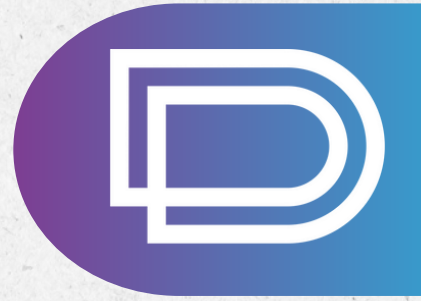


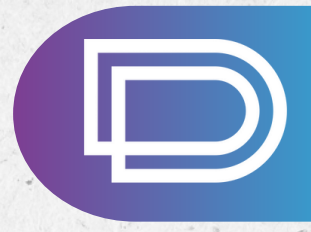
DELPHYS

PARTNERS





CODE OF CONDUCT



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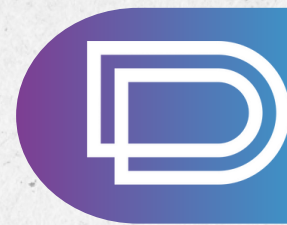
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COMMITMENTS

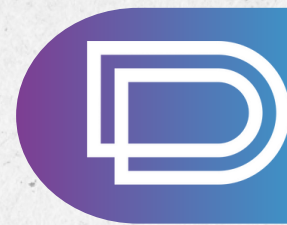
DELPHYS embraces an unwavering commitment to ethics, integrity, and complete transparency in all its operations. This commitment drives continuous improvements in its compliance and governance systems, with the mission of elevating practice standards in institutions in Brazil and worldwide.

To achieve these goals, DELPHYS has established some fundamental guiding principles:

- Contribute individually and collectively to necessary changes in markets and environments where there may be inducement to misconduct.
- Be aware that deviations from proper conduct, whether through action, omission, or complacency, harm society, violate laws, and tarnish the reputation of the entire DELPHYS.
- Adopt ethical, honest, and transparent principles in relationships with public and private entities.
- Relentlessly eradicate corruption in all its forms, including extortion and bribery.
- Ensure transparency in information about DELPHYS, which should be accurate, comprehensive, accessible, and regularly disclosed.
- Guarantee the practice of a Compliance System in DELPHYS and its entire value chain, continually updated with the best references.
- Firmly and determinedly reject any business opportunities that contradict this unwavering commitment.
- Include performance evaluations regarding compliance system adherence in Members' Action Programs.
- Strongly reject cultural or commercial practices as justifications for inappropriate conduct.
- Have the conviction that this commitment will keep us on the path of survival, growth, and perpetuity.

However, DELPHYS acknowledges that adhering to ethical principles, integrity, and transparency goes beyond mere statements. It starts at the highest level of leadership, the DELPHYS Board of Directors, and extends to all employees. This requires building a comprehensive system, including the continuous development and updating of company guidelines, ensuring their effective implementation, and providing ongoing training and awareness to all employees, focusing on prevention rather than reaction.

It is essential that these principles are embraced with determination, responsibility, and without concessions, exceptions, or waivers. Only by maintaining a robust Compliance System can the company achieve its goals and fulfill its corporate purpose in an exemplary manner.



RESPONSABILITIES

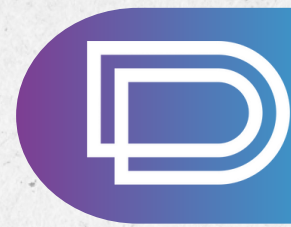
This Code of Ethics, established by the Board of Directors of DELPHYS, outlines the principles by which all members at all levels should conduct their activities in the context of their daily work and in the execution of the Company's operations.

All members must internalize and commit firmly to fully adhere to DELPHYS's Code of Ethics, aware that any deviation from these principles, whether through action, omission, or complacency, harms society, potentially violates laws, and tarnishes DELPHYS's image and reputation.

