

Ethics Policy and Code of Conduct

How we think and act at Semantix

Purpose

The purpose of this ethics policy and code of conduct is to make it clear how we act within the Semantix group with regard to business ethics, work ethics and social and environmental issues.

This policy, together with our values, shall permeate our entire organisation and our day-to-day work. We work to ensure our employees, suppliers and sub-suppliers exhibit the same high ethical standards as Semantix.

The management is responsible for managers and employees having the knowledge required to adhere to this policy. All Semantix employees are expected to act in accordance with it.

Compliance

All employees are expected to comply with this policy and with the guidelines. Breaches of the policy may result in employment law consequences.

Reference: If you suspect or experience breaches of this policy and find that the usual reporting lines would not be appropriate, please refer to our *Whistleblowing Policy*.

Ethics policy

As a business, Semantix shall be characterised by respect, honesty and fairness. We will make conscious choices and be open in our communication, protect individuals' privacy and comply with applicable laws and regulations at all times.

Business ethics guidelines

We require honesty and integrity in all the group's activities, and we expect the same from all parties with whom we have business relationships, for example customers, suppliers, sub-suppliers and partners.

Semantix

- is in favour of free and fair business, and strives for an open market with ethical conditions within the framework of existing legal rules
- supports transparency and openness, provided there is no disclosure of trade secrets that could harm the group's competitiveness and relationships with customers and suppliers
- scrupulously meets the needs of both customers and suppliers for confidentiality at every stage of production
- does not accept bribes of any kind. We comply with each country's laws, and the rules of ethics drawn up by the Anti-bribery Institute (IMM) in Sweden or the equivalent body in the country concerned.

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Work ethics guidelines

Semantix shall

- treat all employees equally – fairly and with respect – regardless of ethnic origin, gender, age, nationality, disability, caste, religion or sexual orientation
- offer salaries and related benefits that are equal to at least the legal or sector minimum in the country concerned
- apply existing legislation and sector standards on working hours in the country concerned
- offer all employees safe and healthy workplaces
- offer employees excellent opportunities to develop their competence and knowledge
- treat and use all records and files containing information about employees in the strictest confidentiality and in accordance with local legislation.

Guidelines for social and environmental responsibility

We have organisational structures, management systems and procedures in place to ensure compliance with relevant laws, ordinances and regulations in the country concerned.

Semantix shall contribute to sustainable development in countries where it operates by

- taking into account how our decisions affect society
- working to promote human rights in and around our business
- having environmental objectives for a sustainable business and, for example, by
 - recycling and sorting paper, discarded computers and other business equipment
 - limiting the use of paper through full computerisation
 - actively choosing to think environmentally smart when travelling, and by using telephone and video conferencing whenever possible.