespersons for Unico or use the company's emblems, logos, or visual identity during such events or discussions. If using materials with Unico's photos, videos, images, and brands, the Ser must obtain prior validation from the External Communications team.
- d) Paid academic work, participation in events, and volunteering will be permitted as long as the activity does not compromise performance, work hours, and is in accordance with all the guidelines of this policy, for example, limited to 20 hours per week.

Exceptions to the situations mentioned above must be pre-approved by the responsible areas, as appropriate, which may include the following areas: Compliance, External Communications, Marketing, Privacy, among others.

5.8. Disclosure of potential conflict of interest situations

Whenever a Ser or Third Party becomes aware of a potential conflict of interest involving one of the hypotheses above, they must immediately inform their manager, the Compliance team, and, when relevant, the People team, so that any necessary actions can be taken or, simply, for internal record-keeping.

The information will be presented in the Conflict of Interest form and must be complete, explaining the type of existing relationship that could trigger the conflict and, when necessary, the details of the company and/or individual involved in the potentially conflicting relationship. It is emphasized that the information from the Conflict of Interest Assessment will be disclosed to managers, Business Partners, and the Ethics Committee for proper follow-up and for the necessary measures to be adopted to reduce the related risks.

When the reported information changes, the Ser must inform the Compliance team, explaining the nature of the possible or potential new conflict of interest.

The Conflict of Interest Form must be updated annually, even if there is no change in the declared situation.

5.9. Situations not covered by this Policy

The rules of this Policy are not exhaustive. Instead, they establish the general standards and principles to be observed in the daily activities of Seres and Third Parties. Situations not foreseen in this Policy may arise.

If you are unsure or have doubts about a certain course of action, do not proceed and consult the Compliance team for guidance. We emphasize once again that all conflicts, regardless of whether they are permitted, must be reported to the Compliance team for monitoring.

5.10. Applicable disciplinary measures

The guidelines provided in this Policy must be followed by all Seres, as well as by Third Parties. Failure to comply with the guidelines by Seres may result in disciplinary measures, such as:

- a) Verbal and/or written warning;
- b) Suspension for an indefinite period; and, in serious cases,
- c) Termination with or without just cause.

Third Parties who, for any reason, fail to comply with the guidelines of this Policy, whether in their relationship with Unico or with other entities, may have their contracts suspended or terminated.

5.11. Assessment of possible conflicts of interest

If the Compliance area rejects an assessment, the **Ethics Committee** will be responsible for the analysis and final collective decision. And, if necessary, other interested parties may be involved. This measure ensures that all conflicts, especially those not directly covered by this policy, are evaluated.

6. Background documents

- Unico Code of Ethics;
- Anti-Corruption and Anti-Bribery Policy;
- Giveaways, Gifts, Hospitality and Entertainment Policy;
- Donations and Sponsorship Policy;
- Public Agent Interaction Policy;
- Whistleblowing and Non-Retaliation Policy;

7. Final considerations

This Policy is valid from the date of its publication and may be amended at any time by the drafting area. This Policy shall come into effect on the date of its publication, revoking any provisions to the contrary.

The rules of this Policy are not exhaustive. Omissions or exceptions to this Policy should be evaluated and approved by the Corporate Governance Board and/or Ethics Committee.

If any situation is identified that may constitute a violation or potential violation of the guidelines of this Policy, please contact Unico's Ethics Channel.

8. Review and Approval

Version	Elaboration	Revision	Approval	Publication
1.0	Compliance	Legal	Ethics Committee	14/01/2022
2.0	Lucas Espíndola	Monica Esposito	Ethics Committee	04/02/2025
3.0	Tatiana Ribeiro	Leonardo Crivari	Ethics Committee	18/08/2025

Update Control	
Version	Description
1.0	Establishment of rules and guidelines to be observed in case of a conflict of interest.
2.0	Harmonization of concepts, adjustment of the document structure, and review of some practices according to Unico's reality.
3.0	Update of roles and responsibilities, review and update of guidelines to be observed in case of a conflict of interest.