To guide business and achieve success in accordance with the principles of this Code, the Company has established Guiding Documents, support documents, training programs, and other guidelines covering topics such as Anti-Corruption Policy, Conflicts of Interest, Related Parties, Recruitment and Identification of Individuals, Disciplinary Measures, Business Courtesies, and other related areas. These resources are readily accessible to each member on the company's respective intranet portals.

Each member is personally responsible for studying, understanding, and complying with the Company's Guidance Materials, including participation in mandatory training established by the Company and strict adherence to applicable laws. Additionally, leaders have the responsibility to ensure that the members under their supervision understand the relevant laws and the Company's Guidance Materials, as well as act in accordance with DELPHYS's standards of ethics, integrity, and transparency. Beyond compliance, all members are encouraged to maintain high standards of ethical and personal conduct in the fulfillment of their assigned duties and responsibilities. Any member who violates these standards and restrictions is deviating from the scope of their role, responsibility, or function.

All leaders must continuously encourage their subordinates to report potential violations through the Ethics Channel. The Company is firmly committed to providing timely and appropriate responses to all potential concerns, conducting investigations confidentially and in compliance with applicable law. DELPHYS strongly condemns any form of retaliation against those who report violations in good faith. Non-compliance with the Code of Ethics and local laws may result in disciplinary measures, including dismissal. None of the Company's Guidance Materials, including this Code, prohibits members from reporting any violation of the law or illegal conduct to the relevant regulatory authorities.



ESG: ENVIRONMENTAL, SOCIAL, AND CORPORATE GOVERNANCE

DELPHYS is firmly committed to adhering to a set of standards and best practices aimed at being a socially conscious, sustainable, and properly managed company. We are determined to be an example of sustainability and corporate responsibility, leading by example and promoting positive change in the world.

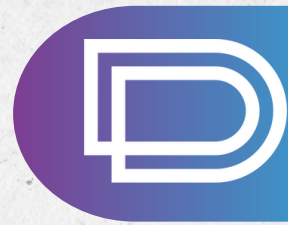
Our company is committed to achieving carbon neutrality, setting annual goals for carbon emission reduction and investing in clean energy sources. Additionally, we seek to minimize the use of natural resources and reduce waste in all our operations. The preservation and restoration of biodiversity are also part of our commitment, with partnerships with environmental organizations to achieve this goal.

We promote an inclusive work environment that respects gender, ethnic, age, sexual orientation, and cultural diversity. We establish diversity and inclusion goals and adopt policies to ensure equal opportunities. We actively contribute to the communities in which we operate through corporate social responsibility programs, donations, and employee volunteer actions. Furthermore, we promote employee well-being, ensuring safe and healthy working conditions, support for work-life balance, and professional development opportunities.

We adopt transparent governance practices, with the disclosure of financial and operational information, ESG reporting, and open communication with stakeholders. We are committed to adhering to the highest ethical standards, combating corruption, bribery, and any other form of unethical behavior in all our operations. Our Board of Directors consists of independent and experienced members who act in the best interest of the company and all stakeholders.

DELPHYS is unreservedly committed to complying with all relevant laws and regulations, as well as industry standards related to health and safety. This implies that the company maintains a firm commitment to the safety of its employees in the workplace and the prevention of environmental pollution and social impact on communities affected by its operations.

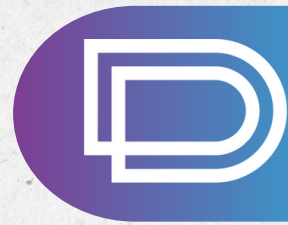
Leaders have the responsibility to take reasonable and necessary measures to ensure compliance in these areas.



In the case of incidents related to health, safety, or the environment involving DELPHYS, its suppliers, or customers, any employee who becomes aware of such events has the obligation to promptly notify their respective leader in writing. Leaders, in turn, must likewise immediately inform in writing the NetZero Environmental leaders responsible for the work performed and/or the environmental safety, health, and safety of employees as necessary.

The consumption of alcoholic beverages and drugs on work premises is strictly prohibited, as is the entry of individuals under the influence of substances that affect their behavior and, consequently, the safety and activities of others. Similarly, the sale or exchange of goods or services of personal interest on DELPHYS premises is prohibited.

Employees should not obstruct the entry or hinder the work of inspectors or auditors on DELPHYS premises. If an employee becomes aware of an unannounced inspection or audit, it is their duty to immediately notify their leader and the Legal Department in writing. Leaders are responsible for ensuring that the supervision of these inspection or audit authorities is carried out by appropriate employees.



RESPECT FOR DIVERSITY

Ethical principles, integrity, and transparency are fundamental pillars that do not allow for any form of harassment or discrimination, a stance that DELPHYS adopts unequivocally. Each team member has the responsibility to maintain an inclusive work environment where everyone feels welcome and that is completely free from harassment, discrimination, or any inappropriate conduct.

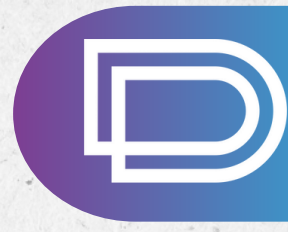
Employees should relate with courtesy and consideration when interacting with other team members and parties involved in the Company's business activities. Valuing diversity is a means to stimulate continuous collaboration, creativity, and innovation. DELPHYS advocates and reinforces equality without making distinctions based on gender and sexual orientation, religion, race, culture, nationality, social class, age, or physical characteristics.

Regarding hiring and promotion practices, DELPHYS is committed to providing equal opportunities to all qualified individuals. The Company strives to create a team that reflects the diversity of the communities in which it operates.

All employees should be treated with equity and fairness, regardless of their differences, and should not tolerate any form of discrimination. It is strictly prohibited for leaders or anyone in a privileged position to request favors or personal services from other employees, as well as to abuse their power or authority, which could result in actions that conflict with current laws and regulations. Additionally, invading people's privacy, both in the workplace and outside of it, is not tolerated.

DELPHYS is aware of human rights, as established in the Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights. The Company also fully supports all internationally recognized human rights, including, but not limited to, them.

DELPHYS strictly prohibits all forms of discrimination and harassment among its members. If an employee believes they have been a victim of discrimination or harassment, or witnesses such behavior, it is their duty to report the incident through the Ethics Channel.



BUSINESS ETHICS

DELPHYS is unwavering in its commitment to conducting business based on ethics, integrity, and transparency, strictly in compliance with applicable laws. The company adopts a stringent policy to operate in compliance with all relevant anti-corruption laws, vehemently prohibiting its employees and third parties from engaging in any form of corruption, regardless of the context.

No member of DELPHYS's team or third party is authorized to offer, promise, pay, or authorize payments in cash or any other type of benefit to public officials or other parties, directly or indirectly, for the purpose of corruptly influencing their actions, decisions, or violating their official duties. It is also prohibited to request or accept money or benefits of value with the purpose of unduly influencing the judgment or conduct of the recipient.

These improper payments are not limited to cash and include gifts, entertainment, meals, travel, contributions, services, business opportunities, employment, investment, unpaid use of services, donations to charity, political contributions, assistance to family and friends, and any other benefit or advantage. DELPHYS vehemently prohibits all types of facilitation payments, which are small payments made to public officials to expedite or ensure the fulfillment of existing duties or obligations.

Additionally, the company and its employees must not engage in extortion, fraud, document forgery, intentional preparation of inaccurate financial statements, or any activity that may constitute corruption or violation of applicable anti-corruption laws.

DELPHYS reinforces its prohibition against improper payments of any kind, whether to or from any person, at any time, or for any reason, in connection with work for the company. Bribery is an unacceptable practice and will not be tolerated in any aspect of DELPHYS's operations.